

# PEI Group

## Modern Slavery Statement

*Financial Year Ending 31 December 2025*

### Introduction

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 (the “MSA”) and sets out the steps taken by PEI Group during the financial year ending 31 December 2025 to prevent slavery and human trafficking in its own business and supply chains.

PEI Group confirms that its annual turnover exceeds the £36 million threshold under Section 54(2) of the MSA, and that it is therefore within the scope of the reporting obligation. This statement is made on behalf of PEI Group and its covered subsidiaries:

- PEI (United States)
- PEI (Hong Kong)
- PEI (Japan)
- PEI (Australia)
- PEI (Singapore)

(together, “PEI Group” or “PEI”).

This statement has been prepared with reference to the UK Home Office’s updated Transparency in Supply Chains: Statutory Guidance (March 2025), and is structured around the six reporting areas set out in Section 54(5) of the MSA: (1) Organisational Structure and Supply Chains; (2) Policies; (3) Due Diligence (including Remediation); (4) Risk Assessment and Management; (5) Monitoring and Evaluation; and (6) Training.

## 1. Organisational Structure and Supply Chains

### 1.1 Our business

PEI Group is a subscriber-focused business intelligence company. Our purpose is to inform and connect investment professionals across global, specialised markets. We identify high-growth, high-value investment sectors and themes where deep insight, strong market relationships and active capital flows are critical for success across a range of asset classes, including traditional asset management, private equity, real estate, credit and debt, infrastructure, and ESG.

At the end of the reporting period, PEI Group employed approximately 500 staff across six international offices: London, New York, Sydney, Tokyo, Hong Kong and Singapore.

## 1.2 Our supply chain

As an information and intelligence provider, PEI Group operates a relatively concentrated supply chain. The principal categories of expenditure are:

- Technology and software (cloud hosting, SaaS platforms, data services, IT hardware and devices);
- Professional services (legal, audit, tax, consultancy, recruitment);
- Event delivery (venue hire, audio-visual production, catering, security and on-site staffing);
- Office occupancy and facilities (leased premises, cleaning, building services in each office location);
- Marketing and publishing services (design, print, distribution and fulfilment); and
- Freelance editorial and content contributors.

The majority of PEI Group's direct suppliers are headquartered in jurisdictions with established labour-law frameworks and, by spend, the supply chain is concentrated in the UK, United States, and other OECD member states.

## 2. Policies

PEI Group is committed to the prevention of forced labour, human trafficking and related forms of modern slavery in its operations and supply chains. We do not tolerate any form of modern slavery, and we expect the same standard from those we work with.

Our approach is informed by, and aligned with, the following international frameworks:

- The United Nations Guiding Principles on Business and Human Rights (UNGPs);
- The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct;
- The International Labour Organization's (ILO) Abolition of Forced Labour Convention (C105) and Worst Forms of Child Labour Convention (C182).

These frameworks are reflected in our internal policies, including our Anti-Slavery and Human Trafficking Policy, Code of Conduct, Whistleblowing Policy, and recruitment and procurement procedures.

### 2.1 Reporting concerns — whistleblowing

PEI Group operates an independent, confidential whistleblowing channel administered by Safecall, available to all employees, agency workers, contractors and other persons working on behalf of or with the Company. Reports may be made in confidence (and, where the reporter chooses, anonymously) through the following channels:

**Website:** [www.safecall.co.uk/report](http://www.safecall.co.uk/report)

**Telephone:** 0800 915 1571

PEI Group prohibits retaliation against any person who, in good faith, reports a concern or assists in an investigation.

### **3. Due Diligence and Remediation**

#### **3.1 In our own workforce**

PEI Group applies the following controls across all jurisdictions in which it operates:

- Right-to-work checks are completed for every employee in every jurisdiction, in accordance with local immigration and employment law;
- Recruitment is conducted directly or through reputable, vetted recruitment agencies, with whom we have established commercial relationships;
- PEI Group applies the Employer Pays Principle: no recruitment fees are charged to candidates at any stage of the hiring process;
- Salaries are set at or above the Living Wage in the UK, at or above the statutory minimum wage in the US, and at or above applicable statutory wage requirements across our APAC offices. Pay structures are reviewed regularly;
- All employees are paid on standard payroll cycles into bank accounts held in the employee's own name. Payments are made either directly by PEI Group or, in certain jurisdictions, via a regulated third-party payroll provider acting on PEI Group's behalf; in no case are wages paid in cash, withheld, or routed through accounts not belonging to the employee;
- All staff have access to a confidential, independent whistleblowing channel (see Section 2.1).

