

Anti-slavery and human trafficking statement

Version 1, March 2017

1. Background

Modern slavery is a crime and a violation of fundamental human rights. It takes many forms, all of which have in common the deprivation of a person's liberty by another with the aim of exploitation in favour of personal or commercial gain.

This statement is made with regard to the obligations arising under section 54(1) of the UK's Modern Slavery Act 2015. Accordingly, this statement should be considered to constitute the slavery and human trafficking statement for Nucleus and all companies within NFG for the 2015 financial year and all future financial years until it may in future be modified or amended.

2. Aim

This statement sets out NFG's actions to understand all potential modern slavery risks related to our business and to ensure steps are maintained to prevent slavery and human trafficking.

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. 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 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.
- We have procedures in place to encourage the reporting of concerns and the protection of whistle blowers.

5. Governance

This statement is owned by the board, delegated to the risk committee, and is subject to review on an annual basis. The Head of Legal is the custodian of this statement and is responsible for its ongoing suitability and implementation. Any amendments to the statement shall be considered by the policy group before submission to the risk committee for approval. There is 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.

6. Our statement

Nucleus Financial Group (NFG) has a zero-tolerance approach to modern slavery.

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015 (the Act). We expect the same high standards from all our contractors, suppliers and other business partners, and expect our suppliers to hold their own suppliers to the same high standards.

Nucleus' group structure and supply chains

NFG is headquartered in Edinburgh. We provide an investment wrap service, some components of which are outsourced and may be further outsourced to sub-contractors.

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 these suppliers to comply with all applicable laws, which, where relevant would include compliance with the Act.
- As a FCA regulated business, we are under an obligation 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 if appointing any sub-contractor.

Policies in relation to slavery and human trafficking

As part of our initiative to identify and mitigate risk (including in relation to that of human trafficking and slavery) we operate a range of policies and procedures. These include the 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

To ensure the risks of modern slavery and human trafficking in our supply chains and our business are understood, training is provided to relevant members of staff. The Board of Directors have been briefed on the requirements of the Act.

7. Conduct risk considerations

Nucleus Financial Group (NFG) is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business, and in so far as is possible to requiring our suppliers hold similar ethos.

8. Further information

Please contact the Head of Legal for further information on this policy.

Version	Author	Date	Action
1	Jenna McMahon & Melanie Ward	28/03/2017	First version