

Modern Slavery Policy

Policy & Scope

This policy is made and complies with section 54 of the UK Modern Slavery Act 2015 (the 'Act') and constitutes the modern slavery and human trafficking statement for Cambridge Investments Ltd.

Cambridge's Organisational Structure and Outsourcing Provisions

Cambridge Investments Ltd provides discretionary managed model portfolios, which are marketed to the financial advisers of the Perspective Financial Group Ltd, for use with their retail clients.

As our supply chain is based in the UK and coupled with the nature of our business, we have measured that our company is at a low risk of human trafficking and slavery within our supply chain or business. This is because Cambridge provides a service, not goods or products.

At present our outsourcing provisions and suppliers include central services (comprising compliance, finance, marketing and human resources), other portfolio managers, IT service providers, auditing and legal service providers who are regulated organisations and use labour for the effective delivery of service within the financial sector. Nevertheless, we have and are continuously taking steps to protect against the risks of modern slavery.

This policy statement applies to individuals working for us or on our behalf in any capacity, including employees at all levels, CEO, directors, officers, agencies, agency workers, seconded workers, volunteers, interns, agents, external consultants, third party representatives and business partners. If you fall into one of these categories, you are required to read and comply with this policy.

Our outsourced human resources department supports Cambridge by promoting a culture of equality and fairness amongst all candidates who apply for a role here at Cambridge and with existing employees. We may amend this policy at any time and does not form part of any employee's employment contract.

Overarching Statement

Cambridge Investments Ltd conducts its business ethically, fairly and with respect and commitment to fundamental human rights. We are committed to acting with integrity and to maintaining systems and controls within our business to prevent modern slavery taking place either in our business or in our supply chain.

Consistent with our disclosure's obligations under the Modern Slavery Act 2015, we are committed to ensuring transparency in our own business as well as through our supply chain.

What is Modern Slavery?

Modern slavery is a crime and a violation of fundamental human rights. It can take many forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for a personal or commercial gain.

Our Approach to Modern Slavery and Labour Standards

Our approach to modern slavery and the labour markets is to comply with the law by ensuring all employees receive pay of including and above the National Living Wage.

We provide training for all employees on modern slavery and human trafficking as well as having internal policies such:

- Anti-bribery & Corruption
- Environmental
- Equal opportunities
- Whistleblowing

Cambridge prevents any form of discrimination by providing all employees with access to our employee handbook where we provide information on equal opportunities, diversity and inclusion.

We recognise that all employees have a right to work in an environment in which the dignity of individuals is respected and which is free from harassment and bullying. Our harassment and bullying policy applies to harassment on the grounds of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation.

Where possible we establish long standing relationships with reputable suppliers, we require either that they have an anti-slavery and human trafficking policy of their own or agree to our Supplier Code of Conduct.

We expect our suppliers will hold their own suppliers to the same high standards. If issues are identified, we will review our relationship and take appropriate action.

We will not support or deal with any business knowingly involved in modern slavery or human trafficking.

Risk Assessment and Due Diligence

The risks relating to modern slavery and human trafficking can occur anywhere in our operations, whether through direct employment or through the delivery of financial services, however we consider ourselves to be a 'low risk' business with regard to slavery and human trafficking. We foster a culture that encourages the identification and reporting of any such risks within our business.

As part of our due diligence processes, we verify every new employee's right to work in the UK upon the commencement of their employment. Within our supply chain we communicate our zero-tolerance approach to modern slavery at the outset of establishing any business relationships and our requirement from our agencies, suppliers is to ensure there is no slavery or human trafficking in their supply chain.

The company's Employee Assistance Programme (EAP) allows our employees to access confidential advice and guidance which is accessible via a free helpline 24/7 365 days a year.

The prevention, detection, and reporting of modern slavery in any part of Cambridge or our supply chain is the responsibility of all those working for the company or on our behalf. All parties are required to avoid engaging in any activity that might lead to, or suggest, a breach of this policy.

Our zero-tolerance approach to modern slavery and human trafficking is clearly communicated to suppliers, contractors and business partners at the outset of our business relationship through a Code of Conduct and reinforced as appropriately thereafter.

Anyone who has any concerns about any issues or suspicions of modern slavery in any parts of our business or supply chains are expected to notify their line manager or a director as soon as possible.

Cambridge aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy and is committed to ensuring no one suffers any detrimental treatment. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. Anyone who believes they have suffered any such treatment should inform their line manager immediately. If the matter is not remedied, they should raise it formally using the Company procedures Cambridge has in place, which includes Whistleblowing. Cambridge recognises that there may be other appropriate routes for some issues, such as employee grievances.

A breach of this policy is taken extremely seriously and any potential breach by an employee will be fully investigated and dealt with under the Company Disciplinary Procedure which may result in disciplinary action up to and including dismissal.

Cambridge continues to actively review new and existing suppliers where any issues will be addressed accordingly and escalated where necessary.

Board of Approval

This statement was approved by the Cambridge's Board of Directors on 1st August 2023