



Modern Slavery Act 2015 (“the Act”)

Introduction

This statement is issued by Northhill Capital LLP, a limited liability partnership registered in England, in compliance with section 54 of the Modern Slavery Act 2015.

Our business

Northhill Capital LLP is the main operating entity within the Northhill Capital Group (“Northhill”). Northhill provides equity and seed capital to a small number of high-quality start-ups or early stage asset managers and provides equity capital to replace existing shareholders in larger more established asset management businesses.

Northhill Capital LLP is authorised and regulated by the Financial Conduct Authority.

This statement is our slavery and human trafficking statement for the purposes of section 54(1) of the Modern Slavery Act 2015. It sets out our ongoing commitment as a responsible business to ensure that modern slavery and human trafficking is eradicated.

Northhill has a zero tolerance approach to modern slavery and human trafficking. As such we are committed to ensuring that there is no slavery or human trafficking in our supply chains or in any part of our business.

We are committed to acting ethically and with integrity in all our business relationships and we will take appropriate and reasonable measures to minimise the risk of this taking place in line with the nature of services provided to the firm.

Northhill considers the risk of slavery, servitude, forced or compulsory labour (together, “Modern Slavery”) and human trafficking existing within its business to be low

Supply chain risk

Northhill does not support or knowingly deal with any business involved in slavery or human trafficking and will not work with any party it suspects is connected with slavery in any way. Our supply chain includes regulated professional advisers, providers of financial data, IT equipment, office supplies and travel providers.

Suppliers are reviewed on an ongoing basis in line with our Third Party Evaluation procedure which includes a requirement to analyse the supplier’s or service provider’s approach to combatting slavery and human trafficking.

Northhill expects its suppliers to adopt the same standards it meets itself, and in turn work only with companies that share these values and principles. Northhill’s suppliers are expected to uphold their workers’ human rights and treat them respectfully, while maintaining workplaces emphasising ethical and fair behaviour.

In the event that Northhill becomes aware of Modern Slavery occurring within its supply chain, we will seek to ensure that the supplier implements remedial action. Northhill expects its suppliers to

react to any Modern Slavery issues constructively and responsibly, and in a manner demonstrating their willingness to remedy issues expediently.

Action taken

Northhill has undertaken a review of its existing suppliers and evaluated the risk of any supplier being unable to meet its obligations under the Act and will continue to focus on the following areas:

- Key service provider on-boarding and due diligence – an analysis of the service provider’s approach to combatting slavery and human trafficking is to be included within our review process going forward.
- Training – we have ensured awareness of the Act to enable staff generally to understand the requirements of the Modern Slavery Act and flag potential issues.

Employees

Northhill’s recruitment processes are thorough and transparent. We communicate directly with candidates to discuss job opportunities and to confirm the details of any offer made. We have robust procedures in place for the vetting of new employees and ensure that we are able to confirm their identities.

Northhill has policies and procedures in place to ensure compliance with human rights and UK employment laws. All staff are remunerated fairly and above the UK’s national living wage. As such, we are satisfied that our employees are not exploited in any way.

Approval

This annual statement covers the financial year ended 31st March 2017. It is publicly available on the Northhill corporate website. The Northhill Capital LLP Partnership Committee has endorsed this policy and has confirmed its commitment to improving practices to combat slavery and human trafficking.