

## **AKO Capital LLP**

### **Modern Slavery and Human Trafficking Statement**

Under the Modern Slavery Act 2015 relevant organisations must prepare a slavery and human trafficking statement setting out the steps an organisation has taken and is continuing to take to ensure that slavery and human trafficking are not taking place in its own business or its supply chains.

This statement is made pursuant to section 54(1) of that Act for the March 2025 financial year of AKO Capital LLP("AKO") and has been approved by the Managing Board.

### **Business Structure and Supply Chain**

AKO Capital LLP is a UK-based limited liability partnership whose sole business is to provide investment management services. AKO does not have any offices in other jurisdictions and its supply chain is limited and not complex. AKO does not deal in any hard goods or manufactured items nor does it purchase any hard goods or manufactured items from any developing countries.

We maintain a rigorous recruitment process and hiring decisions require the approval of line managers and the CEO. All AKO staff are based in the firm's London office where working conditions are easily monitored and regularly reviewed.

### **Policy on Modern Slavery**

AKO has a zero-tolerance approach to any form of modern slavery and human rights violations and is committed to having ethical and sustainable business practices. AKO has controls in place to identify and mitigate risk to ensure slavery and human trafficking practices are not taking place anywhere in its business or supply chain. AKO operates a Supplier Code of Conduct which places expectations on our suppliers in terms of payment of Living Wages and operating in an environment that respects Human Rights in the workplace including that they are free of unlawful labour, unlawful hours and unlawful discrimination.

As of January 2021, AKO is a certified [B Corporation](#) dedicated to meeting the highest standards of social and environmental performance, transparency and accountability. AKO is among a community of businesses that think beyond profit in creating and delivering an environmental strategy to have a material positive impact on society and the environment. Integrating ESG factors is a key element of AKO's investment approach.

AKO is also a signatory to the United Nations Principles on Responsible Investment and as such takes into account environmental, social and corporate governance factors in its investment management activities, including the issue of human trafficking and modern slavery.

## **Risk Assessment**

AKO oversees the provision of financial services to support the management of its investment funds. As such, suppliers predominantly comprise of providers of professional services such as administrators, lawyers, accountants, banks and IT service providers whose staff are primarily based in Western Europe and the United States. These are jurisdictions and industries where modern slavery is not prevalent, and having reviewed our business and supply chain we consider there is a very low-risk of slavery and human trafficking existing.

## **Training and Monitoring**

AKO operates a robust recruitment policy and conducts 'eligibility to work in the UK' checks across all employees to safeguard against human trafficking or individuals being forced to work against their will. Upon entry into the firm, all AKO staff are required to read and provide annual positive affirmation to the AKO Code of Ethics which requires staff to act with integrity and in an ethical manner and to promote and uphold the integrity of all applicable laws, regulations and professional standards. As part of its ongoing training activities, AKO staff are made aware of AKO's obligations and undertakings and the procedures they should follow should they need to raise any issues or concerns without fear of reprisal.

## **Measuring Effectiveness**

While the risk of human trafficking and modern slavery arising in AKO's supply chain is deemed to be very low, AKO will continue to monitor its business and supply chain for such activity taking a risk-based approach in order to allocate resources effectively. In particular, regular due diligence is carried out on our main suppliers and will include reviewing and querying a supplier's position in relation to human trafficking and slavery where it is considered necessary to do so.

This statement will be reviewed on an annual basis and updated where necessary to reflect any changes in circumstances and practice.

Christina Ryan  
Designated Member, AKO Capital LLP