

EFGAM UK
(‘EFGAM UK’)

Modern Slavery Statement
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Version Control

Version	Author(s)	Date	Remarks	Frequency of review	Next review date	Reviewer & approver
1.0	Company Secretary & UK Head of Compliance	12/06/2023		Annually	2024	Approved by EFGAM UK Board on 12 June 2023
2.0	Company Secretary & UK Head of Compliance	03/07/2024	Minor changes only including reference to the financial statements ending 2023 and reference to EFGAM UK's Outsourcing Policy	Annually	2025	Approved by EFGAM UK ManCo on 25 April 2024 Approved at CRIAC 03 July 2024
3.0	Company Secretary & UK Head of Compliance	22/05/2025	Minor changes only including reference to the financial statements ending 2024	Annually	2026	Approved by EFGAM UK ManCo on 22 May 2025 and CRIAC on 08 July 2025
4.0	Company Secretary & UK Head of Compliance	20/05/2026	Minor changes only including reference to the financial statements ending 2025	Annually	2027	Approved by UK ManCo on 26 May 2026, noted by CRIAC on 09 June 2026. Approved by UK Board on 18 June 2026

Scope

All EFGAM UK staff

Policy Governance

Failure to act in accordance with this policy is a serious matter which could result in disciplinary action. If anyone is in doubt of how this policy applies, they should discuss with their line manager and/or EFGAM UK's compliance team.

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1 Introduction

This statement sets out EFGAM UK's actions to understand all potential modern slavery and human trafficking risks related to its business, and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year ending 31 December 2025.

As part of the financial services industry, EFGAM UK recognises that it has a responsibility to take a robust approach to eliminate slavery and human trafficking when conducting business. We are committed to maintaining high ethical standards – adhering to laws and regulations, conducting business in a responsible way, treating all stakeholders with honesty and integrity and to do business with organisations that share this commitment.

EFGAM UK is committed to preventing slavery and human trafficking in its business activities and ensuring that its supply chains are free from slavery and human trafficking.

2 Organisational Structure

EFGAM UK is part of EFG International, a global private banking group headquartered in Zurich, Switzerland. EFG International operates in around 40 locations worldwide, and its shares are listed on the SIX Swiss Exchange.

At EFGAM UK our aim is straightforward. It is to provide clients with high quality investment solutions.

Each employee, whether full or part time, has the same contract of employment setting out the terms and conditions of their employment, and each employee has access to a comprehensive employee handbook.

3 Policies and Standards

EFGAM UK has developed a number of approved policies designed to give employees guidance and direction on a number of key matters encountered during their day to day activities:

- **Whistleblowing Standard:** we encourage all our workers, to report any concerns related to the direct activities of the organisation. This includes any circumstances where there is evidence of slavery or human trafficking taking place, in our workforce or with our suppliers. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees who have concerns can use a confidential helpline.
- **Financial Crime Standard:** we take a rigorous risk-based approach in our commitment to combatting money laundering, corruption and terrorist financing and we have implemented policies, procedures and internal controls that are designed to comply with such laws and regulations. We have developed extensive policies intended to prevent, detect and report money laundering, corruption and terrorist financing. As any proceeds stemming from the offences in the Modern Slavery Act would be the proceeds of crime, instances of slavery would also come within the scope of our money laundering reporting procedures.
- **EFGAM UK Outsourcing Policy** (“Outsourcing Policy”): this Outsourcing Policy sets out the requirements for the control, oversight and monitoring of critical services performed, or supplied by third parties. The scope of this Standard specifically covers both:
 - **Outsourcing:** services provided by a third party (including those provided by an EFG affiliate) that could normally be undertaken by EFGAM UK itself; and
 - **Third Party Services:** other services provided by third party vendors

The Outsourcing Policy establishes the framework of EFGAM UK's outsourcing strategy including:

- Decision process for approval of new outsourced services;

- Due diligence and on-boarding of new service providers;
- Governance, oversight and monitoring of existing service providers;
- Standard service level agreements;
- Compliance with regulatory requirements and expectations;
- Monitoring, audit and access arrangements; and
- Exit and termination of outsourcing arrangements.

The Outsourcing policy conforms to:

- The EFG Group Outsourcing Directive;
 - UK regulatory requirements, guidance and expectations, including Senior Management Arrangements, Systems and Controls 8 (SYSC8); and
 - The Modern Slavery Act 2015
- **Code of Conduct:** The principles and standards set out in the code apply to all aspects of our business. The code aims to support a culture where ethical and responsible behaviour is ingrained.

