



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

November 2025

INTRODUCTION

This Modern Slavery and Human Trafficking Statement is a response to Section 54(1), Part 6 of the Modern Slavery Act 2015 and relates to actions and activities for the financial year ending 2025.

The Progeny Group is committed to preventing slavery and human trafficking violations in its own operations, its supply chain, and its products. We have zero tolerance towards slavery and require our staff members and contractors to comply with our values.

ORGANISATIONAL STRUCTURE

Progeny Holdings Limited and all relevant subsidiaries (together “the Progeny Group”) have business operations in the United Kingdom.

The Progeny Group provides independent advisory services across financial planning, tax, legal and asset management. We are regulated by the Financial Conduct Authority (FCA) and the Solicitors Regulation Authority (SRA).

Our supply chain provides a wide range of products and services to the Progeny Group. These range from professional advice and business services to more operational services such as facilities. As we do not have direct involvement in our suppliers’ operations, we consider the risk of modern slavery and human trafficking to be more significant within those operations than in our own, and view our due diligence as an important mitigating factor in our approach. We are committed to operating in an ethical manner and we expect the same of our suppliers.

DUE DILIGENCE

As part of our efforts to monitor and reduce the risk of modern slavery and human trafficking occurring in our supply chains, we have recently established supplier selection policies and processes. These include detailed due diligence and credential verification elements for material suppliers such as jurisdiction analysis, adequacy of policies and procedures, and compliance with regulatory responsibilities.

Information on our supply chain operations is gathered at the outset of a new supplier relationship and thereafter monitored and reviewed using a risk-based approach. All material suppliers are reviewed at least annually.

Our due diligence procedures aim to:

- Identify and action potential risks in our business and supply chains.
- Monitor potential risks in our business and supply chains.
- Reduce the risk of slavery and human trafficking in our business and supply chains.

During 2025/2026, we will continue to refine our third-party risk management framework to ensure effective supplier oversight and operational resiliency.

POLICIES

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. We continuously review and update all our policies on at least an annual basis.

These include the following:

- Recruitment Policy. We operate a robust recruitment policy, including conducting eligibility-to-work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- Anti-Harassment and Bullying policy. This sets out our approach in relation to allegations of harassment and/ or bullying. Harassment, in general terms, is defined as unwanted conduct affecting the dignity of people in the workplace. It may be related to age, sex, race, disability, religion, nationality or any personal characteristics of the individual and may be persistent or an isolated incident.
- Whistleblowing Policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
- Code of Conduct & Culture code. These codes explain the manner in which we behave as an organisation and how we expect our employees to act.

TRAINING

To raise awareness amongst our employees of modern slavery and human trafficking, we will continue to conduct training for our colleagues so that they understand the signs and what to do if they suspect that it is taking place within our supply chain.

Within our legal teams, training covers how modern slavery considerations intersect with our professional duties and ethical obligations under the SRA Code of Conduct.

RISK ASSESSMENT

Due to the nature and extent of our business, the Progeny Group considers itself to be a business with a low risk of modern slavery. However, we recognise that it is important that we continue to carry out robust due diligence in both our recruitment and supply chain processes.

EFFECTIVENESS

To ensure our approach remains effective, we will seek to develop Key Performance Indicators (KPIs) to measure the risk associated with modern slavery is effectively managed and mitigated. These KPIs will include reporting in relation to concerns raised or whistleblowing related to modern slavery and human trafficking as well as outcomes from ongoing supplier engagement and due diligence.

The statement was approved by the Progeny Holdings Limited Board on the 12th November 2025.

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