

SLATER INVESTMENTS LIMITED

ANTI-BRIBERY POLICY STATEMENT on the FIRM'S WEBSITE

Slater Investments Limited (the “Firm”) is committed to ensuring that it, its directors, staff, agents and anyone contracted to it comply with all laws relevant to countering bribery and corruption including the requirements of the UK Bribery Act 2010 and, where applicable, the U.S. Foreign Corrupt Practices Act (FCPA) and other international anti-bribery and anti-corruption standards.

As part of its anti-bribery corruption framework, the Firm also considers relevant FCA financial crime expectations and, where applicable, SEC requirements including rules relating to political contributions and pay-to-play practices.

Where applicable, the Firm will apply controls designed to prevent improper payments, inducements, political contributions or third-party arrangements that could influence the award, retention or servicing of investment advisory business, including business involving government entities, public pension plans, public officials or foreign public officials.

The Firm conducts its business fairly, honestly and openly, and has a zero-tolerance approach towards bribery and corruption. The Firm prohibits facilitation payments, kickbacks, and the offering, giving, solicitation or acceptance of bribes in any form, including gifts, hospitality or expenses intended to influence business decisions improperly.

The Firm applies a risk-based approach to identifying, assessing and managing bribery and corruption risks. This includes proportionate due diligence on relevant third parties, controls over gifts and hospitality, staff training, internal reporting arrangements, and periodic monitoring and review of its anti-bribery and corruption framework.

The Firm expects those acting for or on its behalf to uphold equivalent standards of integrity and reserves the right not to enter into, or to terminate, relationships with parties that do not meet these standards.

The Firm maintains confidential internal reporting and whistleblowing channels, so concerns about bribery or corruption can be raised without fear of retaliation.

Responsibility for day-to-day oversight of the Firm's anti-bribery and corruption policies and procedures sits with the Compliance Officer, with appropriate reporting to the Board.

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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