



Modern Slavery Act

Mole Valley Asset Management Limited (MVAM) is a private limited company, incorporated in England and Wales with registered number 08600041. The Registered Office is at Mount Manor House, 16 The Mount, Guildford, Surrey, United Kingdom, GU2 4HN. Mole Valley Asset Management Limited is regulated by the Financial Conduct Authority.

Introduction

The Modern Slavery Act 2015 is a world-leading piece of legislation devoted to tackling some of humanity's greatest evils, involving human trafficking, forced labour, domestic servitude and sexual exploitation. Its provisions apply in the United Kingdom and set an example for other countries wishing to do the same. The Act requires businesses such as MVAM to report on the measures we have taken to eradicate modern slavery, including through the scrutiny of our supply chains. In accordance with the provisions of Section 54 of the Act, this statement is an update on the progress that MVAM made during 2020 and our plans for 2021 towards combatting modern slavery in our business and supply chains.

We aim for high standards of governance throughout the company; corporate responsibility matters enormously to us. Accordingly, this statement and the ambitions we have to eradicate modern slavery from the entirety of our business activity go beyond just compliance with the law. MVAM recognizes and is acting on the responsibility we have towards our clients and other stakeholders, including our employees and society as a whole.

Our commitment to combat slavery and human trafficking

MVAM is utterly opposed to slavery. We will not knowingly support or conduct business with any organisation involved in such activities.

Services and Supply

The services MVAM utilises itself are office based and its supply chain in relation to services consists, on the whole, of other regulated professional services (Chartered Surveyors, Law Firms, Accountancy Firms and Banks). MVAM considers these to be very low risk in relation to slavery and human trafficking so takes no specific action in respect to these relationships.

MVAM provides a range of services within the structure of investment and fund management. Investment is made directly into companies following the UN Sustainable Development Goals with the aim of 'improving health and education, reducing inequality, and spurring economic growth – all while tackling climate change and working to preserve our oceans and forests'. MVAM also invests, on behalf of its customers, in a range of different businesses and industries through its portfolio managers.

Given what MVAM understands to be a low risk profile of anyone supplying us with services being involved in slavery and/or human trafficking, we believe our current procedures and ability to rely on regulatory oversight in relation to professional services are sufficient in this regard.



Goods

In terms of goods supplied to MVAM, the majority of goods will be goods for use in an office environment. Given what MVAM understands to be a low risk profile of suppliers of goods, no specific training is provided or undertaken by MVAM staff in relation to these matters.

Our people

Our direct workforce consists predominantly of professionally qualified and skilled employees and we consider the risk of modern slavery occurring within our business to be low.

All new employees of MVAM are directed to our employee handbook, which sets out that we expect the highest standards of ethics and integrity and makes clear that we oppose all forms of unfair discrimination or victimisation.

Due Diligence

We undertake robust due diligence on all our material suppliers and have an established framework setting out the accountability for on-going performance measurement to monitor, review and manage these relationships.

Material suppliers are formally reviewed annually in line with our policies and this includes assessment against service levels, operational risk, compliance with regulation, business continuity and contractual obligations.

Company engagement and ESG

Integrating Environmental, Social and Governance (ESG) analysis into our fundamental investment processes is a core part of how we generate long-term sustainable value for our clients. Modern slavery and companies' management of their workers and suppliers more broadly are becoming increasingly important to our analysis of the companies in which we invest.

We have identified and examined those sectors that we believe are most at risk of modern-day slavery. Consumer companies are most exposed but those with robust supply-chain management strategies are likely to be best placed as the spotlight becomes brighter. We monitor supply chain standards and workforce metrics across all sectors and companies through our proprietary research tool.

Approval

This statement has been approved by the Board of Mole Valley Asset Management Limited and will be reviewed and updated annually.

Craig Harper
Managing Director
January 2021