



MODERN SLAVERY STATEMENT

Introduction from the CEO

We are taking steps to combat slavery and human trafficking, and we are committed to improving our practices in achieving this.

Organisation's Structure

Thesis Unit Trust Management Limited and its subsidiary undertakings, TUTMAN LLP and ConBrio Fund Partners Limited (together "TUTMAN") are authorised fund managers in the UK. Each is authorised and regulated by the Financial Conduct Authority. We are a part of the Thesis Group, and our ultimate parent company is Regit Topco Limited, a company incorporated in Jersey. TUTMAN has its head office in the UK and has 24 employees. Thesis Holdings Limited, a company incorporated in Jersey, is the immediate parent company of Thesis Unit Trust Management Limited. Thesis Holdings Limited and Thesis Unit Trust Management Limited are the members of TUTMAN LLP. Thesis Unit Trust Management Limited is the immediate parent of ConBrio Fund Partners Limited.

Thesis Unit Trust Management Limited has a global annual turnover of over £164m.

Our Business and Supply Chain

Whilst all our business is conducted in the UK from our office in Chichester, West Sussex and our suppliers are principally UK-based, we do have some suppliers and service providers who perform their work for us in other parts of the world.

Our Policy on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery and Human-Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Due Diligence Processes for Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk we have in place systems to:

- Review supplier contracts to check they contain a clause obliging the supplier to comply with applicable law.
- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers, encouraging a culture of openness and reporting of any suspected wrongdoing.

Supplier Adherence to our Values

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a supply chain compliance programme. This consists of:

- All suppliers are reviewed on a regular basis as part of a risk-based monitoring programme.
- As part of our monitoring programme assurance/evidence is sought that suppliers have appropriate policies/procedures in place.

- We have identified those suppliers who provide some services in locations other than the UK.

The Group Environmental, Social and Governance Committee is responsible for modern slavery compliance matters. The Committee consists of representatives from our Legal, Compliance, HR and TUTMAN Oversight teams.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff both on induction and as part of their ongoing development. We also check whether our business partners provide training to their staff, suppliers and service providers.

Our Effectiveness in Combating Slavery and Human Trafficking

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Use of an international background screening service to check eligibility of employees to work in the UK;
- Communication and personal contact with the next link in the supply chain and their understanding of, and compliance with, our expectations;
- Monitoring any incidents or allegations across our supply chains which conflict with our values.

Further Steps

The effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains is kept under annual review and further steps will be taken and recorded in the programme.

This statement, approved by the Thesis Unit Trust Management Limited board of directors as both directors of that company and on behalf of the company as a designated member of TUTMAN LLP and the parent of ConBrio Fund Partners Limited, is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our TUTMAN's slavery and human trafficking statement for the financial year ending 2024.



David Tyerman (Sep 14, 2024 09:46 GMT+1)

David Tyerman, CEO
Thesis Unit Trust Management Limited

Signed 10 September 2024







TUTMAN Modern Slavery Statement September 2024 - approved

Final Audit Report

2024-09-14

Created:	2024-09-10
By:	Louise Wilkinson (louise.wilkinson@thesisam.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAGgwV5QPPrQu-8VQxgu7HDxilcFNEExBr-C

"TUTMAN Modern Slavery Statement September 2024 - approved" History

-  Document created by Louise Wilkinson (louise.wilkinson@thesisam.com)
2024-09-10 - 1:36:40 PM GMT
-  Document emailed to david.tyerman@tutman.co.uk for signature
2024-09-10 - 1:36:43 PM GMT
-  Email viewed by david.tyerman@tutman.co.uk
2024-09-14 - 8:46:11 AM GMT
-  Signer david.tyerman@tutman.co.uk entered name at signing as David Tyerman
2024-09-14 - 8:46:37 AM GMT
-  Document e-signed by David Tyerman (david.tyerman@tutman.co.uk)
Signature Date: 2024-09-14 - 8:46:39 AM GMT - Time Source: server
-  Agreement completed.
2024-09-14 - 8:46:39 AM GMT