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## **Modern Slavery and Human Tracking Statement 2026**

This is the Fraudfinder LTD modern slavery and human tracking statement for the financial year ending 31 December 2025 (the “**Reporting Period**”). This statement has been produced to present the steps taken to prevent modern slavery and human tracking in our business and supply chains, as well as demonstrate full compliance with section 54 of the Modern Slavery Act 2015 (the “**Act**”). It has been approved by the Board of Directors of Fraudfinder LTD as of 01 January 2026.

### **Our Values**

In line with our company values, Fraudfinder is strongly committed to conducting our business operations in an ethically responsible manner. Fraudfinder takes its responsibilities to all our stakeholders (customers, partners, suppliers, communities) very seriously. This includes our commitments to treat all workers with respect and dignity, to uphold all human and employee rights, and to ensure safe working conditions, both within our business and in our supply chains. As part of our overall commitment to supporting human rights, Fraudfinder does not tolerate illegal or inhumane labour practices, including slavery, servitude, forced or compulsory labour and human tracking.

### **Review**

This is Fraudfinder’s first published statement. We intend to review this statement on an annual basis in line with the requirements of the Act, and update it based on our continuous improvements to our policies and processes, working alongside our long-term strategic partners to ensure modern slavery plays no part in our business or supply chain.

## **Fraudfinder's Business, Organisational Structure and Supply Chain**

### **Fraudfinder's Business**

Fraudfinder provides fraud and customer risk analysis solutions. The Fraudfinder Full Check is a leading provider of customer risk analysis in the rental industry, operating in the UK, across Europe and in Australia. Fraud Finder is an AI-powered fraud detection platform that instantly identifies fraud in any document uploaded.

Recognised as a market leader in Fraud and All for customer risk analysis, Fraudfinder is backed by Techstars, Ascension Ventures, Fair By Design and others. Fraudfinder partners with over 300 businesses globally to help thousands access products and assets every week – from billion dollar institutions to hyper growth start-ups.

### **Fraudfinder Group Structure**

Fraudfinder LTD is a private limited company incorporated in England and Wales. It is the immediate parent company for Guarantid Limited. As per the Modern Slavery Act 2015, Fraudfinder LTD (and its subsidiaries) fall within the scope of the Act and also this Statement.

Fraudfinder LTD has prepared this statement, as per the provisions of the Modern Slavery Act 2015, to present the measures undertaken by Fraudfinder LTD and its subsidiaries to prevent modern slavery and human trafficking in our business and supply chains.

### **Responsibility**

The Fraudfinder LTD Board ("**The Board**") is responsible for overseeing Fraudfinder LTD's ("**Fraudfinder**") compliance and corporate responsibility, and has discretion to delegate a broad range of powers and decisions to the Executive Team in order to manage Fraudfinder's business on a day-to-day basis.

The Executive Team designs policies and communications so that employees understand Fraudfinder's objectives, know how their individual actions interrelate and contribute to those objectives, and recognise how and for what they will be held accountable. Management places an emphasis on maintaining comprehensive, relevant internal controls and on communicating the high integrity and ethical values expected of Fraudfinder's personnel.

### **Fraudfinder's Supply Chain**

Fraudfinder procures many different goods and services from a range of suppliers, the large majority of which are based in economically advanced OECD countries - mainly the UK, USA and in Europe. These include:

- partner software services used as part of our product / service provision to our customers;

- business process outsourcers with whom Fraudfinder subcontracts part of our service provision to our customers;
- office-based services, including office supplies, maintenance and cleaning services;
- the purchase of IT hardware and software;
- travel management and the hire of venues on a global basis for company events;
- branding and marketing of our products and services
- contractors and temporary staff;
- staff training and professional subscriptions / memberships, and
- professional services of advisors such as lawyers and auditors.

Whilst our risk assessment indicates we generally procure products or services in low-risk geographies and industry verticals, we recognise that no business is immune to the complex supply chain risk posed by modern slavery. Fraudfinder also expects the same standards from our suppliers as we apply internally, including a zero-tolerance approach to modern slavery.

We therefore operate internal measures and work in strong collaboration with our global supply chain partners to develop robust and long-term solutions to this issue, in order to eliminate, as far as possible, the risk of modern slavery and human trafficking taking place. This includes the requirement for suppliers to agree to adhere to all applicable laws.

### **Supplier Review Process**

Fraudfinder follows a risk-based approach to supply chain risk, which is based upon supplier

- Country risk i.e. suppliers in countries where slavery is more prevalent based on the Global Slavery Index; and
- industry risk i.e. some industries in which we procure products or services are more vulnerable to slavery than others.

As part of our supplier selection and renewals process we require completion of a questionnaire that includes a section relating to the adherence to the Act.

This supplier questionnaire is also periodically re-performed, typically on an annual basis, for our largest or higher-risk suppliers.

Where suppliers operate in higher risk geographies or industries, we also perform additional due diligence at the onboarding and renewals stages, as well as exercising additional ongoing monitoring, in order to identify, prevent, and address risks.

We consistently work with areas of the business which have been identified as higher relative risk to establish further steps that we can take, and are taking, to strengthen our approach and to ensure good working practices. This includes annual audits of relevant hiring practices at our business process outsourcing partners.

