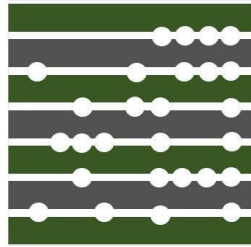


Bedford Row Capital



BEDFORD ROW CAPITAL

Modern Slavery Statement

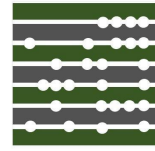
Internal Policy

Version 1.0

November 2020

Version Control

Version 1.0	Original	November 2020



Modern slavery statement (incorporating human trafficking)

The Company has a zero-tolerance position towards slavery and human trafficking in all forms. Modern slavery is wholly incompatible with our ethics and the general standards of integrity expected of all Company Employees. As well as working to prevent modern slavery in Company's business operations and supply chain, the Company takes every opportunity to ensure its partners apply the same standards in their operations as the Company does.

As an organisation of modest size, with a simple supply chain, the Company has no central procurement function or formal procurement policy. Instead, Employees are required to comply with the following policies and Company's supplier set-up procedure, which ensures that the Company operates with the highest possible standards of ethical conduct and integrity.

The Company's Anti-Slavery Policy sets out its zero-tolerance stance on slavery and human trafficking. The policy provides Company Employees with guidance on how to identify and report slavery concerns, if necessary using the Company's Whistleblowing Policy.

The Company sets out the labour, social and environmental standards that it expects partner organisations to adopt. Partners are required to ensure there is no slavery, forced labour or human trafficking in their business or at any stage of their supply chain.

The Company includes appropriate measures in its due diligence processes to assess compliance with anti-slavery practices.

The Company continues to develop and improve policies, procedures, codes of practice, requirements and monitoring processes to address issues of human rights. The Company regularly reviews these documents and behaviours to make sure they remain up to date and fully compliant with modern slavery legislation and, where possible, best practice.