



# GuardCap Asset Management Limited ("GuardCap")

**Modern Slavery Statement**

For the financial year ending 31<sup>st</sup> December 2023

## Overview

This statement is made on behalf of the Board of Directors of GuardCap Asset Management Limited (“GuardCap”, the “Firm”) in accordance with Section 54 of the Modern Slavery Act. Modern slavery is a crime resulting in the abuse of human rights including forced or compulsory labour, child labour and human trafficking.

We recognise the importance of combating modern slavery and human trafficking and are committed to ensuring that our business and supply chain are free from any practices that support or contribute to these egregious violations of human rights. This statement outlines the steps we are taking to address the risks of modern slavery and human trafficking in all aspects of our operations.

## About GuardCap

GuardCap is a UK based investment manager, authorised and regulated by the Financial Authority (“FCA”) in the UK and registered as an investment adviser by the Securities and Exchange Commission (“SEC”) in the U.S. GuardCap is a wholly owned subsidiary of Guardian Capital Group Limited, a Canadian group founded in 1962 and whose shares are quoted on the Toronto Stock Exchange.

## Our Commitment

As an asset management business, we recognise that our supply chain may carry a lower risk of modern slavery than other industries. Nevertheless, we are committed to taking reasonable steps to ensure that the business partners, suppliers, and service providers we work with share our values and uphold the same high ethical standards.

To achieve this, we conduct a risk assessment to identify potential areas of concern related to modern slavery in our supply chain. Based on this assessment, due diligence efforts are prioritised, focusing on suppliers or partners operating in high-risk regions or industries. Newly onboarded suppliers are required to provide their own statement or otherwise detail how they are addressing modern slavery risks in their supply chain.

All staff have undertaken training modules to make them aware of these risks and our responsibilities under the Modern Slavery Act 2015. The modules detail what our organisation can do to help eradicate modern slavery, how to report any concerns or suspicions as well as suggested working practices and policies.

## Reporting and Compliance

We encourage all stakeholders to report any concerns or suspicions regarding modern slavery or human trafficking in connection with our business. All reports will be treated confidentially, and we will investigate them promptly and thoroughly. This modern slavery statement will be reviewed annually to ensure its effectiveness and relevance. It will be published on our website, and all relevant stakeholders will be informed of its existence.

To date, the Firm has not discovered any instances of modern slavery or human trafficking in its supply chain. However, if any such instances were found to be present within an entity in the Firm’s supply chain, swift action would be taken to inform the proper authority, regardless of the potential impact on any business relationship.



## Conclusion

Whilst our defined policies and procedures are in place, we understand there is always more that can be done to reduce the risk of modern slavery and human trafficking within the industry. We are committed to playing our part in eradicating these heinous practices and promoting ethical business standards within our industry.

This statement was approved by the Board of Directors on 23/02/2024.

