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## MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

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VERSION	DATE APPROVED	REVIEWED BY	CHANGES
v.2022	24 <sup>th</sup> March 2022	CO & BoD	New Policy

For the financial year ended 31st December 2021

### **About us**

Seilern Investment Management Limited (“SIM”, or “the Firm” or “we”) is an independent and privately-owned investment management company founded in 1989 by Peter Seilern-Aspang. Based in London, we provide investment management in quality-growth equities to professional and institutional investors through a range of fundamentally research-driven funds. SIM is authorised and regulated by the Financial Conduct Authority (FCA) in the United Kingdom.

This statement is published in accordance with Section 54 of the Modern Slavery Act 2015. It sets out SIM's actions to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

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

SIM strongly oppose any form of slavery or human trafficking. As such, we are committed to ensuring that no such practices or activities occur in our supply chains or any part of our business. SIM seek to implement an appropriate risk-based approach to minimise the risk of slave labour.

We seek to act with honesty and integrity in our business dealings and relationships with clients and suppliers. Our anti-modern slavery efforts are underpinned by the following policies and procedures, which improve our ability to prevent, detect, manage and report slavery and human trafficking. These include our policies and procedures such as the Staff Handbook, Anti-Money Laundering, Anti-Bribery and Inducements and Whistle Blowing.

### **Our Supply Chain**

We expect all those in our supply chain to comply with our values and the Modern Slavery Act. Given the size and nature of our business, we consider the risk of slavery or human trafficking being present in our firm or our supply chain to be Low. As such, we adopt a proportionate and risk-based approach to selecting and monitoring our suppliers.

Supplier services comprise professional and business support services. The key third party suppliers we deal with are principally professional services firms (legal advisers, accountants and brokers) relating to our asset management activities. We also engage with businesses that supply other goods and services such as cleaning, data suppliers, IT and technology, marketing and communications, payroll, recruitment and general office support services. We operate supply chains predominantly comprising business and professional services organisations. We have minimal contact with the countries and sectors that are generally considered high risk to modern slavery and human trafficking issues.

When appointing a new supplier or service provider, depending on the nature and significance of that business relationship and the perceived risk profile, we may seek assurances confirming the supplier or service provider's approach to countering slavery and human trafficking. As a means of ongoing monitoring, periodically, we also require our suppliers to confirm that they continue to operate in compliance with the Act.

## **Employees**

We are duly committed to upholding our employees' highest level of human rights. SIM's policies and procedures are designed to provide staff members protection under legislation relating to human rights and employment. All staff are remunerated fairly and provided with a safe, professional working environment. We have a systematic approach regarding recruitment, subjecting all candidates to pre-employment background screening. All new employees are provided with our staff handbook, which forms as part of staff employment contracts.

We are committed to raising awareness amongst our staff members of our obligation to combat modern slavery and human trafficking and the risks it poses. Our staff members are also reminded of their duty to report suspected instances of modern slavery and, or human trafficking to the Compliance Officer or Chief Operating Officer ("COO").

If any indications of slavery or human trafficking were evident in our business or supply chain, we would respond proportionately to the nature and extent of the issue discovered.

## **Investment Beliefs**

As an investment manager, we recognise that our values must be in harmony with our investment beliefs which is shown in our duties as stewards of our client's capital. As signatories to the UN Principles for Responsible Investment (UN PRI), our beliefs influence our approach to human rights as investors. We are active owners and engage directly with companies when considering issues such as modern slavery or human trafficking.

Our research and investment process also identify relevant findings on these matters, discussed and tackled by the investment team and the Head of Research who sits on the Board. This creates further internal collaboration and imparts market knowledge, strengthening the practices internally, through investments or with suppliers.

## **Training**

SIM will be updating its Staff Handbook concerning modern slavery and human trafficking. Modern slavery and human trafficking training will be provided to relevant staff (via online training modules) to educate them on the importance of implementing and enforcing effective systems to ensure slavery and human trafficking are not occurring in our business or supply chain.

## **Governance**

This statement has been approved by the Board of Directors and will be updated at least annually. Any issues are identified will be managed and addressed by the COO. The COO will raise any issues or concerns in relation to slavery and human trafficking with the Board of Directors.

This statement will be reviewed annually and published on our website.