

Modern Slavery Act

Introduction

Longview Partners LLP (“Longview”) is an asset management business, specialising in delivering long term investment management on behalf of our clients. We are authorised and regulated by the Financial Conduct Authority.

This is our slavery and human trafficking statement for the purposes of section 54(1) of the Modern Slavery Act 2015 (MSA). It sets out our ongoing commitment as a responsible business to help ensure that modern slavery and human trafficking is eradicated. It also explains the processes we have in place to try and combat slavery and human trafficking.

This annual statement covers the financial year ended 31 December 2019. It will be made publicly available on the Longview Partners’ corporate website following approval by the Board of Directors of Longview Partners (UK) Limited on 25 March 2020.

Our policies on slavery and human trafficking

Longview has a zero tolerance approach to modern slavery and human trafficking. As such we are committed to trying to ensure 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.

Our supply chains

Longview considers the risk of slavery or human trafficking within our supply chain to be low, given the nature of our suppliers. Our supply chain includes regulated professional advisers, providers of financial data, IT equipment, office supplies and travel or hospitality providers, but not from jurisdictions considered to be higher risk countries.

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

We have several policies and procedures in place to prevent financial crime generally:

- Anti-Money Laundering/Countering Terrorist Financing
- Fraud
- Data Security
- Anti-Bribery & Corruption
- Risk Management

In addition to the above policies, we also conduct a financial crime risk assessment on an annual basis which considers the areas noted above.

Employees

Longview's recruitment processes are thorough and transparent. We carry out highly specialised activities and as such the staff recruited are considered low risk. 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 and all are paid directly into an appropriate, personal bank account.

Longview has policies and procedures in place to ensure compliance with all applicable human rights laws 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.

Actions taken or planned

Given our assessment of slavery and human trafficking risk as low to Longview's business and also with regard to our straightforward supply chains, our approach is one that is proportionate and risk-based, focusing on the following areas:

- Key service provider onboarding and due diligence – analysis of the service provider's approach to combatting slavery and human trafficking.
- Training – we ensure awareness of the MSA and its impact on our processes across all staff and make such awareness prominent within our internal staff documentation.

Implementation

The Executive Committee of Longview Partners LLP has endorsed this policy and has confirmed our commitment to improving practices to combat slavery and human trafficking.