

Modern Slavery Statement

Managed Capital Finance is committed to preventing modern slavery and human trafficking in all aspects of its business and supply chain. We recognise our responsibility under the UK Modern Slavery Act 2015 to ensure transparency and ethical conduct throughout our operations. Our approach is grounded in integrity, accountability, and respect for human rights.

We operate as a credit profiling and data analysis company based in the City of London, providing analytical and credit assessment services to our corporate clients. Our workforce is highly skilled with all employees working under fair, lawful, and transparent employment practices. The nature of our business means the risk of modern slavery within our direct operations is extremely low; however, we remain alert to potential risks within our broader industry, particularly in outsourced technology, data processing, and service functions.

We have established robust policies and governance frameworks to prevent modern slavery, including a Modern Slavery and Human Rights Policy, a Supplier Code of Conduct, a Whistleblowing Policy, and a Recruitment and Employment Policy. These documents collectively ensure that our operations and suppliers meet ethical standards, prohibit forced exploitation and provide employees with safe and fair working conditions. Our Whistleblowing Policy enables staff and third parties to report concerns confidentially without fear of retaliation.

Due diligence is conducted on all partners before engagement. We assess each supplier's compliance with human rights, and ethical standards and require them to confirm adherence to the Modern Slavery Act 2015. Contracts include clear anti-slavery clauses and suppliers that fail to meet our standards are subject to review, remediation, or termination.

We conduct ongoing risk assessments to identify and address potential areas of exposure. While our operations in the UK are subject to strong legal protections, we recognise that risks may arise from global technology and data service providers. As part of our continuous improvement plan, we are strengthening due diligence for higher-risk jurisdictions and requiring additional verification for subcontractors handling data or IT support functions.

All employees receive mandatory training on recognising and reporting signs of modern slavery. Training forms part of our compliance induction and is refreshed periodically to ensure continued awareness. The Compliance and Risk Committee oversees this programme and monitors adherence to our ethical standards.

To measure the effectiveness of our efforts, we track supplier due-diligence completion rates, compliance attestations and any whistleblowing reports relating to labour practices. Any identified non-compliance is investigated and addressed promptly. We are committed to maintaining zero tolerance for slavery and forced labour in all our business dealings.

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This statement has been approved by the Board of Directors of Managed Capital Finance and will be reviewed and published annually in accordance with Section 54(1) of the UK Modern Slavery Act 2015.

David A. Beevor
Director