#### **3.2 In our supply chain**

Supplier due diligence is conducted on a risk-based, proportionate basis. Material suppliers, and suppliers in the categories identified in Section 4.2, are subject to additional scrutiny at onboarding and on contract renewal, including (as appropriate) review of their own modern slavery statements and labour-practice disclosures.

#### **3.3 Remediation**

No incidents of modern slavery in PEI Group's operations or supply chain have been identified or reported during the reporting period or in any prior period.

In the event that a concern is raised or an incident is identified, PEI Group is committed to responding promptly and in a manner consistent with the UNGPs and the OECD Guidelines. Our remediation approach is:

- Prioritise the safety, wellbeing and informed consent of any affected workers, and avoid actions that could cause further harm;

- Investigate the matter through the Chief Financial Officer, supported by HR, Legal, the Sustainability Manager, and external advisors where appropriate;
- Where the concern relates to a supplier, engage directly with the supplier to understand the facts, agree corrective action, and where appropriate provide or contribute to remedy for affected workers;
- Escalate to relevant law enforcement or regulatory authorities where required by law or where appropriate to do so;
- Review the circumstances giving rise to the incident, and update controls, contractual terms or supplier relationships to reduce the likelihood of recurrence;
- Report material outcomes, including lessons learned, in the following annual modern slavery statement.

## **4. Risk Assessment and Management**

During the reporting period, PEI Group conducted a review of its own operations and its supply chain to identify, assess and prioritise modern slavery risk. The review was led by the Sustainability Manager, with oversight from the Operations Director, and considered both the Company's direct operations across its six offices and its material supplier base.

The methodology drew on recognised external indices and frameworks, including the Walk Free Global Slavery Index. Material suppliers were screened by reference to country of operation, industry sector, and the nature of the goods or services provided.

### **4.1 Risk in our own operations**

PEI Group's workforce is composed predominantly of professional, salaried employees engaged in editorial, research, commercial, technology and corporate functions. All staff are recruited through controlled channels, paid on transparent terms and entitled to formal grievance procedures. On this basis, the inherent risk of modern slavery within PEI Group's direct workforce is assessed as low.

### **4.2 Risk in our supply chain**

The majority of PEI Group's supplier spend is with professional services firms and technology providers based in lower-risk jurisdictions, where the inherent risk of modern slavery is limited. We do not, however, treat the supply chain as uniformly low risk. The following categories warrant closer scrutiny and are the focus of our ongoing due diligence:

- Events delivery, including third-party venue, catering, audio-visual and on-site staffing providers, where short-term and agency-supplied labour is more prevalent;
- Office cleaning and facilities services across each of our six office locations, where outsourced and sub-contracted labour models can obscure visibility of working conditions;

- Print, distribution and marketing fulfilment, where elements of the supply chain (such as print finishing and logistics) may extend into more complex sub-tiers;
- IT hardware and electronics, where upstream component manufacturing is recognised internationally as a higher-risk sector;
- Operations in Hong Kong, Singapore, Japan and Australia, where regional labour-market practices in certain ancillary services may differ from those in our UK and US offices.

These categories are not, on the basis of work conducted to date, areas where PEI Group has identified actual instances of modern slavery. They are, however, the areas to which we proportionately direct our risk-based due diligence effort.

## 5. Monitoring and Evaluation

PEI Group monitors the effectiveness of its approach to modern slavery on an ongoing basis. The following indicators were tracked during the reporting period:

- Number of concerns raised through the Safecall whistleblowing channel relating to modern slavery: none;
- Number of confirmed incidents of modern slavery in PEI Group's operations or supply chain: none;
- Coverage of the modern slavery risk assessment: PEI Group's six offices and material supplier base.

PEI Group will continue to develop its monitoring framework over future reporting periods, including by introducing further indicators alongside the rollout of structured training (see Section 6) and the continued refinement of supplier due diligence.

## 6. Training

Awareness of modern slavery risk has, to date, been addressed through the publication and internal communication of this statement. PEI Group has recently appointed a full-time Learning and Development Manager. During the 2026 financial year, the L&D Manager will identify and onboard an external training provider with a view to rolling out modern slavery awareness training across the Group during the 2026/2027 reporting cycles.

### Looking forward to 2026

In the next reporting period, PEI Group intends to:

- Identify and onboard an external provider for modern slavery training;
- Continue to monitor and report on whistleblowing channel activity and any concerns raised.

## Approval and Sign-off

The person with specific responsibility for anti-slavery responsibilities and procedures within PEI Group is the Chief Financial Officer.

This statement has been reviewed and approved by the Board of Directors of PEI Group in accordance with Section 54(6) of the Modern Slavery Act 2015 and is signed below by a Director of PEI Group on behalf of the Board.

Signed: Mark Brinin

Name: Mark Brinin

Position: Chief Financial Officer

Date of signature: 27/05/2026