

Modern Slavery and Human Trafficking Statement

Introduction

This statement is made according to s.54 of the Modern Slavery Act 2015 and relates to actions and activities that Finatal (the Company) has taken and is continuing to take to ensure that human trafficking is not taking place within its business or supply chain.

We conducted an internal risk assessment, where it has been ascertained that as a professional services firm the risk of trafficking or slavery in our direct workforce is very low. However, all individuals employed by Finatal have a duty to be alert to risks, however small. Employees are expected to report their concerns and management to act upon them.

The nature of Finatal's business

Finatal is search partner for private capital investors and their portfolio companies. We recruit professionals on a contingent, retained, contracted out and permanent basis for clients across multiple sectors. Currently, Finatal operates in the United Kingdom, Germany and USA.

Finatal does not supply workers in the care sector, but does supply into white collar roles in the construction and manufacturing sectors. However, Finatal accepts that no parts of its business is immune to the risk of modern slavery. We appreciate that some areas the business works in and their respective supply chains might have a higher risk of modern slavery taking place within them.

Due diligence in Finatal's business and its supply chain

Finatal has extensive due diligence processes in place to combat any illegal practices related to slavery and human trafficking in our business and supply chains. For the placement of temporary contractors, Finatal carries out a comprehensive vetting process and routinely requests the following documents from work seekers:

- CV and full employment history
- Right to work and ID documentation
- Company registration certificate / VAT certificate
- Bank statement in the name of the limited company to be paid
- Proof of address
- Insurance certificates
- References
- Other documents when required by our clients/ local laws

Furthermore, Finatal undertakes extensive due diligence when working with umbrella companies by verifying their company structure, onboarding processes (including reward schemes) and their compliance with local laws including tax laws.



Finatal has a preferred supplier list in place as it prefers to work with only the most compliant and professional umbrella companies in the market. This preferred supplier list is evaluated on a regular basis.

Furthermore, as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour and we expect that our suppliers also hold their own suppliers accountable to comply with the same standards. Our consultants furthermore keep in touch with the contractors regularly throughout their assignment to resolve any issues the contractor may have (for example not getting paid by their company).

For candidates who are considered for permanent employment with our clients, we only introduce candidates to our clients if we have received their CV and a confirmation that the applicant has the right to work in the relevant territory and has confirmed their express consent to being put forward for the role. Upon our client's request, we would carry out reference checks to confirm their work history.

All staff and third parties are required to raise any concerns about any issue or suspicion of modern slavery in any parts of Finatal's business or supply chains at the earliest possible stage. Finatal encourages openness and will support anyone who raises genuine concerns in good faith, even if they turn out to be mistaken. The Company is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of the business or in any supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If any staff believe they have suffered any such treatment, the individual is encouraged to inform either their manager or the People Team immediately and to report the matter to the proper authorities.

Approval

The board of directors has overall responsibility for upholding the contents of this statement and for the prevention of modern slavery and human trafficking across Finatal. They are responsible for ensuring compliance with Finatal's legal and ethical obligations, and that all those in its employment and third parties under its control comply with it. This statement was approved in February 2024.