



MARATHON

Anti-slavery and human trafficking policy statement

Introduction

Marathon Asset Management LLP (“MAM”) is an independent investment management company based in the West End of London, UK. MAM manages equities for a globally diverse client base comprising a broad range of institutional investors and as such the risk of encountering modern slavery is negligible. Nevertheless, MAM is committed to ensuring it is not connected to modern slavery in any way.

To this end MAM ensures that the business continues to operate in an open and transparent way and the overall approach to tackling modern slavery throughout MAM’s supply chain is consistent with the legal obligations under the Modern Slavery Act 2015.

Organisation structure

MAM operates primarily from its central base in London but has further operations in the US, Japan, Ireland and Cayman. MAM also leverages the resources of a number of third party service providers, some of which have multiple locations across the globe, in furtherance of MAM’s asset management business.

Our policies on slavery and human trafficking

MAM aims to work in partnership with all service providers to ensure that they share and work towards the same values MAM holds against slavery and human trafficking. MAM prohibits, and expects all service providers to prohibit, the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. This prohibition extends to any sub-contractor as MAM expects our service providers to hold their own suppliers to the same high standards. MAM also now obtains confirmations from certain core outsourcers of their own compliance with the Modern Slavery Act 2015.

This anti-slavery policy is available to all staff and MAM informs suppliers of the commitment to preventing modern slavery as part of the close and continuous oversight of any third party supplier contracted to the business.

Due diligence process for preventing slavery and human trafficking

The following systems are in place as part of MAM’s commitment to tackling modern slavery and human trafficking:

- Monitoring of potential risk areas in MAM’s supply chain;
- Long-standing relationships with well respected, regulated service suppliers;
- Close and continuous oversight of all material MAM service providers;
- Clear procedures to encourage the reporting of any wrongdoing through internal and external whistleblowing channels; and
- Protection of whistle blowers.



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Personnel are required to avoid any activity that might lead to, or suggest, a breach of this policy. Staff are encouraged to raise concerns, making use of MAM's whistleblowing procedures which are contained in MAM's Code of Ethics should they so wish.

Supplier adherence to MAM's values

To ensure those in MAM's supply chain comply with MAM's zero tolerance to slavery and human trafficking, a supply chain compliance programme has been introduced which consists of:

- Standard clause in service provider contracts to comply with all applicable laws; and
- Self-certification of compliance where applicable as part of due diligence reviews.

MAM is committed as an organisation to tackling modern slavery and human trafficking and only wants to work with suppliers who share these same values. As part of regular oversight and monitoring, MAM would raise any slavery concerns that had been identified with the relevant service provider.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our organisation and our supply chain, MAM has provided details to all relevant staff and made this policy available on our website for all stakeholders to observe. Ongoing training is provided to all staff upon joining and regularly thereafter about our expectations with regards to modern slavery.

Further steps

MAM's Executive Committee has endorsed this policy and has confirmed MAM's commitment to improving practices to combat slavery and human trafficking following a review of the effectiveness of the steps MAM has taken to ensure that there is no slavery or human trafficking in MAM's supply chains.

Joe Diment

Managing Director

9th December 2020

Signed on behalf of ExCo

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015.



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Neil Ostrer

Member

15th April 2019

Signed on behalf of ExCo

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William Arah

Member

27 December 2018

Signed on behalf of ExCo

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