

## Modern Slavery Act 2015 (the “Act”) Policy Statement

### **Introduction**

At Findlay Park Partners LLP (the “Firm”) we are committed to preventing slavery and human trafficking from taking place within our business activity and supply chains. This Policy Statement outlines our approach in relation to the Act.

### **Organisation’s structure**

We are a UK based Investment Management firm which provides investment management services to professional clients only. We have approximately 41 staff members based in our London office. We do not have a place of business in any other country.

### **Our business**

The Firm is a limited liability partnership which is owned by its Members, it is not part of a group. All our employees have written terms and conditions which govern their employment.

### **Our supply chains**

Our supply chains consist of various suppliers who typically provide services to the financial services industry in the U.K or U.S. The relationship with suppliers is usually governed by a written contract. The services and products received by the Firm are those typically received by financial services companies who operate in an office environment. These services are predominantly sourced from U.K suppliers, all suppliers are reviewed before their services are taken on.

### **Investment process**

In providing services to clients, we will make investments in the securities of U.S., Canadian and, to a limited extent, Latin American companies listed or traded on recognised markets. The Firm conducts in depth due diligence on its investments including but not limited to, a review of any environmental, social and governance factors associated with an investment.

### **Assessment**

The Firm considers the risk exposure as low in relation to slavery and human trafficking.

### **Our policies on slavery and human trafficking**

We are committed to ensuring that there is no slavery or human trafficking involved in our supply chains or in any part of our business. This Policy Statement 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 or any other part of our business.

We have the following policies and procedures in place which we believe reduce the likelihood that our business is exposed to or inadvertently supports slavery or human trafficking:

- Anti-Money Laundering Policy;
- Financing of Terrorist Activity;
- Anti-Bribery and Corruption Policy;

- Market Conduct Policies and Procedures; and
- Whistle Blowing Policy.

### **Due diligence processes implemented in order to identify slavery and human trafficking**

Even though the exposure is perceived to be low, as part of our initiative to identify and mitigate risk we review all of our suppliers and identify those which we regard as being potentially susceptible to slavery or human trafficking. In mapping the risks in our supply chain, we assess the following:

- Country Risk;
- Sector or Industry Risk;
- Business or transaction risk; and
- Product or raw material risk.

When potential risks are identified we will perform enhanced due diligence to ensure that our suppliers meet the requirements of the Act and have their own policy and procedures in place to mitigate risk.

Employees are made aware of this Policy Statement on a regular basis. The Policy Statement is signed off by the Firm's Board ("Board") on an annual basis.

### **Action**

In the event that any instances of human trafficking or modern slavery are identified, the matter would be escalated to the Board. The Board would agree the next steps which could include immediately terminating the relationship with the relevant supplier and notifying the relevant authorities. A log of any risks identified and action taken will be maintained by the Firm's Compliance Team.

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

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