

MODERN SLAVERY DISCLOSURE

Hilbert Investment Services Ltd. (“HIS”) recognises its responsibilities under the Modern Slavery Act 2015 to take a robust approach to slavery and human trafficking. We are absolutely committed to preventing slavery and human trafficking in our own business and our corporate activities and to ensuring that our supply chains are free from slavery and human trafficking.

HIS is an investment group which specialises in providing broking services and distribution of structured products. Given the nature of our business, we believe our exposure to modern slavery or human trafficking to be limited, however compliance measures are in place to monitor this frequently within our own business and our supply chains. We have put in place a robust process for the consideration, approval and monitoring of our outsourcing arrangements in order to exercise due skill, care and diligence when entering into, managing or terminating any outsourcing arrangement. We also conduct appropriate due diligence on any person we accept money from or invest money with.

HIS encourages the use of its Whistleblowing policy for our employees, customers and partners to report any concerns including those of slavery and/or human trafficking and all concerns are investigated thoroughly. HIS uses only specified and reputable recruitment agencies to source employees and verifies the practices of any new agency before accepting workers from that agency. HIS ensures its employees are trained on an ongoing basis with regards to regulatory and personal responsibilities.

HIS will refrain from entering business and/or will discontinue current business with any organisation that is found to be in breach of the Modern Slavery Act 2015. There have been no reported instances of slavery or human trafficking within our supply chains during the preceding twelve months. This statement has been approved by HIS’ board of directors who will review and update it annually.