## **Fraudfinder's Policies Relevant to Slavery and Human Tracking**

Fraudfinder has published a number of policies covering all aspects of our business, in order to outline expectations and requirements of sta (permanent or otherwise). Company policies are openly available to employees via intranet or via Google Drive.

### **Anti-Modern Slavery**

- This statement reflects and confirms our opposition to modern slavery and human tracking.
- In instances where we were to identify any such cases, we have prepared a response template to enable a swift and thorough response. In such cases, we would assess the facts, consider the need for immediate external notification (such as to emergency services), and then take any steps to prevent reoccurrence, including working with the impacted supplier and any other third parties (NGOs, government agencies, law enforcement etc.) to provide training, support, guidance and incentives to implement policies and tackle the issue
- If this is not sufficient to address any instances of coercion, threat, abuse or exploitation to our satisfaction within acceptable timeframes, and in line with Fraudfinder's zero tolerance approach to Modern Slavery, Fraudfinder would strongly consider termination of any suppliers found to be carrying out modern slavery.

### **Supplier Management**

- Fraudfinder has defined and documented Fraudfinder's procurement and supplier management processes in the company internal Procurement Policy. These policies are reviewed annually with assistance from the Risk & Compliance team, and ensure that supplier selection and management are performed in a controlled manner involving a holistic risk assessment following a risk-based approach.

### **Recruitment**

- Fraudfinder's People team have defined the employee onboarding process in a number of policies, including the Pre-Employment Screening Policy which describes the process for conducting pre-employment background checks including right to work checks.

### **Whistleblowing**

- Fraudfinder's Whistleblowing Policy is in place to encourage our employees to report any concerns with non-compliance with legislation, including within our supply chains, and to ensure the protection of whistleblowers. Our Whistleblowing Policy explicitly identifies modern slavery and slavery-like practices as within the scope of Fraudfinder's whistleblowing process, and provides internal and external escalation contacts for any identified instances of wrongdoing.

## **Disciplinary Policy**

- As documented within the Disciplinary Policy, minor breaches of policies result in informal disciplinary action. Instances of serious or gross misconduct as defined in the policy result in formal disciplinary action up to and including dismissal.

## **Employee Protection**

Fraudfinder is committed to ensuring that employee right to work checks are carried out consistently and diligently in line with current relevant legislation. Official documentation that must be checked by us as an employer in order to prevent illegal working is copied and retained on the employee file, with annual audits carried out to ensure that we remain compliant globally with right to work requirements. Alongside this, Fraudfinder also performs additional background checks on prospective employees depending on security and customer requirements. Fraudfinder ensures that any work experience is conducted in line with legislation and best practice guidance including UK government guidance.

All Fraudfinder employees are able to freely enter into employment with Fraudfinder, and are thereafter provided with the appropriate employment contracts or offer letters confirming the full terms and conditions of the employment relationship, for example: employee rights including freedom of association / trade unions / collective bargaining as appropriate.

Fraudfinder operates a number of policies to demonstrate our commitment to employee protection: (including but not limited to)

- Disciplinary Policy;
- Grievance Policy;
- Anti-Bullying, Harassment & Victimisation Policy;
- Equal Opportunities Policy;
- Flexible Working Policy;
- Paid and Unpaid Career Breaks Policy;
- Sickness Absence Policy, Family Friendly Policy

## **Training and development**

All new joiners are required to complete Code of Conduct training as part of onboarding; employees are also required to re-sit the training annually. The Code of Conduct training includes provisions for the identification, reporting and zero-tolerance approach to Modern Slavery, as well as covering Fraudfinder's company values and ethical expectations of employees.

## **Monitoring Our Effectiveness in Eliminating Modern Slavery and Human Tracking**

Through our review processes as well as in the normal course of business, no instances of modern slavery within our direct organisation or suppliers have come to our attention. However we remain vigilant, particularly over suppliers in geographical areas or industries

identified as higher risk for modern slavery or human trafficking. We will continue to monitor the effectiveness of the measures we take in order to ensure there is no modern slavery or human trafficking taking place in any part of our organisation or supply chains. Our effectiveness monitoring efforts include: (but are not limited to)

- Monitoring completion rates of our Code of Conduct training by employees;
- Monitoring whistleblowing reports for instances of reported modern slavery and human trafficking;
- Monitoring completion of, and reviewing responses to, supplier risk assessment questionnaires;
- Reviewing responses to annual risk assessment questionnaires from our largest and highest-risk suppliers;
- Performing risk and compliance audits at our business process outsourcing partners, including reviewing sta hiring and training processes, and agreeing corrective action plans where required;
- Subscribing to, and monitoring alerts from, automated commercial data feeds for our highest-risk suppliers in order to stay abreast of any reported compliance breaches;
- Auditing our own compliance with our own recruitment and onboarding policies; and Monitoring our compliance with the UK Modern Slavery Act.

#### **Our Continued Work**

- We will review our processes, policies and this statement at least annually, and whenever required for any other reason.

Alexander Siedes

CEO, Director

01 January 2026