

Union Bancaire Privée (UK) Limited

Modern Slavery and Human Trafficking Statement 2025 (the “Statement”)

Introduction

This Statement is made in accordance with the provisions of section 54 of the UK Modern Slavery Act 2015 (the “Act”). The serious criminal offences of slavery, servitude, forced or compulsory labour and human trafficking are brought together under one piece of legislation. The intention of the Act is to protect victims, bring perpetrators to justice and provide more effective tools for law enforcement. Union Bancaire Privée (UK) Limited (“UBPUKL”) strives to ensure that slavery and human trafficking is not taking place within our business or supply chain. UBPUKL is now a wholly owned subsidiary of Union Bancaire Privee, UBP SA (“UBP”), effective from 1 April 2025.

Our Business

UBPUKL offers wealth management services to both private and institutional clients.

Our People

UBPUKL has a workforce which is predominantly made up of professionally qualified and skilled employees and, accordingly, we consider the risk of modern slavery occurring within the overall business to be low.

Our Policies

UBPUKL promotes high ethical standards and has an internal Whistleblowing Policy whereby employees can raise concerns regarding unethical behaviour or decisions that could indicate wrongdoing. The Chair of the Board of Directors of UBPUKL is the Whistleblowing Champion. In all our business dealings and relationships, we seek to act with honesty and integrity and have implemented a number of internal policies which set out clearly how we expect employees to act. These include policies such as the UBPUKL Anti-Bribery & Corruption Policy and UBPUKL the Whistleblowing Policy and UBPUKL’s Code of Conduct and Ethical Behaviour Code. As an FCA/PRA regulated entity, with branches registered and regulated in Gibraltar, Guernsey and Jersey, UBPUKL adheres to the various codes of conduct expected of us by our regulators.

Our Due Diligence Process

UBPUKL is strongly opposed to slavery and human trafficking and does and will not knowingly support or conduct business with any organisation involved in such activities.

Our Supply Chains

UBPUKL relies on the use of third parties to support high quality, effective and efficient delivery of our services to clients and we expect all of our suppliers to operate in a responsible, ethical, open and transparent way and in compliance with all applicable laws and regulations.

We work with mainstream suppliers which are screened, at onboarding and on a periodic basis, for compliance with laws and regulations and for their ESG commitment. We also require our higher risk

suppliers to accept our compliance contract clauses and to abide by UBP Supplier Code of Conduct available at <https://www.ubp.com/en/about-us/sustainability> .

Conclusion


In 2024, UBPUKL had no reported incidents of human rights breaches, slavery or trafficking. We reiterate our commitment to the Act and its underlying principle.

Review

This Statement has been reviewed by the Board of Directors of UPBUKL. The Statement will be reviewed annually and updated as required.

Governance

This statement is made with respect to the financial year ended 31 December 2024 in accordance with section 54(1) of the Modern Slavery Act 2015. It has been approved by the Board of Directors of UPBUKL and signed by a Director.

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Mouhammed Choukeir
Chief Executive Officer
Union Bancaire Privée (UK) Limited
26 June 2025