

The UK Modern Slavery Act 2015 – On-Line Partnership Group Limited

This statement sets out the steps taken by On-Line Partnership Group Limited during the financial year ended 31 December 2016 to seek to identify and prevent modern slavery and human trafficking in its business and supply chains.

The Modern Slavery Act 2015 (the “Act”) constitutes the offences of “slavery, servitude and forced and compulsory labour” and “human trafficking”. The Act seeks to increase transparency to the public on the actions organisations are taking to address risks of slavery and human trafficking in their businesses and supply chains.

Organisation, Structure and Business

On-Line Partnership Group Limited is a United Kingdom based organisation with subsidiaries that are also established in the United Kingdom. The On-Line Partnership Group Limited and its subsidiaries The On-Line Partnership Limited (TOLP), The Whitechurch Network Limited (TWN) and In Partnership Financial Advisers Limited (IPFA) are among those group entities incorporated in England and Wales that fall within scope of S.54(2) of the Act.

On-Line Partnership Group Limited provides a range of financial services through its subsidiaries including financial advice to retail consumers on investment and pension products; home finance products; non-investment insurance based products and general insurance products..

Therefore, the group’s supply chains include the following third-party suppliers: product providers, platforms, fund managers, discretionary investment managers and appointed representatives. Further it contracts for services such as commercial real estate, cleaning, office suppliers, commercial waste disposal, software; and services needed to support staff in offices, pay-roll providers, pension fund providers and private health-care providers among other associated service providers.

Due Diligence

On-Line Partnership Group Limited implements due diligence processes prior to commencing any business relationships with a third party such as product providers and these are all subject to ongoing, risk-management checks on a periodic basis which take into account compliance with laws including conflicts of interest and regulatory requirements. On-Line Partnership Group Limited further seeks to ensure such product providers and others contractually agree to comply with regulatory requirements and applicable laws.

Both TOLP and TWN are authorised and regulated by the Financial Conduct Authority in the United Kingdom and as such must comply with a number of regulatory requirements concerning conduct of business, governance, systems and controls and prudential measures, all of which seek to support well-managed and supervised firms.

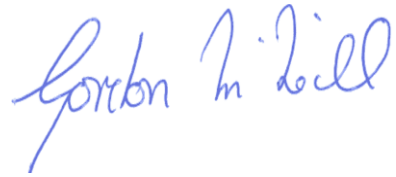
Addressing the Act

Given the nature of On-Line Partnership Group Limited's business, we consider the risk of modern slavery and human trafficking is low; and are currently not aware of any third party relationship raising modern slavery or human trafficking issues. However, On-Line Partnership Group Limited will seek to include contractual provisions in future agreements with higher risk service providers to comply with the Act. Policies and procedures will also be updated to address the Act and ensure associates are made aware of On-Line Partnership Group Limited's commitment to seeking to ensure no slavery or human trafficking occurs in its businesses or supply chains.

Training

Training relating to risks associated with human trafficking and modern slavery will be provided to relevant associates within On-Line Partnership Group Limited, to raise their awareness around issues associated with these risks. Affected boards of directors within On-Line Partnership Group Limited have also been made aware of the requirements of the Act.

This statement has been approved by the relevant boards of directors of On-Line Partnership Group Limited on 20 May 2017.



Gordon McNeill
Director
On Line Partnership Group limited
The On-Line Partnership Limited
The Whitechurch Network Limited
In Partnership Financial Advisers