

June 2024

#### MODERN SLAVERY STATEMENT

This statement is published in accordance with Section 54 (1) of the Modern Slavery Act 2015 and sets out the steps that the Mambu Group takes to prevent modern slavery and human trafficking in its business operations and supply chain. This statement constitutes our slavery and human trafficking statement for the financial year ended October 31, 2023.

#### 1. About Mambu

Mambu was established in 2011 with the aim of bringing banking technology into the digital-first world, to make it accessible, flexible and ready for any market opportunity. Mambu fast-tracks the design and build of nearly any type of financial product for banks, lenders, fintechs, retailers, telcos and more. Mambu has its headquarters in Amsterdam and works with more than 260 institutions in 65 countries, servicing a portfolio of more than 100m end users. By the end of October 2023, Mambu had 607 employees. Mambu provides a SaaS platform to financial services providers that allows customers to create, offer and administer financial products, with subsidiaries across the world.

### 2. Our commitment

Mambu has a zero-tolerance approach to any form of modern slavery or human trafficking within our operations or supply chain. Our commitment to prohibiting Modern Slavery is laid out in our Modern Slavery policy, which applies to all employees, as well as contractors, external consultants, partners or any other person associated with Mambu, no matter where they are located.

We are driven by our Code of Conduct, a set of values and principles that outline our obligations to our customers, our employees, our communities around the world and our shareholders. Our Code unites our global workforce with a common value that the fundamental rights and dignity of all people must be respected. In addition, Mambu has established further policies that outline our commitment to respecting human rights across our value chain and advancing a responsible supply base, including an Anti-Bribery and Corruption Policy and a Partner Code of Conduct.

# 3. Our supply chain



Our extended supply chain comprises more than [818] suppliers globally, which provide hosting services for our platform but also operational support to our employees. A critically important link in our value chain, Mambu's supplier network underpins our business continuity, expands our capabilities and innovation, and enables us to serve our customers.

# 4. Due Diligence for our own operations

Mambu will not knowingly appoint or contract with any person who has been convicted of or prosecuted in any jurisdiction in relation to an offence or alleged offence under any Anti-Slavery Law.

Every Mambu employee or contractor is subject to a background verification process in line with our industry requirements, which may reveal any criminal offences including those related to modern slavery practices. Based on the outcome of the check, Mambu may decide if a termination process should be triggered.

Every Mambu employee must complete mandatory Compliance training and commitment to comply with Mambu's Code of Conduct, which includes our anti-slavery principles.

# 5. Due Diligence for our supply chain

Mambu works only with suppliers who are committed to preventing modern slavery. Our standard terms and conditions for suppliers explicitly state that the supplier must not engage in modern slavery, child labour or any other inhumane treatment.

## 6. Training and awareness

Our Code of Conduct training covering all aspects of our position on modern slavery is mandatory for all new employees. In May 2021, we introduced a Partner Code of Conduct which is now distributed to all new partners of Mambu Group. The Code outlines our zero-tolerance approach to any form of modern slavery and any violation of human rights, and our requirement for partners to adhere to the same principles.

### 7. Grievance mechanism

We are committed to providing effective resolution wherever we might have caused or



contributed to adverse human rights impacts. Where we find impacts directly linked to our business relationships, we will use our influence to work with our suppliers or business partners to prevent, mitigate and address adverse impacts on human rights. Our SpeakUp program — a grievance mechanism available to all employees — offers a secure channel for reporting, where permitted, any suspected concerns or potential violations of our policies or the law, including potential human rights violations. In addition to the SpeakUp program, our employees can report potential violations to the People Team either locally or through our Global team. Alternatively, they can report potential violations to management.

#### 8. Conclusion

We are committed to continuous improvement in our efforts to identify, prevent and remedy modern slavery abuses in our own operations or supply chain. As we make further progress in the above areas, we will report on that progress through subsequent versions of this statement.

This statement has been approved by Mambu Tech Ltd Board of Directors and signed by one director who will ensure it is reviewed and updated annually.

Ellie Heath

Director Mambu Tech Ltd

Dated: 19th June 2024

Elspeth Heath

**Ei-Lene Heng** 

Director

Mambu Tech Ltd

Dated: 19th June 2024

Ei-lene Heng