



H2O AM LLP

Modern Slavery Statement

COMPANY CONFIDENTIAL

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Title: H2O Modern Slavery Statement
Description: This document outlines our approach and commitment to ensuring that there is no Modern Slavery and human-trafficking at H2O AM LLP.

Revision	Date	Revision Description	Author/Reviewer	Executive Committee Approval
1.0	01/04/2019	None	Amy Breeds/Jean-Noel Alba	

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Modern Slavery Statement 2018

H2O AM LLP is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We act ethically and with integrity in all our business relationships and undertake appropriate due diligence which supports the identification and subsequent mitigation of the risk of slavery and human trafficking occurring.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our company's slavery and human trafficking statement for the financial year ended 31st December 2018.

Organisational structure and activities

H2O AM LLP was initially formed in December 2010*, having been co-founded by Bruno Crastes our CEO, and Vincent Chailley our CIO, with the financial backing of Natixis Asset Management (now Natixis Investment Managers). A boutique Asset Manager; H2O AM funds provide institutional, corporate and private investors with privileged access to global macro strategies within UCITS funds. H2O AM aims to provide not only risk-adjusted performance at portfolio level, but also transparency and liquidity to all clients.

"Transparency means that our clients know all about our research, methodology and risk allocation before as well as after investing. Liquidity gives our clients the assurance of knowing that they can move in and out of our funds on a daily basis, and that our investments are closely monitored to satisfy this requirement." – Bruno Crastes, CEO

Headquartered in London, H2O AM has 76 employees with subsidiary businesses located in 4 offices worldwide; all of whom focus on Asset Management. We also work directly with approximately 260 suppliers who provide us with goods and services. The majority of our spending is with suppliers of fully managed outsourced services, IT, professional services, and goods and services related to management of our premises. The UK financial services industry is not within a high risk sector for modern slavery, however, we are not complacent and recognise the possibility of modern slavery issues existing somewhere in our supply chain.

Relevant policies and practice

1. Business Practice

Due to the nature of our investment process and the products we invest in, we are not always able to ensure that our investments across all asset classes comply with best practice environmental, social and governance (ESG) considerations. However, we do undertake vetting of our suppliers in so far as this is possible, and we continue to monitor our supplier relationships throughout the life of any contract.

We will not knowingly support any supplier involved in modern slavery. We expect transparency and will work with our business partners to support them in driving positive change where reasonably possible. In the event that we did become aware of any modern slavery issues within any of our supply chains, this would be escalated to senior management and appropriate action taken depending on the circumstances – from supporting a supplier to make a positive change, to terminating the relationship.

2. Code of Conduct

Our Code of Conduct confirms our commitment to respecting human rights in the conduct of our operations.

3. Whistle-Blowing

If our employees identify any issues relating to modern slavery we encourage them to report this to their manager. If they feel uncomfortable reporting in this way, we have a confidential whistleblowing arrangement in place. We commit to supporting any individual who raises concerns and that there will be no detriment to them. In 2018 we received no calls or correspondence related to modern slavery

4. Staff Training

To raise awareness amongst our employees, our annual staff compliance training programme includes a reminder of our commitment to respecting human rights, and information regarding the whistleblowing processes available. This is mandatory training, completed on an annual basis.

Approval

This statement has been approved by the company's Executive Committee and signed by Jean-Noel Alba, Deputy CEO and COO, on the 3 April 2019.