



SUCCESSION

The Trusted Adviser of Choice

Modern Slavery Act Statement
April 2020

Introduction

At Succession we are committed to managing our business in an ethical manner, we recognise that it is a management responsibility to respect and uphold human rights across our business and this is a duty that we owe to all our stakeholders including clients, colleagues and the communities in which we operate. We will not tolerate or condone abuse of human rights (including modern slavery) in any part of our business or sphere of influence and we are committed to minimising the risk of slavery or human trafficking in any part of our supply chain.

Ray Pierce
Chairman



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Succession Structure

Succession is the fastest growing Wealth Planning brand in the UK with £8bn of funds under management. We have almost 20,000 platform clients and over 600 colleagues and operate in the UK through three distinct and complementary services – Succession Wealth Management, Succession Financial Management and Succession Benefit Solutions as well as through our Platform and Investment business – Succession Investment Services.

Our Supply Chains

We are a Wealth Planning business that controls and owns all of our client services and solutions and therefore our supply chains include fund managers, investment solution and technology providers, as well as consultants or advisors in specialist fields. Also, our offices employ (or through third party companies employ) minimal ancillary staff such as cleaners. Purchasing of our administrative supplies throughout our offices is through a centrally located supply point with our preferred suppliers normally being part of a tendering process including Executive sign off. In January 2020 we introduced new and enhanced Procurement and Third-Party policies and we are reviewing all our current supplier contracts against these standards.

Our Policies on Slavery and Human Trafficking

Succession strives to ensure that there is no modern slavery or human trafficking in any part of our business or our supply chains.

Our contracts of employment, service agreements and policies contained within our employee handbook reflect our commitment to act ethically and with integrity with the objective that this is achieved. We assure that all our key policies including our vision and values, equal opportunities, bullying and harassment and whistleblowing are available to all our colleagues through our intranet.

Succession offers all its colleagues the opportunity to seek independent and impartial legal advice through a confidential service in the event that they should require any additional support services through our free confidential help line.

In 2020 we will be continuing our awareness training for all managers involved in the procurement process with additional awareness campaigns and training opportunities being available to all our colleagues.

Our Policies for our Clients include procedures to prevent financial crime, including anti-money laundering, anti-bribery & corruption, anti-tax evasion and sanctions, which are all supported by colleague training and awareness programmes. We review and monitor our policies and procedures annually as part of our Board Compliance and Risk review.



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We have appointed a dedicated member of our Executive Board to make sure that we are driving awareness throughout our business to demonstrate that we are committed to our whistle-blowing policy and to protecting genuine whistle-blowers. We review our policy annually to affirm that we are responding appropriately to any concerns raised, learning from events where necessary and ensuring that all our colleagues know how to access and use the policy.

Our Matrix Oversight Forum is responsible for ensuring that we conduct thorough due diligence and assessments to confirm that our Matrix partners have strong governance and policies in place, whilst our Investment Committee provides exemplary stewardship of our client's assets, through our supporting policies and procedures.

Due Diligence Process for Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk we ensure that we follow a fair, legal and non-discriminatory recruitment process and that all of our colleagues meet the 1998 Immigration Act requirements. We also complete thorough background checks on all colleagues. We are committed to and at all times uphold diversity and inclusion in all facets of our business and we have a well-being agenda that assures that our colleagues are appropriately supported. Our remuneration and reward policies guarantee that all colleagues receive a living wage for the role that they do and that their individual contributions are recognised.

In 2020 we will be providing all our colleagues with access to a free and confidential independent whistleblowing advice line.

Supplier Adherence to Our Values

We have zero tolerance to slavery and human trafficking and have a dedicated Compliance team to affirm that all those in our supply chain and contractors comply with our Company values. We periodically monitor the policies dealing with slavery and human trafficking of our suppliers. Following the introduction of revised Procurement and Third-Party contracting policies we will be reviewing all our existing contractual arrangements during 2020 and formally launching these policies to our management teams. Through this process we will be helping our contract managers understand the risks associated with modern slavery, and more formal training is available to make sure that our Company values are applied to all contractual arrangements.

Our effectiveness in combating Slavery and Human Trafficking

Our effectiveness is audited as part of our internal audit annual plan and reviewed by the Board annually as part of our Compliance and Risk review.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Succession's slavery and human trafficking statement for the financial year ending 31st December 2020.

Closing Statement

As far as we are aware, no modern slavery concerns were identified as part of the current assessment procedures of our supply chain.

Ray Pierce

Chairman of Succession Holdings Ltd

April 2020

