

Modern Slavery Act Statement

Introduction from Alex Ham & Ross Mitchinson (Co-Chief Executive Officers)

This statement sets out our ongoing commitment in ensuring that Modern Slavery and human trafficking is eradicated and Numis remains transparent and diligent relating to the people and firms we do business with.

It is important to Numis as a UK leading independent institutional stockbroker, corporate advisor and AIM listed company that we are acting in a responsible and ethical manner, part of which encompasses our commitment to ensuring Numis and its supply chains are free from Modern Slavery and human trafficking.

Independent, driven and above all client-focused, Numis has a very strong culture of integrity and hard work. Our partnership ethos drives long term relationships and echoes the service culture of the past. Numis raises capital for successful businesses, both large and small enabling them to access capital to drive growth and achieve their ambitions. We also provide international investors with first class research, advice and trading services.

As part of the activities outlined above Numis engages a number of suppliers and employs over 200 staff, operating in both London and New York. Our head office is in The London Stock Exchange Building, 10 Paternoster Square, London, EC4M 7LT. Our New York office is at 575 Fifth Avenue, 25th Floor, New York, NY 10017. It is these employees, suppliers and the associated 'supply chain' that we are focusing on in our efforts to remain free from Modern Slavery and human trafficking.

Our supply chains

Our supply chains include (but are not limited to):

- Suppliers of IT hardware and software
- Payroll
- Building facilities services
- Legal, accountancy and other professional intermediaries

Our policies on slavery and human trafficking

We have a zero tolerance approach to Modern Slavery and human trafficking, and as such we are committed to ensuring, where possible, that there is no Modern Slavery or human trafficking in our supply chains or in any part of our business. This statement and our internal Modern Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure Modern Slavery and/or human trafficking are not taking place anywhere in our supply chains.

We also have in place robust compliance policies (including those covering ethical behaviour, conduct and whistleblowing) designed to promote ethical and compliance behaviours as well as encourage and to protect anyone who wishes to raise concerns about wrongdoing within our business.

Due diligence processes for slavery and human trafficking

Our recruitment processes are transparent and reviewed periodically. We communicate directly with candidates to discuss job opportunities and to confirm the details of any offer made. We have robust procedures in place for the vetting of new employees and ensure that we are able to confirm their identities and that they are paid directly into an appropriate, personal bank account. We have implemented a number of processes to ensure, as far as is reasonably practicable, that our supply chains adhere to our expectations in respect of their workforce.

If we discover that any of our employees have been complicit in human trafficking or Modern Slavery, we will take the appropriate disciplinary action against them.

We audit and screen all new suppliers we engage with, and are committed to work only with organisations who share our values in the eradication of slavery and human trafficking. We apply a risk-based methodology in monitoring existing supplier relationships and their approach to mitigating the risks associated with Modern Slavery and human trafficking. This may include obtaining annual statements of attestation of their commitments and actions taken to eliminate Modern Slavery.

Numis performs in-depth analysis into country risks on an annual basis and we are conscious that imported products or services sourced from outside the UK or EU (or any country we consider as high risk) are potentially more at risk of slavery or human trafficking issues. If products have to be sourced from such locations, we may look to perform enhanced due diligence of these suppliers and look to gain extra comfort where they can demonstrate a commitment to human rights and fair working conditions, for example by way of certifications such as Social Accountability certification SA8000.

We will not work with any organisation that has been found to have been knowingly involved in either human trafficking or Modern Slavery.

Training

To ensure a high level of understanding of the risks of Modern Slavery and human trafficking in our supply chains and our business, we ensure that all relevant staff within the necessary departments are briefed, and where applicable, trained accordingly.

Our effectiveness in combating slavery and human trafficking

The Company directors and senior management shall take the responsibility for implementing the systems and controls outlined in this statement and shall provide adequate resources and investment to ensure that slavery and human trafficking is not taking place within the organisation or within its supply chains.

We will continue to monitor and review our Policy relating to slavery and human trafficking. If we become aware of any breaches of the Policy, we will investigate and take such steps as are necessary to ensure that the risk of further breaches occurring is minimised.

Following a review of the effectiveness of the steps we have taken in 2017/2018 to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

- Numis is reviewing contracts with all of its suppliers and will look to include clauses in their contracts with Numis relating to Modern Slavery.
- Roll out firm wide training across the firm to all employees so they better understand the risks of Modern Slavery and human trafficking.
- Continue to apply risk based methodologies across the business in identify and mitigating the risks associated with Modern Slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 30 September 2018.

Alex Ham and Ross Mitchinson, Co-Chief Executive Officers, Numis Corporation Plc

Date: 25/04/2019