TrinityBridge

Modern Slavery Statement

TrinityBridge Anti-Slavery and Human Trafficking Statement for the financial year ended 31 March 2025

In September 2024, Close Brothers Group announced the sale of TrinityBridge (formerly Close Brothers Asset Management) to funds managed by Oaktree Capital Management, L.P. Following regulatory approval, the sale completed on 28 February 2025. Following its separation from the Close Brothers Group, TrinityBridge changed its financial year end from 31 July to 31 March each year.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and sets out the steps the Company has taken during the financial period from 1 August 2024 to 31 March 2025 to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business.

Company Overview

TrinityBridge provides high-quality financial advice and investment services to professionals, business owners, individuals and families as well as multi-asset investment management to financial advisers, trustees, consultants and charities.

TrinityBridge is a financial services provider, with a limited supply chain which predominantly focusses on procuring professional and technology services, with most of its suppliers based in the UK and the EU.

Policy and Principles

TrinityBridge is committed to complying with its obligations under the Modern Slavery Act and other relevant legislation relating to the detection and prevention of modern slavery and human trafficking. TrinityBridge is committed to implementing and enforcing effective systems and controls that seek to ensure that modern slavery is not taking place anywhere in its business or in its supply chains.

Consistent with its obligations under the Modern Slavery Act, the business is committed to ensuring there is transparency in its approach to tackling modern slavery throughout its supply chains. TrinityBridge expects and requests the same standards from its contractors, suppliers and other business partners.

TrinityBridge has a Modern Slavery Policy as well as a Third Party Management Policy to ensure the identification, assessment, mitigation and monitoring of risk within its supply chain. This includes a third-party risk appetite statement which formalises the position that TrinityBridge has no appetite for third parties taking risks on its behalf that would be unacceptable if taken internally. The Third Party Management Policy is further underpinned by standards and procedures which prescribe the risk assessment and due diligence requirements to consistently and effectively identify and mitigate against risks in the supply chain, including consideration of those related to modern slavery.

As a signatory of the United Nations supported Principles for Responsible Investment ("**PRI**"), TrinityBridge is committed to improving the way we measure, report and manage environmental, social and governance ("**ESG**") issues throughout our investment activities.

Sourcing, Contractual Standards and Due Diligence

TrinityBridge adopts a risk-based approach for selecting and managing its supply chain to ensure that risk is appropriately identified, assessed and mitigated. With a framework underpinned by technology to facilitate the process and drive MI and reporting, the business considers a broad range of risks, including those specifically relating to modern slavery.

To support the above, TrinityBridge has established a Third Party Oversight Committee ("**TPOC**" and "**Committee**") which provides holistic oversight of Third Party arrangements. Additionally, TPOC is the approval forum for new third party selection that meet a defined risk threshold, taking into consideration all aspects of the Third Party Management framework. Additionally, the Committee ensures that Third Parties agree, adhere to and operate in alignment with TrinityBridge's governance requirements and has visibility of segmental/aggregate risk management data and reporting of Third-Party arrangements.

The Committee meets on a monthly basis and consists of various SME's from across TrinityBridge who are instrumental in ensuring the relevant areas are appropriately represented by the committee, with each SME taking the lead within their area of expertise.

Additionally, TrinityBridge has templated contractual provisions which require suppliers to comply with laws and regulations, including the Modern Slavery Act. These are used wherever possible for new and renewed supplier relationships and include requirements for standards to be passed down the supply chain where appropriate.

Actions taken in financial year ended 31 March 2025

During the financial year ended 31 March 2025, TrinityBridge took the following steps with the intention of further ensuring that slavery and human trafficking does not take place in its business or supply chains.

1. Modern Slavery Policy

There is continued adherence to the Modern Slavery Policy. The policy applies to all divisions and their respective permanent and fixed-term employees, temporary staff and contractors.

2. Third Party Management Framework

Third Party Management will continue to review and update the Third Party Management Policy and supporting standards and procedures to ensure that the framework continues to be in line with best practice and applicable regulatory requirements, including those in relation to modern slavery and human trafficking.

3. Sourcing Practices and Due Diligence

In line with the requirements of the Modern Slavery Act, TrinityBridge has continued to consider these requirements when sourcing new goods and services from the third-party supply market. This includes conducting risk assessments based on the nature of the services and suppliers, resulting in increased due diligence in heightened risk scenarios.

4. Third Party Monitoring

TrinityBridge's Third Party Management Team undertake risk-based reviews on its critical and important suppliers. The team continuously monitors our key suppliers to ensure they meet TrinityBridge's standards.

To enhance our approach further, we have onboarded a new partner which utilises a collaborative platform whereby suppliers complete and maintain a single profile which is shared by their major customers within the financial services sector. Using this platform, the Third Party Management team will have access to standard supplier due diligence responses and supporting documents to conduct monitoring reviews. The platform also drives regular supplier information updates and will enable a greater reach across suppliers in the industry over time.

The findings of these reviews continue to be reported at TPOC, where relevant, along with our expectations for the implementation of time-bound corrective actions. There were no instances of non-compliance identified in relation to Modern Slavery during the period ending 31 March 2025 as a result of these reviews.

Next Steps

Actions currently planned for the 2026 financial year include:

- Continued implementation and integration of our Third-Party Monitoring partner, enhancing our ability to gather comprehensive information and extend our reach over the supply chain, as well as enhance reporting.

- Further enhance the Third Party Management Framework to ensure risks to TrinityBridge's supplier chair are fully managed including but not limited to Modern Slavery.

Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2025. This statement is made on behalf of both TrinityBridge Holdings Limited and TrinityBridge Limited and has been approved by the Board of Directors of these entities and signed on their behalf by Nigel Stockton, CEO, on 19 September 2025.

The statement will be reviewed and updated annually to reflect our ongoing commitment to ensuring that our business and supply chains are free from slavery and human trafficking.

Nigel Stockton
CEO