

JM Finn & Co Modern Slavery Statement 2023

Opening statement:

JM Finn and Co Ltd is a responsible employer operating within the financial services sector. We seek to uphold the highest ethical and professional standards and are committed to ensuring that all our business practices are free from any slavery or human trafficking. We aim to ensure that the behaviours and practices of our supply chain reflect our own business standards and compliance with applicable laws and standards. We take a zero tolerance stance on slavery and human trafficking within our workforce and expect the same from our supply chain.

Organisation structure and business of JM Finn & Co:

JM Finn & Co Ltd provides a high quality, personalised investment management service to private clients, investors and charities. JM Finn & Co Ltd is a UK based firm with 5 offices, employing over 300 staff. Our head office is based in London, with other offices in Bristol, Bury St Edmunds, York and Winchester.

Recruitment:

For direct employees, we carry out pre-employment checks to make sure that anyone we employ has the right to work in the UK. All staff are paid above the National Living Wage. The firm has a range of employment policies designed to protect the welfare of our staff including diversity and dignity at work.

Supply Chains:

As a financial services provider, JM Finn &Co does not act as a producer, manufacturer or retailer of any physical goods. We consider ourselves at a low risk of exposure to slavery and human trafficking issues. Our supply chains primarily involve building management services, recruitment agencies, the procurement of office supplies, materials and equipment, and the provision of professional and support services, principally in relation to IT, facilities, finance, risk management, compliance, human resources and marketing.

While we consider our vendors to be at relatively low risk of engaging in practices of modern slavery and human trafficking, we seek to engage with suppliers who are reputable and well established within financial services. In 2022, we created a central register of all suppliers which will help to increase our oversight of our supply chain.

Policies in relation to Slavery and Human Trafficking:

As part of our commitment to combatting modern slavery, we have a Modern Slavery Policy which will reflect our commitment to acting ethically and with integrity in all our business relationships.

Due diligence processes:

In order to reduce the risk of modern slavery and human trafficking in our supply chain critical JM Finn & Co suppliers are required to complete a due diligence questionnaire before they engage with us. This questionnaire includes information about the supplier's employment practices. We would not engage with suppliers who does not comply with modern slavery requirements.

Risk Assessment:

Building management suppliers are deemed higher risk and must provide additional information about their working practices, which will highlight to us any potential modern slavery risks. Our Facilities Team follow up with any suppliers whose response raises concerns. On a periodic basis, JM Finn requires higher risk suppliers to confirm their ongoing working practices. The Firm will follow up with any suppliers whose response raises concerns.

Training and awareness:

Modern Slavery requirements are communicated via a number of mediums including the company intranet, Quarterly Staff Seminars and Financial Crime training to ensure staff understand our modern slavery policy and how they can proceed if they have any concerns.

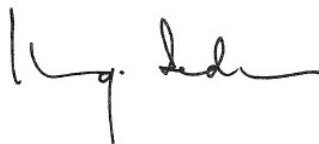
Our effectiveness in combating slavery and human trafficking:

JM Finn & Co has a whistleblowing procedure in place. The whistleblowing procedure allows for issues of concern to be escalated to the Head of Internal Audit and ultimately a Non-Executive Director who is our whistleblowing champion so that they can be dealt with properly.

We will continue to develop our approach to combating modern slavery and human trafficking during the course of 2023 including assessing and managing risks on an on-going basis.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes JM Finn & Co modern slavery and human trafficking statement for the financial year ending 31st December 2022.

Approved by the Board of Directors on 10th May 2023



Hugo Bedford

Chief Executive Officer

JM Finn & Co