

# Anti-slavery and human trafficking statement

Version 3, September 2019

We, Nucleus Financial Group plc and each of the group's subsidiary companies (Nucleus), are a provider of an independent investment wrap service supporting financial advisers. Some components of our service are outsourced and may be further outsourced to sub-contractors. We operate in the United Kingdom and are headquartered in Edinburgh.

## 1 Background

Modern slavery is a crime and a violation of fundamental human rights. It takes many forms, all of which result in the deprivation of individual's liberty by another, with the aim of exploitation for personal or commercial gain. We have zero tolerance to slavery and human trafficking and are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

This statement is made for and on behalf of Nucleus pursuant to Section 54(1) of the Modern Slavery Act 2015 (the "Act") and constitutes our Slavery and Human Trafficking Statement (the "Statement"). The Statement has been approved by Nucleus' board of directors on 4 September 2019.

## 2 Aim

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.

## 3 Scope

The statement applies to all Nucleus colleagues, whether permanent employees, temporary employees, contractors, consultants, working directly for Nucleus or within our third-party outsourcers (in so far as is possible) and covers all operational activities undertaken by Nucleus.

## 4 Statement

We recognise our role in tackling the crimes of modern slavery and human trafficking and are committed to ensuring transparency in relation to the steps we take to address them, both in our own business and throughout our supply chains. We comply with the

disclosure obligations under the Act and expect the same high standards from all our contractors, suppliers and other business partners. We also expect our suppliers to hold their own suppliers to the same high standards.

### Due diligence processes for slavery and human trafficking

As part of our initiative to identify and reduce the risk of slavery and human trafficking occurring within our supply chains, we have adopted the following due diligence procedures:

- we build longstanding relationships with our third-party service providers and suppliers, and place obligations on them to comply with all applicable laws, including compliance with the Act where applicable; and
- as an FCA regulated business, we comply with our obligations to carry out initial and ongoing 'know your customer' and anti-money laundering checks on third parties. Our key third party administrator is subject to this same obligation when appointing any sub-contractor.

### Policies in relation to slavery and human trafficking

We operate a range of policies and procedures designed to ensure that we can efficiently identify, assess and monitor risks, including risks in relation to that of human trafficking and slavery. These include policies and procedures in the following areas:

- Third party provider and outsourcing;
- Whistleblowing;
- Anti-money laundering, bribery and financial crime;
- Suspicious activity; and
- Risk events.

### Training

We provide training to relevant members of staff to improve awareness and understanding of the risks of modern slavery and human trafficking in our supply chains and our business. The board of directors have been briefed on the requirements of the Act.

## Anti-slavery and human trafficking statement

### 5 Measures of success

We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain.

Nucleus measures the success of the measures set out in this Statement through achievement of the following objectives:

- completion of initial and annual, or more regular, due diligence on third party suppliers;
- risk based approach to oversight of our third party suppliers to ensure that resources are allocated appropriately. Risks considered include country risk, sector risk, transaction risk and business partnership risk;
- honest and open communication with the relevant personnel of our service providers and suppliers to set our expectations on their compliance with our expectations; and
- robust procedures to encourage the reporting of concerns and the protection of whistle blowers.

### 6 Conduct risk consideration

Nucleus is committed to acting ethically and with integrity in all our business dealings and relationships. We have implemented and are enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business. We also require our suppliers to observe, to the fullest extent, our values and ethos.

### 7 Governance

This statement is owned by the board of directors, delegated to the risk committee, and is subject to review on an annual basis. The Chief legal officer is the custodian of this statement and is responsible for its ongoing suitability and implementation. We have a zero-risk appetite for material breaches of this statement. All breaches should be referred to the statement owner who is responsible for raising a risk event or suspicious activity report as appropriate. All policies and processes relating to the anti-slavery and human trafficking statement are subject to ongoing assurance.

### 8 Further information

Please contact the Chief legal officer for further information on this policy.

### Signed

This statement has been approved and signed by Stuart Geard, Chief financial officer, Nucleus Financial Group plc, September 2019.

Version	Author	Date	Action
1	Jenna McMahon and Melanie Ward	28/03/2017	First version
2	Nicola Megaw	August 2018	Annual review following ownership transferred from compliance to legal
3	Nicola Megaw	September 2019	Annual review