

ODEY

ASSET MANAGEMENT GROUP

This statement is made with respect to the obligation of Odey Asset Management Group Ltd and its subsidiaries', Odey Asset Management LLP, Odey Wealth Management (UK) Limited, Odey Wealth Management (C.I.) Limited and Odey (Switzerland) SA ("Odey"), under section 54(1) of the Modern Slavery Act 2015 (the "Act"). Odey has its head office in London.

Odey have zero tolerance to slavery and human trafficking. Staff are expected to report any and all concerns and management are expected to act upon them.

OUR BUSINESS

Odey are a financial services firm and we provide investment management services to our clients. We are regulated by the Financial Conduct Authority of the United Kingdom (the "FCA") and are subject to the FCA rules in relation to corruption, bribery and money laundering. We consider that, overall, the risk of slavery and/or human trafficking in all areas of our business is low and we are satisfied that our employees are not exploited.

EXISTING POLICIES

Odey are committed to ensuring there is no modern slavery or human trafficking in any part of our business and take our responsibilities in this area seriously. Odey have a range of well-established policies which aim to ensure good business practice and reflect our commitment to act ethically and with integrity in all our business relationships. Examples include:

- an employee handbook, containing an equal opportunities policy
- anti-money laundering and counter terrorist financing regulation, training and procedures
- whistleblowing policy and guidance for employees
- inducement, gifts, benefits and anti-bribery policy
- annual compliance declaration confirming adherence to all relevant policies

SUPPLY CHAIN

Our business sector is not considered one most at risk and we consider the services we provide are very unlikely to be affected by slavery. Our principle suppliers are professional services firms based in the UK and other low risk countries such as Ireland and the USA. Odey recognise that routine catering and cleaning suppliers may have a higher risk of slavery and human trafficking and have made enquiries where considered necessary.


All Odey Group employees have the necessary documentation to legally work in the UK and no one under the legal minimum age for admission to work is employed. Employment verification is performed according to current Home Office requirements.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the financial year ending 5th April 2019.

This statement will be reviewed annually and updated as necessary.

Approved on.....^{17^m} ~~Sept~~, 2019.....

By the Executive Committee

Signed 
Title *Managing Director*
Date: *17/9/19*