HYBRIDAN

YOUR PARTNER FOR GROWTH

Hybridan Anti-Slavery & Human Trafficking Statement

1. Introduction

Hybridan LLP ("Hybridan") is publishing this statement in compliance with the Modern Slavery Act 2015.

This statement details the steps taken by Hybridan to aid in the prevention of modern slavery and human trafficking during the year ended 31 March 2024.

Hybridan is a specialised Investment Bank offering professional services ranging from corporate broking, corporate finance advisory, and specialised research to a range of clients.

The quality of our partnerships is of paramount importance and we are dedicated to upholding the highest of integrity, professionalism, and ethics. Hybridan is committed to ensuring its business and its suppliers are free from modern slavery and human trafficking, is not only in the best interests of our clients but of all Hybridan's stakeholders.

As required by the Modern Slavery Act 2015 (the "Act"), this statement describes the steps which Hybridan has taken during the financial year ended 30 March 2021 and beyond to ensure that slavery and human trafficking is not taking place in any of our supply chains, or in any part of our own business.

2. Hybridan Supply Chains

Hybridan's supply chains include, but are not limited to:

- Suppliers of IT hardware and software;
- Payroll;
- Building space, facilities, cleaning, and security providers;
- Legal, accountancy and other professional intermediaries;
- Suppliers of financial market data and news services;
- Suppliers of transaction related services and infrastructure; and
- Other office supplies.

We are committed to selecting the very best suppliers to continue the quality service that clients expect. We have long-term relationships with suppliers, actively reassess their services and to help us work with suppliers to strengthen their approach. Hybridan encourages its suppliers to adopt the same ethical business standards and human rights compliance that it supports.

Hybridan maintains an updated register of all our suppliers; arrangements with which are always governed by relevant agreements. Due diligence is always undertaken when engaging and selecting third party suppliers. We ask that all third parties read this Policy, and also the following policies listed below where relevant. This is done in order to ensure fair employment practices and that modern slavery is not taking place in Hybridan's supply chain. Failure to comply, may result in Hybridan terminating arrangements with the supplier.

Hybridan's assessment of suppliers includes a question on suppliers' modern slavery and human trafficking policies and risk management processes, as well as questions aimed at assuring their compliance with Hybridan's ethical business standards.

Hybridan considers country risks when it is proposing to onboard a new supplier and is conscious that imported products or services sourced from outside the UK or European Union (or any country that is considered as high risk) are potentially more at risk of slavery or human trafficking.

Hybridan will always for this check the following surveys on specific country risk: https://www.globalslaveryindex.org/2018/data/maps/#prevalence

Updated and effective as of 1/4/2024

https://www.heritage.org/index/ranking

There are also other ways to look at Country Risk based on the measure of the money laundering risk and sanctions issues of certain countries that is checked in a due diligence process:

https://www.knowyourcountry.com/country-ratings-table

If products or services have to be sourced from such locations, Hybridan will look to perform enhanced due diligence of those suppliers and look to gain extra comfort where they can demonstrate a commitment to human rights and fair working conditions, for example by way of certifications such as Social Accountability certification SA8000. Hybridan will not work with any organisation that has been found to have been knowingly involved in human trafficking or modern slavery.

3. Hybridan Staff Training

Hybridan has a transparent recruitment processes which is consistently reviewed. Hybridan has a vigorous process for assessing employees and confirming their identities, including a Disclosure and Barring Service (DBS) check, credit check, solvency checks, various AML, and online checks as well as numerous references.

It is important to Hybridan that our staff represent our values. Hybridan has a number of compliance polices to encourage employees to conduct ethical and compliant behaviours, in addition to creating a safe environment for anyone who wishes to raise concerns about wrongdoing within the business.

Hybridan's policies and values are expressed in particular across the following policies, as well as in the Hybridan Employee Handbook:

- Acceptable Use of Technology Policy
- Confidentiality Policy
- Conflicts of Interest Policy
- Hybridan procedures in external communication production
- Data Protection (GDPR) Policy and Procedure
- Health and Safety Policy
- Managing Stress in the Workplace
- Privacy Policy
- Public Interest Disclosure (whistleblowing) procedure
- Respect and Equality in the Workplace Policy and Procedures
- Working Time Regulations Policy

Hybridan includes a copy of this statement, along with all other policies, in induction packs for new joiners. New joiners are required to sign a declaration confirming that they have read and understood it, and that they agree to adhere to our policy as set out in this statement.

If Hybridan discovers that any of its staff members have been complicit in slavery or human trafficking, appropriate disciplinary action will be taken.

For general reading and information, staff at Hybridan know to access the following resources, inter alia:

https://www.globalslaveryindex.org/

4. Risks in the Supply Chain

We try to identify risks to workers in our supply chain by consistently reviewing the due diligence we carry out on our key suppliers before we engage them and through the ongoing supplier management processes we have in place.

Updated and effective as of 1/4/2024

When selecting our suppliers, we consider numerous factors. We are committed to buying quality products and services from ethical suppliers and part of this process involves assessing a potential suppliers' own approach to their workforces and supply chain.

All those suppliers identified as higher risk will be individually approached for discussion and, in some cases where deemed appropriate, additional research will be carried out on the supplier. The purpose of this is to work with our suppliers and influence their approach positively.

5. Performance Indicators of the Supply Chain

The CEO or other directors or partners responsible for the firm's relationship with key suppliers may visit them at their own premises from time to time, and at times on short notice. This allows us an opportunity to observe first-hand their working conditions and to talk to a sample of their workers direct.

Hybridan's senior management take the responsibility for implementing the systems and controls outlined in this statement and provide adequate resources and investment to ensure that slavery and human trafficking is not taking place within the organisation or within its supply chains.

6. Hybridan's Ongoing Commitment

Hybridan will make every effort to build upon its existing efforts to combat modern slavery and trafficking across its operations and supply chain.

Hybridan has added this modern slavery statement to the UK Government Registry, which was launched by the Home Office to make it easier for people to find modern slavery statements:

https://www.gov.uk/guidance/publish-an-annual-modern-slavery-statement#add-your-statement-to-the-government-registry