

BPCE Equipment Solutions UK Limited
Modern Slavery and Human Trafficking Statement
for the financial year ending 31st December 2025

MESSAGE FROM DOMINIC HUGHES AND DAVID YATES-MERCER, JOINT MANAGING DIRECTORS

BPCE Equipment Solutions UK Limited (formerly known as *Societe Generale Equipment Finance Limited*) (**BPCE ES UK**) believes that being a responsible company lies at the heart of our business. Being responsible must be tangible in each of our decisions, positions and actions. Our mission is to offer the best equipment finance solutions to the business market in the UK. Our success in doing so relies on people, whether they are employees, contractors or any other stakeholders, therefore respecting human rights and dignity is at the very core of our mission. Hence our commitment to improving our practices to protect human rights and avoid any violation within our sphere of influence.

1. Introduction

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and sets out the steps taken by BPCE ES UK to prevent modern slavery and human trafficking from occurring in its operations and in its supply chains.

BPCE ES UK is authorised and regulated by the Financial Conduct Authority (**FCA**) and is committed to maintaining high standards of governance, risk management, and ethical conduct in line with FCA expectations, including acting with integrity and ensuring effective systems and controls.

2. UK Business

BPCE ES UK is a UK based equipment finance provider, offering financing solutions for business-critical assets such as IT equipment including software and services, Agriculture, Medical, Transport, Industrial and Construction Equipment use for various businesses. Our activities include underwriting, lending, and ongoing portfolio management. Our supply chain is primarily composed of low-risk suppliers, including professional service providers, technology vendors, and equipment finance brokers operating largely within regulated or established markets.

3. Our Group

BPCE ES UK is part of the BPCE Equipment Solutions (**BPCE ES**) network, which sits within the Financial Solutions & Expertise (**SEF**) division of Groupe BPCE. BPCE ES are a major international equipment and vendor finance company that became part of Groupe BPCE in March 2025. BPCE ES are a worldwide leader in equipment leasing and financing, supporting manufacturers, dealers, and corporate clients. BPCE ES operates in 24 countries with approximately 1,600 staff across all entities.

Group BPCE is present in 50 countries and is the second-largest banking group in France through its retail banking networks; Banque Populaire and Caisse d'Epargne ("**Group BPCE**"). Through its 100,000 staff, Group BPCE serves 35 million customers: individuals, professionals, companies, investors and local government bodies, around the world. It operates in the retail banking and insurance fields in France via its two major networks, Banque Populaire and Caisse d'Epargne, along with Banque Palatine and Oney. It also pursues its activities worldwide with the wholesale banking expertise of Natixis Corporate & Investment Banking and with the asset & wealth management services provided by Natixis Investment Managers.

4. Our Commitment

BPCE ES UK are committed to acting ethically and with integrity in all our business relationships. We maintain a zero-tolerance approach to modern slavery and human trafficking and seek to ensure that such practices do not occur within our business or supply chain.

This commitment aligns with FCA Principles for Businesses, particularly:

- Principle 1: Integrity
- Principle 2: Skill, care and diligence
- Principle 3: Management and control

5. Risk Assessment

Due to the nature of our equipment finance activities and the profile of our suppliers, we consider the inherent risk of modern slavery within our direct operations to be low. However, we recognise that risks may arise indirectly, particularly through equipment supply chains or third-party intermediaries.

To address this, we:

- Conduct regular and documented risk assessments of our suppliers and counterparties.
- Consider geographic, sectoral, and transaction-specific risk factors.
- Apply enhanced scrutiny where higher-risk indicators are identified (e.g. cross-border asset sourcing or complex ownership structures).

6. Due Diligence and Supplier Oversight

BPCE ES UK apply proportionate due diligence processes to ensure that our suppliers and business partners meet appropriate ethical standards. These include:

- Supplier onboarding checks, including verification of identity where necessary, regulatory status, and reputation.
- Assessment of suppliers' policies relating to labour standards, human rights, and anti-slavery practices
- Ongoing monitoring and periodic reassessment of supplier risk profiles

Where relevant, contractual provisions may include obligations relating to compliance with applicable anti-slavery laws.

7. Environmental and Social Risk Management

We integrate environmental and social considerations into our broader risk management framework. This includes:

- ESG related screening of suppliers and asset classes where appropriate.
- Consideration of social risks, including labour practices, as part of credit and supplier risk assessments.
- Escalation procedures where material risks are identified.

This approach supports our responsibilities under FCA expectations for effective risk management and governance frameworks.

8. Governance, Policies and Controls

In the UK, there are seven minimum thematic requirements which BPCE ES UK meets in full, relating to:

- Organisation structure and supply chains
- Policies in relation to modern slavery and human trafficking
- Due diligence processes
- Emerging risks, risk assessment and management
- Key performance indicators to measure effectiveness of steps being taken
- Code of Conduct training is mandatory
- Environment and Social Risk (ESR) training is mandatory

BPCE ES UK has identified two main areas where there is a remote possibility of the risk of slavery and human trafficking: outsourced services and recruitment. The policies currently in place and relevant to the prevention of slavery and human trafficking are discussed below.

a. Regarding our Employees

Human Resources Governance

The Human Resources policy provides for appropriate checks (including National Insurance checks, passport and bank account checks and other regulatory checks) to be conducted on all new staff members to ensure that they can legally work in the United Kingdom. All employees are engaged on written terms

which are English law compliant, have a right to terminate their employment contract and are paid at least the National Living wage. BPCE ES UK ' Whistleblowing policy provides a framework for employees to report any concerns related to slavery and human trafficking in the activities of BPCE ES UK . All staff are provided with mandatory training in this area.

The BPCE ES UK Staff Handbook includes the Grievance Policy, Harassment Policy and Diversity Policy.

b. Regarding our Customers

BPCE ES UK follows Group BPCE's Environmental and Social Responsibility (ESR) sector policies during the customer due diligence process.

c. Regarding our Suppliers

BPCE ES UK's Outsourced Suppliers policy continues to be developed to allow for the analysis of prospective outsourced suppliers' ethics policies in the procurement process. As part of its underwriting checks, BPCE ES UK utilises a risk-based approach to cross-check relevant potential new suppliers against multiple exclusion and embargoes lists. In line with Group BPCE 's Code of Conduct, BPCE ES UK expects its suppliers and service providers to adhere to principles equivalent to those in Group BPCE Code of Conduct, including respect for human rights and compliance with all applicable laws.

9. Training and Awareness

We promote awareness of modern slavery and ethical conduct across the organisation. This may include:

- Staff training on financial crime, ESG risks, and ethical standards.
- Guidance to relevant employees involved in procurement and supplier management.
- Reinforcement of escalation and reporting channels.

10. Monitoring and Continuous Improvement

We are committed to continuously improving our approach to identifying and mitigating modern slavery risks. This includes:

- Periodic review of our policies, procedures, and permanent supervision controls.
- Ongoing enhancement of supplier due diligence processes.
- Consideration of regulatory developments and FCA expectations.

11. Conclusion

In view of the policies and processes outlined above and the work we continue to carry out, we believe we have a framework that adequately safeguards BPCE ES UK against slavery and human trafficking within its own business and that of its suppliers, and reflects our obligations relating to Environmental and Social risks. We believe that there is a very low risk of slavery and human trafficking taking place within BPCE ES UK or our supply chain.

12. Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes BPCE ES UK's slavery and human trafficking statement for the financial year ending 2025. It was approved by the BPCE ES UK joint Managing Directors in the usual manner.

April 2026



Dominic Hughes
Managing Director
BPCE Equipment Solutions UK Limited