

STATEMENT ON MODERN SLAVERY AND HUMAN TRAFFICKING

TRIUM CAPITAL LLP

MARCH 2023

INTRODUCTION

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes the Modern Slavery Act transparency statement for the financial year ended 31 December 2022 for Trium Capital LLP (“**Trium**” or “**TCL**”).

The purpose of this statement is to set out the steps that Trium has taken, and continues to take, to ensure that modern slavery or human trafficking does not take place in our business or our supply chain.

BUSINESS AND ORGANISATIONAL STRUCTURE

Trium Capital LLP is a regulated full scope AIFM and Investment Manager to UCITS Funds. It is authorised and regulated by the FCA (FRN 497640), registered in the USA as a CPO and CTA with the CFTC/NFA, NFA ID: 0477553. Trium Capital LLP is a registered investment advisor with the Securities and Exchange Commission (“**SEC**”) in the United States | CRD# 306112/SEC#: 801-122997.

POLICIES AND PROCEDURES

Trium is an equal opportunities employer and does not tolerate any form of discrimination, bullying, harassment, modern slavery or human trafficking in its direct business operations or indirectly from the services provided from its suppliers or any companies invested in.

To support its stance on the matter, Trium has established a number of policies to create an inclusive environment, provide equal opportunities and mitigate the risk of modern slavery/human trafficking across its business operations and investments. To name a few, Trium has established the following policies:

- Whistleblowing policy;
- Responsible Investment and ESG Policy, which includes how Trium considers environmental, social and governance issues;
- Sanctions List, which includes pre and post trade sanction screening of investments; and
- Proxy Voting Statement.

Additionally, Trium is a signatory/ member of a number of organisations which have business conduct codes which must be adhered to. These are as follows:

FCA: Trium is an FCA regulated firm, and as such adheres to the FCA’s ‘11 Principles for business’, and the FCA’s Conduct of Business rules.

PRI: The PRI is the world’s leading proponent of responsible investment. It works to understand the investment implications of environmental, social and governance (ESG) factors and to support its international network of investor signatories in incorporating these factors into their investment and ownership decisions.

SBAI: The SBAI is a standard-setting body for the alternative investment industry and custodian of the Alternative Investment Standards. The SBAI provides a mechanism for creating a framework of transparency, integrity and good governance designed to improve how the alternative investment industry operates, facilitates investor due diligence and complements public policy. The SBAI has produced detailed papers to help its members consider ESG aspects.

AIMA: The Alternative Investment Management Association (AIMA) is the global representative of the alternative investment industry, with around 2,000 corporate members in over 60 countries. AIMA draws upon the expertise and diversity of its membership to provide leadership in industry initiatives such as advocacy, policy

and regulatory engagement, educational programmes and sound practice guides. AIMA has produced detailed papers to help its members consider ESG aspects.

RISK ASSESSMENT

Trium operate supply chains predominantly comprising of business and professional services organisations and have minimal contact with the countries and sectors that are generally considered to have a risk of modern slavery and human trafficking.

Trium acknowledge that “increasingly complex and multi-tiered globalised supply chains, spanning multiple countries, now represent a potential site of risk for every multinational company”¹, however our suppliers are generally considered relatively low risk in terms of sector and location of operations. Many of our suppliers are professional services firms, including banks, accountants and law firms.

RESPECT FOR HUMAN RIGHTS

Our integrity guides our approach to respect and support human rights in line with the United Nations Universal Declaration of Human Rights. We comply with the laws of the countries in which we operate, and we maintain policies and procedures to inform our decisions and responsible behaviour. Trium is a signatory to the UN-supported Principles for Responsible Investments (PRI) and supports the principals of the UN Global Compact.

We acknowledge and respect internationally recognised principles and frameworks on human rights including the United Nations Guiding Principles on Business and Human Rights and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work.

STAFF AWARENESS

The Firm’s Employee Handbook, Compliance Manual and Code of Ethics all require staff to act with integrity and abide by the Firm’s policies and procedures. All staff are required to attest to these on a regular basis and are provided with appropriate ongoing training to ensure they are aware of their obligations to comply with the Firm’s policies and procedures, including with respect to the risk of modern slavery.

APPROVAL

This statement will be reviewed annually and updated as required. It was approved by the Trium Executive Committee on 28 March 2023.

¹ Forced Labour Human Trafficking and the FTSE 100: A review of company disclosure and recommendations for investor engagement: https://media.business-humanrights.org/media/documents/files/documents/Forced_Labour_Human_Trafficking_and_the_FTSE_1_.pdf