FISHER INVESTMENTS EUROPE™

# Anti-Slavery and Human Trafficking Statement
# 2022 Statement

**This Anti-Slavery and Human Trafficking Statement was adopted by the Board of Directors of Fisher Investments Europe Limited (the "Company") under section 54 of the UK Modern Slavery Act 2015.**

## Organisational Structure and Business

The Company is a discretionary investment manager offering the discretionary investment management services of its US parent company to high net worth private clients in the UK, and offering its own discretionary investment management services to institutional clients throughout Europe. The Company also offers its financial planning services and, on occasion, its own discretionary investment management services, to high net worth private clients in the UK. The Company is registered with the UK Financial Conduct Authority (FCA No.19169).

## Supply Chain

As a financial services company, the Company does not have an extensive range of local or international suppliers where modern slavery or human trafficking would generally be a material risk. The vast majority of the Company's suppliers are other financial service providers (such as financial custodians) and providers of professional services (such as accounting firms, legal firms, recruiting firms, and marketing firms) within the UK and the European Economic Area ("EEA"). However, the Company does have some suppliers with an increased risk of modern slavery (for example, janitorial services and hotels where the Company rents event space) and the Company is committed to taking measures to combat modern slavery and human trafficking.

## Anti-Slavery Measures

In seeking to eliminate modern slavery and human trafficking from the Company's supply chain, it is the Company's policy to request that every supplier sign an agreement with the Company certifying that the supplier will (a) not engage in any practice that amounts to slavery, forced labor or human trafficking, (b) conduct proper checks on its suppliers, (c) assist the Company with complying with anti-slavery laws, (d) allow the Company to audit the supplier to ensure compliance, (e) notify the Company of any breach, and (f) remove anyone the Company suspects of being involved in modern slavery from the Company's supply chain.

Whilst the Company endeavours to have every supplier sign its full anti-slavery certification, certain suppliers choose to sign a modified certification or may offer alternative indications of compliance with anti-slavery laws. In each such case, management, in consultation with the Fisher Legal Department, will evaluate the slavery risk presented by the supplier to determine whether such modifications or alternatives are acceptable to the Company. For example, the Company may determine that a financial custodian in the UK that is unwilling to sign the Company's full anti-slavery certification but that has its own anti-slavery policy on its website is still an acceptable supplier.

## Training

The Company trains its employees on the Modern Slavery Act 2015 on an annual basis.



Carrianne Coffey, Director
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