Modern Slavery and Human Trafficking Statement

OneDome Ltd
Financial Year Ending: 31st December, 2025

1. Introduction

This statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015 and sets out the steps that OneDome Ltd has taken, and continues to take, to prevent modern slavery and human trafficking within our business and supply chains.

We are committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery is not taking place anywhere in our operations or wider ecosystem. Our policies and procedures relating to the Modern Slavery Act are in line with our culture and values.

2. Our Business

OneDome Ltd is a UK-based Financial Technology company operating a digital marketplace platform for property transactions. Our platform connects buyers, vendors, real estate professionals and legal and financial services providers.

We primarily operate as a digital ecosystem provider, facilitating connections and transactions between users of the platform. Our operations are largely office-based and supported by a team of employees and self-employed contractors. OneDome Ltd owns a number of subsidiary firms conducting specialist mortgage advice, protection, wealth management and legal services as well as owning minority stakes in Appointed Representative firms.

3. Our Supply Chains and Marketplace Ecosystem

Our direct business to business supply chains include:

- Cloud hosting and infrastructure providers
- Software and data service providers
- Professional services (legal, accounting, recruitment)

In addition, our platform enables users access to a broader network of independent third-party product and service providers ("Marketplace Providers") across the financial and legal services sector. While these providers are not employees of OneDome Ltd, we recognise that our responsibility to take reasonable steps to promote ethical practices across our digital ecosystem.

4. Our Corporate Governance and Policies

We are committed to preventing modern slavery and human trafficking in both our direct operations and, where possible, within our ecosystem.

OneDome Ltd has adopted the QCA Corporate Governance Code which considers, amongst other things, the key stakeholders with whom we engage and their alignment with our strategic goals and code of ethics. Principle 4 of the Code specifically locates the responsibility for the oversight of OneDome's approach to social governance issues with the Board. The Board's responsibilities include identifying key internal and external stakeholders, promoting effective engagement, and ensuring that practices towards employees (direct and indirect) as well as employee conduct within the business are consistent with the Company's values.

To enable stakeholders to raise concerns, appropriate policies are in place to ensure that such matters are considered in confidence and that appropriate actions may be taken.

These policies include:

- Employee Code of Conduct, setting out expected ethical standards of behaviour as an employee of OneDome.
- Recruitment processes in line with local employment laws.
- Employment policies that reflect market appropriate compensation, protect our employees from unfair treatment and promote a fair and inclusive workplace.
- Board Terms of Reference.
- Supplier and Partner Due Diligence Policy.
- Whistleblowing Policy, allowing concerns to be raised confidentially.

We also expect Marketplace Providers using our platform to comply with all applicable laws and to operate in a manner consistent with these principles.

5. Due Diligence and Ecosystem Controls

As an organisation, we take a proportionate and risk-based approach to due diligence.

Measures include:

- Onboarding checks for Marketplace Providers, which may include identity verification and basic business information.
- Requiring acceptance of business terms that include compliance with applicable laws, including those relating to modern slavery.
- Working with reputable suppliers and service providers in our direct supply chain.

- Reviewing higher-risk categories of Marketplace Providers where appropriate.

We recognise that our ability to directly control independent providers is limited; however, we aim to use our own corporate governance framework to promote responsible practices.

6. Risk Assessment and Management

We recognise that modern slavery risks may arise in:

- Labour-intensive services (e.g., cleaning, maintenance, security).
- Providers operating in higher-risk geographies or sectors.
- Informal or subcontracted labour arrangements.

We assess risk based on the nature of services offered both directly to the company and through our platform and prioritise attention on higher-risk categories. As the majority of our supply chain is UK based and within the professional services sector, our exposure is deemed to be low risk. However, the Executive Team and Board remain vigilant and committed to ongoing risk assessments as part of their day-to-day business responsibilities. Where concerns are identified, we may take steps including engagement, suspension, or removal from the ecosystem, company or partnership arrangement.

Our business largely consists of professionally qualified people employed directly by OneDome or self-employed people from regulated firms in the UK with whom we partner on an exclusive basis. Our software engineering team is largely located in Ukraine, a geography with greater risk of modern slavery breaches: our employment policies in the region conform to the best practice utilised in our UK business, with similar standards, oversight and governance procedures. Our external suppliers are mostly UK based companies in low risk sectors such as financial and professional services.

7. Reporting and Whistleblowing

We encourage employees and other stakeholders to report any concerns related to unethical practices, including modern slavery. Reports can be made through our whistleblowing channels and will be treated seriously and confidentially.

8. Training and Awareness

Given our size, formal training is limited; however:

- Relevant staff are made aware of modern slavery risks, particularly in relation to marketplace activity.
- Management maintains awareness of obligations under the Modern Slavery Act 2015.
- The Board of Directors are aware of their responsibilities for the oversight, maintenance and regular review of robust corporate governance policies and practices, as set out in the QCA Corporate Governance Code and the OneDome Board Terms of Reference.
- We intend to expand training and guidance as the business grows.

9. Effectiveness and Monitoring

We monitor our effectiveness through:

- Ongoing review of stakeholder and employee feedback.
- Monitoring and investigation of any reported concerns.
- Periodic review of policies and business terms and conditions.

We have not identified any instances of modern slavery within our direct operations. We remain vigilant regarding risks within our marketplace.

10. Future Steps

We are committed to continuous improvement and will:

- Enhance onboarding and verification processes for future acquisitions and service providers.
- Introduce clearer standards and guidance for providers using our platform.
- Explore additional mechanisms for risk-based monitoring of higher-risk service categories.
- Provide additional internal training and awareness.

11. Approval

This statement has been approved by the Board of Directors of OneDome Ltd and will be reviewed annually.

Signed:
Sir Nigel Knowles
Chair
30th April, 2026
