

# Modern Slavery Act Policy Statement

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## INTRODUCTION

This policy statement is published pursuant to section 54(1) of the Modern Slavery Act 2015 (the "Act") and constitutes Findlay Park Partners LLP (the "Firm's") slavery and human trafficking statement for the financial year ending 31<sup>st</sup> March 2024.

As a business, we are not involved in the supply or manufacturing of goods so our risk of exposure to human trafficking and slavery is limited. However, we are committed to ensuring that we prevent, to the extent possible, any illegal activity from taking place within the Firm's supply chain.

## ORGANISATIONAL STRUCTURE

We are a UK regulated Investment Management firm which has been appointed as the Investment Manager for Findlay Park Funds ICAV (the "Fund"), an Irish domiciled Undertakings for Collective Investment in Transferable Securities scheme with one sub-fund, the Findlay Park American Fund.

The Firm is a limited liability partnership owned by its members and does not belong to a group or have a place of business in any other country outside the UK.

## OUR BUSINESS AND EMPLOYEES

We are committed to ensuring that anyone who works for the Firm benefits from a working environment in which their fundamental human rights are respected and that anyone we do business with shares these principles.

We provide fair working conditions for all our employees, including written terms and conditions governing their employment, remuneration, working hours, health and safety, resting time, holiday entitlements and benefits. Background checks are carried out on all new employees in order to ensure that they have the right to work in the U.K.

## OUR SUPPLY CHAINS

Our supply chains consist of various direct suppliers who typically provide services to the financial services industry in the U.K or U.S. These third parties are generally software and IT infrastructure providers, professional advisors, office support services providers or regulated research providers. The relationship with suppliers is usually governed by a written contract.

## ON-GOING RISK ASSESSMENT AND DUE DILIGENCE PROCESS

When on-boarding new service providers the Firm has a process in place which assesses the risk of exposure to modern slavery and human trafficking. This involves reviewing the risks associated with the service provider's country, sector and industry, and the nature of the specific transaction. The purpose of this risk assessment is to identify any high-risk service providers which require enhanced due diligence to ensure that they meet the requirements of the Act and have their own Modern Slavery Statement and procedures in place to mitigate risk.

The Firm as a rule does not source or undertake services in high-risk countries where forms of slavery are prevalent.

Being a financial institution, the Firm may potentially be at risk of facilitating the investment of financial proceeds which originate from modern slavery and bonded labour in operations or supply chains or through money

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laundering. The Firm has implemented policies and procedures for the mitigation of such risk including Anti-Money Laundering systems and controls.

Our assessment and on-going monitoring of service providers is reviewed by the Firm's Operating Committee. For the year ending 31<sup>st</sup> March 2024, we believe that none of our current service providers expose the Firm to slavery or human trafficking risk.

## OUR POLICIES ON MODERN 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.

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:

- Code of Conduct
- Inducements, Gifts, and Hospitality policy
- Anti-Money Laundering and Counter Terrorist Financing Policy
- Anti-Bribery Policy
- Tax Evasion Policy
- Whistleblowing Policy
- Outsourcing Requirements Policy
- Responsible Investment and Engagement Policy

## TRAINING FOR STAFF

Training is fundamental in raising awareness of modern slavery and human trafficking across the Firm. Our policies are discussed with new starters and all employees are required to confirm their understanding of the policies on at least an annual basis. The Firm has an open compliance culture that encourages employees to raise any concerns in accordance with the Firm's Whistleblowing Policy.

As a financial services firm all employees are required to complete relevant training on an annual basis. Anti-money laundering awareness training is provided bi-annually.

## IDENTIFICATION AND ACTION

In the event that any instances of human trafficking or modern slavery are discovered within the business or our supply chain, 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.

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## APPROVAL

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and was approved by the Board of Findlay Park Partners LLP on 11<sup>th</sup> September 2024.

Signed by:

**Simon Pryke**

**Designated Member, Findlay Park Partners LLP**

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