



Modern Slavery and Human Trafficking Statement

Margetts Fund Management Limited

Introduction

This statement for the financial year ended 30 September 2024 is made by Margetts Fund Management Limited ("Margetts"), in accordance with section 54(1) of the Modern Slavery Act 2015 (the "Act").

Margetts opposes modern slavery and human trafficking (MSHT) in all forms.

This statement sets out Margetts' actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no modern slavery in its business and supply chains. Margetts recognises that it has a responsibility to take a robust approach to countering exploitation and is absolutely committed to preventing MSHT in its corporate activities, and to ensuring that its supply chains are free from MSHT. Margetts is committed to reviewing and improving these processes year on year through annual review and update of this statement following the end of each financial year.

Ultimately, Margetts Board holds responsibility for MSHT matters. Our CFO is responsible for reporting MSHT matters to the board from a supply chain perspective and our COO is responsible for reporting MSHT matters to the board from a HR and contractors' perspective. On a day-to-day basis, the third-party relationship owner is responsible for overseeing the third parties that they work with. Third-party relationship owners are held accountable by Department Working Groups who are then responsible for reporting on third-party matters to the Operational Risk Committee who will then report to the Board via the Risk Committee.

Our business

Margetts is an investments company in the financial services sector. We provide investment management, investment services and fund solutions to clients; principally in the United Kingdom (UK). Please access the various resources regarding the nature of our business on our homepage www.mgtsfunds.com.

We operate a culture of "doing what is right", which is embedded throughout our business and is included within our core values.

In January 2024 we became a Certified B Corporation which reflects our dedication to making meaningful contributions to society and the environment. We have met rigorous standards of social and environmental performance, accountability, and transparency to become a Certified B Corporation.



Supply Chain

Our supply chain is predominantly based in the UK.

Margetts have evaluated the nature and extent of our exposure to the risk of modern slavery and human trafficking in industries and geographies that we perceive to be of higher risk, including real estate, construction and facilities management, where we have limited exposure. We will continue to assess the risks associated with our business and supply chain and expand the scope of our focus as necessary.

Margetts is responsible for governance of the Margetts third-party management program. This includes, but is not limited to, facilitating the efficient and effective use of company resources in the acquisition of goods and services from third-party suppliers, while protecting the Margetts brand and other financial assets. Additionally, it ensures compliance with applicable laws, company policy and regulatory requirements.

Policies, Risk and Due Diligence

Margetts is committed to the highest ethical standards within both its business and supply chain and expects the same standards from its suppliers. We are committed to acting ethically, with integrity and promoting work environments that engender conditions of freedom, equality, security and dignity. Margetts expects its employees, contractors and suppliers to prevent acts of MSHT from occurring. Our governance framework and related corporate policies allow our employees to report and escalate any concerns of unethical conduct, whether relating to modern slavery, human trafficking or other matters.

Margetts has embedded modern slavery assessments into its procurement processes with risk based due diligence reviews governed by our Third-Party Management Standard.

Margetts recruitment processes consider the risk of MSHT, and compliance checks are made on all new employees and contractors.

Actions Taken by Margetts

Relevant staff receive regular training in Culture and Ethics as part of their annual continuing professional development. This aimed to ensure staff have a clear understanding of what both culture and ethics are and why both are important in our business. Margetts' Employee Code of Conduct, along with our policies on Whistleblowing, escalation and speaking up, and Suspicious Activity Reporting, allows our employees and contractors to report concerns in confidence without fear of retaliation or retribution.

We have partnered with STOP THE TRAFFIK, a coalition campaigning to bring an end to human trafficking worldwide through partnerships with leading financial institutions to deliver training to relevant staff. This training will be focussed on increasing awareness of the Modern Slavery Act 2015, highlighting key MSHT risk areas for our business.




Conclusion

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and outlines Margetts Fund Management Limited's commitment to preventing MSHT in its corporate activities and supply chains.

Our Risk Management framework has developed to better assess, measure and manage the risk of MSHT in our recruitment and management of our supply chains. We have clear lines of responsibility, appropriate controls and ongoing training.


This statement has been approved by the Board of Directors of Margetts Fund Management Limited and is signed by:

Signed by:

3E67886F844A452...
Ade Ogunnowo

Director

Margetts Fund Management Limited

26 March 2025

DocuSigned by:

7DDCE2082078486...
Matthew Jealous

Director

Margetts Fund Management Limited

26 March 2025