

Fidera Group Limited
Fidera Management Limited
Fidera Limited
Fidera Vecta Limited**UK Modern Slavery Act Statement**

The following statement has been published on behalf of Fidera Group Limited pursuant to section 54 of the UK Modern Slavery Act 2015 (the “Act”).

Introduction

Fidera Group Limited is committed to respecting human rights and operating with integrity in regard to all aspects of its business. This Statement sets out the steps the Firm has taken to understand the risks posed by modern slavery and ensure such activity does not occur as a result of its business ventures.

Fidera Group Limited is comprised of Fidera Management Limited, Fidera Limited and Fidera Vecta Limited. Fidera Management Limited provides services to its affiliates, Fidera Vecta Limited and Fidera Limited, focus on corporate and asset backed investments, claims and special situations in Europe. Our investment philosophy centres on developing innovative solutions to high quality assets facing complex and process intensive situations.

Supply Chain

Due to the nature of the Firm’s business, it does not have an extensive supply chain and the Firm, its suppliers, and its service providers can be considered at low risk of engaging in modern slavery.

Due Diligence

The Firm performs extensive due diligence on its suppliers and service providers. These procedures are reviewed annually to ensure they continue to effectively mitigate the risk of forced labour occurring in relation to any of the Firm’s business activities.

Relevant Policies

The Firm does have a dedicated anti-slavery policy in addition to its procedures that demonstrate its commitment to this area. These include but are not limited to:

- **Employee Conduct** policy makes it abundantly clear that employees are expected to behave ethically and operate with integrity at all times. The Firm prohibits all its employees, clients and service providers from engaging in the use of forced or trafficked labour.
- **Whistleblowing Policy and Procedure** is in place to ensure that, should an employee or employees uncover evidence of the use of forced labour, they will be able to report their concerns and be protected from victimisation.
- **Compliance Manual and Gifts and Entertainment Policy** outline the Firm’s strong anti-bribery and anti-corruption stance.

Staff Awareness and Training

All members of staff have been made aware of the UK Modern Slavery Act 2015 and its content. We also provide annual training to ensure our staff are educated about the Act and its requirements, as well as reminded of the relevant policies and procedures.

Approval by the Governing Body

The Executive Committee is responsible for ensuring the Firm operates within an established framework of effective systems of internal control, risk management and compliance with applicable laws, rules, and regulation. The Governing Body is ultimately responsible for the risk framework of the Firm.

Given the size and scope of the Firm and the limited scope of its business activities, the Executive Committee has not created separate decision-making committees in this area.

The Firm's Directors who are part of the Executive Committee approved this Statement in October 2024 and will review and update it on an annual basis.



Akbar Rafiq
Director
Fidera Group Limited



Pierre Bour
Director
Fidera Group Limited