



JTC PLC

MODERN ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

FOR YEAR ENDED 31 DECEMBER 2025



Approved by the JTC PLC board of directors on 4 December 2024

MODERN ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT 2025

JTC PLC (“the Group”) is a leading independent and international provider of fund, corporate and private client services. Clients include alternative asset managers, financial institutions, corporates and private clients. The Group has a multi-jurisdictional footprint, with offices across the globe and clients served in over 100 countries, operating across the UK and Channel Islands, the US, the Caribbean, the rest of Europe and the rest of the world.

INTRODUCTION

The Group is committed to displaying integrity in regards to all aspects of its business operations, including respecting human rights. JTC recognises that modern slavery is a crime and a violation of fundamental human rights and we are committed to acting ethically and operating with integrity in regards to all aspects of our business.

This statement is made on behalf of JTC PLC and other group companies pursuant to the Modern Slavery Act 2015, and sets out the steps that we have taken during the financial year ended 31 December 2025 and continue to take, to prevent modern slavery from taking place in our supply chain or within our business.

This modern slavery statement has been approved by the JTC PLC board of directors on 15th January 2026 and covers all companies within and associated with the JTC Group of companies (“JTC”) for the financial year ended 31 December 2025.

The Group operates with a zero-tolerance approach to modern slavery and human trafficking, and this statement is reviewed and approved by the Board on an annual basis and published on the Group website.

ORGANISATIONAL STRUCTURE AND BUSINESS MODEL

The institutional capital services business of the Group is responsible for the administration of a wide variety of fund types, both listed and unlisted, across a diverse range of asset classes, including real estate, private equity, renewables, hedge, debt and other alternatives. Clients include a wide spectrum of fund managers from “first fund” market entrants to large institutional managers. The corporate services business provides company secretarial and administration services to a broad range of corporate clients spanning SMEs, public companies, multinationals, sovereign wealth funds, family offices and private clients requiring a corporate service. The private client services business provides a range of private client services, including formation and administration of vehicles such as trusts, companies and partnerships, on behalf of predominantly high and ultra-high net worth individuals, including family offices.

JTC GROUP ENTITIES THAT CARRY ON REGULATED BUSINESS AND THEIR RESPECTIVE REGULATORS MAY BE VIEWED AT WWW.JTCGROUP.COM/LEGAL-AND-REGULATORY/

SUPPLY CHAIN

The Group does not have a traditionally defined supply chain as the business model is to provide third party administration services directly to our clients. Client and other financial institutions, with which we work, are still likely to employ lower-paid workers around the world in services such as security, cleaning, catering and call centres. These types of jobs are traditionally considered higher risk, not least because the roles are often filled by migrant workers.



Our client and financial institution sector is not generally regarded as a sector where slavery and human trafficking is a significant problem. Due to the nature of the services JTC provides, it is unlikely that we would manage funds that have been generated through the exploitation of individuals either through slavery or human trafficking.

RELEVANT POLICIES

The Group does not currently have a dedicated anti-slavery and human trafficking policy, however, we operate a number of internal policies that reflect our zero-tolerance approach to modern slavery and demonstrate our commitment to ensure that we are conducting business in an ethical and transparent manner. The Group Corporate Social Responsibility Policy makes specific reference to the human rights of employees and to ethical purchasing where the Group aims to obtain and retain competitive goods and services and avoid, where known, any sources that may jeopardise human rights, safety or the environment.

In addition the employee staff handbook makes it abundantly clear that employees are expected to behave ethically and operate with integrity at all times.

The Group's policies and procedures are reviewed annually by the Board and we remain satisfied that the Group's policies remain appropriate, effective and sufficient to prevent modern slavery from taking place in our supply chain or within our business given the Group's activities.

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In addition, the employee staff handbook makes clear that employees are expected to behave ethically and operate with integrity at all times.

The Group's policies and procedures are reviewed annually by the Board, and the Board remains satisfied that the Group's policies remain appropriate, effective and sufficient to prevent modern slavery from taking place in our supply chain or within our business, given the Group's activities.

Any adverse findings or suspicion would be the subject of a formal risk escalation in accordance with the Risk Escalation Policy and Procedure and, where applicable, a suspicious activity report would be made to the relevant authority as any instance would be treated as a breach of law.

ONGOING EFFECTIVENESS

Due to our model and our approach to due diligence, client monitoring and corporate governance, the Group has assessed that there is a very low risk that our business and supply chain could be involved directly or indirectly with slavery and human trafficking.

CONCLUSION

We are proud of the historical steps we have taken to combat any risk of modern slavery and human trafficking being present in our business and supply chains. We will continue to be vigilant and we remain committed to reviewing and improving our practices further in this area in future years as our business grows and develops.



During 2025, we continued to review the effectiveness of our approach to anti-slavery and human trafficking, including the values and behaviours which all JTC employees are expected to adhere to in order to reinforce our commitment to operating a culture of trust, openness and integrity within our business.

We will continue to raise awareness as part of our wider approach to risk management and JTC is committed to educating our employees in relation to the implications of the Modern Slavery Act across our business.

Nigel Le Quesne
Chief Executive Officer
JTC PLC

Michael Liston
Chairman
JTC PLC

