Ebury Partners Group

Modern Slavery Policy

(V.2.0)

Policy Owner: Board of Directors

Document Control

Version	Date Created	Department	Approved By	Materiality (1)	Date of Approval	Date of Next Scheduled Review
V 1.0	March 2024	ESG	EPL Supervisory policy committee	N/A		
V 2.0	January 2026	ESG	EPL Supervisory policy committee	N/A	13 March 2026	13 March 2027
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Change Log

Version	Details of change
v 1.0	V1 of the policy that wasn't uploaded at Ironclad/Policy Library.
v 2.0	V2 of the policy has been updated to align with the new guidance issued by UK authorities in March 2025 of Section 54, as well as the Ebury Procurement Policy. It introduces detailed supplier expectations for social responsibility and environmental stewardship, and formalises corrective action plans and non-compliance protocols, with input from the Procurement, TPRM, and Compliance teams/
v 2.0	Branding Update

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Content

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1 Introduction & Definition

1.1 Introduction

The Ebury Partners Group operates a global network of branches and subsidiaries providing financial solutions to simplify international trade. Our Group Modern Slavery Policy established at the parent level, applies to all Ebury entities and personnel worldwide. In jurisdictions with specific reporting or due diligence obligations, the additional mandates set out in Appendix B shall apply as a mandatory minimum standard.

Alongside this Policy, and in compliance with Section 54 of the UK Modern Slavery Act 2015, Ebury publishes an annual Modern Slavery and Human Trafficking Statement. This Statement is reviewed and adopted by the CEO and the Board of Directors of Ebury Partners Limited ('EPL') and is publicly available on the Group's website.

1.2 Definition

Modern slavery is a term that encompasses severe forms of labour exploitation where individuals are deprived of their freedom through coercion, threats, or deception and are treated as commodities. It includes practices such as forced labour, debt bondage, human trafficking, and other slavery-like practices. It is a violation of fundamental human rights and is characterised by an individual's inability to leave their work situation due to threats, violence, coercion, abuse of power, or deception.

Ebury is committed to identifying, preventing and mitigating the risk of modern slavery in our operations and supply chain. Our company acknowledges the importance of maintaining ethical business practices that uphold human rights standards and comply with all relevant laws and regulations concerning modern slavery and human trafficking.

Our policy is designed to reflect our dedication to acting ethically and with integrity in all our business relationships. It outlines our company's actions to ensure that modern slavery is not taking place within our own business or supply chains and provides a framework for our efforts to ensure transparency, accountability and seeks to ensure that our operations meet the highest ethical principles.

As part of its supply chains, EPL uses suppliers for operational services and information technology needs, as well as suppliers for its equipment, office supplies and other products. All material suppliers we use and collaborate with undergo through an assessment under our strict standards of preventing modern slavery and human trafficking and who operate fair and ethical workplaces.

2 Purpose & Scope

2.1 Purpose

The primary purpose of this Modern Slavery Policy is to set out Ebury's position on modern slavery and to enact provisions to ensure that none of our operations and supply chains give rise to modern slavery or human trafficking. This policy underscores our commitment to acting ethically in all our business activities and to implementing and enforcing systems and controls which safeguard against modern slavery.

Given the intersection of finance and technology, we recognize the unique set of challenges and responsibilities that we, as a fintech company, face in this area. It is our aim to use our influence and the power of financial technology to combat fraudulent activities, including those related to modern slavery and human trafficking.

The prevention, detection and reporting of modern slavery in Ebury's supply chains is the responsibility of all Ebury employees, contractors, partners and third party providers who work for Ebury or on its behalf. This Modern Slavery

Policy provides the framework by which Ebury ensures:

- Everyone understands and aware of the responsibilities in relation to modern slavery;
- It was established and developed the strategic approach by which modern slavery is tackled when identified;
- Establish robust and proportionate governance to provide assurances about the processes and any identified incidents of modern slavery; and
- Report instances to the authorities where modern slavery is identified.

2.2 Scope

This policy applies to all persons working for or on behalf of Ebury, in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives, and business partners. Furthermore, it encompasses all branches, subsidiaries, and entities controlled by Ebury, irrespective of their geographical location.

Our approach to eradicating modern slavery covers our own practices and extends into our supply chains, from the most rudimentary of services to our complex digital infrastructure where subcontractors may provide specialised technological expertise. We understand that the fluid and dynamic nature of fintech requires constant vigilance to ensure that our expansive network remains uncompromised by these unacceptable practices.

In addition, this policy provides direction to our associates in the wider business community and input to the shaping of our partnerships. As a company that stands on the frontier of financial innovation, we recognise that our global digital footprint also includes ensuring that our platforms are not exploited to facilitate or hide the proceeds of such abusive practices.

