

# MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2018

## Introduction

This statement is made by Quoniam Asset Management GmbH pursuant to section 54 of the Modern Slavery Act 2015 and constitutes our Slavery and Human Trafficking Statement for the financial year ending 2018.

Quoniam is committed to taking steps to ensure that human rights abuses in any way are recognised and eradicated in our business and supply chains.

## Our Business

We aim to be the global driving force for active quantitative asset management, achieving reliable and sustainable results for investors. We are passionate about generating added value for our clients whilst at the same time contributing positively to society. We deliver superior investment results because we master the processing, analysis and utilisation of information like no other asset manager.

As a partner-led company with more than 20 years of expertise, we stand for reliability and sustainability in everything we do. The innovative solutions we offer are based on our engineering approach, technological expertise and experience in active quantitative asset management worldwide. Our success is driven by the passion and dedication of our employees. We invest in their development and promote the curiosity and contribution of every staff member – the foundation of innovation. To enforce the existing entrepreneurial spirit all employees be given the opportunity of voluntarily participating in Quoniam's business performance.

Quoniam is a financial services institution in compliance with the German Banking Act and is registered with and supervised by the Federal Financial Supervisory Authority (BaFin) in Germany. In the United Kingdom our activities are subject to limited regulation by the Financial Conduct Authority (FCA).

## Policies and Commitment

Quoniam aims to deliver our institutional investors world-class performance using a transparent and sophisticated investment process we created ourselves. We believe that good ethics and integrity are a fundamental requirement of the investment profession. For this reason, we have documented our core values in our mission: passion, entrepreneurial spirit, technological excellence, reliability and responsibility.

We live and respect these values in our dealing with investors, clients, business partners and society at large; and never tolerate any act of discrimination, harassment or victimisation.

Quoniam has established procedural controls for its conduct of business and developed a formalized set of policies and procedures that describe the appropriate methodology for operations in all lines of business. Such policies and procedures ensure compliance with all applicable laws, regulations and industry standards. We are reviewing our policies to include, where appropriate, commitments addressing slavery and human trafficking considerations in our business activities, supply chains and investment decisions.

Quoniam has an established whistleblowing policy in place and fosters an open compliance culture. We encourage our employees, clients and business partners to report any concerns.

### **Investment Process**

Environmental, social and governance considerations are an integral part of our investment process. When allocated appropriately money can be a force for good. Against this background, Quoniam has decided to develop a sustainability approach. In the first step Quoniam screens the investment universe based on six principles, including human rights. If mandated, we additionally integrate environmental, social and governance criteria into our investment decision process. We are a signatory of the Principles for Responsible Investment that are supported by the United Nations.

Please refer to our [Responsible Investment Policy](#) for further information.

### **Supplier Due Diligence**

We expect our suppliers to uphold the same ethical values as we do. Therefore we perform a supplier due diligence and collect information regarding compliance with sustainability standards (e.g. duty to pay the statutory minimum wage). Supplier due diligence is performed by Governance & Business Advisory Team within the scope of contract negotiations and contract review. In addition, we have a dedicated Money Laundering and Reporting Officer and Compliance Officer whom both remain alert to the risk of Financial Crime and the risk of Modern Slavery.

In case of non-compliance, we will take any appropriate measure, including rejection or termination of any contract with such supplier.

### **Training and Awareness**

Quoniam will use its internal communication vehicles to raise awareness of modern slavery and human trafficking risks.

### **Procedures**

This statement has been approved by our Management Board on 25 March 2019.



Helmut Paulus  
CEO



Silke Weiser-Walther  
CCO und CFO