

With Intelligence Modern Slavery Statement 2024

1. INTRODUCTION AND PURPOSE

This statement is made by With Intelligence and all subsidiaries in respect of itself and its subsidiaries (as defined in the Companies Act 2006) (together, “With Intelligence”), for the financial year ending February 2024, pursuant to Section 54 of the Modern Slavery Act 2015 (“MSA”).

2. BUSINESS OVERVIEW

With Intelligence provides a combination of proprietary data, actionable insights and events across a range of asset classes, including hedge funds, traditional asset management, private equity, real estate and credit/debt. With Intelligence operates in eight locations, with offices in London, Cardiff, Bournemouth, New York, Boston, Cebu, Singapore and Hong Kong. For further information, please see our company website: <https://withintelligence.com>.

3. POLICY

With Intelligence is committed to (i) detecting and preventing any form of slavery or human trafficking in its business and supply chain, through the implementation and enforcement of appropriate systems and controls and (ii) ensuring transparency in its approach to inhibiting modern slavery in its business and throughout its supply chains.

This policy has been incorporated into With Intelligence’s internal policies and procedures. With Intelligence has enhanced its commitment to environment, social and governance (“ESG”) matters through the appointment of a Head of ESG in 2020, now Head of Sustainability, who has the remit of integrating ESG considerations across With Intelligence. A review of slavery and human trafficking forms part of With Intelligence’s ESG considerations.

4. DUE DILIGENCE AND RISK ASSESSMENT

During the year, With Intelligence completed its annual review of (i) its structure, business and supply chains to identify the main risks to slavery and human trafficking in its business and supply chains, (ii) the measures already in place to address such risks, and (iii) any additional measures that may be warranted in light of such risks.

5. WITHINTELLIGENCE STAFF

With Intelligence continually reviews and monitors its employment practices, policies and procedures to ensure it promotes a culture of managing long-term relationships and maintaining a world-class team, which demonstrate integrity, diversity and collaboration. This ensures that slavery and human trafficking does not exist with respect to the recruitment or ongoing employment of With Intelligence permanent staff, temporary staff, agency workers or contractors.

6. SUPPLY CHAIN

As an information provider, With Intelligence has a relatively straightforward supply chain model, with suppliers predominantly providing business support services. Accordingly, With Intelligence considers the risk of modern slavery and trafficking within its supply chains to be low.

Following the financial year ending 02/2023, a review of With Intelligence supplier list has been carried out, which concentrated on supplies which invoice, on an aggregate basis, >£250k.

These suppliers' practices and policies have been screened with respect to slavery and human trafficking. There are, currently, no known matters of concern and With Intelligence is satisfied that none of its material supplier give rise to slavery or human trafficking concerns.

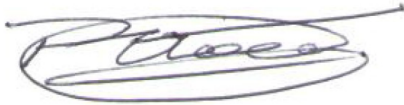
7. TRAINING AND AWARENESS

With Intelligence has made training mandatory for all employees to ensure they are equipped to identify possible indicators of slavery and human trafficking, and respond both effectively and proportionately via their online training platform.

8. APPROVAL AND ONGOING COMMITMENT

The statement will be reviewed and updated as required annually to reflect With Intelligence's ongoing commitment to detecting and preventing slavery and human trafficking in its business and supply chains.

The statement is signed and approved by the CFO.

A handwritten signature in blue ink, appearing to read 'P. O'Toole', enclosed within a blue oval shape.

Phil O'Toole, CFO, With Intelligence