

Slater Investments Limited Modern Slavery Statement

Modern Slavery

The Modern Slavery Act 2015 (“**MSA**”) defines Modern Slavery as “slavery, servitude and forced or compulsory labour” and “human trafficking” (“**Modern Slavery**”).

The Business

The Company is a UK-based investment manager which only operates in the UK. Given the nature of the Company’s operations, Slater Investments operates no activities which are considered to be at high risk of Modern Slavery. We are however committed to working with our suppliers and stakeholders to help end Modern Slavery.

Our Policy

We will seek to understand all potential Modern Slavery risks related to our business and to put in place steps that are aimed at ensuring there is no Modern Slavery in our own business and our supply chains. The Company recognises it has a responsibility to take a robust approach to Modern Slavery and is committed to ensuring that its supply chains are free from any forms of slavery, servitude, forced or compulsory labour and human trafficking. The Company will not tolerate any form of Modern Slavery in its supply chains or operations.

Supply Chains

The Company does not act as a producer, manufacturer, or retailer of any physical goods and, as a financial services provider, it has a relatively straightforward supply chain compared to other sectors. It is not authorised to conduct any financial services outside of the UK, and save for the outsourcing of some fund administration operations to a company based in South Africa, it has no connection with supplier businesses outside the UK.

Company Policies and Procedures

We hold our suppliers to the same ethical standards to which we hold ourselves and require our suppliers to remain in full compliance with all applicable laws, rules, and regulations. We expect our suppliers to extend the principle of fair and honest dealings to all others with whom the supplier does business, including employees, sub-contractors and other third parties.

We undertake due diligence when considering taking on new suppliers and, depending on the nature of the goods or services being procured, we incorporate questions around corporate responsibility (including, where applicable, compliance with the MSA) into our supplier selection process.

Over the next 12 months, we will be reviewing our Modern Slavery due diligence activities so that we not only assess legal compliance on procurements but also assess and manage risk for any suppliers in any higher-risk categories and/or geographies.

The Company has a zero tolerance to Modern Slavery and places a duty on all staff to report any potential infringement arising either internally or externally.

SIL also has various practices, procedures and policies to ensure compliance with all human rights laws and UK employment laws.

In the event of victims of Modern Slavery being identified by the Company, we will:

- notify the appropriate law enforcement agency/ies;
- work openly and proactively with suppliers to resolve issues and change working practices;
- consider terminating any relevant contract.

We are making this statement on a voluntary basis in the form set out in section 54 of the MSA. This statement was approved by the Directors of Slater Investments Limited on 10th September 2021.

Slater Investments Limited
10th September 2021