## **UK Modern Slavery Act**



Albourne Partners Limited
Slavery and Human Trafficking Statement

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in accordance with section 54 of the Modern Slavery Act 2015 of the United Kingdom

for the financial year commencing on 1 April 2018

- This Statement has been made by Albourne Partners Limited ("APL") and approved by its Board of Directors, who are responsible for seeing that this Statement is reviewed and published annually. The Statement appears on the website of APL and is also available in hard copy form from its office at 16 Palace Street, London SW1E 5JD.
- APL and its wholly-owned subsidiaries around the world (together "Albourne") carry on business as independent, nondiscretionary financial advisers to professional clients on alternative investments.
- In the course of those businesses, Albourne purchases goods and services from a variety of suppliers, including those
  associated with the property and buildings it occupies, the administration of its affairs (including office supplies, IT equipment and
  software), data and business intelligence, travel, hotel accommodation and client and staff events. Albourne's general policy with
  respect to suppliers is to deal with reputable, well-established organisations.
- Albourne's policy in relation to slavery and human trafficking is to avoid them entirely in the case of its own businesses and, in
  the case of its suppliers, to take reasonable steps to satisfy itself that they are not present in the supply chain prior to Albourne.
  Should there be indications that a supplier might be involved in such practices, Albourne would urge that supplier to desist from
  them and would cease to make purchases from that supplier until satisfied that it had permanently done so.
- Albourne considers that there is no risk of slavery and human trafficking taking place in its own business and that such risk in its supply chain is low.
- In the financial year commencing on 1 April 2018, APL continues to investigate its supply chain and to seek information about its
  suppliers and the ways in which they conduct their businesses, by trying to include in new supplier contracts an undertaking that
  the supplier does not itself engage in the practices of slavery and human trafficking and that, as far as it is aware, having made
  reasonable enquiries, neither does any of its direct or indirect suppliers; and that it will promptly inform Albourne if either of those
  statements ceases to be true.
- It is intended that in the current financial year certain of APL's subsidiaries will continue to take similar steps, having started this
  process in 2017.
- Albourne believes that those steps are or will be as effective as can reasonably be expected, having regard to the extent to
  which information is available to Albourne. It measures this effectiveness by reference to these performance indicators: (1)
   Sufficiency of supplier responses to Albourne enquiries and appropriateness of Albourne actions. (2) Training of Albourne staff.
- It provides training to its staff through its Group Policy on Modern Slavery and Human Trafficking and intends to produce a training film on this subject.

Signed: Simon Ruddick, Director, Albourne Partners Limited