

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 (UK) (“MSA”) in respect of the following entities: Millennium Capital Management Limited (“MCML”) and Millennium Capital Partners LLP (“MCP”) and (MCML and MCP, collectively, the “UK Group”).

### **Our business**

Millennium Management LLC and its affiliates, (collectively, “Millennium”) is a global investment management firm founded in 1989. Millennium, which has its headquarters in New York, USA, employs a global multi-strategy approach.

### **Our structure**

MCP is a sub-advisor to Millennium and is controlled by its managing member, MCML, a UK company. MCP is authorised and regulated by the Financial Conduct Authority in the United Kingdom.

### **Our supply chain**

The UK Group’s business operates in a low-risk sector and region. We are nonetheless committed to taking appropriate steps to ensure there is no modern slavery or human trafficking in our supply chains or in any part of our business. We expect our suppliers to comply with all applicable laws and regulations in conducting their businesses.

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### **Policies, Awareness and Training**

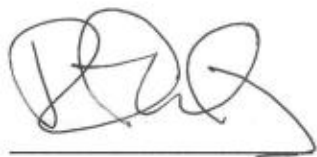
We have various policies in place that are designed to address compliance with applicable laws and regulations, including those relating to money laundering, bribery, incident and issue escalation policy, equal opportunities, non-harassment and discrimination.

We have taken steps to educate appropriate personnel of the UK Group and other individuals within Millennium that have responsibility for procurement and vendor management regarding the requirements of the MSA. Although we believe there is low risk of our vendors having involvement in slavery and trafficking, we have a vendor review process that is designed to identify potential higher risk vendors.

The effectiveness of the steps taken to ensure there is no slavery or human trafficking in our supply chain will be kept under periodic review. We will continue our efforts in raising awareness and educating our staff and supply chain.

This statement is made pursuant to section 54(1) of the MSA and constitutes our slavery and human trafficking statement for the financial year end 2017.

This statement was approved by the board of directors on 10 May 2018.

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Robert Westling, Director