Modern Slavery Act Policy Statement

INTRODUCTION

This policy statement is published pursuant to section 54(1) of the Modern Slavery Act 2015 (the "Act") and constitutes Findlay Park Partners LLP (the "Firm's") slavery and human trafficking statement for the financial year ending 31st March 2026.

As a business, we are not involved in the supply or manufacturing of goods so our risk of exposure to human trafficking and slavery is limited. However, we are committed to ensuring that we prevent, to the extent possible, any illegal activity from taking place within the Firm's supply chain.

ORGANISATIONAL STRUCTURE

We are a UK regulated Investment Management firm which has been appointed as the Investment Manager for Findlay Park Funds ICAV (the "Fund"), an Irish domiciled Undertakings for Collective Investment in Transferable Securities scheme with one sub-fund, the Findlay Park American Fund.

The Firm is a limited liability partnership owned by its members and does not belong to a group or have a place of business in any other country outside the UK.

OUR BUSINESS AND EMPLOYEES

We are committed to ensuring that anyone who works for the Firm benefits from a working environment in which their fundamental human rights are respected and that anyone we do business with shares these principles.

We provide fair working conditions for all our employees, including written terms and conditions governing their employment, remuneration, working hours, health and safety, resting time, holiday entitlements and benefits. Background checks are carried out on all new employees to ensure that they have the right to work in the U.K.

OUR SUPPLY CHAINS

Our supply chains consist of various direct suppliers who typically provide services to the financial services industry in the U.K or U.S. These third parties are generally software and IT infrastructure providers, professional advisors, office support services providers or regulated research providers. The relationship with suppliers is governed by a written contract. Consequently, we consider that the risk of modern slavery and/or human trafficking in our supply chain is low.

ON-GOING RISK ASSESSMENT AND DUE DILIGENCE PROCESS

Given the focused nature of our services and the fact that Findlay Park has straightforward supply chains we adopt a proportionate and risk-based due diligence approach to assess the risk of modern slavery and human trafficking with the people, companies and organisations that we do business with.

The Firm's due diligence process considers elements such as country, sector and industry, the nature of services provided as well as other relevant factors such as regulatory status. The purpose of this risk assessment is to identify any high-risk service providers which require enhanced due diligence to ensure that they have procedures in place to mitigate risk. The Firm does not source or undertake services in high-risk countries where forms of slavery are prevalent.

Being a financial institution, the Firm may also potentially be at risk of facilitating the investment of financial proceeds which originate from modern slavery and bonded labour through financial crime such as money laundering. The Firm has established policies, procedures and controls for the mitigation of financial crime risk.

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The Firm keeps its risk register under ongoing review and performs a formal assessment with risk owners annually. For the year ending 31st March 2026, we believe that none of our current service providers expose the Firm to slavery or human trafficking risk.

ORGANISATIONAL POLICIES

We are committed to ensuring that there is no slavery or human trafficking involved in our supply chains or in any part of our business.

We have the following policies and procedures in place which we believe reduce the likelihood that our business is exposed to or inadvertently supports slavery or human trafficking:

- Code of Conduct
- Inducements, Gifts, and Hospitality policy
- Anti-Money Laundering and Counter Terrorist Financing Policy
- Anti-Bribery Policy
- Tax Evasion Policy
- Whistleblowing Policy
- Outsourcing Requirements Policy
- Responsible Investment and Engagement Policy

TRAINING FOR STAFF

The Firm has an established training program for all staff, including new joiners. As a financial services firm all employees are required to complete relevant training and confirm their understanding of the Firm's policies on an annual basis. The Firm has an open compliance culture that encourages employees to raise any concerns in accordance with the Firm's Whistleblowing Policy.

IDENTIFICATION AND ACTION

In the event that any instances of human trafficking or modern slavery are discovered within the business or our supply chain, the matter would ultimately be escalated to the Board. Actions taken could include immediately terminating the relationship with the relevant supplier and notifying the relevant authorities.

APPROVAL

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and was approved by the Board of Findlay Park Partners LLP on 21st July 2026.

Signed by:

Rose Vangerven

Designated Member, Findlay Park Partners LLP