

Modern Slavery Report

Our Structure

This statement is published in accordance with section 54 of the UK Modern Slavery Act 2015 and relates to the financial year ending 31 December 2024.

It sets out the steps taken by Novia Financial Plc (t/a Wealthtime), and its related group entities (the Wealthtime Group) to prevent modern slavery in their business and supply chains. This statement is considered to represent the position for the Wealthtime Group as a whole including Wealthtime Ltd (t/a Wealthtime Classic) and Copia Capital Management, a trading name of Wealthtime.

Wealthtime is 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 are committed to ensuring 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.

Our people and supply chains

As of 31st December 2024, the Wealthtime Group had over 300 employees based in London, Salisbury, and Bath. Our onboarding processes are designed to ensure that those who are recruited, have appropriate approvals to work.

As a financial services firm, most of Wealthtime's partners were in 2024 and continue to be technology and data providers, regulated firms and professional services providers, the majority being based in the UK, US, mainland Europe and Australia. We are committed to carrying out due diligence on new supplier engagements and when reviewing our relationships with existing partners..

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 suppliers and supply chain. In doing so we consider, flag, and address any risks associated with modern slavery and human trafficking. This provides assurance to our senior leadership team that appropriate due diligence has been undertaken, relevant risks have been considered and that contractual provisions reflecting those risks are, where appropriate, in place.

We also endeavour to include contractual terms in our supplier agreements that promote compliance with the requirements of the Modern Slavery Act.

Awareness and training

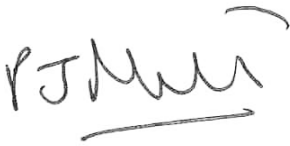
We expect our people to act in a transparent, honest, and ethical way and we require them to take personal responsibility for reporting any instances of actual or suspected wrongdoing.

We have published our modern slavery and human traffic statement on our intranet to remind our people of their obligations in supporting our commitment to combatting modern slavery and human trafficking and are committed to furthering our staff's understanding of modern slavery.

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 our focus on further refining our approach, providing training on modern slavery and enhancing our due diligence processes so that we can identify modern slavery risks as early as possible.

This statement was approved by the board of Wealthtime on 17 July 2025 and signed on its behalf by Patrick Mill, CEO.



Patrick Mill

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

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