



Modern slavery statement

This statement applies to Hamilton Court Foreign Exchange Limited ('HCFX'). The statement contains information in accordance with Section 54 of the Modern Slavery Act 2015 (the 'Act') for the financial year ending 31st March 2024.

HCFX is a foreign exchange specialist founded and headquartered in London, with offices in Italy, Spain and Canada. HCFX is authorised by the Financial Conduct Authority (the 'FCA') to provide payment services and regulated foreign exchange services. Across the affiliates, HCFX has 138 employees.

Definitions

HCFX considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement

Supply Chain Risk

- HCFX provides its services mainly to UK based individuals and corporations and in a few other limited jurisdictions, which are recognised as having low risk of human trafficking and human rights violations.
- Being a provider in financial services, specifically foreign exchange products, HCFX has a limited supply chain and has identified that its suppliers are mainly those that provide IT services.
- In respect of its own employees, HCFX strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the UK, Italy, Spain and Canada and in most cases exceeds those minimum standards.
- HCFX performs due diligence on its suppliers prior to commencement of services by the suppliers. HCFX also performs customer due diligence on its clients. The due diligence includes screening for adverse media, which may provide HCFX with information on reported violations of modern slavery or human trafficking by potential suppliers.

Policies and procedures

HCFX has in place various policies and procedures which help HCFX to mitigate its supply chain risk and/or violation of modern slavery and human trafficking incidents. In particular, it has a Whistleblower Policy which allows employees to raise concerns without fear of reprisal.

Training and Awareness

To ensure a comprehensive understanding of the risks associated with modern slavery and human trafficking within our supply chains, HCFX provides targeted training for relevant employees in areas identified as high-risk. This training enhances staff awareness and the ability to identify and mitigate these risks effectively.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Tony Keterman
CEO

