

## **The Fluid Group Modern Slavery Statement:**

### **Introduction**

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes Fluid Flow Ltd (known as The Fluid Group)'s slavery and human trafficking statement for the financial year ending 28 February 2022.

### **Our business and supply chain**

The Fluid Group is a global provider of CFD consultancy services across a broad range of markets. Further information on The Fluid Group's business can be found at <https://www.thefluidgroup.com/>. All of The Fluid Group's employees are based in the UK.

### **Our policies and procedures**

The Fluid Group has a zero tolerance approach to slavery and human trafficking of any kind within our business or supply chain. Our internal policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place. We are committed to the highest principles of personal and professional conduct throughout the company.

### **Whistleblowing:**

Our whistleblowing policy applies to everyone working within The Fluid Group and provides a mechanism for the reporting of concerns about suspected wrongdoing or dangers at work, including slavery and human trafficking violations, without fear of reprisals and it forms part of The Fluid Group's mandatory training for all employees.

### **Training:**

To ensure a high level of understanding of the risks of modern slavery in our business, all new employees receive training on modern slavery as part of the induction process. This training refers directly to this statement and makes clear that any concerns should to be reported to Legal Counsel as provided by The Magdalen Centre, Oxford.

### **Recruitment and employment practices:**

Our recruitment procedures include mandatory documentation checks to ensure that all employees are over 18 and eligible to work in the UK, as appropriate.

As part of our recruitment policies and procedures, we only use reputable recruitment firms and comply with all relevant local laws and regulations.

We review market related pay and rewards bi-annually.

We implement initiatives to support our personnel's physical and mental wellbeing and stress. This includes cycling schemes and employee assistance programmes that provide work/life support services.

We are committed to fair employment practices in relation to our own people.