

millennium

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 employees receive wages and benefit packages that exceed those required by law and carry out highly-skilled activities in a professional workplace. We are satisfied that there is no evidence of any act of modern slavery or human trafficking involving our employees.

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 takes a risk-based approach to its supply chain. Our supply chains are not complex and are composed predominantly of other financial and professional services companies. The UK Group sources its services primarily from the UK and other low-risk countries where modern slavery is not prevalent. 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.

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.

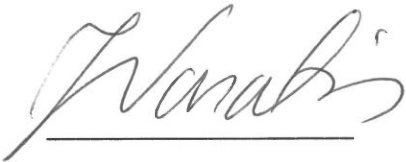
We have taken steps to educate appropriate personnel of the UK Group and other individuals within Millennium who have responsibility for procurement and vendor management regarding the requirements of the MSA. Although we believe there is low risk of our vendors having involvement in

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 2018.

This statement was approved by the board of directors in June 2019.

A handwritten signature in black ink, appearing to read 'Yannis Vasatis', is written over a horizontal line.

Yannis Vasatis , Director