4 Supply Chain

We work with a number of external suppliers and companies to purchase the goods and services we need to run our business. EFGAM UK has a series of policies, guidelines, processes and governance forums to help us manage the relationships and risks with our supply chains and outsourcing agreements.

5 Due Diligence Process

5.1 Outsourcing

When evaluating a potential outsourced service provider (or reviewing an existing one), there are several steps to be followed to ensure compliance with the Modern Slavery Act including:

- Subject matter experts are involved in the assessment process to ensure specific areas are covered appropriately (e.g. Information Security, GDPR)
- The contract is reviewed to ensure various specific areas are covered (in some cases, specific clauses). These clauses are based on requirements of various internal policies and legislation, including (but not limited to) the local outsourcing standard, FCA handbook (SUSC8), GDPR.
- A risk classification is assigned to the service, based upon the due diligence checks, the contract in place and the ongoing performance and oversight.
- The Management Committee will review and approve a new outsourced service provider, and will provide ongoing oversight of existing suppliers.

5.2 Third Party Suppliers

We also contract various services from third party suppliers to support the day to day running of our business.

When evaluating a potential third party supplier (or initially reviewing an existing one), there are several steps to be followed to ensure compliance with the Modern Slavery Act including:

- On an annual basis carry out a review of our supplier list
- When recruiting additional resources, we only use specified, reputable employment agencies to source labour and always verify the practices of any new agency that we use before accepting workers from the agency.
- When offers of employment have been made for temporary agency staff, terms of agreement are always signed with the hourly rate clearly stated, with any agency fee stated separately.
- Any third-party issues identified are highlighted and presented to the Management Committee at the earliest opportunity for discussion and resolution.

5.3 Clients

The activities of our clients can have social and ethical impacts – including the potential for human rights infringements, through forced labour and trafficking. Proceeds stemming from offences linked to the Modern Slavery Act 2015 are considered proceeds of crime and are therefore subject to money laundering reporting guidelines. Our client on-boarding and periodic review due diligence will seek to highlight clients who operate in sectors which present a higher risk from a trafficking and slavery perspective (including links to adult entertainment, manufacturing and mining) and identify, through open source research, instances of recorded or suspected human rights abuses. Individual client relationships may be restricted or terminated where there is suspicion or knowledge that wealth introduced to EFGAM UK stems from illegal activities, always taking into consideration our compliance with local reporting obligations.

5.4 Our Staff

We also have a robust eligibility to work in the UK and employment screening administration procedure in place, where we conduct annual visa checks on required staff to ensure eligibility to work in the UK conditions are continually met.

All interns we employ follow the same on-boarding process as with all other employees of the organisation which are carried out before the internship can begin.

6 Risk Management

The introduction of the Modern Slavery Act prompted us to review how we prevent slavery and human trafficking in our own business, and also our supply chains. We want to take all reasonable steps to ensure that we are not supporting modern slavery in any way.

Given the nature of our business, the modern slavery risk within our workforce is low. The main risk of modern slavery arises within our relationships with third parties in our supply chain.

7 Measuring Effectiveness

We have assessed our effectiveness in ensuring that modern slavery is not taking place in our business and supply chain by considering the overall effectiveness in two separate areas:

7.1 Our Workforce

We consider that our employment policies and procedures are effective to ensure that slavery and human trafficking are not taking place in our business. We regularly review the pay and benefits offered to our employees to ensure that our employees are paid in alignment with market rates. All employees directly employed by EFGAM UK, including Interns and those on fixed-term contracts, receive the same range of benefits.

7.2 Supply Chain

It is our aim that we only do business with suppliers who meet our ethical standards. Accordingly, although we believe that there is a low level of risk to modern slavery in our supply chain, we are continually taking steps to ensure that this is addressed when we renew our supplier contracts. We will continue this process as each contract falls due for renewal.

Our regular Management Committee provides a forum for the escalation of any key issues identified with an ongoing contract, or at the point of renewal, to senior management within our governance framework.

8 Summary

We are working to ensure that there is sufficient transparency, both within our own organisation and also within our supplier base, and as such we have developed a series of steps to mitigate the risks of modern slavery. However, we recognise that our commitment to a no tolerance policy to modern

slavery is a continuous journey and as such we will therefore continue to assess performance and identify areas where we and our suppliers need to improve.