

Aspida Group Limited

Modern Slavery and Human Trafficking Statement

Introduction

Aspida Group Limited ("Aspida", "the Group", "we", "our" or "us") is committed to conducting business ethically, responsibly and with integrity. We recognise our responsibility to respect and uphold human rights and to take appropriate steps to prevent modern slavery, forced labour, servitude, human trafficking and other forms of exploitation within our business and supply chains.

This statement is made pursuant to Section 54(1) of the UK Modern Slavery Act 2015 and should be read alongside Aspida Group Limited's Modern Slavery and Human Trafficking Policy and Procedure. It sets out the steps taken by Aspida Group Limited to minimise the risk of modern slavery and human trafficking within our operations and supply chain.

Our Business

Aspida Group Limited is the holding company of a group of businesses providing corporate, fiduciary, governance, fund administration, accounting, advisory, compliance and related professional services. The Group operates primarily from Guernsey and serves a diverse international client base through its regulated and advisory businesses.

As a provider of professional services, the Group does not operate manufacturing facilities and does not engage in extensive or complex supply chains. The majority of our suppliers provide professional, administrative, technology and operational support services.

Whilst we consider the risk of modern slavery and human trafficking occurring within our own operations to be relatively low, we acknowledge that no organisation is entirely free from risk and remain committed to maintaining appropriate controls and oversight.

Our Commitment

Aspida Group is committed to:

- Conducting business in an ethical and responsible manner.
- Respecting internationally recognised human rights principles.
- Ensuring fair and lawful employment practices throughout the Group.
- Maintaining a workplace free from discrimination, harassment and exploitation.
- Working with suppliers and third parties that share our commitment to ethical business conduct.

- Taking appropriate action where concerns relating to modern slavery or human trafficking are identified.

Our commitment to ethical business practices forms part of the Group's broader Environmental, Social and Governance ("ESG") framework and supports our objective of operating as a responsible corporate citizen.

Policies and Controls

The Group maintains a number of policies, procedures and controls which support the prevention and detection of modern slavery risks, including:

- Modern Slavery and Human Trafficking Policy and Procedure.
- ESG Policy and related responsible business commitments.
- Anti-Bribery and Anti-Corruption Policy.
- Whistleblowing Policy.
- Employee Handbook and associated employment policies.
- Recruitment and onboarding procedures.
- Anti-Money Laundering, Countering the Financing of Terrorism and Countering Proliferation Financing policies and procedures.
- Client due diligence and risk assessment processes.
- Conflicts of Interest and governance policies.

These policies are designed to promote ethical conduct, support lawful employment practices, encourage the reporting of concerns and establish clear expectations for employees and third parties. Aspida Group maintains a zero-tolerance approach to unlawful, unethical or exploitative practices.

Employment Practices

Aspida Group is committed to ensuring that all employees are treated fairly, with dignity and respect.

We operate robust recruitment and onboarding processes to verify identity, right-to-work status and suitability for employment in accordance with applicable laws and regulations. Employment arrangements are transparent and documented, and employees are provided with clear terms and conditions of employment.

We seek to provide a safe, inclusive and supportive working environment and do not tolerate discrimination, harassment, coercion, forced labour, child labour or any form of exploitation. The Group promotes equal opportunities and makes employment-related decisions based on merit and business needs.

Due Diligence and Risk Management

The Group applies risk-based due diligence processes to its business relationships and operations. These include:

- Due diligence undertaken on prospective clients and counterparties.
- Ongoing monitoring of business relationships where required by law and regulation.
- Assessment of reputational, financial crime and ethical risks associated with new business relationships.
- Appropriate escalation and reporting procedures where concerns are identified.

Where information suggests possible involvement in criminal conduct, including human trafficking, forced labour or exploitation, the Group will investigate and take such action as may be appropriate in accordance with its legal and regulatory obligations.

Supply Chain

The Group's supply chain principally comprises:

- Information technology and software providers.
- Professional advisers and consultants.
- Recruitment agencies.
- Office facilities and maintenance providers.
- Telecommunications providers.
- Office equipment and supplies suppliers.
- Catering, cleaning and other administrative service providers.
- Marketing and merchandise suppliers.
- Travel and transportation suppliers.

We seek to work with reputable suppliers and service providers that share our commitment to ethical business practices and compliance with applicable laws.

As part of our procurement and supplier engagement activities, we may consider factors such as:

- Supplier reputation and conduct.
- Compliance with legal and regulatory requirements.
- Ethical employment practices.
- Human rights commitments and ESG credentials.
- Any identified exposure to modern slavery or human trafficking risks.

Where appropriate, we may seek assurances from suppliers regarding their compliance with applicable laws and ethical standards and reserve the right to review supplier relationships where material concerns arise.

Training and Awareness

The Group promotes awareness of ethical conduct, financial crime prevention and responsible business practices through internal communications, policies and training programmes.

Employees are encouraged to raise concerns where they become aware of, or suspect, unethical behaviour, misconduct or any matter that may indicate exploitation, modern slavery or human trafficking.

Concerns may be raised through management channels, compliance functions or the Group's whistleblowing arrangements, without fear of retaliation.

Governance

Ultimate responsibility for this statement rests with the Board of Directors of Aspida Group Limited. The Board oversees the Group's governance framework, ethical standards and risk management arrangements and receives information necessary to fulfil its oversight responsibilities.

The Board will continue to review the effectiveness of the Group's policies, procedures and supplier oversight arrangements to ensure modern slavery risks remain appropriately managed.

Looking Forward

During the next reporting period, Aspida intends to continue:

- Reviewing supplier due diligence processes and procurement practices.
- Promoting awareness of modern slavery and human rights issues.
- Enhancing ESG and ethical procurement initiatives where appropriate.
- Monitoring developments in legislation, guidance and best practice relating to modern slavery and human trafficking.

We remain committed to operating responsibly and to playing our part in preventing modern slavery and human trafficking in all forms.