

## Modern Slavery Transparency Statement

Miton Group plc ('Miton' or the 'Group') is an asset management group listed in the UK operating from one London office. We are committed to ensuring that our supply chains and corporate activities are free from human trafficking and modern slavery. This statement sets out our review for the year ended 31 December 2018.

### Organisational structure and supply chains

Given the nature of our business, our supply chains include financial and professional service organisations, custodians, banks, information service providers, lawyers, accountants as well as providers of cleaning services and consumables. Our supply chains are considered to be relatively simple with low potential risk of slavery and human trafficking.

### Assessment of risk

We have undertaken a risk assessment and consider that our greatest exposure is likely to be with our building and cleaning contractors. As part of our due diligence measures we are working on establishing procurement processes which will result in more rigorous supplier selection practices.

### Relevant policies and practice

Miton operates various policies that underpin our approach:

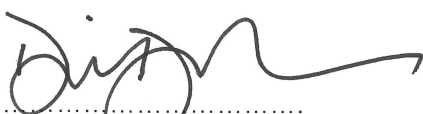
- Employee Code of Conduct: We strive to maintain the highest standards of employee conduct and ethical behaviour in our operations and in managing our supply chain. Our Code of Conduct, part of the Employee Handbook, makes clear to our employees, through various policies, the actions and behaviour expected of them when representing us. The Code incorporates the Whistle-blowing policy, Disciplinary policy and Equal Opportunities policy.
- Compliance Handbook and Protocols: We act in accordance with the Financial Conduct Authority regulations on a variety of issues relating to corruption, bribery and money-laundering. Given the potential links of such topics with slavery and human trafficking, all staff are provided with annual training on ethics, anti-money laundering, anti-bribery and corruption and we adhere to a robust non-monetary benefits policy. We encourage our employees, customers and business partners to report any concerns related to the direct activities or the supply chains of the Group. Our whistle-blowing procedure is designed to make it easy for staff to make disclosures without fear of retaliation.
- Recruitment, Contractors and Agency workers policy: We use only specified, reputable employment agencies and we strive to verify the practices of any new agency we use. We are committed to ensuring that third parties with whom we engage adhere to acceptable standards.

### Training

All employees are required to complete annual anti-money laundering training led by the Head of Compliance to educate staff on potential links between human trafficking and money laundering. Employees complete refresher training on an annual basis.

### Board approval

This statement was approved at a meeting of the Board of Directors held on 18 July 2019.



David Barron, CEO  
For and on behalf of Miton Group plc  
Date: 18 July 2019