

Modern Slavery Report

Our Structure

We are a provider of platform investment services in the financial sector operating in the UK.

We have created a technology solution that's digital first, future proofed and built entirely around Advisers and the ever evolving and complex needs of their clients to deliver great customer outcomes and real value for money.

We offer a wide range of product solutions including ISAs, General Investment Accounts and SIPPs, and an open architecture approach to Investments providing access to a broad range of over 6,000 investment solutions including funds and listed securities.

We ensure that we trade ethically, source responsibly and are alert to the ever-changing nature of modern slavery and human trafficking. As such, we continue to explore opportunities for further improvements in assessing and developing our approach to modern slavery and human trafficking as set out in this statement.

This statement applies to Novia Financial plc, Novia Financial Holdings Limited, Novia Financial plc t/a Copia Capital Management and Wealthtime Limited (the 'Group').

Our People and Supply Chains

The Group has over 300 employees based in London, Salisbury, and Bath. Our onboarding processes ensure those that are recruited, have appropriate approvals to work.

We are partners with over 500 suppliers that are predominately based across the UK, but also mainland Europe, Australia, and the US, from whom we source services and products that are critical to the delivery of our operations.

These services range from utilities run by local small business owners to global enterprises providing technology infrastructures which are crucial to the platform. Outsourcing is kept to an absolute minimum to ensure we maintain control over the quality of our service.

Our Policies on Slavery and Human Trafficking

We have zero tolerance to slavery and human trafficking. We require all suppliers to comply with our values and purpose, and to demonstrate this commitment all suppliers are asked to confirm their compliance with the requirements of the Modern Slavery Act 2015 before we begin working with them.

We also have the following policies in place relevant to modern slavery, which we continuously review and update:

- Supplier Code of Conduct
- Whistleblowing Policy

Due Diligence Processes for Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk we carry out due diligence on our supply chain, as part of this process we consider, flag, and rectify any risks associated with modern slavery and human trafficking. This provides assurance to our senior leadership team that appropriate due diligence has been undertaken, all risks have been considered, and appropriate contractual provisions reflecting those risks are in place.

We also ensure that our contracts with our suppliers contain contractual terms to ensure their compliance with the requirements of the Modern Slavery Act.

Awareness and Training

We expect our people to act in a transparent, honest, and ethical way and we require them to take personal responsibility for reporting any instances of actual or suspected wrongdoing.

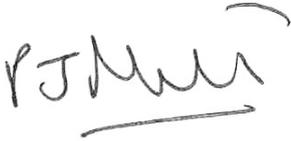
We shall be publishing our first modern slavery and human traffic statement on our Group intranet to remind our people of their obligations in supporting our commitment to combatting modern slavery and human trafficking.

Further Steps

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains, our focus for the next financial year will be to:

- Provide training to our staff on slavery and human trafficking to help combat slavery and human trafficking.
- Implement key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Slavery and Human Trafficking Statement for the financial year ending 31 December 2022 and was approved by the board on 25 May 2023 and signed on its behalf by Patrick Mill, CEO.



5 June 2023

If you require this document in an alternative format please contact us.

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