

# Modern Slavery Act 2015 (the "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. Longview Partners LLP and Longview Partners (UK) Limited meet the criteria in section 54 of the Act and are therefore required to prepare a slavery and human trafficking statement. This annual statement covers these entities.

This is our slavery and human trafficking statement for the purposes of section 54(1) of the Act. 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 2020. 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 22 March 2021.

## ***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/Counter Terrorist Financing
- Fraud
- Data Security
- Anti-Bribery & corruption
- Risk Management

In addition to the above policies, we also conduct a financial 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 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 risks as low to Longview's business and also with regard to our straightforward supply chains, our planned approach is one that is proportionate and risk-based, focusing on the following areas:

- Key service provider onboarding and due diligence – an analysis of the service provider's approach to combatting slavery and human trafficking.
- Training – we have ensured awareness of the MSA and its impact on our processes across all staff and are enhancing such awareness 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.

Approved by the Board of Longview Partners (UK) Limited: 22 March 2021

Signed: 

Emma Davies, Director of Longview Partners (UK) Limited (Managing Member of Longview Partners LLP)