

# Modern Slavery & Human Trafficking Statement 2025

This statement is made on behalf of Polen Capital UK LLP ('PCUK', the 'Firm', 'we', 'our', 'us') pursuant to section 54 of the UK Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement, for the financial year ending 31 December 2024.

## Our Organisation

PCUK is a subsidiary of Polen Capital Management LLC, a global asset manager delivering investment strategies to a wide range of clients globally, offering an array of vehicle options to meet their needs. PCUK is registered in England & Wales as a Limited Liability Partnership No. OC428634. The registered office is First Floor, 15-18 Austin Friars, London, UK, EC2N 2HE. The Firm is authorised regulated by the Financial Conduct Authority.

## Our Commitment

PCUK does not tolerate any form of modern slavery, forced labor, or human trafficking in any part of our business or our supply chains. We recognise our responsibility to take a robust approach to the prevention of slavery and human trafficking. We are committed to acting responsibly, ethically and with integrity across all areas of its business, whilst treating employees, clients and stakeholders fairly and with respect.

## Our Risk Assessment and Due Diligence Processes

Owing to the nature of our business as an investment management firm, we consider the risk of modern slavery within our direct operations to be low. Similarly, we deem our supply chain to be relatively simple as services provided to PCUK include professional services and business support. Our supply chain includes third party suppliers for the following goods and services:

- Professional services
- Travel
- General office support services.
- Recruitment
- IT and telecommunications



However, we acknowledge potential risks among third-party suppliers and service providers, and therefore conduct due diligence on new suppliers, as well as require suppliers to comply with all applicable laws and regulations.

### **Training and Awareness**

We provide training to relevant staff to help them understand the risks of modern slavery and human trafficking and to identify and report any potential concerns.

### **Policies and Procedures**

Our internal policies reflect our commitment to acting ethically and with integrity in all business relationships. These include a comprehensive Code of Ethics, Whistleblowing, and Conflicts of Interest procedures.

All staff are encouraged to report concerns and are assured that they may do so without fear of retaliation. We monitor, and act upon, whistleblowing reports from our employees and alerts from third parties to ensure modern slavery and human trafficking is removed from our business and supply chains.

### **Looking Forward**

PCUK is committed to continually improving our practices to combat modern slavery and human trafficking. We will continue to develop our supplier due diligence program, review and enhance our internal policies, and maintain awareness and training programs.

### **Approval**

Approved by Polen Capital UK LLP.

### **Brian Goldberg**

Authorised Signatory