

This statement is made on behalf of Rational Group, which includes Rational Foreign Exchange Ltd and Xendpay Ltd, pursuant to the section 54(1) of the Modern Slavery Act 2015 and constitutes our Anti-Modern Slavery and Human Trafficking Statement for the financial year ending 31 December 2018.

### **Declaration**

This statement is made by Rational Foreign Exchange Ltd and approved by the board on an annual basis.

### **Our Structure**

Rational Foreign Exchange Ltd ("RationalFX") is registered in England and Wales, Company No. 05385999 and is authorised by the Financial Conduct Authority (No.507958) as a payment service provider; registered with Her Majesty's Revenue & Customs as a Money Service Business (MSB No. 12206957). RationalFX specialise in foreign exchange and global payment services.

The registered office address is Level 32, One Canada Square, Canary Wharf, London E14 5AB, U.K.

Specifically, we provide solutions to our customers' foreign currency exchange and global payments needs. RationalFX's business is therefore based on intangibles rather than physical inventory, and our risk of being supplied directly or indirectly by slave labour is low. Our key suppliers are our banking partners, as well as technology partners that provide us software to support anti-money laundering. RationalFX performs appropriate due diligence on both suppliers and customers.

### **Our Policies on Slavery and Human Trafficking**

RationalFX recognises modern slavery as defined in the Modern Slavery Act 2015, and is in accordance with Article 4 of the Human Rights Convention. For the purposes of this statement, the term 'modern slavery' encapsulates slavery, servitude, forced or compulsory labour and human trafficking.

RationalFX does not tolerate or condone the practice of modern slavery in any form and is committed to delivering the highest standards of corporate governance and ensuring there is no modern slavery in the business or supply chain.

RationalFX's commitment includes delivering training to our employees on sanctions and key 'high risk' indicators to be aware of when discharging their duties. This is embedded into our policies and procedures, and employees are required to report such incidents of suspicious activity to senior management.

### **Risk Assessment and Due Diligence process and controls**

In order to manage and mitigate any risk we periodically assess our business and supply chain in order to identify those areas in which we consider the risk of modern slavery to be the highest. At present we would consider that the risk of modern slavery occurring is somewhat higher in jurisdictions where they have less legislation against or controls of such activity. For business involving such jurisdictions we are on heightened alert for suspicious signals of possible modern slavery.

The due diligence processes we follow include the following measures:

- Due diligence relating to modern slavery carried out on suppliers identified as being at higher risk of modern slavery.
- A periodic risk assessment of our business and supply chain to identify suppliers and business engagement where the risk of modern slavery is highest.
- Scrutinizing clients both during initial on-boarding and on a transactional basis for compliance and reputational risks.

### **Measuring effectiveness**

In order to monitor our effectiveness in preventing modern slavery and human trafficking from taking place in our business and supply chains, we measure our progress against the following indicators:

- Number of Employees and third parties who have completed training
- Amount of Due diligence processes completed
- Number of audit processes completed
- Number of partnerships entered into with relevant organisations

### **Training**

RationalFX has, in the last year, provided training to its employees on its policies and procedures in relation to modern slavery , as part of an annual refresher training in anti-money laundering. These measures ensures an awareness of RationalFX's zero tolerance for being party in any way to slavery or human trafficking, and that this zero-tolerance overrides any potentially competing priorities. All employees within RationalFX are expected to comply with all laws and act in accordance with local guidelines and regulations, and carry out their role with integrity and honesty.

**Responsibility**

In case of any questions or concerns relating to this statement, please feel free to contact us by any of the following methods:

- 1) Email to [compliance@rationalfx.com](mailto:compliance@rationalfx.com)
- 2) Email Head of Compliance – Kirsty Coughlan [kirsty.coughlan@rationalfx.com](mailto:kirsty.coughlan@rationalfx.com)