



Modern Slavery and Human Trafficking Statement

Effective 31 December 2020

Version 3.0

CITCO

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1. Introduction

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 (MSA) introduced in the UK on 29 October 2015 for the financial year commencing 1 January 2021 and ending 31 December 2021 in respect of the following entities within the Citco Group of Companies:

- Citco (UK) Limited
- Citco Custody (UK) Limited
- Citco Financial Products (London) Limited
- Citco London Limited
- Citco Management (UK) Limited
- Citco REIF Services UK Limited
- Marle (UK) Limited

(referred to in this document as “CITCO” or “we”)

We are committed to fair, ethical and responsible business practices and we recognise the importance of implementing practices to reduce the risk of slavery and human trafficking in our supply chain.

2. Organisation’s structure

We are a global provider of a broad range of financial services including governance services, banking and financial products, custody and depository, fund administration and other ancillary services. The Citco Group of companies has over 7,000 employees worldwide and over 50 offices across the globe.

3. Our supply chain standards

We are committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. We expect our suppliers and their supply chain to comply fully with all applicable laws and regulations in the conduct of their business. Therefore, we have taken the following steps to communicate clearly our expectations to our suppliers:

1. Our Third Party Risk Assessment process

Consistent with our commitment to fair, ethical and responsible business practices, Citco has introduced a **Third Party Risk Assessment program** (hereinafter "TPRA"), a process and framework designed to enable Citco to consistently assess and manage the risks associated with our supply chain in accordance with the MSA. As a part of the TPRA, we make enquiries of our potential suppliers to confirm whether they have a policy in place prohibiting child and/or forced labour and whether the policy extends to their own suppliers and subcontractors.

2. Standard Terms of our Third Party Vendor / Supplier Agreements

Third party vendor or suppliers who are engaged using our standard supplier agreement are asked to confirm that they:

- have not committed or been notified that they have been placed under investigation for any offences relating to human trafficking and/or slavery;
- are not aware of any circumstances within their supply chain that could give rise to an investigation or a prosecution; and
- will comply with the Modern Slavery Act 2015 and other legal standards relating to human trafficking and/or slavery.

Our standard third party vendor and supplier agreement also asks them to confirm that they have implemented their own UK Modern Slavery Act statement, which sets out the steps they have taken to ensure that slavery and/or human trafficking is not taking place in any of their supply chains or in any part of their business. Occasionally, potential suppliers are not able to provide the information requested in full or seek to negotiate changes to our standard supplier agreement. We deal with such instances on a case-by-case basis, taking into consideration the risks associated with the supplier's industry and geographic location.

3. Raising Awareness

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we have distributed announcements and provide training to our staff as required.

4. Policies on Modern Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business consistent with the requirements of the MSA. Our Modern Slavery & Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective system and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains in accordance with the MSA. To this end, our policy prohibits human trafficking and related activities within Citco's business, and mandates the use of our standard third party vendor and supplier agreement.