

# P1 Investment Management

Modern Day Slavery Statement v1

January 2021



## Voluntary slavery and human trafficking statement

P1 Investment Management Limited is making this voluntary modern slavery and human trafficking statement relating to section 54 of the Modern Slavery Act 2015 (“the Act”).

We oppose slavery and human trafficking in all its forms and make this statement to set out the steps we have taken to ensure that there is no slavery or human trafficking in our business or in our supply chains. P1 Investment Management’s commitment is entirely aligned to the values, culture and goals of our business.

This statement is dated 20<sup>th</sup> January 2021 and was approved for publication by Paul White, the Compliance Director of P1 Investment Management Limited.

## About us

We are a private limited company providing discretionary fund management and platform services in the financial services sector.

During the Financial Year ending 30<sup>th</sup> September 2020, our annual turnover was under £36 million. Although we are not required to make a modern slavery statement under section 54 of the Modern Slavery Act.2015, we are making this voluntary statement to show our commitment to ethical trading principles and to set out the steps we are taking to tackle modern slavery and human trafficking in our business and in our supply chains.

Our supply chains are mainly made up of the following:

- Investment Managers;
- Investment Trusts;
- IT services and equipment and SAAS providers;
- Financial services product providers.

## Policies

Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

## Due diligence and risk assessment

To help identify and monitor the risk of slavery and human trafficking in our supply chain we review the policies and procedures of the firms with which we work and their publicly available statements of compliance with the Act.



## Effectiveness in combating slavery and human trafficking

We use the following key performance indicators to measure how effective we have been at ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains:

- The percentage of suppliers vetted for ethical labour practices.]
- The number of reported breaches in the past year.
- Percentage of staff receiving training on identifying and addressing the risk of slavery and human trafficking in our business and supply chains.]

## Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will provide training to our staff each year. We also require our business partners to provide training to their staff and suppliers and providers.

## About this statement

This statement was approved by the Board of P1 Investment Management Limited on 13<sup>th</sup> January 2022. This statement represents P1 Investment Management's first voluntary slavery and human trafficking statement. Our progress and compliance with our policy will be reported to and monitored by the Board, following which a statement will be published on our website at least annually.

## Further steps

As this is our initial statement, we intend to take the actions outlined in the above sections of Effectiveness and Training during the current calendar year.