
iSAM's Modern Slavery and Human Trafficking Statement

For the financial year ending 30 June 2024

Introduction

The Modern Slavery Act 2015 (the “Act”) requires certain businesses to produce a statement setting out the steps they have taken to ensure there is no modern slavery in their own business and their supply chains. Modern slavery is a crime resulting in an abhorrent abuse of human rights.

Modern slavery is constituted in the Act by the offences of slavery, servitude and forced or compulsory labour.

iSAM Funds (UK) Limited (“iSAM Funds”) is a London based alternative investment manager that specialises in quantitative investing. iSAM Securities (UK) Limited (“iSAM Securities”) and, together with iSAM Funds, “iSAM”) is a London based, liquidity provider and prime services partner to institutional clients and trading venues globally.

We have zero tolerance to slavery, servitude, forced or compulsory labour (any behaviour that amounts to coercion in the form of either direct threats of violence or more subtle forms of compulsion and/or where work or service is extracted from any person in the menace of any penalty and for which the person has not offered him/herself voluntarily) or human trafficking within our business or supply chains.

Our business and supply chains

As a financial services business, iSAM's supply chains are relatively short and simple, and predominantly comprised of:

- (i) data and information technology services;
- (ii) brokers and other fund /liquidity service providers;
- (iii) professional services from lawyers, accountants and other advisers; and
- (iv) office cleaning and other facilities services.

Therefore, the risk of modern slavery in our supply chains is relatively low when compared to businesses which produce or sell physical goods.

Our policies

We are committed to improving our practices to combat slavery and human trafficking in our business and supply chain.

iSAM has in place a Code of Conduct as well as other policies and procedures that set out the personal behaviours and conduct that is expected of all employees. These policies are made available to employees through the employee intranet. Compliance with the Compliance policies and procedures is reinforced by way of annual attestation for all members of staff to complete and sign.

These policies outline our core values and commitment to comply with the Act and to maintain the highest standards of professionalism, integrity, ethics, and respect for human rights.

Our Compliance and Legal teams review the modern slavery policies and procedures on an annual basis, adapting as necessary to the changing needs of our business.

Due diligence processes

The risk of modern slavery will undoubtedly fluctuate over time. We will use the following processes to assess the effectiveness of our anti-modern slavery procedures on an ongoing basis:

- the onboarding procedures such as information requests aimed at the detection and mitigation of modern slavery; and
- any remedial action taken in response to a report or suspected case of modern slavery in our supply chains.

Training

We provide annual training to our staff on the risks of modern slavery and human trafficking in our supply chains and our business.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015.

It was approved by the iSAM Funds' board and iSAM Securities' boards on 10 July 2024.

Jaco Wentzel

Director

iSAM Funds (UK) Limited and iSAM Securities (UK) Limited