



ANTI-MODERN SLAVERY STATEMENT

TMF Group
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ANTI-MODERN SLAVERY STATEMENT

TMF Group is a global organisation with a presence around the world. At **TMF Group**, we understand our obligation to uphold high standards in contributing to a fair and ethical world. At **TMF Group**, we are committed to eradicating modern slavery in all its forms, aligning ourselves with international laws and ethical standards. We believe that every individual deserves respect, dignity, and fair treatment, and we are determined to ensure that modern slavery has no place in our operations or supply chains. One of our core values at **TMF Group** is “We Act with Integrity”. Within this, we instil in our employees a drive to act ethically, fairly, and openly in everything they do, and we are committed to practices to combat modern slavery in any part of our business.

Our approach to combatting modern slavery is centred on the following key principles:

Zero Tolerance: We have a zero-tolerance policy towards modern slavery in any form, including forced labour, child labour, human trafficking, and debt bondage. We expect the same commitment from all our employees, contractors, and suppliers.

Transparent Supply Chains: We strive to maintain transparency in our supply chains to identify and address potential risks of modern slavery. We engage in regular assessments and due diligence to ensure that our suppliers share our commitment to ethical practices.

Supplier Evaluation: As part of our procurement process, we evaluate potential suppliers' ethical practices and compliance with anti-modern slavery legislation. We prioritize working with suppliers who share our values and actively promote fair labour practices. A copy of TMF Group Supplier Code of Conduct can be found [here](#).

Recruitment of Staff: We believe that ethical recruitment practices are fundamental in preventing modern slavery. Our hiring process is designed to ensure that all employees, regardless of their position, are treated with respect and fairness. We conduct thorough checks to verify the eligibility and identity of candidates

Identity Documents: The withholding of worker identity or immigration documents are prohibited within TMF Group. No employee will have any official documents or valuable items confiscated or withheld as a condition of employment. The withholding of property will not be used, directly or indirectly, as a means of coercion or to restrict employees' freedoms or to create workplace slavery.



Fair Compensation: We recognize that fair compensation is essential in safeguarding the rights and well-being of our employees. We are committed to providing competitive wages that meet or exceed legal requirements and industry standards. Fair pay is not just a legal obligation but a moral responsibility that underpins our commitment to human rights.

Employee Awareness and Training: We continuously educate our employees about our core principles, values and standards and the importance of identifying and reporting any concerns. Empowered employees play a critical role in creating a resilient anti-slavery culture.

Strong Policy Framework: Our comprehensive policies and procedures serve as a robust framework to guide our actions and decisions. Among those, our AML/CFT Policy, Sanctions Compliance Policy, Procurement Policy and underlying guidelines are rooted in international best practices and legal requirements. We clearly communicate these guidelines to all employees, suppliers, and business partners, emphasizing the absolute prohibition of modern slavery in any part of our value chain.

Continuous Improvement: We regularly review and enhance our policies and procedures to ensure their effectiveness and relevance. We strive for continuous improvement in our efforts to combat this issue.

Commitment to Change: As signatory of the [UN Global Compact](#) and the [Principles for Responsible Investment](#) we are committed to the collective efforts in eradicating modern slavery globally, supporting the drive for stronger legislation and best practices to combat this human rights violation.

Whistle-blower Protection: Transparency and accountability are crucial elements of our anti-modern slavery efforts. We encourage a culture where employees and stakeholders can confidently report any suspicions or instances of modern slavery among other legislative and ethical, as detailed within TMF Group Whistle-Blower Policy. Our reporting mechanisms are designed to protect whistle-blowers, and all reports are treated with the utmost confidentiality and seriousness.

Through these initiatives, **TMF Group** contributes to the global effort to end modern slavery. We understand the profound impact of our actions on vulnerable communities and the broader society, and we are determined to uphold the dignity and rights of all individuals involved in our operations and supply chains.

Our collective stance against modern slavery is not just a corporate responsibility but a moral imperative. By working together, we can create a world where every person is free from exploitation, and human rights are upheld without compromise.

This statement is subject to an annual review to minimise the risk of modern slavery occurring within TMF supply chains or main operations. We reserve all rights.

Signed by:

Signed by:

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Xander Van Riessen

Group General Counsel and Head of Risk & Compliance

