Modern slavery statement for financial year 2025

This statement is made pursuant to section 54 of the UK Modern Slavery Act 2015 and sets out the steps that S.W.I.F.T. SC and its group ("Swift") take to ensure that modern slavery or human trafficking does not occur within our business or our supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Swift has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within our business or our supply chain.

About Swift

Swift is a global member-owned cooperative and the world's leading provider of secure financial messaging services. We provide our community with a platform for messaging and standards for communicating, and we offer products and services to facilitate access and integration, identification, analysis and regulatory compliance.

Our messaging platform, products and services connect more than 11,500 banking and securities organisations, market infrastructures and corporate customers in more than 200 countries and territories. While Swift does not hold funds or manage accounts on behalf of customers, we enable our global community of users to communicate securely, exchanging standardised financial messages in a reliable way, thereby facilitating global and local financial flows, as well as trade and commerce all around the world. As their trusted provider, we relentlessly pursue operational excellence; we support our community in addressing cyber threats; and we continually seek ways to lower costs, reduce risks and eliminate operational inefficiencies. Our products and services support our community's access and integration, business intelligence, reference data and financial crime compliance needs. Swift also brings the financial community together – at global, regional and local levels – to shape market practice, define standards and debate issues of mutual interest or concern.

Headquartered in Belgium, Swift's international governance and oversight reinforce the globally inclusive character of its cooperative structure. Swift's global office network ensures an active presence in all the major financial centres.

Our business and policies

We are committed to a number of internal policies to ensure we are conducting business in an ethical and transparent manner. These include:

- A Code of Conduct embodying principles of integrity, ethics (including diversity and inclusion, treating people with respect, equal opportunity and no toleration of harassment) and trust, not only for Swift employees, but also for consultants, contractors and suppliers.
- An anti-bribery and corruption policy
- An open-door policy
- A reporting and whistleblowing policy
- A recruitment framework

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United Nations Global Compact

In October 2012, Swift became a signatory to the United Nations Global Compact, an international initiative that brings companies together with UN agencies, international labour organisations and civil society to support universal environmental and social principles. The ten principles of the UN Global Compact, which include human rights, labour, environment and anti-corruption, are aligned with the expectations of the Modern Slavery Act.

Swift issues an annual Communication on Progress (COP) which includes the advancements made towards the Ten Principles. We hereby disclose our continuous efforts to integrate the Ten Principles into our business strategy, culture, and daily operations, and contribute to United Nations goals, particularly the Sustainable Development Goals. For more information, please visit our dedicated webpage.

Our suppliers and business partners

Swift has an established Vendor Risk Management Policy and process which includes a rigorous due diligence process for onboarding suppliers, helping to mitigate the risk of modern slavery in its operations and supply chains.

Swift aims to manage its supply chain responsibly. In 2021, Swift further expanded its Sustainability Obligations Charter into a self-standing Supplier Code of Conduct. This code is based on and aligned with the ten principles of the UN Global Compact. It requires suppliers, CSR partners, and their subcontractors to recognise the freedom of association; prohibit forced, bonded or compulsory labour; abolish child labour; maintain safe and healthy work environments; prohibit unlawful discrimination; and ensure fair working hours, weekly rest and fair wages.

Swift's Suppliers Code of Conduct ("the Suppliers Code") is always included as an annex to any agreements signed with suppliers and CSR partners when using Swift Master Services Agreement templates. Suppliers are required to comply with all applicable laws and regulations (including in particular, human and labour rights, and environment requirements), as well as standard business practices and ethics.

Suppliers must promptly and proactively inform their Swift contact when a situation develops that causes the suppliers to operate in violation of the Suppliers Code, so that Swift can resolve the situation. Swift reserves the right to terminate the contractual relationship with any of its suppliers in case of a breach of the Suppliers Code.

In addition, all contractors and consultants are made to adhere to a specific Code of Conduct before they are allowed to perform assignments at or for Swift. This separate code of conduct embodies the principles of integrity, ethics and trust, and covers various requirements, such as conflicts of interest, gifts and anti-bribery, private investments and insider trading, equal opportunities, harassment, safety, security, as well as privacy and competition laws. It also includes a reporting mechanism in case there is suspicion of violation of the temporary personnel code by any individual.

In situations where Swift must adhere to contract templates provided by third parties, we strive as far as possible to have our Suppliers Code added into the supplier contract, and we perform desk research on our counterparties. For strategic contracts, Swift gives

priority to companies that are also compliant with the Modern Slavery Act 2015 or similar sustainability requirements.

Swift Code of Conduct for employees and training

The following Labour rights-related policies are available and accessible to all employees:

1. Swift's Leadership Principles focus on the treatment of and respect for our employees. A company-wide employee management feedback mechanism is used to assess our leaders against the Swift Leadership Principles, and Swift encourages employees to make use of the mechanism. An upward feedback pulse check allows every employee in the company to assess how their direct manager performs against each of the Leadership Principles. Feedback reports are made available to managers where a sufficient number of responses ensures confidentiality. The feedback provides valuable insight to our managers and helps identify leadership skills gaps and development priorities. These are captured in Swift's people management and development processes.

2. Swift's equal opportunities policy outlines key elements to ensure equal treatment and opportunities for staff, regardless of gender, age, colour, ethnic origin, disability, marital status, sexual preference, religion, or veteran status.

3. Swift's open-door policy invites employees to raise any issues for escalation and follow-up (including issues related to labour and human rights). Swift has published a company-wide investigation policy to ensure that we follow a fair, consistent, and thorough process if claims are made. This policy complements our 'reporting and whistleblowing' policy for employees to raise concerns related to personal or ethical breach of policies within Swift.

Swift maintains a Code of Conduct which is aligned with the ten principles of the UN Global Compact and applies to all Swift employees, whether or not they are working with customers directly. Swift also provides mandatory Code of Conduct training which is designed to help employees understand the underlying principles, objectives and practical implications of Swift's Code of Conduct and to encourage them to reflect upon their personal responsibilities and behaviour. Training is delivered through e-learning courses and is included in the induction programme for new employees. Periodically Swift staff are required to confirm their compliance with the Code of Conduct.

4. Swift is dedicated to a Speak Up culture where it appreciates that employees and others feel comfortable sharing their views and concerns and encourages anyone who has a concern about misconduct to report it without delay. There are various methods that our people can use to raise concerns or queries, including:

- Using Swift's Speak Up tool
- By contacting a supervisor, manager, HR representative, persons of trust
- By contacting Compliance for cases of legal risk and/or compliance.

Due diligence processes

Swift's recruitment process is designed to ensure fair, lawful, and professional hiring practices. Prior to onboarding our independent screening advisors, we conduct thorough background checks in accordance with local regulations. These may include identity verification, employment verification, right-to-work confirmation, criminal record screenings, and validation of education and professional qualifications.

Key performance indicators

Monitoring of concerns reported through Swift’s reporting channels has demonstrated that in 2025 no suspected or confirmed instances of modern slavery were identified within Swift’s business or supply chain.

This statement will be reviewed and updated every year.

Approved on 16 June 2026
by Javier Pérez-Tasso, Swift CEO