



Twelve Securis

Securis Investment Partners LLP

Modern Slavery Act 2015 (“The Act”)

1.1 Introduction

This statement is issued by Securis Investment Partners LLP (“SIP LLP”), a limited liability partnership registered in England, in compliance with section 54 of the Modern Slavery Act 2015.

1.2 Our Business

Securis Investment Partners LLP (“SIP LLP”) is an operating entity within the Twelve Securis Group. Twelve Securis is an independent, specialist investment manager focused on insurance-related investments. The firm was formally established on 14 February 2025 following the merger of Securis Investment Partners LLP (Securis) and Twelve Capital AG (Twelve Capital). SIP LLP was established in 2005 and Twelve Capital in 2010.

SIP LLP is authorised and regulated by the Financial Conduct Authority (FCA) and is a registered investment advisor with the United States Securities & Exchange Commission (SEC).

This statement is our slavery and human trafficking statement for the purposes of section 54(1) of the Modern Slavery Act 2015. It sets out our ongoing commitment as a responsible business to ensure that modern slavery and human trafficking is eradicated. It has been issued by SIP LLP, however, it applies to all entities within the Twelve Securis Group.

SIP LLP has a zero-tolerance approach to modern slavery and human trafficking. As such we are committed to ensuring that there is no slavery or human trafficking in our supply chains or in any part of our business.

We are committed to acting ethically and with integrity in all our business relationships and we will take appropriate and reasonable measures to minimise the risk of this taking place in line with the nature of services provided to the firm. The Twelve Securis Group Code of Ethics sets out the standard of conduct that Twelve Securis expects from its staff and assist personnel in meeting their own and the Group’s legal and regulatory obligations.

SIP LLP considers the risk of slavery, servitude, forced or compulsory labour (together, “Modern Slavery”) and human trafficking existing within its business to be low.

1.3 Supply Chain Risk

SIP LLP does not support or knowingly deal with any business involved in slavery or human trafficking and will not work with any party it suspects is connected with slavery in any way. Our supply chain includes regulated professional advisers, providers of financial data, IT equipment, office supplies, travel providers and other third-party service providers (“Suppliers” for the purpose of this note).

Suppliers are subject to comprehensive due diligence before being onboarded.

Suppliers are reviewed on an ongoing and a periodic basis, which is risk-adjusted, in line with the Twelve Securis Group Outsourcing & Service Provider Oversight Policy which includes a requirement to analyse each Supplier’s approach to combatting slavery and human trafficking.

SIP LLP expects its Suppliers to adopt the same standards it meets itself, and in turn work only with companies that share these values and principles. Suppliers are expected to uphold their workers’ human rights and treat them respectfully, while maintaining workplaces emphasising ethical and fair behaviour.

In the event that SIP LLP becomes aware of Modern Slavery occurring within its supply chain, we will seek to ensure that the supplier implements remedial action. SIP LLP expects its Suppliers to react to any Modern Slavery issues constructively and responsibly, and in a manner demonstrating their willingness to remedy issues expediently.

1.4 Action Taken

SIP LLP has undertaken a review of its existing Suppliers and evaluated the risk of any Supplier being unable to meet its obligations under the Act and will continue to focus on the following areas:

- Key Suppliers on-boarding and due diligence – an analysis of the service provider’s approach to combatting slavery and human trafficking is included within our review process going forward.
- Training – we have ensured awareness of the Act to enable staff generally to understand the requirements of the Modern Slavery Act and flag potential issues.

1.5 Employees

SIP LLP’s recruitment processes are thorough and transparent. We communicate directly with candidates to discuss job opportunities and to confirm the details of any offer made. We have robust procedures in place for the vetting of new and existing employees and ensure that we are able to confirm their identities.

SIP LLP has policies and procedures in place to ensure compliance with human rights and UK employment laws. All staff are remunerated fairly and above the UK’s national living wage. Consequently, we are satisfied that our employees are not exploited in any way.

1.6 Approval

This annual statement covers the year ended 31 December 2025. It is publicly available on the Securis corporate website. The SIP LLP Operational Governance Committee (a committee of the SIP LLP Board) has endorsed this policy and has confirmed its commitment to improving practices to combat slavery and human trafficking.