

ENVESTORS

MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

Introduction

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. It is a real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain.

At Envestors Limited, we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain. We have taken concrete steps to tackle modern slavery, as outlined in our statement. This statement sets out the actions that we have taken to understand all potential modern slavery risks related to our business, and to implement steps to prevent slavery and human trafficking during the financial year 2023/24.

Organisational structure

- Envestors Limited has business operations in the United Kingdom
- We operate in the technology, corporate finance, entrepreneurial and business advisory sectors

We work with a number of key direct suppliers, who provide us primarily with business services, including IT software, marketing and consultancy.

We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and references.

We haven't been made aware of any allegations of human trafficking/slavery activities against any of our suppliers, but if we were, then we would act immediately against the supplier and report it to the authorities.

For more information about the Company, please visit our website: www.envestors.co.uk

Risk assessment

In the past year, we conducted a risk assessment of our supply chain by taking into account:

- The risk profile of individual countries based on the Global Slavery Index
- The business services rendered by the suppliers
- The presence of vulnerable demographic groups
- A news analysis and the insights of labour and human rights groups

This assessment will determine our response and the risk controls that we implement.

Policies

Investors Limited operates the following policies for identifying and preventing slavery and human trafficking in our operations:

- **Recruitment and Selection Policy** – We conduct checks on all prospective employees to verify that they are eligible to work in the UK
- **Supplier Code of Conduct** – We operate this policy to ensure our suppliers operate in full compliance with the laws, rules and regulations of the countries in which they operate, and to seek similar commitments across their own supply chain.
- **Whistleblowing Policy** - we encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. We provide a confidential helpline to protect the identity of whistle-blowers.
- **Staff Code of Conduct** - our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.
- **Purchasing Code** - we have updated our Purchasing Code and supplier contracts to make explicit reference to slavery and human trafficking.
- **Safeguarding Policy** – This policy highlights the potential risks of modern slavery and human trafficking, including how to identify signs of exploitation and how to report concerns.

Supplier due diligence

Investors Limited conducts due diligence on all new suppliers during on-boarding and on existing suppliers at regular intervals. This includes:

- Assessing risks in the provision of particular services
- Auditing the suppliers, and their health and safety standards, labour relations and employee contracts
- Requiring improvements to substandard employment practices
- Sanctioning suppliers that fail to improve their performance in line with our requirements

We require all suppliers to attest that:

- They don't use any form of forced, compulsory or slave labour
- Their employees work voluntarily and are entitled to leave work
- They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment

- They don't require employees to post a deposit/bond and don't withhold their salaries for any reasons
- They don't require employees to surrender their passports or work permits as a condition of employment

Awareness

Envestors Limited has raised awareness of modern slavery issues by sending an email that is focused specifically on modern slavery to all our staff, which explains:

- Our commitment in the fight against modern slavery
- Red flags for potential cases of slavery or human trafficking
- How employees should report suspicions of modern slavery

Training

In addition to the awareness programme, Envestors Limited has rolled out a fresh e-learning course to all employees and supplier contacts, which covers:

- Various forms of modern slavery in which people can be held and exploited
- The size of the problem and the risk to our organisation
- How employees can identify the signs of slavery and human trafficking, including unrealistically low prices
- How employees should respond if they suspect slavery or human trafficking
- How suppliers can escalate potential slavery or human trafficking issues to the relevant people within their own organisation
- What external help is available for the victims of slavery
- What terms and guidance should be provided to suppliers in relation to slavery policies and controls
- What steps Envestors Limited will take if a supplier fails to implement anti-slavery policies or controls
- An attestation from employees that they will abide by Envestors Limited's anti-slavery policy

Measuring how we're performing

Envestors Limited has defined a set of key performance indicators and controls to combat modern slavery and human trafficking in our organisation and supply chain. These include:

- How many employees have completed mandatory training?
- How many suppliers have filled out our ethics questionnaire?

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- How many suppliers have rolled out an awareness and training programme that is equivalent to ours?
- How many reports have been made by our employees that indicate their awareness of and sensitivity to ethical issues?
- What are the findings of our cross-functional Human Rights team, which reviews how we are addressing modern slavery and human trafficking?

In the next financial year, we intend to take the following steps to tackle slavery and human trafficking by introducing new policies and procedures and/or organising wider training for the internal team working on modern slavery and human trafficking issues.

This statement covers 1 April 2023 to 31 March 2024 and has been approved by the board of Envestors Limited at the board meeting on 01/05/2024.



Scott Haughton
Co-Founder, Director, COO

01/05/2024