

ANTI SLAVERY AND HUMAN TRAFFICKING STATEMENT 2018

INTRODUCTION

We remain committed to ensuring our practices are effective in combating slavery and human trafficking. We have a responsibility to be alert to the risks, however small, in our business and in the supply chain.

ORGANISATION'S STRUCTURE

We are a provider of investment management services in the financial services sector. We are the parent company of the J O Hambro Capital Management Group ("Group") which comprises J O Hambro Capital Management Limited, ("JOHCM") JOHCM (Singapore) Pte. Ltd and JOHCM (USA) Inc. The Group has 153 employees worldwide and operates in four countries.

The Group's global annual turnover for the year ended 30 September 2018 was £228.5 million.

OUR BUSINESS MODEL

The Group provides investment management services in relation to a defined range of equity and multi-asset investment strategies each managed by a separate fund management team.

OUR SUPPLY CHAIN

Our supply chain includes third parties and outsourced providers.

OUR POLICY ON SLAVERY AND HUMAN TRAFFICKING

Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all of our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chain.

As an asset management business with a comparatively straightforward supply chain, we regularly review our supply chain which comprises predominantly large businesses and professional service providers. We have concluded that there is a limited risk of slavery and human trafficking in our supply chain.

We recognise that we engage certain suppliers who employ lower-wage staff which may present a higher risk of slavery and human trafficking. Nevertheless, we remain committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business.

We operate a Whistleblowing policy that encourages staff to report any suspicion of wrongdoing including of criminal offences without fear of recrimination.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

We continue to use the following steps to identify and mitigate risk in our supply chain:

- Identify, assess and monitor potential areas of risk in our supply chain.

- Mitigate the risk of slavery and human trafficking occurring in our supply chain.
- Ensure an annual senior management review of our anti-slavery and human trafficking policy.
- Protect whistleblowers.

SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking. We expect our suppliers to adhere to the same high standards as us. To ensure those in our supply chain and contractors comply with our values, we analyse our supply chain with a risk-based approach and obtain:

- assurance that suppliers have appropriate procedures/policies in place; and
- identification of those suppliers who provide some services in locations other than the UK or EEA.

TRAINING

To embed further an understanding of the risks of modern slavery and human trafficking in our supply chain and our business, we are developing specific guidance for staff as part of our wider ethical training programme.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

Our outsourcing oversight function, in conjunction with our HR and Operations teams monitor how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chain and report any concerns to senior management for remedial action.

All staff are responsible for communication and relationship management with our direct service providers to ensure their understanding of, and compliance with, our expectations.

FURTHER STEPS

We will continue to monitor the effectiveness of the steps we have taken to prevent slavery or human trafficking in our supply chain and will review the Modern Slavery Act statements made, where applicable, by our suppliers to ensure they meet our expectations.

This statement was approved by the Board of J O Hambro Capital Management Limited made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ended 30 September 2018.

Emilio Gonzalez
Acting Chief Executive
J O Hambro Capital Management Limited
12 February 2019