



Modern Slavery Statement 2025

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (the “Act”) and sets out the steps Citrus Capital LTD (“Citrus Capital”, “we”, “our”) has taken to prevent modern slavery and human trafficking in its business and supply chains.

Introduction

Citrus Capital is an independent corporate finance advisory firm incorporated in England and Wales. We provide services to corporate clients, investors, and institutions. As a financial services provider, we do not produce, manufacture, or sell physical goods, and therefore operate a relatively low-risk supply chain compared to other sectors. However, we remain vigilant and committed to ensuring that neither modern slavery nor human trafficking have any place in our business or supply chains.

We are committed to conducting business with transparency, integrity, and respect for human rights. We expect the same from all of our employees, contractors, suppliers, and business partners.

Governance & Policies

Citrus Capital maintains a zero-tolerance approach to modern slavery and human trafficking. Our framework is underpinned by:

- Code of Conduct – setting clear standards of behaviour, ethics, and respect.
- Supplier Due Diligence – including checks on legal compliance, jurisdictional risk, and ethical practices.
- Recruitment & HR policies – ensuring fair hiring, direct engagement with candidates, and pre-employment screening.
- Whistleblowing & Grievance policies – enabling staff to raise concerns confidentially.
- Equal Opportunities & Anti-Discrimination policies – reinforcing ethical employment practices.

Supply Chains & Risk Management

Our suppliers mainly provide regulated professional services (legal, audit, consultancy), IT infrastructure, and office-related services. We undertake:

- Risk assessments of suppliers – to identify potential concerns.
 - Enhanced due diligence – where services are sourced from outside the UK/EU or other higher-risk jurisdictions.
 - Ongoing monitoring – to identify and address emerging risks.
- We will not knowingly sanction any supplier or relationship that supports modern slavery.

Recruitment & Staff Safeguards

Our recruitment process is transparent and regularly reviewed.

- We communicate directly with candidates to confirm roles and contractual terms.
- Third-party pre-employment screening is used to confirm identity, eligibility to work, and right-to-work checks.
- Employees are paid directly into personal bank accounts with verified NI details.
- Training is provided for staff where appropriate, including awareness of ethical employment practices and the risks of modern slavery.

Training & Awareness

We integrate modern slavery awareness into our compliance and conduct training. This ensures staff understand how to identify, escalate, and mitigate potential risks.

Ongoing Commitment

We recognise that preventing modern slavery requires continuous vigilance. Over the next year, Citrus Capital will:

- Continue to review and strengthen supplier due diligence processes.
- Provide ongoing staff training to reinforce awareness.
- Monitor evolving guidance and industry best practice.

Approval

This statement has been approved by the Board of Directors of Citrus and will be reviewed annually.



Jayceon Barry

CEO