

**King & Shaxson Asset Management (KSAM)
Modern Slavery Statement**

Version	Details	Approved by	Date
2026.01	Initial policy creation	Martin Langlands	23/07/2026

Introduction

KSAM provides discretionary investment management services to private clients, charities, trusts and institutional investors. Our operations are primarily office-based and depend on a relatively limited supply chain, including professional services providers, technology vendors, data providers and business support services.

Statement

King & Shaxson Asset Management Limited ("KSAM") is committed to maintaining the highest standards of ethical conduct and corporate responsibility. We oppose all forms of modern slavery, forced labour, human trafficking, servitude and exploitation, and are committed to ensuring that these practices do not occur within our business or supply chains.

We expect all employees, contractors and suppliers to uphold the same commitment to ethical business practices and respect for human rights.

Governance and Policies

KSAM maintains a range of policies and controls that support ethical business conduct and help reduce the risk of modern slavery, including:

- Recruitment and employment practices that comply with UK employment legislation.
- Whistleblowing procedures that facilitate the reporting of concerns.
- Employee conduct and compliance policies.
- Supplier assessment and onboarding procedures.
- Risk management and compliance oversight.

Supplier Due Diligence

While the risk of modern slavery within KSAM's business is considered low, we seek to work only with suppliers and service providers that operate in accordance with applicable laws and recognised ethical standards.

Where appropriate, supplier relationships are assessed as part of our procurement and supplier management processes.

Reporting and awareness

Employees are encouraged to report any concerns regarding modern slavery or human trafficking through management, Compliance or the firm's whistleblowing arrangements. Such concerns are treated seriously and investigated where appropriate.

Continuous Improvement

KSAM is committed to reviewing its policies and business practices on an ongoing basis to ensure they remain effective in identifying and addressing modern slavery risks.

King and Shaxson Asset Management Ltd. (Reg. No. 3870667) has its registered office at 155 Fenchurch Street, London, EC3M 6AL. The Company is registered in England and Wales and is part of the PhillipCapital Group. King and Shaxson Asset Management Ltd. (FCA Reg. No. 823315) is authorised and regulated by the Financial Conduct Authority, 12 Endeavour Square, London, E20 1JN