Modern Slavery and Human Trafficking Statement

This statement is made on behalf of J M Finn & Co Ltd pursuant to section 54 (1) of the Modern Slavery Act 2015.

The Business

J M Finn & Co Ltd provides a high quality, personalised investment management service to private clients, investors and charities. In both 2016 and 2017 we were proud winners of the City of London Wealth Management award for Best Discretionary Service. JM Finn is UK based with offices in London, Bristol, Bury St Edmunds, Leeds and Cardiff. All our suppliers are based in the UK.

Our Commitment

As a responsible employer operating within the financial services sector, we 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 expect the same high standards and commitment from our suppliers.

Supply Chains

As a financial services provider, JM Finn do not act as a producer, manufacturer, or retailer of any physical goods. We therefore consider ourselves at a low risk of exposure to slavery and human trafficking issues. Our supply chains are mainly in respect of recruitment, 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. We seek to engage with suppliers who are reputable and well established within financial services, and who are demonstrating compliance with modern slavery legislation.

Policies in relation to Slavery and Human Trafficking:

JM Finn complies with all UK human rights laws and employment laws. This includes adhering to the current living wage. In terms of HR procedures we have rigorous identity and background checking in place and work with carefully selected and reputable third parties to source candidates. All checks must be completed before employment is confirmed. Once in employment, we encourage a culture of speaking up about any concerns. Key policies include:

- Ethics Policy
- Whistleblowing Policy
- Grievance Procedure
- Diversity and Dignity at Work Policy
- Health and Safety Policy
- Free and confidential helpline available to employees and their partners
Actions underway in 2018

Due Diligence

The Firm is conducting an enhanced risk analysis of our key supply chains. Our suppliers have been required to complete due diligence questionnaires, which include:

- A requirement to confirm that they are not contravening slavery or human trafficking
- Ensuring that employees/contractors are paid at or above the minimum wage set by UK guidelines
- Whether policies are in place to protect the welfare of the employee/contractors
- Whether they use third party suppliers, and if so, whether due diligence checks are taken prior to using their services

During this review any non-conformity or discrepancy will be carefully reviewed by the firm.

Training

The Firm is currently identifying training options for all staff.

Signed on behalf of the Board

[Signature]

Name: S. A. Sussman

Date: 7.6.18