



**Modern Anti-Slavery and Human Trafficking  
Statement 2019**

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 (UK) for the financial year ended 31 December 2019 in respect of Apex Group Limited and its subsidiaries (“Apex”).

Apex is committed to combating the risk of modern slavery or human trafficking within its business and its supply chains. The Apex Corporate Social Responsibility Charter establishes our belief in respecting human rights, and this is reinforced by the Apex Group Business Values which centres on caring and the promotion of respect in our activities.

## 1 Our business

We are a global financial services organisation offering a full suite of products surrounding our core fund accounting services, from regulatory solutions to middle office services, covering the full value chain for our clients.

Apex provides depositary, investment, fund accounting, fund administration, asset management, investment banking, directorship services and alternative investment services.

## 2 Our supply chain and due diligence

As a financial services company we have a limited supply chain, and operate in an industry with a low risk of modern slavery. Nevertheless, Apex recognises that the risk of slavery or human trafficking may exist in any supply chain. Therefore Apex has committed to take adequate actions and put in place mitigates to reduce such risk.

As part of new supplier due diligence, Apex requests a copy of the supplier’s anti-slavery and human trafficking statement and/or policy, which is expected to extend to the supplier’s sub-contractors. Potential Apex suppliers are also asked to confirm that they:

- Have not committed or been notified that they have been placed under investigation for any offences relating to human trafficking and/or slavery;
- Are not aware of any circumstances within their supply chain that could give rise to an investigation or a prosecution; and
- Will comply with the Modern Slavery Act 2015 and other legal standards relating to human trafficking and/or slavery.

### **3 Our effectiveness in combatting slavery and human trafficking**

Apex supports the fundamental principles of human rights, such as those adopted in the United Nations' Universal Declaration of Human Rights. We believe that upholding these principles is an important component of our culture and values. Our commitment to fair, ethical and responsible business practices is central to our way ahead.

We have a number of internal policies that reflect our zero-tolerance approach to modern slavery, our commitment to ethical business behaviour and slavery free supply chains. Our whistleblowing policy allows employees to highlight issues they come across, which could include matters such as supplier ethics and behaviours.

### **4 Looking to the future**

Our next steps will include the roll out of global training to all employees (as part of our Anti-Bribery and Corruption training) to ensure that they are aware of the risk factors and will be able to report any issues that conflict with Apex's zero tolerance approach to modern slavery.

Apex is also currently reviewing its vendors' standard agreements, and including the above mentioned due diligence requirements where this is missing. The vendor on boarding team will review potential suppliers and ascertain whether they are able to commit to Apex's approach to anti-modern slavery as mentioned in this statement

This statement has been approved by the Board of Directors of Apex Group Ltd. and will be updated annually in line with the reporting requirements of the Modern Slavery Act.