

Caxton Associates LLP

Statement on Modern Slavery and Human Trafficking

This statement is made by Caxton Associates LLP and its relevant group companies (together “**Caxton**”, “**we**” or “**our**”), pursuant to Section 54(1) of the Modern Slavery Act 2015 (the “**Act**”). This statement outlines the steps we have taken during the financial year ended 31 March 2025 and the following period prior to publication of this statement (the “**Period**”), to ensure Caxton’s business and supply chain remain free from modern slavery and human trafficking.

Caxton is headquartered in London with other offices in New York City, Monaco, Dubai and Singapore. Caxton Associates LLP is regulated and authorised by the United Kingdom’s Financial Conduct Authority (“**FCA**”) and is subject to the FCA Handbook of Rules and Guidance. Our core business is investment management, including providing investment advice and related services to Caxton group companies. Caxton Associates LLP acts as the principal trading advisor to the Caxton investment funds.

We are committed to ensuring that we help protect, preserve and promote human rights and we have a zero-tolerance approach towards slavery, forced labour or human trafficking (“**Modern Slavery**”) of any kind. We aim to apply and maintain the use of effective systems and controls to help detect and prevent any risk of Modern Slavery within our business and supply chain.

To address and mitigate Modern Slavery, we apply a risk-based approach to supply chain oversight. We consider factors such as the vendor’s sector, location(s) and in-scope services. As a financial services business, Caxton’s supply chain is relatively limited in scope. Our supply chain primarily consists of major financial firms, financial data providers and information technology companies that typically employ skilled and professional individuals in developed markets where we deem the risk of Modern Slavery to be low. Caxton has minimal reliance on manufactured products. Should we receive any non-core products or services, we will conduct any additional due diligence that we deem necessary to ensure the risks of Modern Slavery are assessed as required. Additional vendors that Caxton worked with during the Period included:

- outsourcing and professional services such as IT, audit, legal, tax, and payroll support;
- cleaning, office equipment, and food supply for Caxton employees; and
- private healthcare, dental plans, and other employee benefits for Caxton employees

We typically work with organisations with whom we have had an established and successful relationship for several years, with such organisations consistently satisfying our due diligence checks and requirements.

We expect our vendors to take all necessary steps to reduce the risk of Modern Slavery occurring in the their businesses and supply chains, along with ensuring that they will obtain and maintain all permits, licenses, visas and consents that may be required in connection with our relationship. We endeavour to include provisions in our contractual arrangements with vendors requiring them to fully comply with all applicable laws in the conduct of their business (including the Act) and we reserve the right to refuse or terminate any engagement with a vendor that fails to comply.

Should we engage a new vendor, we conduct appropriate due diligence and adopt a risk-based approach to determine whether it is suitable for Caxton to enter into any arrangements. This approach consists of:

- understanding risks related to the geographical location of any vendor’s services;
- the nature of the services to be provided;
- commercial, legal, and regulatory risk-analysis; and

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- conducting appropriate background checks to satisfy internal policies and applicable external requirements before proceeding with engagement.

Caxton is committed to fair employment practices. During the Period, all new employees underwent a thorough interview process and background checks. Employees receive ongoing training on areas including but not limited to Modern Slavery, anti-money laundering, anti-bribery and whistleblowing and must attest annually their compliance with internal policies. Caxton maintains a whistleblowing policy that encourages employees to report concerns without hesitation or fear.

This Statement was approved by the Management Committee of Caxton Associates LLP.