

Slavery and Human Trafficking Statement 2024

This Statement is made pursuant to section 54 of the Modern Slavery Act 2015 (“the Act”) and sets out the steps that Arbuthnot Latham & Co., Limited (Arbuthnot Latham) has taken to ensure that slavery and human trafficking is not taking place in its supply chains or any part of its business or that of its subsidiaries (“AL Group”).

Introduction

Arbuthnot Latham does not tolerate modern slavery or human trafficking within the AL Group’s business operations and is committed to ensuring that its supply chains are free from slavery and human trafficking. This Statement sets out the actions that Arbuthnot Latham has taken and will continue to take, to understand and combat slavery and human trafficking risks within the businesses of the AL Group.

Our business

Arbuthnot Latham is a private limited company registered in England and Wales and is a wholly owned subsidiary of Arbuthnot Banking Group PLC.

Arbuthnot Latham provides private banking, wealth management and commercial banking services, with offices in London, Manchester, Exeter and Bristol. Arbuthnot Latham’s subsidiaries include Renaissance Asset Finance, Arbuthnot Commercial Asset Based Lending Limited, Asset Alliance Group Holdings Limited and Arbuthnot Specialist Finance Limited. The Arbuthnot Latham Group prides itself on quality of service and reputation built on understanding client needs.

In support of our business operations, Arbuthnot Latham purchases goods and services from a number of suppliers, the majority of which are based in the UK.

Our policy on slavery and human trafficking

We have an Anti-Modern Slavery Act Policy, procedures and processes which reflect our commitment to acting ethically and with integrity in all business relationships, and additionally to ensure slavery and human trafficking is not taking place anywhere in our business or supply chains. We also operate a Whistleblowing Policy, which encourages our employees to report any concerns or wrongdoing.

Supply chain risk within Arbuthnot Latham

We operate within a professional and regulated environment and do not have complex supply chains or obtain material services from suppliers with a high risk of slavery or human trafficking. We have adopted a risk-based approach to review existing suppliers and will adopt this approach for any new supplier with which we contract. The Arbuthnot Latham Anti-Modern Slavery Act Policy is available to all existing and potential new suppliers to Arbuthnot Latham. Where applicable, we ensure that our suppliers have a contractual obligation to comply with all applicable laws that apply to their supply of goods and services to us, regardless of the jurisdiction in which they operate.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate the risk of slavery and human trafficking, we carry out a risk assessment which will denote the level of due diligence and compliance checks required when engaging and working with suppliers. This ensures that the diligence undertaken is proportionate to the services provided. All of our supplier relationships are reviewed on an annual basis, or biennial, if considered to be 'low risk'.

Training

Training is fundamental to raising awareness and educating all staff members on the issues highlighted in the Act. We provide relevant training and development for all staff members in order to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and business, and our obligations under the Act. This training is reviewed biennially to ensure that it remains relevant and up to date.

Looking Ahead

We will continue to review and report on the following indicators to assess the effectiveness of our actions:

- The number of employees trained in relation to slavery and human trafficking
- Any non-compliance with the Modern Slavery Act and its requirements.

Conclusion

In 2023 we had no reported incidents of human rights breaches, slavery, or trafficking. We reiterate our commitment to the Act and its underlying principles.

Review

This Statement has been reviewed by key stakeholders and senior management and has been approved by the Arbuthnot Latham Board of Directors. It will be reviewed annually and updated as required.

Approval

This statement is made with respect to the financial year ended 31 December 2023 in accordance with section 54(1) of the Modern Slavery Act 2015. It has been approved by the Arbuthnot Latham Board of Directors and signed by a Director.

Andrew Salmon

Chief Executive Officer

Arbuthnot Latham & Co., Limited

31 March 2024