

Introduction

FinTrU is committed to ensuring a zero-tolerance approach to modern slavery and human trafficking (“**MSHT**”) in our supply chains or in any part of our business.

As per the UK Modern Slavery Act 2015 (“**Act**”), all commercial organisations that supply goods or services in the UK and meet the annual turnover threshold of £36m or more must publish an annual slavery and human trafficking statement.

This Modern Slavery Statement (“**Statement**”) has been published in accordance with Section 54 of the Act. It sets out the steps taken by FinTrU Limited (“**FinTrU**”) during the financial year ending 31st December 2025 to mitigate the risk posed by MSHT in its business and supply chains.

This Statement covers the following FinTrU entities:

- FinTrU Limited
- FinTrU Inc.
- FinTrU Ireland Limited

Our Business

FinTrU is a multi-jurisdictional technology-enabled solutions company. We specialise in providing solutions at scale in the areas of KYC, Risk, Compliance and Legal. Since 2013, we have worked with the biggest Tier 1 Investment Banks and other financial institutions, providing solutions that are highly specialised to address the unique challenges of Banking, Wealth Management and other financial services sectors.

Headquartered in Belfast, we employ over 1,100 people across our global offices in Derry/Londonderry, Letterkenny, New York, London and Porto. FinTrU was named in the Sunday Times Virgin Atlantic Fast Track 100 in consecutive years due to its outstanding growth. In March 2024, FinTrU was named in the Financial Times' report of the 1000 fastest growing companies in Europe. This was the third time in the eight-year history of the annual report that FinTrU placed on the list.

Our People

At FinTrU, our people are at the core of everything we do. Our onboarding processes are robust, and all employees are required to undertake ‘right to work checks’ to prevent illegal working.

We invest heavily in our people as part of their professional careers and continue to support our employees on an ongoing basis. We consider ourselves to have a fundamental social purpose to create high-quality professional employment and we care deeply about our culture and our core values of **Partnership, Passion, People and Professionalism**.

We have direct control and oversight over our hiring practice and working conditions. As a result, we consider the risks of MSHT within our workforce to be extremely low. To ensure this, we undertake the following:

- all employees have a contract of employment that sets out their employment rights and obligations including the notice period needed for them to terminate their contract and leave our employment;
- we verify employee’s identity and ongoing right to work;

- we do not withhold any employee's physical identity documents (e.g. passport) as a condition of employment;
- we do not withhold any employee's property so as to restrict their freedom or create workplace slavery; and
- we comply with all legislation in respect of working time and statutory time off, holiday entitlement, time off for personal emergencies, sickness and maternity/paternity leave and minimum rest breaks; and we have an annual reward review process and discretionary bonus scheme.

Our Clients

FinTrU provides services to the financial services industry across the globe. Our clients, many of whom are regulated, have a strong awareness of MSHT risks, as evidenced in their robust policies and they seek to minimise MSHT risks throughout their supply chains (which includes FinTrU as a supplier).

Our Suppliers

We are committed to ensuring a zero-tolerance approach to MSHT in our supply chains or in any part of our business. Our supply chains are limited to standard daily business supplies and are primarily confined to the United Kingdom. Prospective vendors are assessed for their compliance with MSHT risk prior to onboarding. As a result, we consider that given the nature of our business and the industries in which we operate, the risk of encountering modern slavery practices is extremely low.

Our Policies

We have published the following policies and procedures which are designed to identify any risks associated with modern slavery and provide steps to mitigate such risks in our operations:

- **Modern Slavery Policy:** Our Modern Slavery Policy sets out FinTrU's responsibilities and those of anyone working for or on behalf of FinTrU, in observing and upholding our modern slavery and human trafficking approach. The policy provides guidance on how to identify and report any concerns. All employees are required to attest to their understanding of and adherence to the policy.
- **FinTrU Employee Handbook:** Our Employee Handbook reflects the changing world within which we operate, the nature of our work, how we do business and ultimately how we enshrine ethical decision making into our operations. It is one of the many tools we can use to guide us on our way and ingrain our values into our day-to-day operations.
- **Whistleblowing Policy:** We operate a Whistleblowing Policy, principally aimed at our employees, which encourages staff to report wrongdoing - this extends to human rights violations like MSHT. All reports can be made anonymously and are fully investigated, with appropriate remedial actions taken.
- **Recruitment Policy:** We have a robust recruitment policy that includes conducting checks confirming eligibility to work in the UK and other countries in which we operate, to safeguard against human trafficking or individuals being forced to work against their will.

All policies listed above, including this Statement, are reviewed and re-issued to all employees on an annual basis, subject to the approval of the FinTrU Policy Committee. Employees can access any of our policies at any time on our internal policy management system.

Due Diligence

We have put in place our own supplier evaluation processes with the aim of assessing all our suppliers (existing and new) against a set of requirements including, but not limited to, data privacy, information security and modern slavery.

Where it is appropriate we will engage directly with suppliers to gain a proper understanding of the measures they have in place to ensure that modern slavery is not occurring within their own businesses and supply chains and agree how such measures should be enhanced.

Training

To ensure a high level of understanding of the risks of MSHT in our supply chains and our business, all employees complete mandatory internal training on modern slavery and human trafficking.

Key Performance Indicators (KPIs)

We monitor the effectiveness of our implemented controls dealing with MSHT. Key Performance Indicators (KPIs) used to monitor performance include:

- completion rates of assigned training on modern slavery;
- continuing to pay our employees above minimum wage/living wage plus benefits.

Looking Forward

This Statement and our approach to MSHT risk will continue to evolve year on year. As a company, we will continue to develop measures to minimise risk in our supply chain and will seek to monitor these risks and take corrective action where required.

Board Approval

This statement is made pursuant to section 54(1) of the Act and will be updated annually.

The statement is for the financial year ending 31st December 2025 and was approved by the FinTrU Board on 27th May 2026.