

## **Modern Slavery Act Compliance Statement**

This statement is published by Tristan Capital Partners LLP and its subsidiaries, including Tristan Capital Partners Holdings Limited and Tristan Equity Partners (GP) Limited (together, “Tristan Capital”) in accordance with the requirements of section 54 of the Modern Slavery Act 2015.

Tristan Capital is committed to ensuring that slavery and human trafficking is not taking place within our own operations or in any part of our supply chain. This statement outlines the steps that we have taken during the financial year ending April 2019 to ensure compliance.

### **Introduction**

Tristan Capital is an independent real estate investment management boutique with its head quarters in London. We are regarded as one of the leaders in our field and employ approximately 85 people in the UK and 105 worldwide. Tristan Capital operates in 8 locations across Europe.

Our business is organised as a number of departments, which includes: Investments, Asset Management, Marketing/Client Services, Fund Operations, Corporate Finance, Operations, HR.

Our supply chains include investment and asset managers together with the goods and services we purchase in order to operate our office buildings and infrastructure.

### **Our Approach**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We strive to operate our business in a responsible and ethical way. We seek to promote human rights, equal opportunities and fair treatment. Our operating policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to preserve, protect and promote human rights.

As part of our initiative to identify and mitigate risk we risk assess our suppliers, and require all suppliers to enter into contractual terms confirming that they comply with the Modern Slavery Act 2015 and that they ensure that there is no modern slavery or human trafficking in their supply chains.

We have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

We have a dedicated compliance team, which consists of representatives from the following departments:

- **Audit and compliance**
- **Human resources**

To ensure a high level of understanding of equal opportunities and the risks of modern slavery and human trafficking we provide annual training to our staff on equal opportunities, dignity and respect in the workplace, and all staff



Updated 21.02.19

must read and acknowledge our code of conduct. We operate a comprehensive whistleblowing policy and actively encourage staff to report concerns regarding unlawful or improper conduct, whether within our workplaces or with regard to third parties that we deal with in the course of our business.

**Looking forward**

In the financial year ending 30<sup>th</sup> April 2020 we propose to further develop our due diligence process. If we become aware that any of our suppliers have modern slavery or human trafficking related issues we will address those situations as appropriate. We will further review our business terms to ensure that they reflect our commitment to operating our business in a responsible and ethical way, including by developing a code of conduct that we will require our suppliers to adhere to.

**This statement was reviewed and approved by the Board of Directors on the 21<sup>st</sup> of February 2019.**

  
.....  
**Signed**  
IAN LAMING  
.....  
**Print name**  
Co-CEO  
.....  
**Job Title**  
5/4/19  
.....  
**Date**  
  
.....  
**Signed**  
RICHARD W LEWIS  
.....  
**Print name**  
Co-CEO  
.....  
**Job Title**  
05/04/19  
.....  
**Date**