



Polar Capital Holdings Plc. (“Polar Capital”) is the parent company to the Polar Capital group which provides specialist active investment management to professional and institutional investors through a range of fundamentally research-driven funds diversified by asset class, geographical and sectoral specialisation. Polar Capital is principally located in London and maintains offices in Tokyo, Connecticut, Jersey, and Edinburgh, Shanghai and Europe (including France, Spain and Germany).

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (“the Act”) and constitutes Polar Capital’s slavery and human trafficking statement for the financial year ended 31st March 2021. This statement is published on behalf of Polar Capital Group Holdings plc, Polar Capital Partners and Polar Capital LLP (together “Polar Capital”) and references to “we”, “us”, “our” or the “firm” are to all three entities.

Our Supply Chain

We deem our supply chain to be relatively simple as services provided to Polar Capital comprise of professional services and business support. Upon assessment we therefore conclude that the risk of modern slavery occurring within our supply chain is low.

Our supply chain includes third party suppliers for the following goods and services provided to the company in respect of:

- Professional services;
- Recruitment;
- Travel;
- IT and telecommunication;
- Marketing and communication; and
- General office support services.

Polar Capital takes a zero-tolerance approach to slavery and human trafficking. We expect all of those in our supply chain to comply with our values and the Modern Slavery Act. As a means of ongoing monitoring, on a periodic basis we require our suppliers to confirm that they continue to operate in compliance with the Act.

Due Diligence and Risk Assessment

On appointment each new supplier is subject to due diligence and where applicable must certify that they operate in compliance with the Act. Due diligence is conducted using a risk-based approach, therefore respective investigation would reflect the risk profile of a supplier.

When evaluating a supplier’s modern slavery risk, we consider elements such as the geographic location of the supplier, the nature of the services provided along with factors such as the corporate status of the supplier. Performing due diligence assists us in better understanding supplier risks and ultimately better managing supply chain risk effectively.

We believe that the sectors and locations in which we operate represent a relatively low risk of modern slavery and human trafficking.

Our Policies

Our anti-modern slavery efforts are underpinned by the following group-wide policies and procedures which improve our ability to prevent, detect, manage and report slavery and human trafficking.

Code of Conduct

Our global code of conduct sets out the principles and values that we hold ourselves to when making decisions. All employees are required to fulfil their obligation to fully comply with all applicable laws, rules and regulations. All employees are required to, at least annually confirm that they have read and understood our code of conduct.

Whistleblowing

Our whistleblowing policy encourages all employees to report any suspected concerns regarding unethical behaviour and misconduct. Staff are expected to report breaches or suspected breaches. Divided between internal and external, the various whistleblowing reporting lines that a member of staff may use to report concerns are listed within our policy.

Equal Opportunities and Diversity Policy

Our equal opportunities and diversity policy specifies our company-wide commitment to provide equal employment opportunities for all employees and applicants with the aim of maintaining a tolerant, respectful and dignified working environment.

Employees

We are duly committed to upholding the highest level of human rights for our employees. Polar Capital's policies and procedures are designed to provide staff members protections in accordance with legislation relating to human rights and employment. All staff are remunerated fairly and provided with a safe professional working environment.

Polar Capital has a systematic approach regarding recruitment, subjecting all candidates to pre-employment background checks. All new employees are provided with our employee handbook which is to be read in conjunction with staff employment contracts.

Staff Awareness

We provide staff with training regarding the risks surrounding modern slavery and human trafficking, ultimately helping them to better understand the scale of the problem and learn to spot the signs.

Key Performance Indicators

We have introduced two key performance indicators (KPIs) to assist in measuring the effectiveness of our anti-slavery efforts. Staff and key third-party supplier adherence to our Anti-Slavery Policy will be monitored annually on a percentage basis.

Governance

This Modern Slavery and Human Trafficking Statement was approved by the Executive Management Committee at Polar Capital and is updated annually.

We reiterate our commitment to the Act.



Chief Executive Officer

Gavin Rochussen

Polar Capital Holdings Plc.

September 2021