

## **JM Finn & Co Modern Slavery Statement 2026**

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### **Opening statement:**

In accordance with the requirements of section 54(1) of the Modern Slavery Act 2015 (the Act) this Statement sets out the steps we are taking to prevent modern slavery taking place within our business. This statement focuses on the risk of modern slavery and human trafficking related to our employees and supply chain. 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 behaviors 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 6 offices, employing over 300 staff. Our head office is based in London, with other offices in Bristol, Bury St Edmunds, Cheltenham, York, and Winchester. JM Finn oversees £11.9bn in client assets as at 31 December 2025.

### **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 inclusion 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 inherent 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 low inherent risk of engaging in practices of modern slavery and human trafficking, we recognise that risk can arise through our supply chains and therefore apply additional due diligence for higher risk suppliers. We seek to engage with suppliers who are reputable and well established within financial services.

### **Policies in relation to Slavery and Human Trafficking:**

As part of our commitment to combatting modern slavery, we have a Modern Slavery Policy along with Whistleblowing, Gifts and Hospitality Policies and Anti-Money Laundering Handbook which reflects 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 (tier 1) and important (tier 2) JM Finn & Co suppliers and outsourced providers are required to complete a due diligence questionnaire before they engage with us. For Tier 1 outsourcers/suppliers due diligence is completed on an annual basis. This questionnaire includes information about the supplier's employment practices such as compliance with minimum wage requirements and documenting evidence of the right to work in the UK. We would not engage with suppliers who do not comply with modern slavery requirements.

**Risk assessment and management:**

JM Finn & Co takes a risk-based approach to addressing modern slavery and human trafficking within the firm and its supply chain. 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 engage with any building management suppliers whose response raises concerns. On an annual 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:**

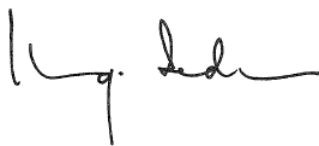
Modern Slavery requirements are communicated via a number of channels including the company intranet. Whistleblowing, Conduct and Financial Crime training are delivered as part of the new joiner programme. In 2026, all staff are required to complete mandatory Modern Slavery training.

**Key performance indicators to measure effectiveness of steps being taken:**

JM Finn & Co has a whistleblowing procedure in place. The whistleblowing procedure allows for issues of concern to be escalated to the Compliance Director and ultimately a Non-Executive Director who is our whistleblowing champion so that they can be dealt with properly. Our Conduct Risk Committee reviews whistleblowing metrics each quarter.

The Firm also tracks the completion of modern slavery reviews for high risk and critical suppliers as a Key Risk Indicator. At the time of this statement being signed, there are no outstanding reviews. We will continue to develop our approach to combating modern slavery and human trafficking 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's modern slavery and human trafficking statement for the financial year ending 31<sup>st</sup> December 2025.

Approved by the Board of Directors on 5<sup>th</sup> May 2026



Hugo Bedford

Chief Executive Officer

JM Finn & Co