

FUNDROCK PARTNERS LIMITED

Modern slavery and human trafficking statement

INTRODUCTION

As part of a global organisation we understand that we need to lead by example in the way we do business. We recognise that modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

OUR BUSINESS AND OUR SUPPLY CHAIN

We are part of a global organisation that operates across multiple countries. We procure our goods and services from companies in many different countries. Such companies may in turn procure the goods and services from other third parties in other third countries. We may also, from time to time, outsource some of our operational functions to various suppliers.

We expect all our suppliers, including our delegated investment managers, to operate in a responsible and ethical manner, adhering to all applicable laws and regulations. In order to monitor compliance with these requirements we ask them to complete an annual due diligence questionnaire, as part of our supplier oversight, and also request copies of their modern slavery statements.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We aim to act fairly, ethically and openly in everything we do and we are committed to practices that seek to combat slavery and human trafficking in our supply chains or in any part of our business. We expect the same from our direct suppliers and from suppliers lower down in the supply chain.

KEEPING OURSELVES UP TO DATE

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we aim to keep ourselves and our staff updated on developments and best practice in order to ensure that we are able effectively to combat modern slavery and human trafficking, where there is a risk of this occurring.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

If we discover practices that are out of step with our expectations on anti-slavery we will respond in a manner that is proportionate to the nature and extent of the violation.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our anti-human trafficking statement for the financial year ending 31 December 2019.

FUNDROCK PARTNERS LIMITED DIRECTOR

Date: 25.6.20