

Modern Slavery Act Transparency Statement

This statement is made on behalf of Premier Miton Group plc and its subsidiaries pursuant to section 54(1) of the Modern Slavery Act 2015 (the "Act") and constitutes our anti-slavery and human trafficking statement. Premier Miton Group plc (registered number 06306664) is the parent company of Premier Portfolio Managers Limited (registered number 01235867) and Premier Fund Managers Limited (registered number 02274227), collectively referred to as Premier Miton in this statement.

Premier Miton's structure, business and supply chains

Premier Miton's business is UK asset management with a focus on delivering good investment outcomes for investors through relevant products and active management across its range of investment strategies, which include multi-asset, equity, fixed income and absolute return funds. As at the date of this statement, Premier Miton only has employees in the UK although our supply chain includes administrative support and services from large global institutional banks and commercial entities. As a firm with relatively simple supply chains, Premier Miton believes that there is limited risk of slavery or human trafficking taking place. Notwithstanding this, Premier Miton is committed to developing initiatives to prevent slavery or human trafficking in its supply chains.

Policies in relation to slavery and human trafficking

Premier Miton has robust policies in place to ensure it complies with the Financial Conduct Authority rules on a variety of issues relating to financial crime, corruption, bribery, money laundering and whistleblowing. In addition, Premier Miton's Responsible Investing Policy guides the consideration of environmental, social and governance (ESG) related factors (including compliance by UK companies with the Act) in its investment processes.

We have included steps in our due diligence to support supplier selection, such as procuring FSC certified paper stationery products where possible. FSC certification includes core labour requirements in its certification system for companies.

Due diligence process in relation to slavery and human trafficking

Material suppliers are subject to an appropriate level of due diligence on their appointment and on an ongoing basis and are required to certify that they are in compliance with the Act.

Assessment and management of slavery and human trafficking risks

Premier Miton is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or business. As part of an on-going programme of assessing the effectiveness of its policies, training and due diligence, a review of any key risks is

undertaken under Premier Miton’s procurement arrangements, which are reported to the relevant boards, as appropriate.

In terms of its own staff, Premier Miton does not use zero hours contracts and is committed to offering fair pay to all staff by paying above applicable minimum or living-wage requirements. Premier Miton is committed to fair and consistent treatment of its employees. Premier Miton’s aim is to create a work environment in which all people are able to give of their best, all decisions are based on merit and there is no bullying, victimisation, harassment or discrimination.

Monitoring and effectiveness

During the financial period to 30 September 2023 Premier Miton has continued to take steps within its organisation to ensure that organisational policies and relevant processes are followed by all employees and suppliers of Premier Miton. Premier Miton is not aware of any of its suppliers which do not comply with the Act and no breaches have been reported by Premier Miton staff or suppliers during the period

As Premier Miton does not have intricate or complex supply chains, no additional measures with regards to slavery and human trafficking have been deemed necessary at this time.

During the financial period to 30 September 2023 Premier Miton has carefully considered the additional risks of exploitation and has monitored workers’ health and safety and its suppliers to be alert and responsive to any new and emerging risks.

Training

Premier Miton provides comprehensive training to staff on a variety of issues relating to financial crime, corruption, bribery, money laundering and whistle blowing. All employees have the necessary documentation to legally work in the UK and no-one under the legal minimum age for admission to work is or will be employed.

Key performance indicators

Key performance indicators (KPIs) are used to measure the effectiveness of Premier Miton’s efforts to reduce modern slavery risks. Premier Miton is committed to ensuring meaningful progress against these KPIs.

KPI	Rationale for inclusion
Raise awareness of modern slavery risks amongst employees	Equipping employees with an understanding of the risks ensures effective procurement processes
Integrating modern slavery considerations into investment process	Investments are the biggest potential area of impact for Premier Miton

To support the integration of ESG into our investment process, Premier Miton has engaged third party ESG data and research providers whose research includes considerations of modern slavery and provides data on investee companies' compliance with the Modern Slavery Act 2015. As part of our stewardship activities, Premier Miton would aim to raise any concerns with the investee company management.

In the financial period to 30 September 2023, Premier Miton has continued to support a number of collaborative engagement initiatives which include modern slavery considerations, and which inform our investment team. One specific initiative focusses on FTSE 350 (and more recently extended to AIM listed) companies that have failed to comply with section 54(1) of the Modern Slavery Act 2015, which was initially coordinated through the Principles of Responsible Investment (PRI) collaboration platform. During the financial period we engaged with a number of companies to discuss their approach to modern slavery and to encourage a review of their modern slavery statements, where required. If companies fail to take steps to remedy non-compliance we will escalate the issue, which may include voting against the report and accounts at the next annual shareholder meeting.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Premier Miton's anti-slavery and human trafficking statement for the financial year 30 September 2023 as approved by each relevant Board of Directors.

Mike O'Shea

Michael O'Shea
Chief Executive Officer
For and on behalf of Premier Miton Group plc, Premier Portfolio Managers Limited and Premier Fund Managers Limited

Date: 11 March 2024