We are committed to regular review and reassessment of both our internal practices and those of our partners to further combat any potential for modern slavery. We will continually refine our due diligence and auditing processes to improve detection and prevention as our field evolves.

Through the articulation and enforcement of this policy, we assert our global commitment to the fight against modern slavery and demonstrate our proactive stance on corporate social responsibility. We hereby establish our dedication to safeguarding human rights and to operating with the highest principles of ethical behaviour, remaining aligned with global movements toward a more transparent and just financial future.

By establishing this policy, Ebury communicates its active role in the financial sector to uphold both legal obligations and the moral imperative to contribute to a world free from slavery and exploitation.

3 Policy Statement

Pursuant to Section 54 of the UK Modern Slavery Act 2015 (considering the March 2025 updated guidances) and equivalent global mandates, including the Australian Modern Slavery Act 2018, the Canadian Forced Labour and Child Labour in Supply Chains Act, and emerging EU standards (CSDDD & Forced Labour Regulation), Ebury Partners Limited ('EPL') and its global subsidiaries are making this statement. It outlines the measures Ebury is taking to ensure that slavery and human trafficking are not part of any of the Group's business operations or extensive digital supply chains.

As defined by the Act, slavery covers: slavery, servitude, forced or compulsory labour, and human trafficking. In consolidation of the offences relating to trafficking and slavery, the act criminalises aiding, abetting, or procuring forced labour or human trafficking, or being an accessory to such offences.

At Ebury, we are acutely aware of the pernicious effects of modern slavery and human trafficking, not only on individual lives but also on global economies and the financial industry. The advancement of technology has brought new opportunities; however, we recognize that it can also inadvertently facilitate certain illicit activities. As a leading fintech company operating in 30+ markets, we hold an obligation to leverage our technological capabilities to combat these social injustices head-on.

Our commitment is to create and maintain a business ecosystem that is free from the taint of modern slavery and human trafficking. We are meticulous in our operations and vigilant in our partnerships, ensuring that the cutting-edge solutions we provide are never used to perpetuate abuse or exploitation.

We shall carry out business with integrity and transparency, employing innovative technologies not just to transform finance, but to set a higher standard for corporate conduct. Our systems, including artificial intelligence and data analytics, are utilised to monitor, review, and, where necessary, act to prevent any instance of modern slavery within our operations or our extensive digital supply chain.

As we navigate the complexities of the digital financial landscape, our resolve is unshakable. Ebury will forge pathways in the fintech sector that promote fair labour practices and dignity for all individuals. We make this commitment not only in compliance with legal and regulatory frameworks but as a fundamental expression of our core CARE values (Consistency, Accountability, Resilience, and Eburian First)

This policy statement represents our unwavering stance against modern slavery. It embodies our dedication to being a force for good in the fintech industry, harnessing the power of technology to secure financial freedom and safeguard human rights around the globe.

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4 Responsibilities and Compliance

EPL's board has overall responsibility for this Statement and for ensuring that the firm complies with its obligations in regards to modern slavery and human trafficking. Any questions and concerns arising in regards to modern slavery or human trafficking taking part in any area of our business or supply can be raised directly with our HR, Risk Department, Procurement, ESG, Compliance and Legal Department. Additionally, reports can be submitted through our confidential whistleblowing systems, which include the dedicated Whistleblowing channel and the Having Your Voice Heard channel. Anonymous reporting is an available option through these systems.

The ESG department is responsible for the monitoring and maintaining of the policy.

5 Risk Assessment & Procedures to Avoid Modern Slavery

The nature of the business by EPL does not consist of manufacturing of goods, construction or any other industry which is more susceptible to higher risk of modern slavery and as such the risk of modern slavery existing is considered to be low.

The suppliers and partners operating with EPL are mostly regulated entities or are in an industry in which the existence of modern slavery is also low. This can include consulting firms, banks, other financial institutions etc. As such, the overall risk of modern slavery through the supply chain also remains low.

Nevertheless, we are committed to ensuring and carrying out all the necessary steps in our due diligence to prevent and combat modern slavery and human trafficking. As part of this commitment we have set up the following processes:

- **Supplier Expectations from Procurement Policy:** The Ebury Procurement Policy (complemented by our Ebury Environmental, Social & Governance Policy, the Code of Business Conduct and Ethics, and all other relevant Ebury policies) outlines detailed expectations for suppliers in line with our commitment to Environmental, Social, and Governance (ESG). As part of our comprehensive tender and RFx processes, suppliers' capabilities and commitment to ESG practices will be formally assessed, and they are expected to align with our ESG vision. Our expectations cover:

    - **Social Responsibility:** Suppliers and their subcontractors must comply with all applicable wage, hour, anti-slavery, and human trafficking laws, maintaining a strict prohibition against child or forced labor and a mandate to notify Ebury immediately of any actual or suspected violations. Furthermore, to ensure alignment with our values, we proactively request information on suppliers' Diversity, Equity, and Inclusion (DEI) policies and strategies to assess their commitment and progress in these critical areas.

