



## Modern Slavery Policy

Last updated  
December 2025



## Objective

This statement comprises the Slavery and Human Trafficking statement of Stellar Asset Management Limited ('Stellar') for the financial year ending 31 December 2025. Stellar is required to make this statement pursuant to section 54(1) of the Modern Slavery Act 2015 ('MSA'). This statement sets out the steps Stellar has taken to seek assurances that slavery and human trafficking are not taking place in its supply chains and its own business. The statement was approved by the board of directors in December 2025.

## Organisation structure and supply chains

Stellar is a private limited company and is not part of a group.

Stellar provides investment and fund management services within the United Kingdom ('UK'). Investments are made directly into exchange listed AiM stocks; residential and commercial property development; renewable energy; commercial forestry; hospitality and leisure, care homes, and bridging finance.

Stellar does not act as a producer, manufacturer, or retailer of any physical goods and, as a financial service provider, it has a straightforward supply chain compared to other sectors. Stellar utilises the services of other regulated professional services (Law Firms, Accountancy Firms, Chartered Surveyors and Banks). This supply chain is mainly office based which is considered to be very low risk in relation to slavery and human trafficking. As such Stellar requests and reviews copies any key third-party Modern Slavery Policy and holds this on file to ensure they comply with the MSA.

Stellar understands there to be a low risk profile of anyone supplying them with services being involved in slavery and/or human trafficking. Stellar believe their current procedures and ability to rely on regulatory oversight in relation to professional services is sufficient in this regard.

The majority of goods supplied to Stellar are goods for use in an office environment. Stellar understand such suppliers of goods to have a low risk profile of suppliers of goods, no specific training is provided or undertaken by our staff in relation to these matters.

## Policies in relation to slavery and human trafficking

For our own operations, Stellar's policies and procedures aim to ensure Stellar creates a safe and inclusive working environment for staff. The **Employee Handbook** contains policies on 'Equal Opportunities,' 'Anti Bullying & Harassment and protecting staff's 'Health and Safety.' The Employee Handbook also contains several policies aimed at ensuring employees wellbeing, including the provision of support available to them. The Employee Handbook also contains a Grievance Procedure and a Whistleblowing Policy, each aimed at giving staff a platform to raise concerns about any wrongdoing (such as any criminal offence or failure to comply with a legal obligation), or poor working practices, as soon as possible. It also provides contact details for the Financial Conduct Authority ('FCA') for staff seeking independent advice about whistleblowing. Stellar also has a **Conflicts of Interest Policy**. The Conflicts of Interest Policy is intended to set out the minimum standards of propriety that Stellar expects from its directors and employees.



Stellar use their own standard terms and conditions wherever possible. General Terms and Conditions include a warranty that the relevant supplier's goods or services will comply with all statutory or similar requirements. The standard terms and conditions Stellar use for the supply of goods and services include a provision requiring suppliers to comply with all applicable laws, statutes, regulations, and codes in force relating to slavery and human trafficking including, but not limited to, the MSA.

### Due diligence processes

Although Slavery and Human Trafficking concerns are of a low risk to the business, Stellar has introduced an approach to ensure on-going monitoring of suppliers. Stellar assess and review anti-slavery matters with existing suppliers at the time when each contract is reviewed and/or renewed, and always at inception with any new supplier. This also includes, where appropriate, the insertion of provisions into written contracts which oblige suppliers to comply with the MSA and hold them to the same standards as Stellar applies to its own business in this regard. If, after enquiry, any organisation within its supply chain is unable to demonstrate their commitment to their obligations after enquiry, they will not be taken on as a supplier, or their services will be terminated.

### Risk assessment and management

Because of the nature of the business, Stellar considers the inherent risk of modern slavery and human trafficking occurring to be low. Nonetheless Stellar takes responsibility to identify and effectively respond to any incidents of modern slavery and human trafficking very seriously.

### Key performance indicators to measure effectiveness of steps being taken

Stellar intends to monitor key performance indicators ('KPIs') relating to steps taken to measure the effectiveness of the steps being taken to prevent modern slavery, in subsequent financial years. Data is significant to understand where modern slavery breaches are occurring and give management the ability to understand where change is required to prevent repeated violations.

KPI's that will be tracked include:

- **Number of suppliers who have been subject to due diligence by Stellar**
- **Number of Stellar staff trained on modern slavery**
- **Number of breaches of modern slavery identified in Stellar's supply chain**

### Training on modern slavery and trafficking

Stellar provides employees and management with training on a range of compliance matters which, where relevant to their role, would include their obligations under the MSA, particularly in relation to mitigating risks within supply chains.



## Summary

Stellar does not tolerate slavery or human trafficking in its own business or supply chains. Stellar are committed to continually improving policies and practices in the fight against slavery and human trafficking and protecting human rights. Stellar aims to provide a rewarding working environment in which people are valued and respected. Stellar is a Living Wage Employer and is committed to pay its staff not less than the current Living Wage (which exceeds the UK's national minimum wage). Stellar has a strong commitment to diversity and inclusion and look after the wellbeing of staff, ensuring that they are safe and well and that Stellar cares for them appropriately.

Stellar commits to updating this statement annually and when material changes occur, to continue to refine our process, to share improvements and to report on failings. This document is publicly available via our website.

**This statement was approved by the Board of Directors of Stellar Asset Management in December 2025**

**For and on behalf of the Board  
Jonathan Gain – Stellar Asset Management CEO**

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Stellar's anti-slavery and human trafficking statement for the 2025 financial year.