BROOKS MACDONALD

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT
FOR THE FINANCIAL YEAR ENDING 2023

Introduction

This statement is made by Brooks Macdonald Group plc ("Brooks Macdonald", the "Group" or the "Company") pursuant to section 54(1) of the Modern Slavery Act 2015. It applies to the financial year ending 2023 and covers all of the Company's subsidiary companies, whether they are incorporated within or outside the UK.

Our Structure

Brooks Macdonald is a trading name of Brooks Macdonald Group plc used by various companies in the Brooks Macdonald group of companies. The principal companies which make up the group are:

- **Brooks Macdonald Group plc** is registered in England No 4402058. Registered office: 21 Lombard Street, London, EC3V 9AH.

- **Brooks Macdonald Asset Management Limited** is authorised and regulated by the Financial Conduct Authority. Registered in England No 3417519. Registered office: 21 Lombard Street, London, EC3V 9AH.

- **Brooks Macdonald Asset Management (International) Limited** is licensed and regulated by the Jersey Financial Services Commission. It operates branches in Guernsey, the Isle of Man and South Africa which are licensed and regulated by the Guernsey Financial Services Commission, the Isle of Man Financial Services Authority and the South African FSCA respectively. Registered in Jersey No 143275. Registered office: Third Floor, No 1 Grenville Street, St Helier, Jersey, JE2 4UF.

- **Brooks Macdonald International Fund Managers Limited** is incorporated and domiciled in Jersey. It carries out the business of managing Collective Investment Funds under Manager and Registrar categories of the Collective Investment Funds (Jersey) Law 1988 and the business of managing Alternative Investments Funds under the Financial Services (Jersey) Law 1998. Registered in Jersey No 7313. Registered Office: Third Floor, No 1 Grenville Street, St Helier, Jersey, JE2 4UF.

- **Adroit Financial Planning Limited** is authorised and regulated by the Financial Conduct Authority. Registered in England No 07980535. Registered Office: 21 Lombard Street, London, EC3V 9AH.

- **Integrity Wealth Solutions Limited** is authorised and regulated by the Financial Conduct Authority. Registered in England No 08462446. Registered Office: 21 Lombard Street, London, EC3V 9AH.

Our Business

Brooks Macdonald Group plc, through its various subsidiaries, provides leading investment management services in the UK and internationally. The Group, which was founded in 1991 and began trading on AIM in 2005, had Discretionary Funds under Management of £16.85 billion as at 30 June 2023.

Brooks Macdonald offers a range of investment management services to private high net worth individuals, pension funds, institutions, and trusts onshore and offshore. The Group also provides financial planning and acts as fund manager to a range of funds.

The Group has fifteen offices across the UK and Crown Dependencies including London, Cheltenham, East Anglia, Exeter, Southampton, Birmingham, Leeds, Manchester, Tunbridge Wells, Nuneaton, Scotland, Wales, Jersey, Guernsey and the Isle of Man.

Our Supply Chain and Risk Assessment

At Brooks Macdonald, we provide a high level of service to all of our clients and partners and seek to maintain the highest professional standards in doing so. Our guiding principles – we do the right thing, we are connected, we care and we make a difference – are basic beliefs that everyone in our business is expected to hold and we choose suppliers and partners with the same standards of honesty and fairness.

Brooks Macdonald's supply chain in relation to its investment management services consists mainly of regulated professional services including banking services, financial product services and financial data services. The Group also uses the services of key suppliers in respect of IT, operations and facilities. The Group has identified key outsourced service providers, and these have been assessed with regards to their risks of modern slavery and human trafficking. The risk for each and in aggregate is considered low. The Company continues to evolve its key supplier risk management framework and over time includes further suppliers, using a risk-based approach, in each iteration.

Our Approach and Policies

Brooks Macdonald has policies in place which reflect our commitment to acting ethically and with integrity in all our business relationships, all of which are subject to ongoing review. These include:

- A Whistleblowing Policy which encourages staff to report suspected wrongdoing as soon as possible with the confidence that their concerns will be taken seriously and investigated as appropriate and that their confidentiality will be respected. The Whistleblowing Policy also provides staff with guidance on how to raise concerns.
- An Anti-Bribery Policy which shows a top-level commitment to reducing the risk of giving and receiving bribes as part of Brooks Macdonald's business.
- An Anti-Money Laundering and Counter Terrorist Financing (AML & CFT) Policy which outlines the key measures that must be in place to prevent and detect money laundering (including terrorist financing). As part of this program, Brooks Macdonald works to help identify clients whose financial activity may show involvement in human trafficking and escalates actionable information in accordance with the Company's Incident Reporting Policy.

In addition, Brooks Macdonald maintains a Code of Business Conduct, which forms part of our Staff Handbook, that communicates our expectation that business be conducted ethically and in accordance with the Company's legal and regulatory obligations. The Company expects that all relationships among persons in the workplace, including within our supply chains, be business-like and free of bias, harassment, intimidation, bullying or violence.

We do not tolerate slavery and human trafficking and if we found any evidence of a failure to comply with our policies and procedures, we would immediately seek to terminate the relationship and make reports to any regulatory body or authority of competent jurisdiction as deemed appropriate.

Training

Where relevant to their line of business and function, employees receive training on policies and procedures that pertain to products and services Brooks Macdonald provides to our clients. This includes training on our Code of Business Conduct, Anti-Bribery, AML and whistleblowing policies and practices. All newly hired employees are assigned Code of Business Conduct training to help employees understand how environmental and social risks could impact our clients and our business, as well as how to escalate concerns.

Effectiveness

We continue to evolve the way we identify and mitigate modern slavery risks and measure the effectiveness of our policies through this framework. We recognise modern slavery is a hidden crime and therefore measuring the effectiveness of our response is challenging. As our approach continues to evolve, so too will our year-on-year monitoring. We currently use the following metrics to evaluate our performance:

Area	KPI	2020	2021	2022
Identification	Number of suspected incidents of modern slavery raised via our Whistleblowing Policy	0	0	0
Training	Percentage of new colleagues who completed the mandatory Code of Business Conduct training	100%	100%	100%
Reporting	Number of incidents of modern slavery reported	0	0	0

Further steps

At Brooks Macdonald, we are satisfied that these systems and controls are reasonable and proportionate to minimise the risks of slavery and human trafficking that exist within our supply chains. We will continue to develop our approach to combating modern slavery and human trafficking. Our policies are kept under review and amended as necessary, with new policies being adopted where required. The evolution of our key supplier risk management framework will further assist us to monitor our suppliers and reduce the risk of Modern Slavery in our supply chain.



Andrew Shepherd
Chief Executive Officer

BROOKS MACDONALD GROUP PLC

This statement was approved by the Board of Directors on 5 December 2023