

MODERN SLAVERY STATEMENT 2025

Financial year ending: 31 December 2025

Introduction

This statement is made pursuant to **Section 54 of the UK Modern Slavery Act 2015** and outlines the actions taken by **GBM Securities Limited** (“GBM”, “the Company”) to identify, prevent, and mitigate the risk of modern slavery within our business operations and supply chains.

GBM is committed to maintaining the highest ethical standards across all aspects of our business. We oppose all forms of modern slavery and are dedicated to ensuring that our organisation and supply chains remain free from such practices.

Our Business and Structure

GBM Securities Limited is a **global prime brokerage and securities firm** providing **trading, clearing, and financing services** to professional and institutional clients worldwide.

We are headquartered in **London, United Kingdom**, and operates under the authorisation and regulation of the **UK Financial Conduct Authority (FCA)**.

Our core services include:

- Prime brokerage and securities financing
- Execution and trading services
- Clearing & Custody
- Risk Management

We work with regulated financial institutions, market counterparties, and service providers across multiple jurisdictions.

Our Business Relationships

GBM engages with a range of regulated financial institutions, market counterparties, and professional service providers who support our global prime brokerage operations. These include custodians, exchanges, clearing houses, technology providers, and professional advisers.

We consider the risk of modern slavery within these professional relationships to be low, but we remain committed to ensuring that all third parties we engage with uphold the same high ethical and human rights standards as GBM.

Policies and Governance

GBM has established governance frameworks and internal policies to uphold ethical standards and prevent modern slavery, including:

- Code of Conduct and Ethics
- Whistleblowing Policy
- Anti-Bribery and Corruption Policy

Responsibility for compliance with the Modern Slavery Act rests with the **Board of Directors**, supported by the **Compliance** and **Procurement** functions.

Risk Assessment and Due Diligence

GBM conducts ongoing risk assessments to identify areas where the risk of modern slavery may exist within our operations and supply chain. Our due diligence measures include:

- Screening suppliers and partners during onboarding using ethical and regulatory checks
- Requiring suppliers to confirm adherence to applicable labour, human rights, and modern slavery laws
- Reviewing higher-risk suppliers based on geography, sector, or service type
- Including contractual clauses that require compliance with the Modern Slavery Act 2015

Training and Awareness

GBM promotes awareness of modern slavery risks among employees through:

- Annual compliance training covering ethics, anti-bribery, and human rights
- Targeted training for staff involved in procurement and supplier management
- Internal communications reinforcing the importance of reporting any concerns

Employees and third parties are encouraged to report suspected unethical practices or modern slavery concerns through our confidential **whistleblowing channels**.

Monitoring and Effectiveness

To ensure continuous improvement, GBM:

- Reviews supplier performance and compliance annually
- Monitors staff training completion rates
- Tracks whistleblowing reports and investigations
- Reports progress and findings to the Board of Directors annually

We are committed to strengthening our oversight of suppliers and partners to ensure ongoing compliance and ethical conduct.

Future Commitments (2025–2026)

During the next financial year, GBM will:

- Integrate enhanced environmental, social, and governance (ESG) considerations into supplier assessments
- Expand supplier audits to cover human rights and ethical sourcing criteria
- Continue to engage with industry bodies and peers to promote best practice in combating modern slavery