



## **1. Introduction**

Minerva Money Management Ltd is committed to preventing modern slavery and human trafficking in all its forms. This Modern Slavery Policy sets out our approach to ensuring that slavery and human trafficking do not occur in any part of our business or supply chains. This policy applies to all employees, contractors, suppliers, and any other parties associated with Minerva Money Management Ltd.

### **Our Responsibilities**

2.1. Minerva Money Management Ltd acknowledges its responsibility to respect human rights and combat modern slavery and human trafficking. We are committed to upholding the highest ethical standards and ensuring that all our activities are conducted with integrity and fairness.

2.2. The prevention, detection, and reporting of modern slavery are the responsibilities of all employees of Minerva Money Management Ltd. Any concerns or suspicions of modern slavery should be reported immediately to the designated point of contact.

2.3. Minerva Money Management Ltd will provide adequate resources, training, and support to ensure awareness and understanding of modern slavery risks and compliance with this policy. We will regularly review and update our policies and procedures to address any evolving risks and challenges related to modern slavery.

### **Risk Assessment**

3.1. Minerva Money Management Ltd conducts regular risk assessments to identify areas of potential vulnerability to modern slavery within our operations and supply chains. We assess both internal and external factors that may contribute to modern slavery risks.

3.2. Our risk assessment includes, but is not limited to, the following areas: a) Employment practices and working conditions within our organisation b) Supplier and

contractor selection and due diligence processes c) Geographical locations where our business invest or sources from d) Industry sectors that may have a higher risk of modern slavery.

### **Supplier Due Diligence**

4.1. Minerva Money Management Ltd is committed to working with suppliers and contractors who share our values and commitment to eradicating modern slavery. We will seek to establish long-term relationships with trusted partners who adhere to the same high standards.

4.2. Our supplier due diligence process includes: a) Conducting risk assessments and screening companies before we invest b) Assessing suppliers' policies and practices related to modern slavery c) Incorporating modern slavery clauses into contracts with suppliers d) Encouraging suppliers to adopt their own modern slavery policies and procedures.

### **Training and Awareness**

5.1. Minerva Money Management Ltd will provide training to employees and relevant stakeholders to ensure awareness and understanding of modern slavery risks and indicators.

5.2. This training will cover topics such as: a) The types and indicators of modern slavery b) Reporting mechanisms for suspicions or concerns c) Compliance with this policy and relevant legislation d) The importance of responsible sourcing and supply chain management.

### **Reporting and Compliance**

6.1. Minerva Money Management Ltd encourages the reporting of any suspicions or concerns regarding modern slavery or human trafficking. Reports can be made confidentially, and the identity of whistleblowers will be protected in accordance with applicable laws.

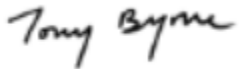
6.2. Failure to comply with this policy may result in disciplinary action, up to and including termination of employment or termination of contracts with suppliers or contractors.

### **Review and Continuous Improvement**

7.1. Minerva Money Management Ltd is committed to reviewing and continuously improving this Modern Slavery Policy and associated procedures. We will monitor and assess our performance regularly to ensure the effectiveness of our efforts in preventing modern slavery.

This Modern Slavery Policy has been approved and endorsed by the senior management of Minerva Money Management Ltd.

07/07/2023

A handwritten signature in black ink that reads "Tony Byrne". The signature is written in a cursive, slightly slanted style.

Anthony W Byrne Managing Director