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Modern Slavery Statement

In accordance with Section 54 (1), Part 6 of the Modern Slavery Act 2015 (the **Act**), this statement sets out the steps that WealthKernel ("**WK**", "**we**", "**our**") has taken to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business.

WK is committed to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business.

This statement is only in relation to WK and its Appointed Representatives (**AR's**), not its business clients.

Background

Modern slavery is an international crime, affecting millions of people around the world – a growing global issue that transcends age, gender and ethnicities. Sadly, vulnerable people from overseas as well as across the UK, are forced to work illegally against their will across many different sectors from agriculture, construction, hospitality, retail, manufacturing, and more.

In this regard, the Act requires commercial organisations supplying goods or services with a turnover of more than £36 million to prepare and publish an annual 'Slavery and human trafficking statement'. The statement must set out the steps an organisation has taken, if any, during its financial year to ensure that slavery or human trafficking is not taking place in its business or supply chain.

Our Business

WK is a digital investment infrastructure platform that enables fintechs, traditional wealth management firms, banks and asset managers with all the necessary services to build digital investment propositions.

WK's purpose is to make it easier for new and existing financial institutions to build digital investment propositions and help retail customers have access to more options for saving and investing, at a lower price point. Currently, WK operates only in the United Kingdom and has its Head office in London.

WK is authorised and regulated by the Financial Conduct Authority ("FCA") as an Investment Firm under the UK Financial Services and Markets Act 2000 ("FSMA") and underlying Regulations.

The firm is managed by the Board of Directors including the Chairman.

Our Commitment

WK is committed to the principles of the Act and the abolition of modern slavery and human trafficking. Our actions around prevention of slavery and human trafficking aim to:

- Ensuring slavery or human trafficking is not taking place in the company's own business and supply chain; and
- Exercising our influence over partners with whom WK has business relationships, to encourage adoption of measures to prevent slavery and human trafficking.

As an employer, we're committed to creating and ensuring a non-discriminatory and respectful working environment for our staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves.

Our recruitment and people management processes are designed to ensure that all employees are legally entitled to work anywhere in the world and to safeguard employees from any abuse or coercion.

We do not associate with any organisations, in the UK or abroad, which knowingly supports or are found to be involved in slavery, servitude and forced or compulsory labour.

Our Supply Chain

Due to the nature of our business model, in our supply chain the risk of slavery and human trafficking is very limited because our service providers and counterparties are known, reputable, professional and/or regulated organisations.

Our external suppliers are mostly UK based companies in low-risk sectors such as IT, banking or other tech based financial services.

WK expects suppliers to adopt and enforce policies to comply with legislation and does not knowingly support or conduct business with a company involved in modern slavery or human trafficking.

Our Policies

We are committed to preventing any form of slavery and human trafficking in our business and supply chains. In this regard, WK has established a 'Modern Slavery policy' which sets out the key issues and how WK would respond including an internal escalation procedure.

In addition, WK has a Whistleblowing Policy in place, in order for employees to confidentially report any concerns about any form of actual or suspected wrongdoing including those related to modern slavery and human trafficking, without fear of recrimination or further consequences. WK also has a Code of Conduct which encourages our employees to be accountable and do the right thing by clearly stating the actions and behaviour expected of them when representing WK.

The specific anti-slavery and human trafficking measures adopted by WK form part of its overarching Compliance, Risk and Governance frameworks, which are overseen by the Conduct of Business Committee, Risk & Compliance Committee and ultimately, by the Board of Directors.

Due Diligence and Responsible Procurement

The implementation of our policies and procedures includes due diligence on suppliers that we engage with. When we onboard a new client firm to WK, a thorough due diligence process takes place to ensure that the client firm has a good reputation with appropriate practices in several areas including people and culture. Once on boarded as a client firm, compliance with WK policies is a condition for the ongoing business relation.

To the date of this statement, WK has had no identified instances of modern slavery.

Training on modern slavery and trafficking

WK provides periodic mandatory training to our people on the subject of modern slavery and our policies to address the risks to help increase education and awareness.

Further Information

If you would like to find out more about any aspect of this policy then please email compliance@wealthkernel.com.

This statement is in respect of WK's financial year ended 31 December 2022 and has been approved by the WK Board of Directors on 4 August 2023.

WK takes responsibility for this Policy and its related objectives and will review and update it on an annual basis.