

TANQUERAY HOLDCO LIMITED GROUP

Annual Modern Slavery and Human Trafficking Statement Financial period ending 31 December 2023

Introduction

Tanqueray Holdco Ltd (“Company”) is a wholly owned subsidiary of and governed by the board of directors of Tanqueray Topco Ltd (“Board”).

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Company’s statement on slavery and human trafficking for the period commencing 12 October 2022 and ending on **31 December 2023**. References to “Group” in the statement are to the Company and all its wholly owned subsidiaries.

Structure and business

The Group is a private equity backed international software vendor with offices in UK, Jersey, Malaysia, Singapore, Hong Kong, Australia and Guernsey. The Group develops, implements, licences and supports its proprietary software for the wealth management industry focussed on trust administration and corporate services. The Group licences its software to customers around the world.

The Group is organised as central functions managed primarily from the UK and Jersey with regional offices that mainly develop software, provide consultancy services and/ or act as sales offices.

The Group is not listed and is not a regulated firm.

Supply chains

The Group’s main supply chains include:

1. Microsoft (Microsoft products are used in conjunction with the Group’s software)
2. Management and business consultancies used to support the Group.
3. Other software vendors and specialist technical consultants.
4. Office and marketing merchandise suppliers.
5. Outsourced sales services

Policies on slavery and human trafficking

The Group has zero tolerance of slavery and human trafficking. The Board fully supports the Modern Slavery Act 2015, and its Anti-Slavery and Human Trafficking policy reflects its commitment to acting ethically and with integrity in all the Group’s business relationships to ensure slavery and human trafficking is not taking place anywhere in its supply chains.

The Group is committed to complying with employment and other legislation applicable to the locations in which it employs people, ensuring the human rights of individuals are protected. The Group has a diverse workforce and follows a policy that no employee or other person receives more or less favourable treatment on the grounds of gender identity, sexual orientation, colour, race or ethnic origin, nationality, religion, disability or age.

Managing risk and due diligence processes in relation to slavery and human trafficking

The Group’s senior management are in close contact with the management teams and key staff from the Group’s international offices and regularly visit these offices. This helps senior management ensure there is no slavery and human trafficking in the Group’s own business.

Group’s greatest risk of exposure to modern slavery and human trafficking is through its supply chain. However, the Group uses suppliers at low risk of modern slavery and human trafficking. In order to ensure the Group’s suppliers operate to the highest standards, the group selects high-quality mainstream suppliers with good reputations within the industry, and will not knowingly engage with a business involved in slavery or human trafficking. Additional due diligence is performed on any supplier assessed to present a higher risk of modern slavery and human trafficking before the supplier is accepted by the Group.

Reporting a concern

All employees across the Group worldwide have a responsibility to be aware of the risk of modern slavery and human trafficking abuses in the Group’s business and supply chain. Employees are encouraged to discuss concerns with their line managers or senior management.

Effectiveness in combatting slavery and human trafficking

The Group's management is not aware of any slavery or human trafficking in its own business or in its supply chains. The Board continues to work with management to ensure the business is effective in combatting slavery. In the last 12 months:

- No slavery or human trafficking issues have been identified;
- No reports were made under the Anti-Slavery and Human Trafficking policy or under the Whistleblower policy with respect to modern slavery and human trafficking; and
- No remedial actions were required in the last 12 months.

Communication

To ensure the identification of modern slavery and human trafficking in our supply chains and our business, employees are reminded annually of the Group's Anti-Slavery and Human Trafficking policy.

This statement was approved by the Board on 21 June 2024.

HEATH DAVIES

Chairman

Signed on behalf of the UK reporting entity Tanqueray Holdco Ltd

ROBERT BROWNING

Director