



# Modern Slavery Statement

September 2022

# Transparency Statement on the UK Modern Slavery Act 2015

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Slavery and Human Trafficking Statement and Interim Statement ("Statement") for the financial year ending 31 March 2022 for 17 Capital LLP ("17Capital").

This Statement outlines 17Capital's policy, approach, and status in relation to the Modern Slavery Act 2015.

## 17Capital Staff:

- 17Capital continually reviews and monitors its employment practices to ensure it promotes its culture of managing long-term relationships and maintaining a world-class team, which demonstrates integrity, diversity, and collaboration.
- Regular dialogue between those charged with governance and the Head of People and Talent, together with 17Capital's policy and processes and employee handbook, ensures that slavery or human trafficking does not exist with respect to the recruitment or ongoing employment of 17Capital's permanent staff, temporary staff, or contractors.
- 17Capital staff are already protected by relevant laws and regulations, which are fully reflected in the firm's policies and procedures.
- Contractors and consultants utilised by 17Capital carry out highly skilled activities and are therefore deemed low risk.
- 17Capital conducts training for all employees to ensure they are equipped to identify possible indicators of slavery and human trafficking and respond both effectively and proportionately.

## Investments:

- 17Capital's investment team is required to comply with its ESG and Responsible Investment Policy and approach to responsible investment, which includes topics such as slavery and human rights. These elements are considered during the ESG due diligence and monitoring process.
- The ESG and Responsible Investment Policy is practically implemented and built into the pre-investment process through the ESG questionnaire, which includes specific references to human rights violations and labour standards.
- The investment teams monitor ESG considerations throughout the life of an investment. An annual ESG questionnaire is also sent to the underlying portfolio managers which include specific reference to human rights violations and labour standards as part of the ongoing investment monitoring.

## Suppliers:

- As an asset management company, 17Capital has a relatively straightforward supply chain model which is built around its core financial practice, maintaining its global offices, and supporting its technological infrastructure.
- A review of our supplier list has been carried out, which concentrated on suppliers that invoice, on an aggregate basis, over £25,000 or which are from industries or regions which may pose a higher risk of slavery or human trafficking.
- All suppliers which were considered to potentially pose a higher risk were subjected to a more detailed review and/or formally contacted to request details of their practices and policies with respect to Modern Slavery. There are no known matters of concern, but this statement will be updated if any subsequently arise.
- On this basis, we are satisfied that none of our material suppliers give rise to slavery or human trafficking concerns. We will continue to keep our supplier base under review in the coming year.

# Approval and Ongoing Commitment

This statement has been approved by those charged with governance of 17Capital. The statement will be reviewed and updated as required annually to reflect 17Capital's ongoing commitment to detecting and preventing slavery and human trafficking in its business and supply chains. The statement is signed by Augustin Duhamel (Managing Partner) and Oliver Pritchard (Chief Compliance Officer).



for and on behalf of all 17Capital Managing Partners

14.09.2022