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Modern Slavery Report

Introduction

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 2025.

It sets out the steps taken by Novia Financial Plc, and its related group entities (together the Wealthtime Group) to prevent modern slavery and human trafficking in our business and supply chains. This statement applies to the Wealthtime Group, being Novia Financial Plc (t/a Wealthtime and Copia Capital Management) and Wealthtime Ltd (t/a Wealthtime Classic).

It reflects the Group's commitment to acting ethically, responsibly, and transparently in all areas of our operations.

Our business and structure

Wealthtime and Wealthtime Classic are providers 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

As of 31st December 2025, the Wealthtime Group had over 150 employees based in London and Bath. We are committed to fair, lawful, and ethical employment practices. Our recruitment onboarding processes are designed to ensure:

- All colleagues have the legal right to work in the UK;
- Appropriate pre-employment checks are completed;
- Employment is freely chosen; and
- Working conditions meet applicable legal and regulatory standards.

We promote a culture of inclusion, respect and integrity and expect all colleagues to act in line with our values and policies.

Our supply chains

As a financial services group, the majority of the Wealthtime Group's suppliers are technology and data providers, regulated financial services firms, and professional services providers. These suppliers are predominately based in the UK, with some operating in the US, mainland Europe, and Australia.

Wealthtime has entered into a strategic partnership with Wipro, which delivers certain outsource services from its operations in both the UK and India. We are committed to undertaking appropriate due diligence on all new supplier engagements and when reviewing our relationships with existing partners.

Our policies and governance

We have zero tolerance approach to modern slavery and human trafficking. We expect all colleagues, suppliers, and business partners to uphold the same high standards across our operations and supply chains. We encourage all of our suppliers to align with our values and purpose and to demonstrate this as part of our onboarding process.

Our approach is supported by a range of policies relevant to modern slavery, which are reviewed and updated regularly, including:

- Supplier Code of Conduct;
- Whistleblowing Policy; and
- Relevant people, risk and governance policies.

These policies set out expectations relating to ethical behaviour, reporting concerns, and compliance with applicable laws and regulations.

Due diligence and risk management

We operate proportionate risk-based due diligence processes for managing suppliers and partners, aligned to our Third-Party Management Policy. Due diligence is undertaken prior to contract conclusion and, where appropriate, throughout the supplier lifecycle.

Our approach considers relevant risk factors including the nature of the services provided, geographic location, use of subcontractors, operational resilience, information security, data protection, legal and regulatory requirements, and the supplier's ability to comply with our ethical and contractual standards.

These processes are designed to:

- Identify and assess potential modern slavery risks;
- Apply appropriate contractual protections where relevant; and
- Provide assurance to senior management that material risks are identified and managed.

Where appropriate, supplier contracts include provisions requiring compliance with the Modern Slavery Act 2015 and related legislation, cooperation with risk assessment and monitoring activity, notification of material issues, and the application of appropriate standards to subcontractors.

Training and awareness

We expect all colleagues to act in a transparent, honest and ethical manner and to take personal responsibility for reporting any actual or suspected wrongdoing.

Our Modern Slavery and Human Trafficking Statement is published on the Group intranet and forms part of our broader approach to raising awareness of modern slavery risks.

During 2025, we continued to focus on strengthening understanding of modern slavery risks across the organisation. We are committed to enhancing this further through targeted training, particularly for colleagues involved in supplier engagement, procurement, and oversight activities.

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Effectiveness and continuous improvement

We recognise that modern slavery risks evolve over time and are committed to continuous improvement.

During the next financial year, our focus will include:

- Further refining our approach to supplier due diligence,
- Enhancing training and awareness across relevant teams,
- Reviewing the effectiveness of our policies and controls,
- Continuing collaboration across People, Finance, Operations, Risk and Compliance functions.

Approval

This statement was approved by the Boards of Novia Financial plc and Wealthtime Limited on 09 July 2026 and signed on its behalf by Patrick Mill, CEO.

PJ Mill

Patrick Mill