

This statement is approved by the board of Medlar TopCo Limited and each of its applicable subsidiary and affiliate companies and is made pursuant to section 54(1) of the United Kingdom's Modern Slavery Act 2015. The statement constitutes the Aztec Group's slavery and human trafficking statement for the financial year ending 31 March 2025. It was approved by the Board on 18 July 2025.

For the purposes of this statement "Aztec", "the Aztec Group", "we", "us" and "our" relates to all members of the Aztec Group of companies.

Modern Anti-Slavery and Human Trafficking Statement

The Aztec Group is opposed to all forms of modern slavery.

Aztec remains committed to respecting human rights, promoting ethical trading and responsible sourcing, and actively working to combat modern slavery and human trafficking within our organisation and across our supply chain. We continuously emphasise the importance of conducting our business in a manner that upholds, ethical standards not only ensuring that our own practices are transparent and fair, but also that our supply chain partners share the same commitment to prevent any form of modern slavery and human trafficking.

We take regulatory compliance and risk management very seriously, and every employee within our organisation recognises their responsibility in maintaining the high standards that Aztec upholds, as outlined in our policies and procedures.

Our Business and Supply Chain

We are a global provider of financial services in the professional services sector where the risk of modern slavery and human trafficking is relatively low. We are the administrative parent company of the Aztec Group. The Aztec Group has over 2000 employees worldwide and operates from nine offices from six different jurisdictions. Those jurisdictions do not have a significant history of slavery or human trafficking, and we do not outsource our services to third parties in other jurisdictions where the risks of these issues occurring may be greater.

The Aztec Group structures its operations across jurisdictions into specialised teams aligned with five core client-focused business units. This jurisdictional model ensures that each team brings local expertise and regulatory insight to the delivery of services, while maintaining a consistent standard of excellence across all locations. These teams are deeply embedded in their respective markets, enabling them to respond effectively to client needs and regulatory developments in each jurisdiction. Each of our offices have their own supply chains, and the procurement of certain services and goods are centralised.

More information on the Aztec Group can be found on our website: www.aztecgroupp.co.uk

Aztec's Policies on Slavery and Human Trafficking

Aztec Group acknowledges its responsibility to human rights in all aspects of its business and have embedded human rights in our group policies and procedures and in our day-to-day working culture. Our policies reinforce our commitment to eliminate modern slavery and human trafficking from our supply chains and from all aspects of our operations. We consistently review and updated our policies to ensure their effectiveness and that they remain fit for purpose.

Our anti-slavery policy demonstrates our dedication to conducting business ethically and with integrity in all our business relationships. It also emphasises the implementation and enforcement of effective systems and controls to prevent slavery and human trafficking within our supply chains. This commitment is further reinforced through our internal policies, particularly our Code of Conduct for Employees, which aligns with and supports the principles outlined in our anti-slavery stance.

Suppliers

We have a zero-tolerance approach to slavery and human trafficking. To ensure all those in our supply chain comply with our values, we review all our suppliers and contractors together with their wider footprint to ensure there is no likelihood of modern slavery and human trafficking occurring. Due to the nature of our business, we do not have an intricate supply chain, and we have not identified any cause for concern during our review of our suppliers and contractors, and their operations. All the teams involved in procurement at Aztec have embedded controls around these points in their operational processes.

Due Diligence

As part of our initiative to identify and mitigate risk we conduct extensive due diligence checks on our clients, their beneficial owners and controllers, and any third parties on whose behalf the client is acting. This is in accordance with each of our jurisdictions' legal and regulatory requirements, which include if any criminal (including modern slavery and human trafficking) issues have been identified.

Training

To promote a high level of understanding of the risks associated with modern slavery and human trafficking within our supply chains and operations, we provide training to our employees and encourage our business partners to provide training to their employees, suppliers, and service providers. It is compulsory for all new joiners regardless of their role to undertake training on the Aztec Group's culture, dealing with one another in the workplace and our policies and procedures.

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in their respective jurisdictions and to safeguard employees from any abuse or coercion. All Aztec employees are provided with a clear contract of employment and are free to choose to work for us. We encourage freedom of association and collective bargaining, and ensure our employees are able to raise concerns, particularly ethical concerns through our 'Speak Up' (*whistling blowing*) policy, whereby if our staff ever observe conduct that they suspect violates the law or applicable regulations, our values and/or Group policies, they are encouraged to report these.

Conclusion

The Board is satisfied that the Group's policies and working practices are appropriate to prevent the Group from knowingly permitting slavery and human trafficking to occur in our business or in our supply chain.



Kathryn Purves
Chief Executive Officer
Medlar TopCo Limited
18 July 2025