
Modern Slavery and Human Trafficking Statement (“Statement”) FY25



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This Statement is made on behalf of Record plc and its subsidiaries ("Record", "we," "our" or "us") and is published pursuant to section 54 of the UK Modern Slavery Act ("the Act") and the United Nations Global Compact ("UNGC") principles, of which Record is a signatory of.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another for the exploitation for personal or commercial gain. This Statement outlines the steps Record has taken to detect and prevent modern slavery and human trafficking from occurring in our organisation and supply chains.

Our Company and commitment

Record is a currency and alternative asset manager, providing solutions to institutional clients. Record operates in a sector and countries which have a relatively low risk of modern slavery and human trafficking. Nevertheless, Record seeks to provide its services according to the highest ethical and professional standards and takes a zero-tolerance approach to modern slavery and human trafficking within its business activities and supply chains.

Record's policies and procedures are aligned with internationally recognised human rights standards, including the International Labour Organisation's standards and the Universal Declaration of Human Rights. We comply with human rights standards and labour laws of each of the countries we operate in, and we do not tolerate any instances of modern slavery, human trafficking, child labour or any other form of human rights abuse within our organisations.

Our approach

Our approach to combatting modern slavery and human trafficking is discussed further below:

Operational

We have a number of policies and procedures that govern the way we operate and aid us in identifying and mitigating modern slavery and human trafficking risk within our business. These include:

- Detailed background checks which are carried out on all new staff and outsourced contractors through an independent third-party provider, ensuring that any history of human rights abuses, if known, will be flagged and identified prior to joining Record.
- Staff Conduct Notice and Code of Ethics policy which represents the standards by which all Record staff are expected to conduct their business.
- Staff are encouraged to report any unprofessional or illegal behaviour through various channels described in our Staff Conduct Notice. In addition, our Whistleblowing Policy enables staff to raise concerns anonymously about any suspected violations of the law or Code of Ethics, including concerns about modern slavery, to senior management without fear of recrimination.

Supply chains

Record only deals with reputable and well-established suppliers and expect the same high standards from all of our suppliers, contractors and any other third parties that provide paid for goods and/or services to Record (collectively, Record's Suppliers). All Suppliers are subject to Record's Supplier Code of Conduct which sets out the minimum standard of conduct we expect from our suppliers and has been developed in line with the UNGC principles in the areas of human rights, labour, environment and anti-corruption. The code is used as a guide to collaborate with Suppliers in the promotion of lawful, professional and responsible business practices.

Record's Suppliers are largely based in advanced OECD countries, mainly the UK, Europe and the USA. Further, our supply chain is relatively short and predominantly comprises high skilled professionals. As a result, we believe there is limited risk of modern slavery taking place in our supply chain. However, we recognise that certain goods and service requirements for our office facilities, such as office equipment, cleaning services and IT services, may carry a higher risk of modern slavery. Therefore, Record considers the risk of its Supplier relationships on a case-by-case

basis during the onboarding phase and assesses Suppliers across four risk factors:

- 1) the type of workers they employ (e.g. migrant workers, base-skilled);
- 2) the nature of the goods or services they are providing us with (e.g. cleaning services, maintenance services); and
- 3) location (e.g. country ranking on the Global Slavery Index).
- 4) controversy risk (we use Reprisk to review any incidence of modern slavery in the media using Reprisk)

Where Suppliers have been identified as high risk, due diligence is carried out by assessing company policy and procedures, as well as requesting a due diligence questionnaire to be completed. The company must provide appropriate evidence that it has satisfactorily assessed its own risk of involvement in modern slavery and has preventative measures in place.

Investment process

Record has a responsible investment policy (available [here](#)) which outlines our approach to incorporate appropriate ESG considerations into our investment management process. The policy is written in line our status as a signatory to the United Nations-supported Principles for Responsible Investment.

Ongoing plans

- Regularly review our approach to modern slavery and human trafficking in our supply chain to ensure our due diligence process is effective.
- Use contract management platform to complete modern slavery due diligence on all new suppliers.
- We commit to organising modern slavery and human trafficking training for relevant personnel/teams.

This Statement was approved by the board of directors of Record plc on 18 June 2025 and is signed on their behalf by Jan Witte, Chief Executive Officer.



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