



**LOMBARD ODIER**  
INVESTMENT MANAGERS

# Lombard Odier Asset Management (Europe) Limited

## Slavery and Human Trafficking statement for the purposes of Section 54(1) of the Modern Slavery Act 2015 (“MSA”)

Lombard Odier Asset Management (Europe) Limited is strongly opposed to slavery and human trafficking. We are committed to acting ethically and with integrity in all our business relationships.

Overall, we consider the risk within our supply chain to be low, as we largely deal with professional investors, regulated financial services firms and professional advisors. In respect of our operational requirements, we are working with leading services businesses who specialise in servicing asset managers. All our major suppliers are subject to an appropriate level of due diligence on their appointment and on an ongoing basis.

More generally, we comply with a number of legal and regulatory requirements in respect of financial crime and have policies and procedures in place to prevent:

- Terrorist financing
- Sanctions violations
- Money laundering
- Bribery and corruption
- Fraud

With respect to our employees, we have procedures in place for the vetting of new employees and ensuring they are able to confirm their identities. Where applicable all employees provide necessary documentation to show that they are legally able to work in the UK. Remuneration for UK based employees is over the minimum wage threshold.

### **Our investment approach**

Embedding sustainability into our portfolio management is a key part of our DNA.

We believe that, for a company to deliver long-term value, it needs to be focussed on its broad ecosystem of business stakeholders consisting of regulators, shareholders, employees, clients, suppliers, the environment, and its local community. In other words, to be as focussed on its business practices as on its financial performance. This includes, for example, having programmes in place to address gender diversity, adhering to best practice on board composition, having solid and robust policies in place to ensure the health and safety of employees, and minimise any negative impact on the environment.

We also monitor whether the companies we invest in are exposed to controversies, in particular human rights, labour rights or child labour, and we can divest from these companies if they do not meet our standards.

We translate this into a three-pillar approach, designed to identify which companies are more sustainable over the long-term, and therefore best positioned to benefit from the significant opportunities that sustainability presents.

On top of our investment, we also believe strongly in the importance of active ownership. It offers us a means to make a positive contribution, by promoting the sustainability of the companies and economies we invest in through board-level and regulatory engagement.

Lombard Odier is a signatory of the UN Global Compact, a series of 10 principles, promoted by the UN, which includes human rights and labour rights.

This statement has been approved by the board of directors of Lombard Odier Asset Management (Europe) Limited.

**Chairman of the board**  
**Annika Falkengren**