

# ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

## Introduction from the CEO

We are taking steps to combat slavery and human trafficking, and we are committed to improving our practices in achieving this.

## Organisation's Structure

We are a provider of Investment Management and Fund Management services in the Financial Services sector. We are a part of the Thesis Group, and our ultimate parent company is Thesis Asset Management plc (Thesis). Thesis has its head office in the UK and has over 110 employees.

The Group has a global annual turnover of £77m.

## Our Business and Supply Chain

Our business is organised into three business units: Thesis Asset Management, Thesis Unit Trust Management and Pallant Independent. Whilst all our business is conducted in the UK, we do have suppliers and service providers who perform their work for us in many other parts of the world.

## 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 Anti-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.

## Due Diligence Processes for Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

## Supplier Adherence to our Values

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a supply chain compliance programme. This consists of:

- All suppliers are reviewed on a regular basis as part of a risk-based monitoring programme.

- As part of our monitoring programme assurance/evidence is sought that suppliers have appropriate policies/procedures in place.
- We have identified those suppliers who provide some services in locations other than the UK or EEA.

We have a dedicated compliance team which is chaired by the CEO, which consists of representatives from Legal, Compliance and HR departments.

## 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 provide training to our staff. We also require our business partners to provide training to their staff and suppliers and providers.

## Our Effectiveness in Combating Slavery and Human Trafficking

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Use of payroll systems to check eligibility of employees in the UK;
- Communication and personal contact with the next link in the supply chain and their understanding of, and compliance with, our expectations;
- Monitoring any incidents or allegations across our supply chains which conflict with our values.

## Further Steps

The effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains is kept under annual review and further steps will be taken and recorded in the programme.

This statement, approved by the Thesis Board, 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 2016.

David Tyerman, CEO  
Thesis Asset Management plc

Date: 12 July 2016