

Parmenion

Modern Slavery Statement

For the year ended 31 December 2022

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Introduction

This statement is published in accordance with the UK Modern Slavery Act 2015, section 54(1).

It sets out the steps that Parmenion Capital Partners LLP, and related group entities, take to help prevent modern slavery in our operations and supply chain.

Parmenion Capital Partners LLP (OC322243) is an LLP incorporated and domiciled in England and Wales. The address of the registered office is: Aurora, Counterslip, Bristol, BS1 6BX.

We offer collective investment fund based discretionary management and platform custody services to the retail clients of UK authorised Independent Financial Advisers.

As a business that champions the importance of financial wellbeing for everyone, ethics and fairness are right at the heart of everything we do.

While the UK financial services industry is not considered a high risk for modern slavery, we are on constant alert for issues. Any suggestion of modern slavery among our partners or suppliers will be escalated to our Executive Committee and appropriate action taken. Depending on the circumstances, this may range from supporting a partner or supplier to make a positive change to terminating our working relationship.

Entities covered by this statement

Parmenion Capital Partners LLP is part of a group of companies in which it is the main trading entity. None of the other members of this group of entities are in scope for producing a Modern Slavery Statement of their own, and as such this statement is also considered to represent the position for the group as a whole.

Entities covered by this statement, and their relationship in respect to Parmenion Capital Partners LLP are set out in the below table.

Entity	Relationship to Parmenion	Type of Entity
Parmenion Capital Partners LLP	This entity	Main trading entity
ebi Portfolios Limited	Sister company, owned 100% by Shillay Bidco 3 Limited	Trading entity (acquired by Group Dec 2022)
Shillay Bidco 1 Limited	Immediate parent and designated member 90%)	Holding company
Shillay Bidco 2 Limited	Immediate parent and designated member 10%)	Holding company
Shillay Bidco 3 Limited	Sister company, owned 100% by Shillay Finco Limited	Holding company
Shillay Finco Limited	Indirect parent 100%	Holding company

Shillay Midco Limited	Indirect parent 100%	Holding company
Shillay Topco Limited	Indirect parent 100%	Holding company
Parmenion Nominees Limited	Subsidiary 100%	Dormant company
Wise Trustee Limited	Subsidiary 100%	Dormant company
Parmenion Capital Limited	Subsidiary 100%	Dormant company
Wealth Horizon Limited	Subsidiary 100%	Dormant company
Self-Directed Investments Limited	Subsidiary 100%	Dissolved 4 th January 2022

Assessing risk

We assess modern slavery risk as part of our on-going evaluation of a company’s approach to ensuring respect for human rights. We expect that the companies we work with meet internationally recognised human rights standards.

We also expect total transparency regarding policies, practices and the performance of all steps taken to address human rights issues.

Policies

We have a number of policies and statements that apply across the group and collectively demonstrate our approach to identifying and mitigating modern slavery risks. These are communicated to staff through the onboarding and training process. One of the main vehicles to alerting potential instances of human rights and labour abuse is our Whistleblowing policy, as detailed below.

We also maintain related Anti-Bribery & Corruption and Anti Financial Crime Policies, which establish supporting core principles and required reporting processes applicable to all staff.

“Speak Up” Hotline

If our employees identify an issue relating to modern slavery, we encourage them to report it to their manager. If they feel uncomfortable raising their concern using their normal reporting line, or wish to do so anonymously, an independently managed confidential Hotline is available. All concerns are taken seriously and anyone raising a concern in good faith will not risk losing their job or suffer any form of reprisal as a result, even if the concern is proved to be unfounded. All reports received are investigated and appropriate action taken.

Training

To raise awareness amongst our employees of both modern slavery and the Speak Up Hotline, we incorporate these into our mandatory annual training program. We are in the process of implementing a specific Modern Slavery training module to be rolled out in 2023. The content of our mandatory annual staff training program is reviewed and managed by our HR and Risk & Compliance departments.

Due diligence and risk assessment of suppliers

Heightened risk of modern slavery and human trafficking exists in certain territories, and in the production of certain goods and supplies. As a financial services firm most of our suppliers are professional service firms, data providers, regulated firms, technology providers and office supplies and the majority are based in the UK. In addition, we are committed to carrying out due diligence where relevant on new supplier engagements and when reviewing existing relationships. Our due diligence approach includes reviewing their policies, attestations, and accreditations they may have including anti-bribery policies, human rights policies, and adherence to the Modern Slavery Act. Through our procurement process, we strive to select suppliers who meet and share our ethical standards, conduct and values.

Responsible investment

As a firm, we integrate Environmental, Social and Governance (ESG) factors into our investment decisions. We have a specific questionnaire that we submit to funds we are considering investing in, which includes mandatory questions about ESG, including their approach to human rights. The responses to these queries help to inform the decision-making surrounding our investments.

Measurement

We measure our progress against the following:

1. Raise awareness amongst our employees of modern slavery issues and how to respond.
2. Complete due diligence for our relevant suppliers, including modern slavery enquiries
3. Integrate human rights considerations into our investment process

As a result of our internal policies and procedures, we have not found any instances of modern slavery in 2022.

This statement has been approved by the Designated Members of Parmenion Capital Partners LLP and is signed on their behalf by Martin Jennings, Chief Executive Officer of Parmenion Capital Partners LLP and director of Shillay Bidco 1 Limited and Shillay Bidco 2 Limited (the designated members).



Martin Jennings

UK Modern Slavery Adult Victim Support Providers

The below third-party contacts are not managed by Parmenion Capital Partners LLP or associated with us but have been included as a reference.

England and Wales

The Salvation Army 0300 303 8151

Scotland

Trafficking Awareness Raising Alliance (TARA) 0141 276 7724

Migrant Helpline 07837 937737 or 07789 791 110

Northern Ireland

Migrant Help 013 0420 3977 or 07766 668 781 (for male potential victims of human trafficking)
Women's Aid 028 9024 9041 (for female potential victims of human trafficking)

Modern Slavery Helpline

The NGO Unseen operates a UK-wide 24/7 Modern Slavery Helpline that victims, employers and members of the public who may encounter modern slavery can call for expert support and advice on 08000 121 700.

Get in touch

If you'd like to chat to us about our Modern Slavery Statement, please get in touch.

Phone:

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Parmenion

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