

Introduction

FinTrU are committed to ensuring a zero-tolerance approach to modern slavery or human trafficking in our supply chains or in any part of our business.

As per the UK Modern Slavery Act 2015 (“**Act**”), all commercial organisations that supply goods or services in the UK and meet the annual turnover threshold of £36m or more must publish an annual slavery and human trafficking statement.

This statement has been published in accordance with Section 54 of the Act. It sets out the steps taken by FinTrU Limited (“**FinTrU**”) during the financial year ending 31st December 2023 to mitigate the risk posed by modern slavery and human-trafficking in its business and supply chains.

This statement covers the following FinTrU entities:

- FinTrU Limited
- FinTrU Inc.
- FinTrU Ireland Limited

Our Business

FinTrU is a multi-award-winning technologically enabled Regulatory Solutions company, specialising in the areas of KYC, Compliance, Legal, Risk & Controls and Operations. Working with Tier 1 Investment Banks around the globe, FinTrU designs technology-enabled solutions to help our clients meet their regulatory obligations.

Headquartered in Belfast, we employ over 1,400 people across our global offices in Derry/Londonderry, Letterkenny, New York, London, Dublin and Porto. FinTrU has been named in the Sunday Times Virgin Atlantic Fast Track 100 in consecutive years due to its outstanding growth. In April 2022, FinTrU received the prestigious Queen’s Award for International Trade for ‘Outstanding Continuous Growth’ in overseas sales over the last six years.

Our People

At FinTrU, our people are at the core of everything we do. Our onboarding processes are robust, and all employees are required to undertake ‘right to work checks’ to prevent illegal working.

We invest heavily in our people as part of their professional careers and continue to support our employees on an ongoing basis. We consider ourselves to have a fundamental social purpose to create high-quality professional employment and we care deeply about our culture and our core values of Partnership, Passion, People and Professionalism.

We have direct control and oversight over our hiring practice and working conditions. As a result, we consider the risks of modern slavery and human trafficking within our workforce to be low. To ensure this, we undertake the following steps:

- all employees have a contract of employment that sets out their Employment Rights and obligations including the notice period needed for them to terminate their contract and leave our employment;
- we verify employee's identity and ongoing right to work in the UK;
- we do not withhold any employee's physical identity documents (e.g. passport) during their employment;
- we comply with all legislation in respect of working time and statutory time off, holiday entitlement, time off for personal emergencies, sickness and maternity/paternity leave and minimum rest breaks; and
- there is an annual reward review process and a discretionary bonus scheme.

Our Clients

FinTrU provides services to the financial services industry, with our clients predominantly Tier 1 Investment Banks located across the globe. Our clients have a strong awareness of modern slavery and seek to enforce this requirement throughout their supply chains (which includes FinTrU as a supplier). All our agreements with our clients include contractual obligations relating to modern slavery and we are subject to audit on these obligations on an ongoing basis.

Our Suppliers

We are committed to ensuring a zero-tolerance approach to modern slavery or human trafficking in our supply chains or in any part of our business. Our supply chains are limited to standard daily business supplies and are primarily confined to the United Kingdom. As a result, we consider that given the nature of our business and the industries in which we operate, the risk of encountering modern slavery practices is low.

Our Policies

We have published the following policies and procedures which are designed to identify any risks associated with modern slavery and provide steps to mitigate such risks in our operations:

- **FinTrU Employee Handbook:** Our Employee Handbook reflects the changing world within which we operate, the nature of our work, how we do business and ultimately how we enshrine ethical decision making into our operations. It is one of the many tools we can use to guide us on our way and ingrain our values into our day-to-day operations.
- **FinTrU Equality & Inclusion Policy:** We are proactively committed to creating a working environment that values diversity, fairness, mutual respect and inclusion. We believe that equality, diversity and inclusion contribute to FinTrU's success. We recognise the value of different cultures, backgrounds and perspectives and understand that this diversity makes us stronger.
- **Whistleblowing Policy:** We operate a Whistleblowing Policy, principally aimed at our employees, which encourages staff to report wrongdoing - this extends to human rights

violations like modern slavery and human trafficking. All reports can be made anonymously and are fully investigated, with appropriate remedial actions taken.

- **Recruitment Policy:** We have a robust recruitment policy that includes conducting checks confirming eligibility to work in the UK and other countries in which we operate, to safeguard against human trafficking or individuals being forced to work against their will.
- **Anti-Modern Slavery Policy:** We are currently in the process of drafting a standalone Anti-Modern Slavery Policy and such policy will be published in due course.

All policies listed above, including this statement, are reviewed, and re-issued to all employees on an annual basis, subject to the approval of the FinTrU Policy Committee. Employees can access any of our policies at any time on our internal policy management system.

Due Diligence

We have put in place our own supplier evaluation processes with the aim of assessing all our suppliers (existing and new) against a set of requirements including, but not limited to, data privacy, information security and modern slavery. This process is currently being built out and will incorporate the integration of a newly automated Supplier Risk Management tool, to include modern slavery-related questions.

Questions that will be asked of suppliers will focus on key topics such as:

- the identification of modern slavery risk in their operations or supply chain;
- the existence of policies addressing modern slavery;
- training of staff to increased modern slavery awareness; and
- carrying out supplier audit and checks on a regular basis.

Over the next 12 months, it is intended that this automated tool will capture our existing supplier population as well as any newly established relationships which will give us more visibility over our entire supply chain.

Where it is appropriate we will engage directly with suppliers to gain a proper understanding of the measures they have in place to ensure that modern slavery is not occurring within their own businesses and supply chains, and, where appropriate, agree how such measures should be enhanced.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we aim to provide regular training to our staff. We are in the process of developing training materials on the various risks associated with modern slavery and human trafficking and aim to deliver this training in 2024.

The training materials will include information on defining modern slavery, relevant legislation, supply chain risks in terms of product or service type and geographies, example scenarios, the

role of due diligence, what staff can do to support anti-modern slavery efforts and how staff should respond where a risk of modern slavery is identified.

Key Performance Indicators (KPIs)

We will focus on monitoring the effectiveness of our implemented controls to deal with modern slavery and human trafficking. Key Performance Indicators (KPIs) that will be established to monitor performance include the following:

- completion rates of assigned training on modern slavery;
- monitor the completion of supplier assessments to ensure all of those targeted have completed as well as reviewing the output of such questionnaires to determine our risk profile;
- tracking that employees in scope of the Anti-Modern Slavery Policy have attested to reading and understanding its contents;
- continuing to ensure that we pay our employees above minimum wage/living wage plus benefits; and
- ensuring that all our supply agreements include a clause relating to modern slavery.

Looking Forward

We will continue to develop and implement the measures mentioned above in respect of our supply chain. Our approach to modern slavery and human trafficking risk will continue to evolve and improve year-on-year and we will continue to mitigate these risks.

Board Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and will be updated annually.

The statement is for the financial year ending 31st December 2023 and was approved by the FinTrU Board on 6th June 2024.