# Slavery and Human Trafficking Statement



# **Slavery and Human Trafficking Statement**

Timeline Portfolios Ltd (Timeline) is committed to taking our responsibilities as a corporate citizen seriously. We acknowledge our responsibility to take steps against the risks of slavery and human trafficking taking place in our business and supply chains.

This statement is made in accordance with section 54(1) of the UK Modern Slavery Act 2015 (the "Act") and constitutes Timeline's Modern Slavery and Human Trafficking Statement for the financial year ending 31 December 2021.

#### **Our business**

Timeline's low-cost combination of financial planning tools, turnkey model portfolios and powerful reporting gives forward-thinking advisers a competitive edge. Plus, our clients love our visual and engaging presentation of information and the interactivity of our plans.

Our planning software and model portfolios are built based on 100 years of capital markets data and methodologies verified by Nobel prize-winning economists. Our evidence-based investment philosophy drives a scientific approach and removes emotional decision-making. Intelligent working.

We offer financial planning firms a range of services that enable them to focus on delivering core financial planning and behavioural coaching to clients, while delegating time-consuming tasks such as portfolio construction, rebalancing and due diligence to us.

We help individuals with pensions and retirement income, partner with advisers who want to focus on their client relationships rather than administration and provide an enhanced overall experience via the use of technology to make things simple and clear.

# Our supply chains

Our supply chains consist mainly of key outsourced providers of regulated financial services and suppliers in respect of data, IT, operations, office and support services, and professional advisers.

Our supply chains are more straightforward in comparison to providers of physical goods or other types of services. We, therefore, believe that the risk of slavery and human trafficking practices by our suppliers is relatively low. Nonetheless, we are aware of modern slavery threats in the financial services industry and recognise the importance of combatting modern slavery and our responsibility to take steps to tackle the issue.

# Our policies and procedures

We have several policies and procedures in place which reflect our commitment to acting with integrity in our business relationships and which help us to detect and prevent any potential modern slavery within our business and supply chains. These include an anti-money laundering policy, anti-bribery, and other financial crime-related policies and procedures. We also encourage our staff to report any concerns they may have under our whistleblowing policy.

#### Our approach to suppliers

We are committed to carrying out reviews on our suppliers' adherence to the statement publication requirement under the Act as part of our efforts to ensure the requirements under the Act are addressed in our supply chains. Where relevant, when entering into new agreements with suppliers, we require confirmation of compliance with all applicable laws, including the Act.

We regularly look at reviewing and updating our policies and procedures to continue to pursue the highest standards, and maintain a transparent, accountable culture. However, we recognise we can do more to combat the risk of modern slavery in our supply chains. During the year, we continued a review of our procurement and supplier management framework and procedures, including the robustness of due diligence checks carried out on suppliers proportionate to the level of risk in our supply chains. We implemented a modern slavery compliance questionnaire within our Marketing function, more specifically the Events function of the business as a pilot with a view to rolling out the questionnaire across all new third-party vendors we contract with.

#### Responsible investing

Turning to our investment process, we have committed to incorporating Environmental, Social and Governance factors into our investment process. As part of this and in reference to the Modern Slavery Act, we have updated our third-party due diligence to explicitly ask how firms we invest with are considering the risks relating to modern slavery. Additionally, we have resolved to actively engage with investment managers whom we consider can do more in combating modern slavery.

## **Training**

We recognise the importance of training our staff to raise awareness of modern slavery threats in our business and supply chains. During the year, we reviewed and enhanced our staff training and continued the company-wide training programme to ensure that our staff receive relevant training. This included training related to anti-modern slavery, anti-money laundering and financial crime, and our policies and procedures for the management and escalation of associated risks.

Our effectiveness in combatting modern slavery in our business and supply chains An internal working group meets to consider and assess the steps we have taken. It also looks to identify any further measures we can take, to help detect and prevent modern slavery in our business and supply chains and review the effectiveness of our approach. We will continue to review our policies, procedures, and processes, and engage with our suppliers to develop our approach to combatting modern slavery.

## Our commitment to anti-modern slavery

In addition to working proactively to combat anti-modern slavery in our business and supply chain, during the year, the internal working group resolved to voluntarily publish the statement for the previous financial year to the government's newly introduced Modern Slavery Statement Registry.

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