

## **GuardCap Modern Slavery and Human Trafficking Statement**

For the financial year ended 31<sup>st</sup> December 2019

### **Overview**

In accordance with s.54 of the Modern Slavery Act 2015, this statement outlines the actions taken by GuardCap Asset Management Limited ("GuardCap" or "the Firm") in the previous financial year to ensure that business and supply chains do not include the use of modern slavery or human trafficking. GuardCap is committed to the principles set out in the code and strongly oppose any form of slavery or human trafficking.

This statement has been approved by the board and management of the Firm and will be updated at least annually.

### **About GuardCap**

GuardCap is an investment manager, authorised and regulated by the Financial Conduct Authority (FCA). The Firm is a sub-threshold AIFM, undertaking MiFID activities and is focused solely on managing concentrated, bottom up, strategies constructed on an "index-agnostic" basis for institutional investors. GuardCap is a wholly owned subsidiary of Guardian Capital Group Limited, a Canadian group which was founded in 1962 and whose shares are quoted on the Toronto Stock Exchange.

### **Business and Supply Chain**

Considering the nature of business that GuardCap is involved in, management deems there to be a low risk of modern slavery or human trafficking existing within the Firm's supply chain. Regardless of this, careful consideration is taken when making decisions regarding the selection of our suppliers. The main third party suppliers used within the business relate to professional services firms such as brokers, accountants, lawyers and compliance advisers. The Firm also uses third party firms for support services such as IT, payroll and recruitment.

### **Policy and Approach**

GuardCap is committed to ensuring that slavery and human trafficking does not exist within its supply chain. In addition to being bound by FCA regulations, the Firm and its employees abide by internal policies set out in its compliance manual that promotes integrity and professional behaviour. Our recruitment process ensures that all employees have been screened and referenced and staff training is completed regularly, including making staff aware of their duty to report any suspected breaches of ethical principles.



## **Remediation Process**

To date, the Firm has not discovered any instances of modern slavery or human trafficking in its supply chain. However, if any such instances were found to be present within an entity in the Firm's supply chain, swift action would be taken to inform the proper authority, regardless of any potential impact to our business relationship with that supplier.

## **Future Plans**

Whilst defined policies and procedures are already in place, GuardCap understands there is always more that can be done to reduce the risk of modern slavery and human trafficking within the industry. GuardCap will continue to review its supply chain for new and existing contracted suppliers and clients. The Firm is currently looking into the provision of training centred on ethical issues surrounding modern slavery to ensure its staff are better aware of these risks.