

Nucleus Modern Slavery Statement

Introduction

Modern slavery is a crime and a violation of fundamental human rights, it takes many forms all of which result in the deprivation of an individual's liberty by another, with the aim of exploitation for personal or commercial gain.

Nucleus has a zero-tolerance policy towards modern slavery and has implemented appropriate controls to mitigate the risks of slavery and human trafficking occurring in our business or in our supply chain. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the "Act") and constitutes our slavery and human trafficking statement (the "Statement") for the financial year ending 31 December 2023. The Statement sets out actions Nucleus has undertaken and policies that have been introduced to understand and mitigate all potential modern slavery and human trafficking risks related to our business. Nucleus is fully compliant with its obligations under the Act and is committed to keeping its policies and procedures under review and ensuring that they are always fit for purpose.

The Statement applies to all our people, whether permanent employees, temporary employees, contractors, consultants, working directly for Nucleus or within our third-party suppliers (in so far as is possible) and covers all operational activities undertaken by Nucleus. This policy does not form part of any employee's contract of employment and we may amend it at any time.

Organisational structure and supply chains

Nucleus Group Services Limited is a subsidiary undertaking of Nucleus Financial Platforms Limited ("NFPT"), that together with the other undertakings of NFPT from time to time comprise the "Nucleus Group". The Nucleus Group currently employs over 800 people. The major shareholders of the Nucleus Group are HPS and Epiris. "HPS" means HPS Investment Partners, LLC, its group undertakings, together with funds managed and/or advised by any of them and "Epiris" means funds managed by Epiris GP Limited and/or Epiris Co-Invest GP Limited, both of which are advised by Epiris LLP.

Nucleus is one of the UK's leading independent financial planning and retirement-focused platforms operating from offices in London, Bristol, Ipswich, Salisbury, Edinburgh and Glasgow. The business administers £83 billion of customer assets across Self-Invested Personal Pensions, Individual Savings Accounts, general investment accounts and other products for over 5,000 financial advisers and more than 250,000 underlying clients.

Nucleus's commitment to eradicating modern slavery is embedded in our business through our Supplier Code of Conduct which sets out our expectations as to the behaviours and practices of our suppliers.

As a provider of financial services, we do not have a very long or complex supply chain. Our main suppliers are predominantly UK-based providers of goods and services that enable us to maintain and develop our operations. While we consider our suppliers to be at relatively

low risk of engaging in practices of modern slavery and human trafficking, and there have been no recorded incidences of modern slavery within our supply chain, our Supplier Code of Conduct requires suppliers to comply with all applicable laws, thereby mitigating the risk of any practices which might amount to modern slavery.

As part of our obligations under the Act and other legislation relating to the detection and prevention of modern slavery, our Supplier Code of Conduct embeds our commitment to act ethically and with integrity in all our business relationships and is our primary governance tool in being able to identify and eradicate modern slavery and human trafficking should they ever arise in our supply chain.

We strive to ensure that there is transparency in both our supply chain and our own business and look for the same standards from our contractors, suppliers and other business partners as we apply in our own business. We are committed to ensuring that this is a continuous, developing process.

Controls

Supplier code of conduct: As part of our obligations under the Act and other legislation relating to the detection and prevention of modern slavery, our Supplier Code of Conduct embeds our commitment to act ethically and with integrity in all our business relationships and is our primary governance tool in being able to identify and eradicate modern slavery and human trafficking should they ever arise in our supply chain. We strive to ensure that there is transparency in both our supply chain and our own business and look for the same standards from our contractors, suppliers and other business partners as we apply in our own business. We are committed to ensuring that this is a continuous, developing process.

Robust HR policies and practices: These align with our obligations under the Modern Slavery Act 2015, which include background checking on all new employees and the use of reputable and trusted agencies for recruitment and pre-employment screening of both permanent and temporary or fixed-term workers. We have a particular focus on our employees who are on the front line in terms of identifying issues such as modern slavery and human trafficking. Expectations of employee conduct – in particular, the expectation that employees will act in alignment with Nucleus's core values – are made clear through a transparent and linear induction process and probationary period. Our whistleblowing policy ensures a safe environment for any employee wishing to report any actual or suspected wrong-doing.

Stringent anti-money laundering processes and controls: As a financial institution, Nucleus is at risk of handling cash and other assets that could have been financed by modern slavery. Nucleus has in place a range of policies covering anti-money laundering, sanctions, fraud and financial crime, a Money Laundering Reporting Officer and other controls for identifying and preventing any form of money laundering or other financial crime (including that which may facilitate financing that supports modern slavery).

Due diligence

This is undertaken in respect of suppliers, the results of which have demonstrated that our suppliers present a very low risk of modern slavery or human trafficking in our supply chain. We take care to use reputable UK-based (and a small number of EU-based) suppliers whose attitude towards the prevention of modern slavery and human trafficking and

compliance with the Act align with ours before entering into business arrangements with them.

Our Terms and Conditions of Purchase are periodically reviewed to ensure that they reflect our key business aims and values, including the prevention of modern slavery and human trafficking.

Rolling periodic reviews are carried out by our vendor management team for our contractual arrangements with suppliers to maximise consistency and transparency in those relationships.

Terms requiring compliance with all applicable laws (including the Modern Slavery Act 2015 and secondary legislation) are included in our standard contracts.

Nucleus is wholeheartedly committed to implementing effective systems and controls to ensure that the abhorrent practices of modern slavery and human trafficking are not taking place in our business or supply chain. We are pleased that our current measures have been effective, as there have been no reported incidences of modern slavery or human trafficking in our business or supply chain, but we are not complacent and are aware that this is an on-going risk. We will therefore continue to develop our approach, educate our employees, and assess and manage risks on a continuing basis.



Richard Rowney

Chief Executive Officer