

ISAM Funds (UK) Limited Modern Slavery Statement

For the period ended 30 June 2022

Introduction

The UK government introduced the Modern Slavery Act in 2015 (the "Act") which 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.

The Act

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

ISAM Funds (UK) Limited and Modern Slavery

ISAM Funds (UK) Limited is a London based alternative investment manager that specialises in quantitative investing.

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 Funds (UK) Limited's supply chain is relatively short and simple, and predominantly comprised of (i) data and information technology services, (ii) brokers and other fund service providers, (iii) professional services from our lawyers, accountants and other advisers, and (iv) office cleaning and other facilities services.

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

Our policies on slavery and human trafficking

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

ISAM Funds (UK) Limited has in place a Code of Conduct as well as a Compliance Manual and 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 for slavery and human trafficking

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

- the onboarding procedures such as information requests aimed at ensuring 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 and/or our business.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide annual training to our staff.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 30 June 2022. It was approved by the board on 1 August 2022.

Alexander Lowe

Director **Alexander Lowe**

ISAM Funds (UK) Limited

Date: **01 August 2022**