EUROPEAN POLICY EXCHANGE

SLAVERY AND HUMAN TRAFFICKING STATEMENT

INTRODUCTION FROM THE BOARD OF DIRECTORS

Slavery and human trafficking remain a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the any part of our supply chain. Staff are expected to report concerns and management are expected to act upon them. EPEX is strongly opposed to slavery and is committed to acting ethically and with integrity in all its business dealings and relationships.

ORGANISATIONAL STRUCTURE

European Policy Exchange Ltd. (the "**Company**" or "**EPEX**") is part of the Policen Direkt Group (Policen Direkt GmbH), based in Frankfurt, Germany.

OUR BUSINESS

EPEX is trading in financial products, based in London, UK. The Company is engaging in the acquisition and administration of German traded endowment policies.

The Company has an annual turnover in excess of £36m.

OUR SUPPLY CHAINS

Our supply chains are relatively straightforward and short, therefore the risk of modern slavery or human trafficking occurring in our business or supply chains is low. The vast majority of our suppliers are financial and insurance services organisations including banks, lawyers, accountants, consultants, insurers and recruitment agencies. Other suppliers include providers of IT software, office and stationery equipment, serviced offices and similar services.

Notwithstanding the relatively low risk, we understand the importance of combatting slavery and human trafficking and are committed to ensuring that modern slavery is not taking place in our business or our supply chains. We have taken a risk-based approach to monitor our business and suppliers, which we believe allows us to allocate resources appropriately and effectively, selecting only highly reputational business partners where possible.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business. Our Anti-slavery Policy reflects our commitment 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 business or supply chain. EPEX believes that all its employees have a right to be treated fairly and with respect, which is the reason why the Company applies the employment principles listed in the Appendix.

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TRAINING

We believe that the training of people is an effective way to raise awareness of issues around modern slavery. Our senior management team and professionals involved in the procurement of products or services from third parties, including our IT, human resources and administrative functions, are well aware of our commitment to fair employment practices, and are periodically reminded of the key issues of modern slavery. (see Appendix of employment principles)

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We use the following tools to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Use of payroll systems
- Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

FURTHER STEPS

We recognise that policies and procedures seeking to address modern slavery risks require ongoing review to identify potential enhancements. We will continue to review our processes and controls to determine where enhancements may be warranted.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the for the financial year ending 31. December 2023.



Till Heimlich
Company Secretary

Approved by the Board on 15.07.2024

This statement will be reviewed and updated every year.

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Appendix employment principles

- Freedom of workers to terminate employment
- Freedom of movement
- Freedom of association
- Prohibits any threat of violence, harassment and intimidation
- Prohibits the use of worker-paid recruitment fees
- Prohibits compulsory overtime
- Prohibits child labour
- Prohibits discrimination
- Prohibits confiscation of workers' original identification documents

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