

Modern Slavery Act 2015

The United Kingdom Modern Slavery Act 2015 (“**MSA**”) requires certain businesses to provide disclosure concerning their efforts to ensure there is no modern slavery or human trafficking in their organisation or supply chain.

The following is the statutory statement by Fern Trading Limited made pursuant to section 54 of the MSA and constitutes our slavery and human trafficking statement for the financial year ending 30 June 2023.

This statement is published on behalf of Fern Trading Limited, a private limited company, incorporated in England and Wales with registered number:12601636. In this statement, references to “Fern”, “we”, “us”, “our” or the “firm” are references to Fern Trading Limited and each of its subsidiaries.

Goods, Services and Supply

The services Fern utilises itself are both office and field based and its supply chain in relation to services consists on the whole of regulated professional services (Asset Managers, Chartered Surveyors, Law Firms, Accountancy Firms and Banks) and consultants. In addition to these regulated professional service providers, Fern engages Octopus Investments Limited (“**Octopus**”), a private limited company regulated by the Financial Conduct Authority, to provide management services under a service agreement approved by the Board. Fern considers the supply chain for these services to be very low risk in relation to slavery and human trafficking so takes no specific action in respect to these relationships.

The majority of other goods and services supplied to, or on behalf of, Fern are from the construction industry, energy generation and supply industry, and other services associated with property (domestic, commercial, rural and forestry) including secured property lending. Given what Fern understands to be a low risk profile of any party supplying us with goods and services being involved in slavery and/or human trafficking, we believe our current procedures and ability to rely on regulatory oversight are sufficient in this regard.

Training of staff

Fern provides employees and management with training on a range of compliance matters which will include their obligations under the Modern Slavery Act 2015, particularly in relation to mitigating risks within supply chains. Where management services are undertaken by Octopus, Fern ensures that Octopus provides its employees and management with training on such compliance matters which includes the Modern Slavery Act 2015. Fern also ensures that such training is provided to employees of subsidiary companies where relevant.

Modern Slavery Act 2015 Policy

The policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

The policy confirms our commitment to ensuring there is supply chain transparency with regard to modern slavery and human trafficking and that Fern expects that all suppliers of goods and services to us will hold their own suppliers to the same high standards.

This statement has been approved by the Board of directors of Fern.

A handwritten signature in black ink, appearing to read 'K Willey', with a stylized, cursive script.

K Willey

Chairman

05 December 2023