



Dated	Author	Reason for change	Version
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1. Policy Statement

This Statement set out the steps taken by Sigma Financial Group Limited, pursuant to section 54 of the Modern Slavery Act 2015. This Statement covers the period during the financial year ended 31 December 2020.

2. Our Commitment

We will not tolerate slavery and human trafficking within our business. We are committed to acting responsibly in business relationships and ensuring that slavery and human trafficking does not occur anywhere in our business operations. We will also require our Clients and business partners to take the necessary steps to avoid and/or tackle slavery and human trafficking.

3. Our Business

Sigma Financial Group Limited (SFGL) is a wholly owned subsidiary of Sanclare (UK) Ltd which is authorised and regulated by the Financial Conduct Authority. Where SFGL undertakes contracts on a white label or outsourced basis for clients, then the policies of those clients shall be adopted into this policy. Policies and procedures may be utilised when undertaking such work, where it has been agreed with the client that it is appropriate to do so.

4. Policies in relation to Slavery and Human Trafficking

SFGL has a responsibility to conduct its business in an ethical and transparent way. Accordingly, we adhere to a set of business principles which include a commitment to human rights principles. Policies and procedures underpin the Group's overall control and governance structure, as well as supporting our Company ethos, including policies covering conduct, whistleblowing, recruitment, anti-bullying and harassment, health and safety, anti-bribery and corruption, diversity and equality, compassionate leave, disciplinary, and religious holidays. These policies are reviewed and updated as appropriate in line with changes to best practice and/or legislation.

The Group's policies and frameworks reflect our commitment to minimise the risk of modern slavery or human trafficking occurring anywhere in our business operations.

Sigma's Client Relationship Management Procedure requires each Client be assigned an Account Manager who is responsible for ongoing oversight of the campaign performance and its compliance with Sigma policies and procedures.



5. Updates to Policies

Our Employee Code of Conduct, which sets out the expectations we have of our employees, has been updated to provide a greater emphasis on the issues surrounding modern slavery and human trafficking. Through this, we've strengthened the need for our employees to work collectively to identify and report any activities which they suspect are contrary to the Modern Slavery Act.

6. Training & Development

We raise awareness of conduct, human rights and diversity and inclusion amongst our colleagues through mandatory training at induction and via an online platform during employment. Completion rates for all mandatory training are monitored and business leaders are informed where these rates are not satisfactory.

We also ensure all of our colleagues are aware of our whistleblowing policy, and are advised how to report potential or actual incidents. We encourage colleagues to report all potential or actual incidents that relate to wrongdoing or actual or suspected illegal or serious inappropriate activity, whether related to modern slavery or not. A confidential, externally facilitated portal is provided for colleagues to report their concerns confidentially.

7. Risk Assessment

We include appropriate measures in our due diligence processes to engage employees and business partners on a risk assessed basis. Compliance with human rights, fair treatment and reasonable remuneration for colleagues as well as safe working conditions are all reviewed.

As part of the pre-employment and recruitment process for our colleagues, we ensure that all colleagues are legally permitted to work within the UK and that they are joining us of their own free will and are not coerced to join us and financial checks are undertaken on all of our colleagues.

8. Review Process

This Policy will be reviewed by the Compliance Department as required, but at least annually or more frequently if required whenever changes are made to this Policy.