

Modern Slavery and Human Trafficking Statement

Effective Date: 31 March 2025

Review Date: 2 June 2025

Approved by: TAM plc Board

1. Introduction

This statement is made by Tatton Asset Management plc (“TAM”, the “Company” or the “Group”) pursuant to section 54(1) of the Modern Slavery Act 2015. It applies to the financial year ending 31 March 2025 and covers all of the Company’s subsidiary companies.

TAM is committed to conducting our business with integrity and transparency and we uphold the highest standards of ethical conduct. We recognise the potential risk of modern slavery and human trafficking, even in the professional services sector, and are committed to ensuring that there is no place for such practices within our organisation or supply chains.

2. Scope

This policy applies to all employees, directors, officers, contractors, agencies, agency workers, seconded workers, volunteers, interns, consultants, suppliers, and any other parties working on behalf of Tatton Asset Management plc and its subsidiaries across all jurisdictions in which we operate.

3. Our Business and Supply Chains

Tatton Asset Management plc (“TAM”) is an on-platform only model portfolio services (“MPS”) discretionary fund manager (“DFM”), working exclusively with independent financial advisers (“IFAs”) who seek third party investment and operational support in order to elevate outcomes for both advisers and their clients.

From our offices in London, Manchester and Birmingham, we offer a range of services to IFAs across the UK, from on-platform only investment management as well as regulatory, compliance and IFA consulting services and a whole of market mortgage proposition.

The Group’s principal trading subsidiaries are:

- Tatton Investment Management Limited – investment management
- Paradigm Partners Limited – IFA compliance and consulting services
- Paradigm Mortgage Services LLP – whole of market mortgage and protection proposition

The Group also includes several smaller subsidiaries supporting various aspects of our operations. We operate exclusively in the UK, with all staff and operations based domestically.

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Given the nature of our services and suppliers, we assess our risk of modern slavery and human trafficking within our supply chain or business as low. We have, however, and are continuously taking steps to protect against the risks of modern slavery.

4. What is Modern Slavery?

Modern slavery is a serious crime that infringes upon fundamental human rights. It encompasses various forms of exploitation, including slavery, servitude, forced or compulsory labour, and human trafficking. Central to all these forms is the control or coercion of individuals, depriving them of their liberty for personal or commercial gain. This exploitation can manifest through physical, psychological, or financial means, often involving threats, deception, or abuse of vulnerability. Modern slavery is a global issue that affects individuals across all demographics and is present in many sectors, including those within the UK.

5. Policies and Procedures

Our approach to modern slavery and the labour markets is to comply with the law by ensuring all employees receive pay of including and above the National Living Wage.

We provide induction training for new employees and regular refresher courses to our employees to ensure understanding of modern slavery risks and our policies. To support our commitment to ensuring transparency in our business as well as through our supply chain, we have implemented the following policies:

- Code of Conduct: outlining expected standards of behaviour across the Group;
- Whistleblowing Policy: providing a confidential mechanism for reporting concerns about unethical conduct;
- Supplier Code of Conduct: requiring suppliers to operate ethically, lawfully, and free from modern slavery.

The Group's employee handbook is made available to all employees where information on equal opportunities, diversity and inclusion is provided.

Anti-Bribery and Corruption training is being rolled out during the coming financial year to all employees, along with a formal Anti-Bribery and Corruption Policy.

Where feasible, we aim to build long-term relationships with reputable suppliers. We require that they either maintain their own anti-slavery and human trafficking policy or formally commit to complying with our Supplier Code of Conduct. We also expect our suppliers to apply the same high standards throughout their own supply chains. Should any concerns or violations be identified, we will assess the relationship and take appropriate action, which may include termination. We will not knowingly engage with any organisation involved in modern slavery or human trafficking.

6. Due Diligence and Risk Assessment

Our operations are low-risk by sector and geography, however the risk relating to modern slavery and human trafficking can occur anywhere in our operations, whether through direct employment or in our supply chain. We seek to foster a culture that encourages the identification and reporting of any such risks within our business.

As part of our recruitment processes, we verify every new employee's right to work in the UK upon the commencement of their employment. We also undertake the following measures to identify and mitigate risks:

- Mapping our supply chain, which primarily comprises UK-based professional service providers, including ACDs, fund managers, research providers, other financial services for example risk profiling, legal, IT, and property. These organisations are service organisations and use labour for the effective delivery of service within the financial sector;
- Performing risk-based due diligence on key suppliers, particularly new or higher-risk engagements (e.g. outsourced services providers or cleaning/maintenance contractors);
- Requiring suppliers to confirm adherence to our standards; and
- Monitoring existing suppliers for compliance

7. Monitoring and Reporting

We monitor the effectiveness of our policies through:

- Regular review of our suppliers;
- Reviewing reports or concerns raised under our whistleblowing procedures; and
- Engaging with stakeholders to gather feedback.

Any concerns or violations can be reported confidentially through our whistleblowing mechanism. No instances of modern slavery or human trafficking were identified in the reporting year.

8. Continuous Improvement

We are committed to continuous improvement by:

- Regularly reviewing and updating our policies; and
- Staying informed about emerging risks and best practices.

9. Governance and Approval

This statement covers Tatton Asset Management plc and its subsidiaries and is approved by the Board of Directors of Tatton Asset Management plc. It has been signed by a director on behalf of the Board.

Approved by the Board of Directors on 2 June 2025

Signed:



Paul Edwards
Chief Financial Officer

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