



Modern Slavery Statement

MODERN SLAVERY ACT TRANSPARENCY STATEMENT

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Modern Slavery Act transparency statement for the financial year ended 30 June 2021 for Pacific Capital Partners Limited, trading as Pacific Asset Management (PAM).

ORGANISATIONAL STRUCTURE

PAM is a wholly owned subsidiary of Pacific Investments Limited, which is ultimately owned by Sir John Beckwith.

PACIFIC ASSET MANAGEMENT

PAM provides investment management and advisory services to institutional clients, financial intermediaries, private clients and investment vehicles around the world. We invest in a wide selection of equity, fixed income and alternative investments with the goal of producing superior risk-adjusted investment returns and providing investment solutions customised for our clients.

RISK ASSESSMENT

We believe that the sector and locations in which we operate represent a relatively low risk of modern slavery and human trafficking. Whilst we acknowledge that increasingly complex and multi-tiered globalised supply chains, spanning multiple countries, now represent a potential site of risk for every multinational company, our suppliers are generally considered relatively low risk in terms of sector and location of operations. Many of our suppliers are professional services firms, including banks, accountants and law firms. We also source services relating to, among others, cleaning

DUE DILIGENCE

We have sought and received confirmation from our key existing suppliers that neither they nor any company in their group has committed or been notified or placed under investigation for any offences relating to modern slavery or human trafficking. We have further received confirmation that none of our key suppliers is aware of any circumstances within their supply chain that could give rise to an investigation or a prosecution for any offences relating to modern slavery or human trafficking.

We undertake due diligence prior to the appointment of any new supplier. We will ensure that each new supplier addresses the issue of modern slavery and human trafficking during our procurement process. We will also seek to ensure that relevant suppliers are obliged to inform us of any developments in respect of modern slavery or human trafficking either in their business or in their supply chain.

STAFF AWARENESS

We also provide relevant staff with training regarding the risks surrounding modern slavery and human trafficking in supply chains and the steps they should take to reduce those risks.

Pacific Capital Partners Limited

Registration Number 2849777