

## Statement on Modern Slavery and Human Trafficking

Pursuant to Section 54(1) of the Modern Slavery Act 2015 (the "Act"), this Statement, for financial year ending 31 December 2020 (the "Period"), is made by Caxton Europe LLP on behalf of itself, Caxton Europe Asset Management Limited and other relevant Caxton group companies ("Caxton", "we", "us" or "our") which identifies the steps taken and will continue to be taken to ensure that Caxton's business and supply chains remain absent of modern slavery and human trafficking.

Caxton Europe LLP is regulated and authorised by the Financial Conduct Authority ("FCA") and is subject to the requirement of the FCA rules. The principal activity of Caxton is investment management and the provision of investment advice and services to the group companies. Caxton Europe LLP also acts as a sub-advisor to the Caxton funds, where Caxton Associates LP, a Delaware limited partnership is the primary advisor.

Caxton's commitment and respect for human rights is fundamental to our organisation and we continue to take seriously our responsibility to ensure we help protect, preserve and promote human rights and do not tolerate slavery, forced labour and human trafficking of any kind. Caxton has a stringent policy that its businesses and supply chain are and remain free from modern slavery and human trafficking. We aim to implement and enforce the use of effective systems and controls to maintain this position, as reasonably as possible, within our business and supply chains, whomever we may choose to conduct business with.

Caxton has continued to monitor its employment practices during the Period across the Caxton group companies and ensured the hire of any new employees is conducted via a thorough interview process and appropriate background checks. All employees are required to read, understand and comply with internal policies, which are restated annually, which govern the business and renders Caxton confident of its continued success as a leader in the industry. During the Period, Caxton has worked with various third party organisations that have provided:

- outsourcing and professional services such as IT, audits, legal, tax and payroll support;
- cleaning, office equipment and food supply for Caxton employees;
- private healthcare, dental plans, and other employee benefits for Caxton employees; and
- financial services support for the Caxton group companies and Caxton funds such as fund administration, prime brokerage services, research and marketing data providers and trading and execution services

With respect to Caxton's vendor oversight and procurement process, Caxton's approach is to work with organisations with whom we have had an established and successful relationship for a number of years, where these organisations have consistently satisfied our due diligence checks and requirements.

In the event we are choosing new vendors, we conduct appropriate due diligence and adopt a risk based approach to determine whether it is suitable for us to enter into any arrangements. This approach consists of:

- understanding risks related to the geographical location of the supplier's services;
- the nature of the services to be provided;
- the commercial and legal ramifications of this service, and
- conducting appropriate background checks and know your customer requests of information to satisfy internal policies before proceeding with engagement

We expect high standards from all our service suppliers. We endeavor to include provisions in our contractual arrangements with suppliers to indicate we anticipate them to fully comply with all applicable laws and regulations in the conduct of their business, which includes the Act. We have an expectation that our suppliers will take steps to reduce the risk of modern slavery occurring in the conduct of their business and supply chain along with ensuring that the supplier will obtain and maintain all permits, licenses, visas and consents which may be required in connection with our relationship.

This Statement was approved by the partners of Caxton Europe LLP and signed on its behalf by a designated member on 17 November 2021.

For and on behalf of **Caxton Europe LLP**

A handwritten signature in black ink, appearing to read 'Matthew Wade', written in a cursive style.

Name: MATTHEW WADE  
Date of Approval: 17 NOVEMBER, 2021