
SECOR

**Modern Slavery and Human Trafficking
Statement**

September 2023

Modern Slavery Act and Human Trafficking Statement

SECOR provides business operations in the UK providing goods and services; issues this statement pursuant to Modern Slavery and Human Trafficking.¹

Statement

SECOR is committed to ensuring that our business and supply chains are free from modern slavery and human trafficking. Slavery, human trafficking, and any forms of coerced labor and servitude is in direct contradiction to our long-standing culture and values, and our organisation's aim of "Doing good while doing well". SECOR supports and follows the principles and regulations set forth by relevant authorities. We are dedicated to ensuring our business operations, processes, and dealings with clients and third parties are in keeping with this statement.

Organisation

SECOR is a boutique global investment advisory and investment management firm launched in 2010 with offices in London and New York. We provide a range of investment advisory and implementation solutions, including fiduciary management (FM) services led by those who were at the helm of one of the world's largest pension funds. People are our most valuable asset, and the SECOR team includes experienced practitioners from asset owners and allocators, investment and actuarial consulting firms, buy-side asset managers and global investment banks. Our clients include pension funds, insurance companies, endowments and family offices from across the globe.

Risk Assessment

Due to the nature of our business as an investment advisor and fiduciary manager that provides financial advisory and implementation services to a wide range of institutions and corporations, SECOR's supply chain consist primarily of employees who provide intellectual capital. SECOR has internal investment, operations, legal, finance and IT professionals who are employees of our company. As needed, we engage with third parties who provide business related support services such as IT, legal and accounting, as well as subscribe to data and research providers.

SECOR has undertaken a risk assessment of its current staff profile, recruitment practices (covering employees and contractors), and supply chains and we believe that the risk of Modern Slavery, physical or labor exploitation in our business is very low. To date, there is no evidence to suggest that Modern Slavery is present within SECOR or our supply chains.

Screening and Training

SECOR administers background checks for all hires, and employees are required to comply with the full range of SECOR policies, codes of conduct, and business guidelines. We ensure that our hiring practices are fair and ethical. All UK employees are authorised to work in the UK. SECOR is also an accredited Living Wage employer. All SECOR employees are required annually to undergo general compliance training and review and attest to following SECOR's employee handbook rules and policies.

¹ SECOR is not required to prepare a slavery and human trafficking statement under UK Section 54(1) of the Modern Slavery Act 2015. (Modern Slavery Act) <https://www.legislation.gov.uk/ukpga/2015/30/section/54/enacted>

Investment Activities

SECOR is committed to high standards of governance and stewardship, such as the UK Stewardship Code 2020 and the UN Principles for Responsible Investment. We agree with and support the UN Global Compacts' principles on human rights, labour, environment and anti-corruption and societal goals, and we have incorporated these principles of Environmental, Social, and Governance (ESG) into our advice and processes for investing client assets. (please see SECOR's Stewardship Policy)

In addition to SECOR's internal risk assessment and processes, we are committed to engaging with our appointed investment managers on modern slavery. We expect and demand that their supply chains are free from modern slavery and human trafficking, and that they seek to identify, monitor, and take action where appropriate, where a related risk is identified in relation to any portfolio companies or underlying investments.

As a minimum, as part of our on-going manager engagement program (via questionnaire and semi-annual reviews), SECOR will inquire about each manager's principles on human rights, and labour practices, and will assess how these have been reflected in the implementation and oversight of their portfolio(s). We expect immediate reporting and appropriate action to be taken if any manager's holdings are found to be in contravention with their commitment to promote transparency and integrity in business activities as it relates to stewardship, including modern slavery.