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## Modern Slavery Statement

### 1. Introduction

Under s54, Part 6, of the Modern Slavery Act [1] 2015 a Slavery and Human Trafficking statement is required with effect from the 2017/2018 financial year.

U.M. Association Limited (UMAL) and Hasilwood Management Services Limited (HMSL), “the Company”, is committed to ensuring that its business dealings are carried out in compliance with the relevant laws and, in doing so, we endorse the implementation and promotion of ethical business practices to protect workers from being abused and exploited.

The Company is committed to preventing slavery and human trafficking in its corporate activities and to ensuring that its supply chains are free from slavery and human trafficking.

### 2. Organisation Structure

This statement covers the activities of the Company (engaged in financial services) which has a staff of circa 20 and is based in the City of London. The Company’s annual turnover is below the threshold (£36m) required to produce an Anti-Slavery Statement; however we have chosen to prepare it on a voluntary basis in the spirit of the Act.

### 3. Relevant Policies

Given the nature of our business (financial services) and small scale of operations, the risk of modern slavery within our own workforce is remote and the risk of modern slavery within our clients and counter parties (largely professional and charitable organisations based in the UK) is also remote.

However, the Company operates a number of policies that mitigate the risk of modern slavery and set out steps to be taken to prevent corruption generally and slavery and human trafficking in its operations.

#### 3.1 Whistleblowing and Public Interest Disclosure Policy

The Company encourages its staff to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company’s whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

#### 3.2 Supplier Chain Management

Whilst the Company exercises a key role in the risk protection and distribution chain, it does not have a supply chain that is reliant on factories or other entities that would normally be associated with slavery or forced labour.

As a general rule, contractors and suppliers used by the Company are therefore not likely to be susceptible to this risk. However, we are mindful that others may not always uphold standards to the same level as the Company. Consequently, employees responsible for procuring and managing suppliers and others involved with the Company are themselves responsible for ensuring that our 3 values and ideals are upheld. This continues to be a work in progress and we are strengthening our controls as new contracts are agreed. For example, serious violations by customers and suppliers will lead to the termination of the business relationship.

### **3.3 Recruitment and Selection**

The Company uses only specified, reputable employment agencies to source labour; and ensures that appropriate controls are in place to ensure employees have the right to work and are therefore protected by employment legislation.

The Company does not employ individuals that would be considered to be 'child workers'. Young and inexperienced workers may be employed or given work experience, but they are subject to the rights and protections that we afford all workers.

- Basic rights, which we expect all workers to enjoy, include:
- The right to a reasonable wage
- The right to a safe working environment
- The right to an appropriate level of holiday and cover for period of sickness
- The freedom to complain directly via our whistleblowing policy free of charge, if they believe that they are not being fairly treated or have any other concerns.

### **3.4 Other Policies and Procedures**

The company has a comprehensive staff handbook, which sets out all of the Companies policies and procedures. This handbook is regularly updated and is issued and available on line to all staff. There are a number of detailed policies and procedures that contribute to detecting and reporting corrupt practices that may harm individuals and organisations include:

- Bullying & Harassment Policy
- Grievance Procedure
- Equality & Diversity
- Health & Safety
- Anti-Financial Crime & Anti-Fraud Policy
- Anti-Bribery & Corruption Policy

## **4. Quality Management Audit**

The Company subscribes to the quality management standard ISO9001 and undergoes an annual review of the quality management systems and procedures by an approved auditor.