

## Modern Slavery Act Statement

In October 2015, the UK Modern Slavery Act (“MSA”) came into force and requires large organisations doing business in the United Kingdom such as Mondrian Investment Partners Limited (“Mondrian”) to produce a public “slavery and human trafficking statement”. The concept of “modern slavery” encapsulates behaviours such as forced, compulsory or coerced labour, deprivation of personal freedom or facilitating the movement of people for exploitation. This Statement sets out Mondrian’s actions taken to understand potential modern slavery risks related to its business and to put in place policies, processes and business practices that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

### Introduction

Mondrian is a private, employee owned company with its registered office at 10 Gresham Street, London EC2V 7JD. Mondrian is a global investment manager providing investment management services to institutional clients (pension funds, endowments, co-mingled funds and sovereign wealth funds). Part of our managerial belief is that it is best to locate our investment team in a single London location to encourage dialogue and to remain disciplined to our valuation approach. Additionally, we have a small client services team in Philadelphia. The Firm is authorised and regulated by the Financial Conduct Authority.

Mondrian is fully committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chain is free from slavery and human trafficking.

As a signatory to the Principles for Responsible Investment, Mondrian is committed to including relevant issues such as child labour into its investment analysis, decision-making and ownership practices.

### Supply Chain and Due Diligence

We believe Mondrian faces a low risk of slavery and human trafficking in its business and supply chains as Mondrian does not act as a producer, manufacturer, or retailer of any physical goods and, has a straightforward supply chain which includes, information and data technology specialists, professional services firms and asset custodians. Therefore, this assessment is based on the nature of our industry, the limited range of our supply chain, and the countries in which our supply chains operate.

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## Actions Taken and Planned

This being the first year in which the Firm has been subject to MSA, its activities have been confined to the assessment and consideration of the implications of the MSA on the business and to commence the planning of relevant changes to its existing procedures to address identified issues:

### 1. Review of the Firm's Supply Chain

- We have identified all suppliers that are part of our relevant supply chain for the purposes of MSA analysis.
- As slavery and trafficking concerns are of a low risk to the business, it is planned to assess and review our larger suppliers and those that we have put in a higher risk category based on our criteria below.

### 2. Communications with our Supply Chain

- We have asked and will be asking these suppliers to provide assurances that their working practices and offices are reviewed and free from slavery and human trafficking globally.
- We will be conducting further analysis to determine if any suppliers may be at greater risk of slavery in their organisation, and will take stronger actions relative to our analysis. The criteria include geographical base of the supplier's services, and nature of services provided (particularly when a supplier is providing physical labour, catering or staff contracting services).

### 3. Review of our Procurement Procedures and Contract Terms

- We will be adding a clause to all new contracts including renewals, to ensure suppliers are aware they must comply with the MSA.

### 4. Raising Awareness

- We have made all operations-team managers aware of the regulation and their need for diligence when considering all vendor relationships. Periodic training will be provided to fully ensure staff are aware of their obligations.

### 5. Our own Employment Policies

- Mondrian operates in an open and fair manner with all staff. Mondrian's Code of Ethics which all staff are required to adhere to requires that staff conduct themselves with integrity and that our clients' interests take precedence over any personal interests. Annual training is provided to all employees on the importance of ethical conduct.

## Conclusion

The Board of Mondrian makes this statement pursuant to Section 54 of the Modern Slavery Act 2015 and constitutes Mondrian's slavery and human trafficking statement for the current financial year.



Clive Gillmore  
Chief Executive Officer

March 2017