



BLACKFINCH

GROUP

Modern Slavery Act Statement
For year ended December 31 2019



Blackfinch mark of
Environmental, Social,
and Governance

Background

Blackfinch Group Ltd (Blackfinch) continues to develop its Corporate Social Responsibility (CSR) framework. Our focus is on co-ordinating and consistently driving business and social practices in the following areas:



Client environment

Adapting and evolving our products and services to ensure they meet adviser and client needs and aspirations



Work environment

Adapting and evolving around staff recruitment, how we help people develop, how we ensure work-life balance, and how we communicate and inform



Community environment

We will continue to engage with local and national bodies and support charities through sponsorship and fundraising



World environment

We aspire to be a responsible entity and uphold our duty of care to ensure that we contribute positively to the planet's sustainability

Introduction

Blackfinch is committed to preventing acts of modern slavery and human trafficking from occurring within both its business and supply chains. Transparency is core to our approach, providing assurance to our customers that we're working ethically.

We're focused on meeting investors' expectations, treating all clients fairly and ensuring that our objectives are aligned with those of our stakeholders. We're committed to environmental, social and governance (ESG) initiatives and are a signatory to the Principles of Responsible Investment (PRI).

This statement is made in compliance with section 54 of the Modern Slavery Act 2015. In this statement we set out the steps we're taking to ensure that modern slavery and human trafficking is not occurring in our business or supply chains.

Organisational Structure

Blackfinch is based in the UK. With a 25-year heritage our businesses cover tax-efficient solutions, early-stage investing, multi-asset portfolios and property financing. We sell our products primarily via the UK financial intermediary market through our nationwide distribution team.

We currently employ more than 100 people and procure goods and services from a limited number of suppliers. Blackfinch doesn't have an intricate supply chain and doesn't obtain services or goods from businesses based in high-risk countries. So, we deem the risk of modern slavery and human trafficking within Blackfinch to be low.

Governance and Policy

Blackfinch has a set of policies in place to ensure that we're managing the risk of modern slavery and human trafficking. Our policies include our Human Rights Statement and codes of conduct for our employees and suppliers. These policies establish the standards expected across our business activities. We review all our policies annually and adapt them in line with changes in the business. Our sector is relatively low risk for human rights violations, and this informs policy content.

We expect our employees, contractors, and suppliers to prevent modern slavery and human trafficking from occurring. Our governance framework and related corporate policies encourage our employees and contractors to report and escalate any concerns around unethical conduct. This applies in relation to modern slavery, human trafficking or other matters.

Risk Assessment

The financial services sector in which we operate is not considered to be one of those most at risk. Blackfinch doesn't have multiple levels of contracting, or intricate supply chains. Furthermore none of our partners have businesses based in countries where labour laws are non-existent or not enforced.

We usually receive services via regulated professional service providers. We consider these to be low risk in relation to modern slavery and human trafficking. So, we don't take specific action in regard to these relationships.

We also consider the supply of goods to Blackfinch to have a low risk profile. Most goods we order are for use in an office environment. Before using a supplier, we work to ensure that their policies align with our own. We also work to confirm that they comply with applicable modern slavery and human trafficking laws in their business and supply chains.

In our day-to-day business activities we make investments in property developments, renewable energy, media, and leisure. We also have our own venture capital team which invests in a range of early stage technology-enabled businesses. Meanwhile our asset management division invests in third-party collective investments as well as firms listed on regulated exchanges.

When selecting investments across all of our product ranges, and where relevant, we work to ensure that investee firms have modern slavery and human trafficking policies aligned to our own. We document this as part of our thorough due diligence and investment processes. We also assess the relevant risks prior to making any investment. Where we identify modern slavery or trafficking practices, we actively engage with those companies to resolve and end those practices. Where our engagement is unsuccessful, we withdraw our investment.

Training, Awareness and Continued Development

Blackfinch Group is a collection of a diversified subsidiaries. Each has a defined process around ensuring that the Group maintains its ESG standing.

