



KERNOW
ASSET MANAGEMENT

Kernow Asset Management

SLAVERY AND HUMAN TRAFFICKING STATEMENT

October 2022

Document Governance

Document owner:

Name	Role
Edward Hugo	Chief Executive Officer, Chief Compliance Officer and Money Laundering Reporting Officer

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Introduction

This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 (the “Act”) and constitutes the slavery and human trafficking statement (“Statement”) for the financial year ending 30 September 2020 for Kernow Asset Management Limited (Kernow). It sets out Kernow’s policy and approach in relation to the Act.

Organisation Structure

Kernow is an MiFID II investment firm, authorised and regulated by the Financial Conduct Authority in the United Kingdom to provide investment management services to managed accounts.

Kernow’s Policies on Modern Slavery

Kernow’s anti-slavery policy reflects its commitment to acting ethically and with integrity in all of its business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking practices are not taking place anywhere in its business or supply chains. Kernow will take appropriate and reasonable measures to minimise such risks, taking into account the nature of services with which it is being provided.

This Statement will be reviewed annually and updated where necessary to reflect changes in circumstances and actual practice.

Kernow’s Approach to Slavery and Human Trafficking

Kernow administers a suitable risk-based approach to minimise the risk of slave labour.

As a provider of investment management services, Kernow does not have a particularly long or complex supply chain – the key suppliers are providers of investment research, middle and/or back office support services (such as IT support), equipment and office management. Kernow is nevertheless committed to preventing acts of modern slavery and human trafficking from occurring within both Kernow’s business and that of its supply chain.

Based on the above, the relative risk exposure to slavery, human trafficking and forced labour is low given the nature of the business undertaken, and the skillset required in Kernow’s supply chain; i.e. mainly skilled labour. Nevertheless, as a general principal, Kernow endeavours to deal only with suppliers who conduct their business in a lawful and ethical manner, including adopting business practices that prevent or eliminate modern slavery and human trafficking from taking place.

As part of Kernow’s initiative to identify and mitigate risk in connection with its business and/or supply chains (as applicable) Kernow endeavours to:

- identify and assess potential risk areas;
- mitigate the risk of slavery and human trafficking occurring in our business; and
- monitor potential risk areas.

Training and Monitoring

Relevant training is provided, as deemed appropriate, to Kernow's staff, to ensure an appropriate level of understanding of the risks of modern slavery and human trafficking.

Kernow is committed to reviewing its processes on an ongoing basis to ensure that there is no modern slavery in any aspect of its business.



Authorised Signatories
For and on behalf of
Kernow Asset Management

Contacting Us

Should you have any questions about this statement please contact us:

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