
Modern Slavery Act 2015 (“the Act”)

Slavery and human trafficking statement

1 Introduction

This statement is issued by GAM International Management Limited (“**GAM**”), a company incorporated under the laws of England and Wales, in compliance with section 54 of the Modern Slavery Act 2015 (the “**Act**”) for the year ended 2016. This statement sets out GAM’s approach to the prevention of slavery, servitude, forced or compulsory labour (together, “**Modern Slavery**”) within GAM and its supply chains.

2 Our business

GAM is one of the world’s leading independent asset management groups focused on active investing. We manage investments for a wide range of clients, including institutions, wholesale intermediaries and financial advisers. GAM is ultimately owned by GAM Holding AG which is listed on the SIX Swiss Exchange.

Given the nature of our business and the services we procure from suppliers, we believe the risk of Modern Slavery within our business to be low.

3 Supply chains

GAM is committed to ensuring that our supply chain is free of any Modern Slavery and/or human trafficking and will not knowingly support and/or do business with any suppliers who are involved in Modern Slavery.

In any procurement process appropriate due diligence is conducted to assess the extent of GAM’s exposure to the risk of slavery. This may include measures such as:

1. Incorporation of questions in procurement documents covering the supplier’s working practices;
2. A contractual commitment from the supplier to confirm its on-going compliance with the Act;
3. Reference to compliance with the Act in any on-going review or audit processes.

The above measures will be applied proportionately in accordance with GAM’s assessment of the level of risk associated with the particular supplier. Consideration is given to the nature of products or services and the locations from which those products are made, or services provided.

All staff with responsibility for procurement from third party suppliers receive appropriate training on GAM’s obligations under the Act and how best to meet those obligations. In addition, GAM’s Legal and Compliance Department provides ongoing advice to such staff, as required.

Subject to compliance with its contractual obligations, GAM will not commence or continue a relationship with any third party supplier in circumstances where we are not satisfied that the supplier has an appropriate approach to compliance with the Act.

4 Whistleblowing

GAM has a whistleblowing policy under which employees are encouraged to report concerns of non-compliance with FCA rules or statutory obligations, including those under the Act, to GAM’s compliance or HR department. Any concerns raised in respect of the Act will be escalated to senior management for review and investigation.

5 Approval procedure

This statement was approved by GAM’s Board of Directors on 6 September 2017 and is subject to annual review.