    - **Environmental Stewardship:** Suppliers must comply with all relevant environmental laws and operate responsibly, including commitments to Climate Change Mitigation, Resource Efficiency & Circularity, Environmentally Friendly Practices, and Responsible Waste Management.

    - **Good Governance:** We expect suppliers to uphold the highest standards of ethical business conduct, integrity, and accountability, including clear policies on Ethical Conduct, Anti-Corruption, Anti-Bribery, and a mechanism for Risk Management.

    - **Purpose-Led Business:** We request suppliers to share their latest sustainability reports and publicly disclosed ESG information, including their goals and targets for the coming years, to drive sustainable value for all stakeholders.

- **ESG Integration in Third-Party Risk Management (TPRM):** We have successfully embedded ESG criteria across our entire supply chain lifecycle through our Third-Party Risk Management (TPRM) framework. This holistic approach ensures that all Material and Tier 1 vendors undergo rigorous ESG assessments, including specific scrutiny of modern slavery, labor policies, and environmental commitments, both during the initial onboarding of new partners and through continuous, risk-weighted evaluations of existing suppliers. By utilizing this dynamic assessment model, we can proactively identify and respond to evolving ethical risks, ensuring our global vendor base remains aligned with Ebury's high standards for transparency and social responsibility.

6 Breaches of Policy and Commitment to Action

Adherence to this Modern Slavery Policy and its associated best practices is a mandatory contractual requirement for all business partners, contractors, and third-party providers. Any identified or suspected breaches, whether internal or external, will be thoroughly investigated in accordance with Ebury's breach policy and disciplinary procedures.

Ebury recognizes its responsibility to provide for, or cooperate in, the remediation of any adverse human rights impacts it has caused or contributed to. If modern slavery is identified within our supply chain, we are committed to working with the relevant parties to ensure the safety of affected individuals and the provision of appropriate redress. Ebury maintains a zero-tolerance approach to modern slavery and is prepared to take decisive action when risks or incidents are identified. Our primary objective in responding to breaches is the protection and remediation of victims. Actions for non-compliance will be proportionate to the breach and may include:

- Immediate suspension of the business relationship.
- Collaborative actions with the supplier to establish and implement remediation plans that not only address the breach but specifically support the victims involved.
- Termination of the contract in accordance with contractual terms as a last resort. Ebury commits to responsible disengagement, with a victim-centered approach, assessing the potential impact of termination on the victims and prioritizing remediation.
- Reporting the instance to relevant legal and regulatory authorities, including the police, where breaches of modern slavery law are identified.

Through these processes, we uphold our legal and moral obligations while fostering a culture of transparency, responsibility, and continuous improvement. Additionally, we encourage the reporting of any concerns through our specific dedicated Whistleblowing channel .

7 Appendices

Appendix A: Definitions and Abbreviations

Term / Acronym	Description / Definition
EPL	Ebury Partners Limited
Modern Slavery	An umbrella term that covers practices such as slavery, servitude, forced and compulsory labour, and human trafficking. These are situations where a person cannot refuse or leave due to threats, violence, coercion, deception, or abuse of power.
Human Trafficking	The act of recruiting, transporting, transferring, harbouring, or receiving persons through the use of force, coercion, or other means, for the purpose of exploitation.
Forced Labour	Any work or service which people are not doing voluntarily and is exacted from them under the threat of a penalty.

Appendix B: Local Mandates and Regional Standards

Region / Entity	Local Mandate
UK Group Entities	Modern Slavery Act 2015 and March 2025 Updated Guidance of Section 54
Australia (Ebury Partners Australia Pty Ltd)	Modern Slavery Act 2018 (Commonwealth)
Canada (Ebury Partners Canada Ltd)	Fighting Against Forced Labour and Child Labour in Supply Chains Act (S-211)
European Union (e.g., Ebury Partners Belgium NV/SA)	CSRD, CSDDD & EU Forced Labour Regulation
Brazil (Ebury Brazil Group)	Penal Code (Art. 149) & State Laws (e.g., Law 14.946)
United Arab Emirates (Ebury Partners DIFC Ltd)	Federal Law No. 51 of 2006

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Appendix C: Reporting Requirements Compliance

Regulatory Requirement	Relevant Section
Organizational Context & Supply Chain Overview	Section 1 Section 2 Section 2.2
Identification of Modern Slavery Risks	Section 5
Risk Mitigation & Strategic Interventions	Section 5 Section 6 Section 3
Monitoring & Performance Evaluation	Section 4 Section 6
Stakeholder Consultation Framework	Document Control
Governance & Executive Endorsement	Section 1.1 Section 4 Approval History