

Document ID: BA-POL-004

Title: Modern Slavery & Human Trafficking
Statement Policy

Version: v2.0

Status: APPROVED

Owner: Butterfly Advisory

Approved by: Giedre Beige

Butterfly

CLARITY THAT DECIDES

Modern Slavery & Human Trafficking Statement

Last updated: 19 February 2026

This statement sets out the steps Butterfly International Ltd (trading as Butterfly Advisory) takes to help prevent modern slavery and human trafficking in our business and supply chain.

Butterfly International Ltd is committed to acting ethically and with integrity, and to maintaining effective systems and controls designed to reduce the risk of modern slavery.

1) Our business

Butterfly provides advisory support, preparation, coordination and introductions across business, finance and private matters. We work with a panel of specialist associates and external suppliers to support delivery, including professional services and technology providers.

2) Our approach and policies

We take a zero-tolerance approach to modern slavery. Our wider standards include:

- Ethical conduct and integrity in how we operate and partner.
 - Supplier and partner due diligence proportionate to risk.
 - Clear expectations around lawful working practices.
 - Escalation routes for concerns.
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3) Supply chain and risk areas

Our supply chain is primarily service-based and may include:

- Professional advisers and specialist partners (e.g., legal, accountancy, specialist providers).
- Technology and operational suppliers (e.g., hosting, CRM, communications, document tools).
- Marketing, design and other business services.

We recognise that risks can exist in any supply chain, particularly where subcontracting or outsourced labour is involved.

4) Due diligence and controls

We apply proportionate checks designed to reduce risk, which may include:

- Assessing suppliers/partners before engagement and reviewing where appropriate.
- Preferring established suppliers with appropriate governance and policies.
- Using contractual terms that require lawful and ethical conduct.
- Limiting and monitoring third-party access to client information and delivery processes.
- Investigating concerns and taking action where standards are not met.

5) Speaking up

If you have concerns about unethical conduct, exploitation, or modern slavery linked to our business or supply chain, please contact us:

Email: dpo@butterfly-advisory.com

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Telephone: 020 7060 0604

Post: Butterfly International Ltd (trading as Butterfly Advisory), Cardinal Point, Park Road, Rickmansworth, Hertfordshire, WD3 1RE, United Kingdom

Concerns will be handled sensitively and, where appropriate, escalated for review.

6) Ongoing improvement

We keep our approach under review and aim to strengthen controls over time, including:

- Reviewing supplier onboarding questions and contractual standards.
 - Improving internal awareness of risk indicators and escalation routes.
 - Periodic review of higher-risk suppliers where applicable.
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7) Approval

This statement is approved by the management of Butterfly International Ltd and will be reviewed and updated as appropriate.

Name: Giedre Beige, Director

For and on behalf of: Butterfly International Ltd (trading as Butterfly Advisory)