

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

The finnCap Group is a full-service financial advisory firm providing strategic advisory and capital raising services. We provide these companies with access to the private, debt and public equity markets as well as provide advice on acquisitions, disposals and public market bids. We are committed to acting ethically and with integrity in all our business relationships and we expect our staff to maintain high standards.

We acknowledge that slavery is not a relic of history eradicated by the abolitionist movement; slavery and human trafficking still very much continues in the modern world and the finnCap Group is committed to addressing the requirements of the UK Modern Slavery Act 2015 (the "Act") and ensuring that our business and supply chain is compliant with the regulations. We are endeavouring to educate our team to understand the harm of modern slavery, human trafficking and bribery and corruption.

This statement is made pursuant to section 54 of the Act and constitutes the finnCap Group's Modern Slavery and Human Trafficking Statement for our financial year ended 31 March 2022.

Organisational structure

The finnCap Group comprises finnCap Group plc, finnCap Ltd, Cavendish Corporate Finance LLP and their respective subsidiaries from time-to-time. finnCap Ltd is authorised by the London Stock Exchange to act as a nominated adviser allowing it to advise issuers seeking admission to and trading on AIM. finnCap Ltd is also authorised by the UK Listing Authority to act as sponsor to issuers seeking listing on, or conducting transactions on, the Official List and is an Aquis corporate adviser and a member firm of the London Stock Exchange.

Policies

The finnCap Group is committed to complying with its obligations under the Modern slavery Act and other relevant legislation relating to the detection and prevention of modern slavery and human trafficking. We have a zero tolerance approach to Modern Slavery and human trafficking and are committed to ensuring, where possible, that there is no modern slavery or human trafficking in supply chains or in any part of our business. The finnCap Group expects the same standards from its contractors, suppliers and other business partners.

The finnCap Group has a Modern Slavery Policy which reflects our commitment to acting ethically and with integrity in all our business relationships.

Supply chain

As a provider of financial and strategic advisory services, our supply chain is not particularly complex and includes but is not limited to:

- IT hardware and software
- Building facilities and office management
- Marketing
- Financial market data and news



- Travel and accommodation
- Providers of outsourced services (e.g. settlement and analysis services)

Due diligence processes for slavery and human trafficking

Our recruitment processes are transparent and reviewed periodically. We communicate directly with candidates to discuss job opportunities and to confirm the details of any offer made. We have robust procedures in place for the vetting of new employees and ensure that we are able to confirm their identities and that they are paid directly into an appropriate, personal bank account.

We have implemented a number of processes to ensure, as far as is reasonably practicable, that our supply chains adhere to our expectations in respect of their workforce.

If we discover that any of our employees have been complicit in human trafficking or Modern Slavery, we will take the appropriate disciplinary action against them.

We take a risk-based approach to screening all new suppliers we engage with and we are committed to work only with organisations who share our values in the eradication of slavery and human trafficking.

We apply a risk-based methodology in monitoring existing supplier relationships and their approach to mitigating the risks associated with Modern Slavery and human trafficking. This may include obtaining annual statements of attestation of their commitments and actions taken to eliminate Modern Slavery.

We perform an analysis into country risks which is updated on an annual basis and we are conscious that imported products or services sourced from outside the UK or EU (or any country we consider as high risk) are potentially more at risk of slavery or human trafficking issues. If products have to be sourced from such locations, we may look to perform additional due diligence of these suppliers and look to gain extra comfort where they can demonstrate a commitment to human rights and fair working conditions.

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

Staff training and awareness

The education of our team is an important part of our culture. As such we are continuing to develop an ongoing programme to ensure that at induction, and periodically, our staff are made aware of modern slavery and human trafficking and remain vigilant to the risk to our business and supply chain.

Richard Snow
Chief Financial Officer
finnCap Group plc
28 July 2022