

# Regnology on modern slavery

Statement 2024

Version No. 1.0

# 1 About us and our mission

Regnology Group (“Regnology”, “we”, “our”, “us”) is deeply committed to conducting business ethically and responsibly. Upholding the highest standards of ethical conduct and human rights across our operations and supply chain is a priority for us. We have a zero-tolerance approach to, and strongly condemn, modern slavery, human trafficking, child labour, forced or bonded labour, and servitude in any form and in any context, in any geographies in which we operate, and within our global supply chain.

Our dedication extends to adhering to the UN Guiding Principles on Business and Human Rights, the UN Sustainable Development Goals, the principles of the UN Global Compact, the International Bill of Human Rights, and the International Labour Organisation’s (ILO) Declaration on Fundamental Principles and Rights at Work.

Providing software products and services in the areas of regulatory reporting, regulatory management, and supervisory technology, Regnology primarily collaborates with suppliers of IT services, business support services, marketing materials, and office maintenance supplies. These are not typically high-risk for human rights violation. Nevertheless, we continuously monitor risks related to modern slavery and human rights violations and actively work to improve our policies, processes and governance structures to reflect our ongoing commitment to transparency and accountability.

## 2 Our achievements

We are proud of the progress we have made in strengthening our approach to preventing modern slavery in our operations and supply chain. The following achievements reflect our ongoing commitment to meaningful action, transparency and continuous improvement.

### 1. Company-wide policies and procedures

- We implemented or maintained and annually reviewed all key policies relevant to human rights and modern slavery, including our Code of Conduct, Supplier Code of Conduct, Health and Safety Policy, Diversity & Inclusion Policy, Procurement Policy, Anti-Bribery and Anti-Corruption Policy, etc.
- We ensured alignment of our policies with international standards, including the UN Guiding Principles on Business and Human Rights and the ILO Core Conventions as part of our annual review.
- We enhanced our supplier selection process to strengthen our commitment to maintaining an ethical supply chain.
- We maintained our commitment to conducting business ethically by requiring all our employees to complete our annual training on Regnology’s Code of Conduct and acknowledge their commitment to adhere by its rules.

- We strengthened internal governance by clearly defining a policy governance process and specific roles and responsibilities for managing modern slavery risks.
- We formalised escalation and remediation protocols to ensure timely and appropriate responses to identified risks or potential incidents, including enhancements to our Whistleblowing Policy.

## 2. Third party Due Diligence

- We enhanced our Due Diligence Policy to ensure that our supply chain and every aspect of our business organisation is free from slavery and human trafficking.
- We improved our Know-Your-Customer/Supplier process to identify, address, mitigate and monitor potential risks associated with our supply chain.
- We revised and strengthened the risk-based due diligence monitoring process for new and existing customers, suppliers, and partners with enhanced scrutiny for high-risk geographies and sectors.
- We revisited our contractual templates to strengthen our commitment to compliance and ensure our partners, whether customers or suppliers, uphold similar commitments.
- We maintained a supplier onboarding process which requires suppliers to acknowledge and comply with Regnology's Supplier Code of Conduct or equivalent policies.
- We embedded sustainability and human rights related principles further into our supplier selection process.

## 3. Training and awareness

- We provided ongoing mandatory training sessions for all employees regarding our Code of Conduct as well as any related internal policies.
- We enhanced our online training curriculum for employees to focus on additional policies connected to broad human rights topics, including but not limited to Health and Safety Policy, Diversity & Inclusion Policy, Procurement Policy, Anti-Bribery and Anti-Corruption Policy.
- We provided tailored guidance and resources to high-risk teams, including procurement and supplier-facing teams.
- We continued to enhance our fully confidential whistleblowing system, the "Regnology TrustLine", for reporting any potential concerns.
- We monitored completion rates and training effectiveness to support continuous improvement.

## 4. Enforcement

- Any violation of these standards and requirements by a supplier may result in contractual termination.

- Any violation of these standards and requirements by an employee (this refers to all individuals, including selected consultants and contractors, as applicable, who are under terms of employment, work contracts, or apprenticeships with Regnology) may result in disciplinary action, up to and including termination of employment.

### 3 Our ongoing commitments

Our commitment is to maintain and enforce these principles and the overall compliance culture of integrity and responsibility. Our aim is to further strengthen our policies and governance processes as well as focus on the implementation of, or alignment to, applicable laws, regulations and best practices.

We continue to review our human rights efforts and best practices in the marketplace, to understand how we can further strengthen our commitments. Additionally, we continue to focus on both firm-wide and local Environmental, Social, and Governance (ESG) initiatives and we strive to increase the transparency in our global supply chain.

*Regnology's Modern Slavery Statement for the financial year ending 31 December 2024 is approved and owned by Regnology's CEO and leadership team and is made pursuant to section 54(1) of the UK Modern Slavery Act 2015.*