

Cape Ann Asset Management Limited

Anti-Slavery and Human Trafficking Statement

Modern slavery is a crime and a violation of fundamental human rights. It can take various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Cape Ann Asset Management Limited and Cape Ann Asset Management, Inc. (for purposes of this statement only, "Cape Ann") is committed to acting ethically and with integrity in its business dealings and commercial relationships and to implementing and enforcing effective systems and controls to help to ensure that modern slavery is not taking place within its business or supply chains. Cape Ann's services are provided from offices in London and Massachusetts. Cape Ann's directors, officers and employees are subject to a Code of Ethics which sets out high ethical standards for business conduct. Annual training is provided on the importance of ethical conduct. Cape Ann's primary suppliers include custodians, fund administrators, IT service providers and professional services firms (these typically provide legal, tax, accounting and professional services). Cape Ann has considered its risk profile and that of its primary suppliers. Cape Ann's larger primary suppliers in the UK are required to publish anti-slavery policies and procedures, which Cape Ann has reviewed. In the case of certain smaller suppliers, where Cape Ann has determined that the risks of exploitation may be higher, Cape Ann will seek to utilise contract wording (for example on right to work status and minimum pay levels in excess of living wage figures) to help ensure compliance. This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and constitutes Cape Ann's slavery and human trafficking statement for the current financial year.