



## Modern Slavery Act Statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 30 September 2023, and covers the following legal entities:

- Numis Corporation Limited
- Numis Securities Limited (together with Numis Corporation Limited, “Numis”)

The approval of this statement by these entities’ governing bodies has been incorporated into the review of this statement. Each entity has approved the publication of this joint statement on its behalf.

### Introduction from Alex Ham & Ross Mitchinson (Co-Chief Executive Officers)

This statement sets out our ongoing commitment to ensuring that Modern Slavery and human trafficking is eradicated and Numis remains transparent and diligent relating to the people and firms we do business with.

It is important to Numis as an ambitious, dynamic and innovative investment bank that we are acting in a responsible and ethical manner, part of which encompasses our commitment to ensuring Numis and its supply chains are free from Modern Slavery and human trafficking.

Numis is an international investment bank that partners with the most ambitious companies and investors, offering strategic advice, unique insights and connectivity to the capital markets. Already a leader in the UK market, Numis is the adviser of choice for listed companies, including one-fifth of the FTSE 350 index, with an average market capitalisation of £1bn, and has acted on the most UK IPOs over the past decade. Since 2016, Numis has diversified its strategy to grow its UK M&A franchise, expand internationally and develop its private markets business, which combined now account for almost half of investment banking revenues.

During the financial year as part of the activities outlined above Numis engaged a number of suppliers and employed over 350 staff, operating in London, Dublin and New York. Our head office was at 45 Gresham Street, London, EC2V 7BF. Our Dublin office was at Riverview House, 21-23 City Quay, Dublin 2, and our New York office was at 575 Fifth Avenue, 25<sup>th</sup> Floor, New York, NY 10017. It is these employees, suppliers and the associated ‘supply chain’ that we focused on in our efforts to remain free from Modern Slavery and human trafficking.

After the financial year end on 13th October 2023 Numis Corporation PLC was acquired by Deutsche Bank AG, and de-listed from AIM and became a private company. Numis Corporation PLC changed its name to Numis Corporation Limited on 24 October 2023.

### Our supply chains

As a financial service provider, the risk of modern slavery and human trafficking within Numis’ business operations is low. Nevertheless, we recognize that some parts of our supply chain are more likely to be exposed to such risks. Numis has identified certain areas in which it could be exposed to the risk of modern slavery and human trafficking in its supply chain: (i) cleaning, security, and maintenance services provided at our premises; (ii) transportation and delivery services; (iii) the



supply of catering consumables; and (iv) the manufacture of corporate clothing and corporate-branded promotional materials.

Numis has a vendor selection processes which includes review of areas that may pose a heightened risk of modern slavery and human trafficking. Numis operates globally, offering a wide range of products and services to clients across many industries. Although these operations could potentially be connected to adverse human rights impacts, the majority of these impacts would be indirect and beyond the bank's direct control. Nonetheless, Numis recognises that it needs to have appropriate processes in place to minimize the risk that its operations could be used in this manner

Numis is committed to selecting the very best suppliers to continue the quality service that clients expect.

### [Our policies on slavery and human trafficking](#)

We have a zero tolerance approach to Modern Slavery and human trafficking, and as such we are committed to ensuring, through our due diligence processes that there is no Modern Slavery or human trafficking in our supply chains or in any part of our business. This statement and our internal Modern Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure Modern Slavery and/or human trafficking are not taking place anywhere in our supply chains. We also have in place robust compliance policies (including those covering ethical behaviour, conduct and whistleblowing) designed to promote ethical and compliance behaviours as well as encourage and to protect anyone who wishes to raise concerns about wrongdoing within our business.

### [Due diligence processes for slavery and human trafficking](#)

During the financial year our recruitment processes were transparent and reviewed periodically. We communicated directly with candidates to discuss job opportunities and to confirm the details of any offer made. We had robust procedures in place for the vetting of new employees and ensured that we were able to confirm their identities and that they were paid directly into an appropriate, personal bank account.

During the financial year if we had discovered that any of our employees have been complicit in human trafficking or Modern Slavery (for example, through whistleblowing), we would have taken the appropriate disciplinary action against them.

We have in place a number of processes to ensure, as far as is reasonably practicable, that our supply chains adhered to our expectations in respect of their workforce. For all newly onboarded suppliers, Numis assessed them for risk exposure on the following factors: Political Exposed Person(s), Sanctions and Embargoes, and Adverse News. These checks were carried out through an industry recognised platform. After onboarding, suppliers continue to be screened against these risk factors on an ongoing basis - with any relevant identified risks being escalated to Numis' Anti-Financial Crime function to assess and opine on.

During the financial year we audited and screened new suppliers where appropriate, and were committed to work only with organisations who shared our values in the eradication of slavery and human trafficking. We applied a risk-based methodology in monitoring existing supplier relationships and their approach to mitigating the risks associated with Modern Slavery and human trafficking. This methodology included (where appropriate) obtaining annual statements of attestation of their commitments and actions taken to eliminate Modern Slavery.



We performed in-depth analysis into country risks and we were conscious that imported products or services sourced from outside the UK or EU (or any country we consider as high risk) were potentially more at risk of slavery or human trafficking issues. If products had to be sourced from such locations, we performed enhanced due diligence of these suppliers where appropriate and looked to gain extra comfort where suppliers could demonstrate a commitment to human rights and fair working conditions, for example by way of certifications such as Social Accountability certification SA8000.

We did not knowingly work with any organisation that has been found to have been knowingly involved in either human trafficking or Modern Slavery.

### Training

To ensure a high level of understanding of the risks of Modern Slavery and human trafficking in our supply chains and our business, we ensured that all relevant staff within the necessary departments were briefed, and where applicable, trained accordingly.

### Our effectiveness in combating slavery and human trafficking

The Company directors and senior management took responsibility for implementing the systems and controls outlined in this statement and provided adequate resources and investment to ensure that slavery and human trafficking was not knowingly taking place within the organisation or within its supply chains.

We will continue to monitor and review our policy relating to slavery and human trafficking. If we become aware of any breaches of the policy, we will investigate and take such steps as are necessary to ensure that the risk of further breaches occurring is minimised.

Numis continues to employ the steps outlined in its last review in 2018/2019 to ensure that there is no slavery or human trafficking in its supply chains. These steps include:

- reviewing contracts with suppliers and, where relevant and necessary, including clauses in such contracts relating to Modern Slavery;
- providing firm wide training to all employees so they better understand the risks of Modern Slavery and human trafficking, and remain vigilant against it; and
- applying risk based methodologies across the business in identify and mitigating the risks associated with Modern Slavery and human trafficking.

Alex Ham and Ross Mitchinson, Co-Chief Executive Officers, Numis Corporation Limited

Date: 6 February 2024