



GUIDEPOINT

This statement is issued by and on behalf of Guidepoint Global, LLC, and its subsidiaries including Guidepoint Global UK Limited ("Guidepoint"), pursuant to section 54 of the Modern Slavery Act 2015 (the "Act") and in respect of the financial year ended 31 December 2022.

## **1. Background**

Guidepoint connects clients with vetted subject matter experts—Advisors—from its global professional network. Guidepoint clients leverage the insights and perspectives shared by its Advisors to stay informed and make better business decisions. Since 2003, Guidepoint has provided its clients with practical insights, setting up more than 1,000,000 interactions. Its slate of services, including phone consultations and meetings with Advisors, custom surveys, events and proprietary data products, help professionals gain a comprehensive understanding of a topic before making major investment and/or business decisions. Guidepoint's multinational client list includes nine of the top 10 consulting firms, over 100 private equity firms, over 200 hedge funds, and over 100 public companies. Guidepoint has over 1,300 employees worldwide. The company's industry-leading compliance platform -- overseen by Guidepoint's Chief Legal Officer, Catherine Smith, a former SEC enforcement attorney -- supports appropriate client-to-Advisor interactions through the application of Guidepoint's own policies and procedures as well as custom, client-specific controls the Company implements at clients' requests.

## **2. Structure**

Guidepoint is head-quartered in New York (NY) with US offices in Boston (MA), Phoenix (AZ), San Francisco (CA) and Honolulu (HI) and international offices in London, Dusseldorf, Athens, Dubai, Hong Kong, Singapore, Seoul, Tokyo, Shanghai, Beijing, Mumbai and Sydney. The Company services its clients on a global basis in varying jurisdictions.

As a company, it is committed to acting responsibly and supporting the objectives of the Act.

## **3. Steps Taken**

### **a. Guidepoint Internally**

#### **i. Employees**

Guidepoint employees are engaged through a formal contract of employment, complying with all local laws and best practices. Guidepoint issues an Employee Handbook to all UK staff setting out a code of ethics and expected behavior of employees. Employees are given substantial training upon commencement of their employment. Guidepoint actively encourages engagement and feedback from its employees including whistleblowing. Employees are directed to report any policy violations to their manager, human resources or Guidepoint's Chief Compliance Officer, depending on the nature of the violation. Guidepoint prohibits retaliation against individuals who report violations of company policies.

### **b. Guidepoint Supply Chain**

#### **i. Advisors**

Guidepoint utilizes the experience of its Advisors to provide expertise to its clients. These Advisors are independent contractors, qualified to provide consultancy services due to their career experience and/or certain qualifications they hold. Guidepoint ensures all Advisors take thorough training in how to consult through Guidepoint's network including a robust



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compliance framework. Guidepoint maintains procedures regulating payments to Advisors ensuring the payments are correctly remitted to the accounts designated by the Advisors. For these reasons, Guidepoint considers its Advisors to be a low risk in relation to modern slavery concerns.

## **ii. General Suppliers**

Due to its business model Guidepoint does not operate with a complex supply chain. Guidepoint utilises a relatively small number of suppliers. Of those suppliers, few require unskilled labour. The company undertakes due diligence on each supplier it seeks to onboard. Guidepoint requires certain suppliers to fill in a Supplier Security Due Diligence Questionnaire. Guidepoint aims to incorporate questions relating to human rights and modern slavery into its onboarding process.

## **iii. Code of Conduct**

To make clear Guidepoint's position on Labour and Human Rights, Equal Opportunity, Diversity and Inclusion, and Environmental Impact and Sustainability, it recently published a Code of Conduct. Suppliers to Guidepoint are required to adhere to this Code and to report to Guidepoint any breach of the Code and cease such breaching conduct immediately.

## **iv. London Living Wage**

As a responsible employer, Guidepoint UK pays its staff and aims to ensure that its London suppliers pay their staff at least the London Living Wage, a voluntary higher rate of base pay.

Guidepoint determines that the risk of modern slavery in its business and in its supply chain is low, however it acknowledges the importance of reviewing its processes and remaining alert to this risk as the business continues to expand.

Signed for and on behalf of Guidepoint Global, LLC, and its subsidiaries.

  
Albert Sebag  
CEO