MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

INTRODUCTION
Modern slavery is an international crime and a violation of fundamental human rights. It may take several forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain. This growing global issue transcends age, gender and ethnicities and includes victims trafficked from overseas into the UK to perform forced and illegal work in different sectors such as agriculture, hospitality, construction, retail and manufacturing.

Merian Global Investors (“MGI”) has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its business relationships. It is also committed to implementing and enforcing effective systems to ensure that modern slavery and human trafficking are not taking place anywhere in its own business or supply chain.

MODERN SLAVERY ACT
The Modern Slavery Act 2015 requires commercial organisations that supply goods or services in the UK and have a turnover of above £36 million to prepare and publish an annual ‘Slavery and Human Trafficking Statement’. This sets out the steps an organisation has taken, if any, during its financial year to ensure that slavery or human trafficking is not taking place in its supply chain.

This statement provides an update on the progress that MGI has made during 2018 and its plans for 2019 to prevent slavery and human trafficking.

ORGANISATIONAL STRUCTURE
MGI is a leading, independent, global asset management firm employing 240 people operating across the UK, Europe and Asia. The business was formed in June 2018 when its management team, together with funds operated by the global growth private equity firm, TA Associates, acquired the “single-strategy” investment capabilities of its legacy firm, Old Mutual Global Investors.

MGI manages assets on behalf of institutional and retail investors, financial institutions and high net worth clients from around the world. Merian Global Investors Holdings Limited (“MGIH”) is the holding company of the Group with its head office based in London and 5 operating subsidiaries globally.

The MGIH board of directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this statement and are given adequate training on the issue of modern slavery and human trafficking in supply chains.

DUE DILIGENCE IN THE SUPPLY CHAIN
MGI relies on third party suppliers to deliver asset management services to our clients. MGI expects all our suppliers to operate in a responsible, ethical and compliant manner, adhering to all applicable laws and regulations.

In 2018 MGI introduced a supplier management framework and forum to ensure the robustness of supplier oversight. Within this framework MGI categorises its suppliers on a number of areas; business impact, importance of service, regulatory requirements, contractual and commercial drivers. These all determine the level of oversight and due diligence that is performed within the year. To monitor compliance with this statement MGI may request documentation and/or conduct onsite due diligence. Critical suppliers are reviewed at least annually in line with our procedures.

MGI’s commitment to addressing the issue of modern slavery and human trafficking in its business and supply chains is communicated to all suppliers, contractors, business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

MGI expects all its investee companies to take active steps within their own businesses and supply chains to eradicate modern slavery. If we become aware that standards at any investee company fall short of this expectation we will push for change in practice and oversight.

EMPLOYMENT AND TRAINING OF STAFF
MGI employs 240 people and apply the highest possible standards in the recruitment and employment of its people.

As well as ensuring that the policies set out in the Employee Handbook are complied with, MGI ensures that:

• All legal obligations are complied with in the recruitment and on-boarding process with a particular focus on an individual’s right to work in the relevant country in which they will be engaged;
• An appropriate level of due diligence is conducted on prospective employees prior to them joining the firm, including a robust selection process and taking up employment references; and
• MGI recruits, promotes and develops its people on the grounds of merit and capability alone.
• MGI conforms to the Real Living Wage for its UK employees and contractors, as part of an ongoing commitment to fair pay.
MGI has raised awareness of modern slavery issues and associated risks by circulating a series of communications to staff and by publishing this statement. Further communications and regular training on the policy and on the risks our business faces from modern slavery in its supply chains is planned for 2019 and will be included in the induction process of all individuals who work for us.

**RISK ASSESSMENT**

Due to the nature of its business, MGI does not consider itself to be a business that is at a high risk of modern slavery, and has not identified any specific areas of risk which it believes need to be managed. However, MGI recognises that this is not an excuse to be complacent and carries out rigorous due diligence in both its recruitment and supply chain processes, and will continue to do so.

In 2019, MGI will continue to emphasise the importance of highlighting the risk of modern slavery and human trafficking to its employees and business partners by communicating its commitment to tackling modern slavery and taking action where necessary.

This statement has been approved by MGI’s board. It will be reviewed (and, where necessary, updated) on an annual basis.

Mark Gregory CEO

This Modern Slavery Statement was approved by the board of directors of Merian Global Investors Limited on 19 December 2018.