

CG Asset Management

Statement on Modern Slavery

NOVEMBER 2022

cgam

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*This statement is made by CG Asset Management Limited
("CGAM" or "the Company")*

Background

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Our Business

CGAM is a boutique asset manager which is majority owned by an employee ownership trust, a model pioneered by the John Lewis Partnership. Research confirms that employee owned businesses have longer term focus, greater investment in human capital and wider employee participation in governance. We believe that a strong and positive firm culture is a driver of maintaining high standards and our own ownership structure powerfully reinforces our culture. The Company helps clients to reach their investing goals by managing investment strategies across our range of funds.

CGAM's focus is long-term sustainability. CGAM aims to be a responsible corporate citizen and to take into account environmental, social and governance issues that have real and quantifiable financial impacts over the long-term for CGAM and the firms in which CGAM invests. Long-term responsibility and sustainability are integrated into CGAM's business model and investment ethos and in the way CGAM conducts its business and serves its clients.

We consider that given the nature of the services that we offer that the risk of involvement in modern slavery and human trafficking is low.

Steps we have taken to ensure that modern slavery is not taking place in our organisation or supply chains include the following:

We have a robust recruitment and onboarding process with multiple checks built in to ensure all individuals employed by us have the right to work in the UK, are paid a fair salary in compliance with all relevant rules and regulations and are not subjected to human trafficking or forced labour. Further, we maintain a reputation for conducting our business activities in the highest ethical and professional manner. All employees are expected to comply with CGAM's Code of Business Conduct which sets out basic principles designed to guide our employees, officers, and directors. All employees, officers, and directors must conduct themselves in accordance with this Code and seek to avoid even the appearance of improper behaviour. Our employees have a personal responsibility to immediately report illegal or unethical behaviour to the Compliance Officer.

We conduct our business activities in the highest ethical and professional manner and we expect all of our suppliers to adhere to these same standards and principles. Our expectation regarding the Modern Slavery Act 2015 relates to engaging suppliers and understanding supplier risks.