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# Ebury Partners Group

## Modern Slavery and Human Trafficking Statement

2026

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## 1 Opening Declaration

This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015, including the March 2025 updated guidance and constitutes Ebury Partners Limited's slavery and human trafficking statement. This document outlines the steps we have taken to prevent modern slavery within our operations and supply chains, underpinned by our Global Modern Slavery Policy.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, child labour, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We maintain a zero-tolerance approach to all forms of modern slavery, including forced labour, servitude, and human trafficking. As a leading fintech company, we recognise our obligation to leverage our technological capabilities to combat these social injustices. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere within our business, our supply chains, or our customer platforms.

## 2 Structure of our Organization

Ebury Partners Limited is an international organisation operating in the Financial Technology sector providing tailored currency services and business funding for companies supply chains globally. Ebury currently operates branches and subsidiary entities providing regulated services in 30+ markets, with a workforce exceeding 1,900+ employees.

Additionally, in order to deliver our services to our business partners and clients, we work with a range of suppliers in the Financial Sector. Irrespective of the services Ebury Partners Limited receives from a supplier we insist that their obligations in respect of modern slavery and human trafficking must be to the same high standards as our own.

## 3 Our Practices

We are committed to ensuring transparency within our business and in our approach to addressing modern slavery throughout all of our operations and supply chains, consistent with our corporate values and disclosure obligations under the Modern Slavery Act 2015.

While our business nature as a fintech provider generally presents a low risk of modern slavery compared to sectors like manufacturing or construction, we remain vigilant across our entire network. Our approach includes Internal Operations, our Supply Chain, and the Customer Journey.

Therefore, we expect the highest standards regarding modern slavery from all of our contractors, suppliers, and other business partners. Consequently, as part of our contracting processes, we incorporate specific prohibitions against the use of forced, compulsory, or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will require the same high standards from their own suppliers.

## 4 Integrated Policy and Procedures Framework

To ensure a holistic approach to human rights, our modern slavery strategy is supported by an interconnected framework of policies and procedures:

- Ebury Global Modern Slavery Policy: Our primary framework for identifying, preventing, and mitigating risk.
- Ebury Procurement Policy: Sets the standards for ethical sourcing and supplier conduct.
- Ebury Environmental, Social, and Governance Policy: Integrates environmental, social, and governance criteria into our business decisions.
- Ebury Code of Business Conduct and Ethics: Establishes our minimum expectations for integrity and transparency.
- Ebury Global Whistleblowing Procedures and Channels: We have established specific report processes and systems, including dedicated and confidential whistleblowing channels, to process reports and identify potential compliance breaches and incidents.

## 5 Due Diligence and Supply Chain Strategy

In order to monitor and reduce the risk of slavery and human trafficking within our supply chains, we have adopted due diligence processes which will enable Ebury Partners to take positive and decisive action in the event of any suspected breaches of the Act:

- Supplier Risk Assessment: We integrate ESG (Environmental, Social, and Governance) criteria into our Third-Party Risk Management (TPRM) framework. This includes a risk assessment of all suppliers to identify potential concerns. Furthermore, all Material and Tier 1 vendors undergo rigorous evaluations, with particular attention paid to their anti-slavery statements and labor policies.

- Pre-Engagement Due Diligence: Appropriate levels of due diligence, such as reference checking, are conducted before entering into any new supplier relationship.

- Geographic Origin Assessment: Where feasible, we assess the geographic origin of goods and services delivered through the supply chain to determine if they originate from high-risk areas.

- Continuous Monitoring: Regular supplier audits are carried out to monitor changes and inform the effectiveness of the checks detailed above.

## 6 Training and Awareness

Awareness training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and training will be provided as necessary.

Our zero-tolerance approach to modern slavery in our business and supply chains is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

## 7 Risk and Compliance

We have created and circulated a policy to staff and C-level executives discussing the risk of exposure to modern slavery at the relevant board meetings.

We do not consider that we operate in high risk sectors or locations because the majority of suppliers and business partners provide professional services. The company has an internal procurement process which is monitored on a regular basis.

If we find evidence of a failure to comply with our standards in respect of Modern Slavery or a breach of this legislation we will immediately take action to terminate the relationship with the supplier. We will investigate all suspicions of breaches appropriately.

## 8 Breach Management and Victim-Centered Remediation

Any suspected breach is thoroughly investigated in accordance with Ebury's disciplinary procedures. Our response to non-compliance is victim-centered:

- Remediation First: We prioritise the safety of victims and work with suppliers to establish remediation plans, potentially involving NGOs and local authorities.

- Responsible Disengagement: While we may terminate contracts as a last resort, we commit to assessing the impact of such termination on the victims to ensure our actions do not cause further harm.

- Legal Cooperation: We report breaches of law to relevant authorities, including the police, where necessary.

## 9 Reporting & Whistleblowing

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 Human Resources, Risk Management, 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. These systems allow for confidential and anonymous reporting, guaranteeing full protection against retaliation for anyone raising a genuine concern.

## 10 Further Actions and Sign Off

We commit to monitoring our supplier chain on a regular basis to assess the exposure to modern slavery and trafficking and compliance with our policy. New suppliers will be asked for their commitment to anti-slavery practices and to provide such appropriate information on the company as part of a reference check.

The Board of Directors of Ebury Partners Limited has overall responsibility for this statement and for ensuring the firm complies with its legal and moral obligations regarding modern slavery.

This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015, including the March 2025 updated guidance and constitutes Ebury Partners Limited's slavery and human trafficking statement for the financial year 2026. It was approved by the Supervisory Committee of Ebury Partners Limited on 13 March 2026.