



Modern Slavery Statement

Version: 1.0

Effective Date: March 18 2025

1. Modern Slavery Statement

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes the Modern Slavery Statement for Tenora Financial Group Limited ("TFG"), Tenora Financial Solutions Limited ("TFS"), and Tenora Financial Technologies Limited ("TFT") (collectively referred to as "Tenora," "we," "us," or "our").

As Tenora was incorporated in October 2024, this statement sets out our initial approach to addressing modern slavery and human trafficking risks. It outlines our forward-looking commitments and the measures we plan to implement throughout the financial year ending 2025 to ensure compliance with our legal and ethical obligations.

2. Our Commitment

Tenora is committed to ensuring that modern slavery, human trafficking, forced labour, and all forms of exploitation have no place in our business operations or supply chain. We take a zero-tolerance approach to these issues and are dedicated to upholding ethical business practices within our organisation and the third parties we engage with.

3. Our Business and Structure

The Tenora structure consists of three legal entities:

- Tenora Financial Group Limited - Registered in England and Wales (Company No. 16008121) with its registered office at 30 Moorgate, City of London, EC2R 6DA.
- Tenora Financial Solutions Limited – Registered in England and Wales (Company No. 16018511) with its registered office at 30 Moorgate, City of London, EC2R 6DA.
- Tenora Financial Technologies Limited – Registered in England and Wales (Company No. 16018592) with its registered office at 30 Moorgate, City of London, EC2R 6DA.

4. Our Supply Chain

Tenora's supply chain is considered low-risk, consisting primarily of professional service providers, technology suppliers, and financial institutions operating in highly regulated jurisdictions classified as low risk by sustainability indices, including The Global Slavery Index. While we consider the risk of modern slavery within our supply chain to be low, we continuously review our employee onboarding, procurement and third-party engagement processes to ensure compliance with ethical labour practices.

The potential areas of risk in our supply chain include:

- Third-party service providers, including technology and infrastructure suppliers.
- Office services, including facilities management and outsourced cleaning and security providers.
- Suppliers of office supplies.

5. Policies and Due Diligence Procedures

To ensure that modern slavery and human trafficking are not present in our business or supply chain, Tenora has implemented the following policies and procedures:

- Code of Conduct - Establishes clear expectations for all employees, contractors, and suppliers to operate with integrity and in compliance with applicable laws and ethical standards.
- Whistleblowing Policy - Encourages employees and third parties to report any concerns about unethical or illegal activities, including human rights violations, without fear of retaliation.
- Third-Party Due Diligence Procedures - All key suppliers undergo risk assessments and due diligence checks before engagement. Suppliers in higher-risk jurisdictions or industries are subject to enhanced due diligence.
- Employee Recruitment and Compliance - Our hiring processes ensure compliance with all relevant employment legislation, as per the laws of that local jurisdiction (i.e., 'right-to-work' checks).

6. Training and Awareness

Tenora recognises the importance of educating employees and key stakeholders about the risks of modern slavery. We provide training to relevant staff, particularly those involved in procurement, compliance, and risk management, to ensure they can identify and respond to potential risks in our operations or supply chain.

On an annual basis, our employees must confirm that they have read and understood the applicable Compliance Manual and our Code of Conduct, which outlines our values and the behaviours we expect. Our Whistleblowing Policy covers all employees, temporary staff, contractors, consultants, and secondees working with Tenora, enabling them to report suspected or potential misconduct.

We actively promote the Whistleblowing Policy across all channels, providing clear guidance on raising concerns without fear of retaliation. Reports, whether direct or via the confidential system, are acknowledged promptly, with swift and effective resolution.

7. Risk Assessment and Continuous Improvement

We regularly review our policies, procedures, and risk assessment frameworks to mitigate the risk of modern slavery and human trafficking. Our senior management team is responsible for monitoring compliance with the Modern Slavery Act and ensuring ongoing improvements in our due diligence processes. Based on identified risks, we are committed to regularly evaluating the number of suppliers with modern slavery statements or policies and closely monitoring those without to ensure compliance and ethical standards.

8. Approval and Publication

This statement has been approved by the Group Chief Executive Officer of Tenora, Harry Adams.

Signed by:

Harry Adams

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