

PEELHUNT

ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

2021



PEELHUNT.COM



Statement 2021

1. Introduction

Peel Hunt LLP is part of a group of entities headed by PH Capital Limited. The other group members are Macsco 22 Limited, Peel Hunt Holdings Limited and Peel Hunt Inc. (together with Peel Hunt LLP and PH Capital Limited, “Peel Hunt”). PH Capital is publishing this statement in compliance with the Modern Slavery Act 2015 for and on behalf of Peel Hunt.

This statement details the steps taken by Peel Hunt to aid in the prevention of modern slavery and human trafficking during the year ended 31 March 2021.

Being a partnership goes beyond Peel Hunt’s structure to the way Peel Hunt does business. It is a principle that defines the relationship between departments and, above all, with clients. Conducting our business with integrity, openness and professionalism, part of which encompasses Peel Hunt’s commitment to ensuring that its business and its supply chains are free from modern slavery and human trafficking, is not only in the best interests of our clients but of all Peel Hunt’s stakeholders.

As a specialist UK Investment Bank, Peel Hunt offers corporate broking, advisory, research, sales and trading services to clients. Trading services encompass market making in all UK listed instruments, both equity and fixed income; domestic and international trade facilitation; and market access technology.

In conducting the activities above, Peel Hunt engages a number of suppliers and employs c.280 staff in both London (located at 100 Liverpool Street, London EC2M 2AT) and New York (located at 489 Fifth Avenue, 32nd Floor, New York NY 10017). It is these members, employees, suppliers and the associated “supply chain” on which Peel Hunt is focusing in its efforts to remain free from modern slavery and human trafficking.

2. Our policies on modern slavery and human trafficking

Peel Hunt has a zero tolerance approach to slavery and human trafficking. Peel Hunt is committed to conducting business in an ethical manner, ensuring that there is no slavery or human trafficking in its supply chains or in any part of its business and remaining transparent and diligent relating to the people and entities with which Peel Hunt does business.

3. Our supply chains

Peel Hunt’s supply chains include, but are not limited to:

- Suppliers of IT hardware and software;
- Payroll;
- Building space and facilities;



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- Legal, accountancy and other professional intermediaries;
- Suppliers of financial market data and news services;
- Suppliers of transaction related services and infrastructure; and
- Other office supplies.

Peel Hunt is committed to selecting the very best suppliers to continue the quality service that clients expect. Peel Hunt encourages its suppliers to adopt the same ethical business standards and human rights compliance that it supports.

Peel Hunt maintains a central register of its suppliers, which is kept up to date. Peel Hunt's Third Party Vendor Management Policy sets out guidelines relating to the procurement, management and termination of third party services or products. That policy sets out guidelines for the decision to engage a third party, the selection of third parties and the due diligence that should be undertaken on such third parties (which includes ensuring that modern slavery is not taking place in Peel Hunt's business or supply chains).

Peel Hunt's assessment of suppliers includes a question on suppliers' modern slavery and human trafficking policies and risk management processes, as well as questions aimed at assuring their compliance with Peel Hunt's ethical business standards.

Peel Hunt considers country risks when it is proposing to onboard a new supplier and is conscious that imported products or services sourced from outside the UK or European Union (or any country that is considered as high risk) are potentially more at risk of slavery or human trafficking. If products or services have to be sourced from such locations, Peel Hunt will look to perform enhanced due diligence of those suppliers and look to gain extra comfort where they can demonstrate a commitment to human rights and fair working conditions, for example by way of certifications such as Social Accountability certification SA8000. Peel Hunt will not work with any organisation that has been found to have been knowingly involved in human trafficking or modern slavery.

4. Training and staff

Peel Hunt's recruitment processes are transparent and reviewed regularly. Peel Hunt communicates directly with candidates to discuss job opportunities and to confirm the details of any offer made. Peel Hunt has robust procedures in place for the vetting of new members or employees and ensuring that their identities are confirmed and that they are paid directly into an appropriate, personal bank account.

Peel Hunt's staff are the front line of its business and it is important that staff embody the values and principles Peel Hunt has as an organisation. Peel Hunt also has in place robust compliance policies (including those covering ethical behaviour, conduct and whistleblowing) designed to



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promote ethical and compliant behaviours as well as encourage and to protect anyone who wishes to raise concerns about wrongdoing within the business.

Peel Hunt includes a copy of this statement in induction packs for new joiners. New joiners are required to sign a declaration confirming that they have read and understood it, and that they agree to adhere to our policy as set out in this statement.

If Peel Hunt discovers that any of its staff members have been complicit in slavery or human trafficking, appropriate disciplinary action will be taken.

5. Our effectiveness in combating slavery and human trafficking

Peel Hunt's senior management take the responsibility for implementing the systems and controls outlined in this statement and provide adequate resources and investment to ensure that slavery and human trafficking is not taking place within the organisation or within its supply chains.

Peel Hunt will continue to monitor and review our policy relating to slavery and human trafficking. If we become aware of any breaches of the policy, we will investigate and take such steps as are necessary to ensure that the risk of further breaches occurring is minimised.

6. Our ongoing commitment

Peel Hunt will continue to build upon its existing efforts to combat modern slavery and trafficking across its operations and supply chain.

Steven Fine, CEO

2021

[This statement has been reviewed and approved by the board of directors of PH Capital Limited, Macsco 22 Limited, Peel Hunt Holdings Limited and Peel Hunt Inc., and the board of Peel Hunt LLP.]