



Slater Investments Limited

Anti-Money Laundering Statement

July 2024

Slater Investments Limited (the ‘Company’)

Anti-Money Laundering Statement

The Company is committed to the prevention of financial crime such as money laundering, the funding of terrorist activity, and bribery and corruption. Our aim is to not only comply with our regulatory and legal requirements but also to mitigate, reduce and protect both the Company and our clients from such crimes.

We set a minimum, mandatory, standard for Anti-Money Laundering (AML) and Counter-Terrorism Financing (CTF), based on and compliant with the requirements of the FCA and industry guidance from the Joint Money Laundering Steering Group (JMLSG), which are reviewed and updated regularly.

We have a Money Laundering Reporting Officer who is responsible for oversight of the Company’s compliance with the FCA’s rules on anti-money laundering and financial crime systems and controls who reports directly to the Board of the Company.

We perform risk based due diligence on all new customers, including verification of their identity and, where appropriate, an assessment of the source of their wealth and funds which is detailed in our KYC/Onboarding Procedures Manual. Annual reviews of our corporate clients are undertaken.

Where KYC checks are delegated to third parties i.e. our Fund Administrators, we have an SLA detailing agreed procedures in place. We receive quarterly reports from these third parties. Investor onboarding procedures and our controls ensure that all the entities are verified in line with Anti-Money Laundering regulations and JMLSG guidance, including validating their regulatory status. Third parties also warrant that they will comply with all aspects of the Anti-Money Laundering regulations applicable to it.

Sanctions screening is conducted prior to take on and weekly thereafter.

Anti-bribery and corruption screening includes adverse media checks and screening against PEPs lists. Fuzzy logic name matching criteria is included in settings.

We comply with all suspicious activity reporting required of us by the regulators and law enforcement agencies and have processes and systems in place which are designed to monitor investor transactions for the purpose of identifying suspicious activity.

We provide annual training to our staff on Anti Money Laundering, on our customer due diligence policies and procedures, including how to detect and report suspicious activity. Our training and awareness programme seeks to ensure that our staff can meet their responsibilities.

We undertake regular testing by second line assurance function and third line audit function.

Do you need extra help?

If you would like this Statement in a more accessible format (for example audio, large print, braille) please contact us and tell us what format you need.

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