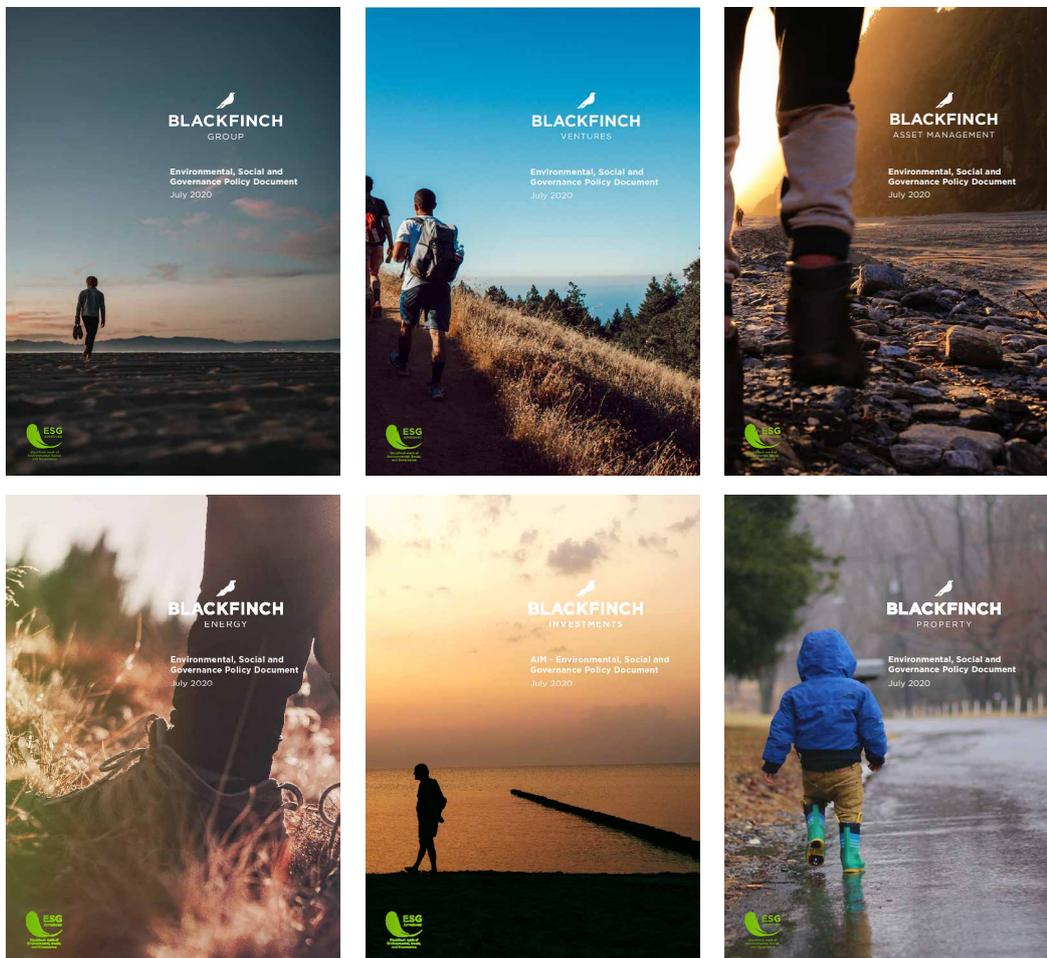
We're committed to ensuring that our employees are fully educated on human rights and modern slavery issues and can identify its indicators and risk factors. Blackfinch provides all employees with regular training on a range of legal and compliance matters. This includes their obligations under the Modern Slavery Act 2015.

Our focus for the next year is to continue to review our practices and maintain the rigorous controls we have in place to manage risk. Through ongoing training, we will also continue to build awareness of the prevention of modern slavery and human trafficking within our business and supply chains.

A handwritten signature in black ink, appearing to read 'Richard Cook', with a stylized flourish at the end.

Richard Cook
CEO and Founder

For more information on related CSR & ESG policies at Blackfinch please visit www.blackfinch.com/ESG.



Contact Us

Blackfinch ESG Committee

Blackfinch Group

1350-1360 Montpellier Court

Gloucester Business Park

Gloucester GL3 4AH

Tel: 01452 717070

Email: blackfinchesg@blackfinch.com

