

Modern Slavery Act Statement 2019

Independent Franchise Partners, LLP (“the Firm”) is an independently-owned asset manager serving institutional clients. The Firm is registered as a limited liability partnership and is authorised by the Financial Conduct Authority in the United Kingdom.

As part of its mission statement the Firm strives to:

- maintain a culture and work environment that promotes teamwork and enables us to attract and retain the highest calibre of people, and to foster their growth and satisfaction; and
- uphold the highest standards of ethics and integrity.

The Firm does not tolerate any slavery or human trafficking within its business operations or its supply chains. This policy is published clearly to its staff and training is provided to all staff on the ethical standards expected of them.

In accordance with this policy and the provisions of the Modern Slavery Act 2015, the Firm periodically considers the risks and takes steps designed to ensure that slavery and human trafficking are not taking place in any part of its own business or in its supply chain.

The Firm operates from an office in London. At present, four Partners, seventeen employees and two contractors work in this office. One Partner and two employees work from offices in Australia. The enterprise is small enough that the Partners are in regular contact with all staff. All of our staff and contractors would generally be classified as skilled or highly skilled workers. The Partners are confident that none are working in conditions of slavery and that none are victims of human trafficking. Decisions on creating new roles and hiring for them follow a rigorous interview process and are approved by the Partners.

Independent Franchise Partners, LLP operates an extensive supply chain. Most of its suppliers are sophisticated professional service or financial service organisations. Many publish their own Modern Slavery Act statements. The Firm has seen no evidence of any of its suppliers engaging in practices amounting to either slavery or human trafficking. Nonetheless, in April 2019, as in 2018, the Firm undertook a risk assessment of its suppliers to identify those where, due to the nature of the work undertaken or the geography in which it was carried out, there was a possibility of slavery or human trafficking.

We wrote to all suppliers where there was a possible risk, asking about their own procedures for eliminating slavery and human trafficking from their businesses and supply chains and seeking assurances that there was no material risk of such practices being followed. We have received replies to all of our enquiries, giving the assurances sought and providing supporting facts. The Partners have no reason to doubt the truth or accuracy of those replies and accordingly are satisfied that neither slavery nor human trafficking is taking place in the Firm’s supply chain.

Further Steps

The Firm continues to review the processes and procedures in place to prevent modern slavery and human trafficking in its business and supply chains to ensure that they remain appropriate and

effective for its business. This includes the ongoing monitoring of the Firm's outsourcing processes and supply chain.

This statement constitutes our slavery and human trafficking statement for the financial year ending 31 December 2018. The Partners of the Firm have approved the publication of this statement describing the steps taken in the calendar year 2018 and subsequently. This statement will be reviewed annually and made available on the Firm's website.

Signed on behalf of Independent Franchise Partners, LLP

Hassan Elmasry, Managing Partner

28 June 2019