Lighthouse Group plc Modern Slavery Statement

This statement sets out steps taken by Lighthouse Group plc and other relevant group companies (the Group) to prevent modern slavery and human trafficking in its business and supply chains.

Lighthouse Group plc is committed to the steps we have taken to combat slavery and human trafficking and to ongoing improvement of our practices to combat slavery and human trafficking.

ORGANISATIONAL STRUCTURE

Lighthouse Group plc (the “Company” or the “Group”) is an AIM-quoted financial advisory group, providing financial solutions tailored to meet clients’ needs, be they individual or corporate.

The Group provides regulatory authorisation for all of its financial advisers, both through Appointed Representative (“AR”) firms and as individual advisers under a Lighthouse brand. The AR firms of Lighthouse Advisory Services Limited (the Group’s directly authorised and wholly owned subsidiary entity) comprise both the Group’s wholly-owned subsidiaries Lighthouse Financial Advice Limited, LighthouseCarrwood Limited, LighthouseWealth Limited and Falcon Financial Advice Limited, as well as independently owned, thirdparty AR firms.

Full details of all divisions are available at: http://www.lighthousegroup.plc.uk/about-lighthouse/

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our 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 slavery and human trafficking is not taking place anywhere in our supply chains.

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1 This Statement sets out the steps taken by Lighthouse Group plc and its subsidiaries, including Lighthouse Advisory Services Limited, which falls within the scope of section 54(2) of the Modern Slavery Act 2015. A full list of subsidiaries can be seen at appendix 1.
OUR SUPPLY CHAINS AND SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain to comply with our values and approach.

Due to the nature of the Group’s operations there is an inherently low risk of Slavery and Human Trafficking in our supply chain.

The largest cost to the Group (apart from agreed income share with its AR firms and advisers) is staff costs. All Group staff are trained on and made aware of the Group policy.

Excluding staff costs the main costs incurred by the business are regulatory fees and professional indemnity insurance premiums, IT infrastructure and operating costs, premises costs, marketing and other professional fees.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We have therefore written to all of the Group’s suppliers outlining the Group’s zero tolerance to Slavery and Human Trafficking whilst asking for details of their commitment to also combat slavery and human trafficking. This process has not identified any issues in relation to Slavery or Human Trafficking. AR firms that are not owned by the Group and all individual financial advisers are required to go through a robust due diligence process before being appointed.

Should any instances of non-compliance arise, the Group will bring this to the attention of the supplier concerned and, if not satisfactorily resolved or explained, will cease to operate with that supplier going forward.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, all staff have been provided with an online training module and we will continue to provide training to our staff both at induction and periodically during their period of employment with the Group.

All of the Group’s self-employed advisers are subject to the same training and awareness programmes introduced to the Group’s employees. As the majority of the Group’s advisers are self-employed sole traders the risk is deemed to be very low.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We will monitor and update the steps in this statement and our Modern Slavery Policy and will be reviewed annually in line with our accounting reference period. The following will be reviewed and reported on in the next Statement:
• The continued training of employed staff and advisers
• The roll out of relevant training to the Group's self-employed advisers
• Actions taken to continue strengthening the audit of our supply chain
• Any investigations or remedial action taken where necessary

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31st December 2018.

Signatory:

Peter Smith, Group Finance Director
For and on behalf of the Board of Directors of
Lighthouse Group plc

Date:
Appendix 1

The principal trading subsidiary undertakings of Lighthouse Group plc, all of which are wholly owned, are as follows:

Name of company

- Lighthouse Advisory Services Limited
- Lighthouse Financial Advice Limited
- LighthouseCarrwood Limited
- LighthouseWealth Limited
- Falcon Financial Advice Limited
- Lighthouse Corporate Services Limited
- Lighthouse Support Services Limited
- Luceo Asset Management Limited

In addition, Lighthouse Group plc has a number of non-trading and/or dormant subsidiaries. These are:

Name of company

- The Falcon Group Limited**
- Financial Services Advice and Support Limited**
- Lighthouse Benefits Limited*
- Lighthouse Financial Adviser Services Limited*
- Lighthouse Financial Advisers Limited*
- LighthouseXpress Limited*
- Lighthouse Direct Limited*
- Lighthouse Temple Limited*
- Lighthouse Wealth Management Limited*
- Lighthouse+ Limited*
- LighthousePensions Limited*
- LighthousePlus Limited*
*dormant and non-trading  **non-trading