



# Modern Slavery Statement

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Last updated: **March 2025**

Subscription  KYC  Tax  MLRO

## Introduction

Sonata One (Holdings) Limited and its subsidiaries (collectively "Sonata One") have issued this Modern Slavery Statement for the 2025 financial year. The purpose of this statement is to provide an overview of Sonata One, the risks it faces from a modern slavery point of view and the policies, procedures and controls in place to mitigate those risks. This statement will be updated each year.

### Sonata One – structure and business

Sonata One (Holdings) Limited is the group parent company registered in Guernsey and has a number of subsidiary companies in Guernsey, the UK, South Africa, and Mauritius (and in Luxembourg, the USA, and the Cayman Islands in due course) which provide services to clients all around the world.

Sonata One is the owner and operator of a digital platform which provides a hub for the private markets investment community. Sonata One's typical client base is comprised of collective investment schemes, advisory companies, trust and corporate services, law firms and administrators. Sonata One's three key service lines in 2025 are fund subscription, Know Your Client due diligence ("KYC") and the automatic exchange of information for tax reporting purposes (FATCA/CRS). In addition, Sonata One will be adding Transfer Agency services during the course of 2025.

### What is modern slavery?

Modern slavery is the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation. It is a crime under the Modern Slavery Act 2015 (UK) and includes holding a person in a position of slavery, servitude, forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after.

### Supply chain

Sonata One is a purely digital service provider and so our suppliers are also typically business to business service providers. Sonata One has consciously chosen key suppliers from large, reputable international technology companies with ethical policies and procedures. We therefore consider our supply chain risk to be low in relation to modern slavery. We have, however, identified a number of potential risks and duly introduced policies and practices to mitigate these risks.

### Risks

The chief risk to Sonata One is the employment of individuals who are victims of modern slavery or the use of vendors or contracting companies employing such individuals. While we consider this risk to be low

given the industry in which we operate, Sonata One has implemented the policies detailed below to mitigate such risks.

### Policies and due diligence process

Sonata One operates a new business and vendor policy in which all potential suppliers are subject to a due diligence process, including screening via a third-party system, prior to contracting with Sonata One. As part of this policy, Sonata One ensures that each vendor has in place a modern slavery statement or equivalent ethical commitments. If vendors are ultimately accepted, they are then screened daily thereafter.

As regards its own employees, Sonata One ensures each employee has an appropriate work permit and that salaries are fair, (in line with industry benchmarks,) and paid directly to the employees' account. Sonata One also has an Employee Handbook which outlines our ethical standards and a Whistle Blowing Policy to facilitate escalation of issues where such standards are not being met.

For independent contractors, Sonata One ensures those contracting directly with Sonata One are paid fairly and directly to their own account or where the contract is through an agency, that the agency has in place a modern slavery statement or equivalent ethical commitments and that these indirect contractors have transparent access to Sonata One management to facilitate reporting of issues or concerns.

### Effectiveness

Sonata One performs an annual review of each vendor/supplier and assesses if our policies and procedures have been effective by reviewing publicly available information on the vendor/supplier, screening results, updated modern slavery statements and annual attestations from vendors who do not have an audited operational controls report.

### Training

All staff, contractors and the board of directors of each group company receive training on at least an annual basis on Sonata One's policies, procedures and controls including our ethical values and modern slavery statement.

### Approval

This statement has been approved by the Chief Executive on behalf of the Board on 03 March 2025.

Signed by:

*Tim Andrews*

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## Appendix A: Version Control

<b>Title</b>	Modern Slavery Statement			
<b>Description</b>	Revised			
<b>Created By</b>	Mark Quigley			
<b>Date Created</b>	07/01/2022			
<b>Maintained By</b>	Louis Dodd			
<b>Version Number/ Document Name</b>	<b>Modified By</b>	<b>Modifications Made</b>	<b>Date Modified</b>	<b>Status</b>
Modern Slavery Statement – V1.0	Tim Andrews	Approved	07/01/2022	Approved
Modern Slavery Statement – V1.1	Claire Howarth	Add new branding	25/07/2023	Approved
Modern Slavery Statement – V2.0	Louis Dodd	Updated for 2024	03/01/2024	Approved
Modern Slavery Statement – V3.0	Louis Dodd	Updated for 2025	07/01/2025	Approved

# Sonata One

The Private Funds Clearinghouse

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Sonata One is a trading name of the Sonata One group of companies. Details of our licensed companies are available on our [website](#).