

EBURY PARTNERS LTD – Anti Modern Slavery and Human Trafficking Statement March 2019

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 have a zero-tolerance approach to modern slavery and 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 in our own business or in any of our supply chains.

Structure of our organisation

Ebury Partners Ltd is an international organisation operating in the Financial Technology sector providing tailored currency services and business funding for companies supply chains globally. We operate across branches and subsidiary entities currently in 18 countries globally employing 800 people.

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 Ltd 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.

Our practices

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include 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 hold their own suppliers to the same high standards.

Training

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.

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:

- Undertake a risk assessment of suppliers to identify indicators which may raise concerns in this regard.
- Carry out appropriate levels of due diligence prior to entering into a new supplier relationship for example, reference checking.
- Where possible, assessing the origin of goods and services delivered through that supply chain specifically around the geographic origin of goods to assess whether these are high risk areas.
- Carry out regular supplier audits which monitor changes which inform the checks set out above.

Risk and compliance

We have created and circulated a policy to staff and C-level executives discuss 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.

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.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Ebury Partners Ltd 's slavery and human trafficking statement for the financial year commencing 1 January 2019 to 31 December 2019.

Signed by Juan Lobato, CEO

