

## Modern Slavery and Human Trafficking Statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”) in respect of Tudor Capital Europe LLP (the “LLP”, “We” or “Our”).

### Our commitment

We take our obligations in relation to identifying, reporting and preventing slavery and human trafficking very seriously and have a zero-tolerance approach to abuses of human rights. As a responsible business, we are committed to taking appropriate steps to ensure that slavery and human trafficking does not occur within any part of our business or supply chains.

### Our business

The LLP is a Collective Portfolio Management Investment firm authorised under the Alternative Investment Fund Managers Directive and permitted to undertake additional activities. The LLP is regulated by the Financial Conduct Authority (“FCA”) in the United Kingdom (“UK”) and is a MIFIDPRU firm as defined in the FCA rules. It was formed under the laws of England and Wales on 8 October 2008 and commenced operations on 1 April 2009.

### Our supply chain

Our business is operated by a highly skilled workforce, and we take a risk-based approach to our supply chains. We do not deal in physical goods or manufactured items which are the activities involving the highest risk of slavery or human trafficking. Furthermore, our supply chains are not complex and are composed predominantly of other financial and professional services businesses, primarily from the UK and other low-risk countries. Having reviewed the requirements of the Act in the context of our business activities, we believe that our business and supply chain are at low risk of involvement in instances of modern slavery and human trafficking. Nevertheless, we acknowledge that we need to remain vigilant when conducting business, and this Statement affirms our intention to act ethically in our business relationships.

### Policies, Awareness and Training

We have a number of policies and procedures in place that assist in the prevention of slavery and human trafficking in its operations:

- **Whistleblowing Policy:** We encourage all of our members of staff to report any concerns related to our direct activities and our supply chains without fear of retaliation.
- **Code of Ethics:** We strive to maintain the highest standards of conduct and ethical behaviour in our operations, including managing our supply chain.
- **Modern Slavery and Human Trafficking Training:** All staff members are provided training annually.
- **Recruitment process:** All members of staff are vetted prior to commencing work and are required to provide evidence of their eligibility to work in the UK.
- **Due Diligence process:** We conduct appropriate due diligence on new suppliers and periodically review existing relationships to ensure continued compliance with our standards on preventing slavery and human trafficking.

We monitor the effectiveness of our policies and procedures via the number of reports we receive from staff members and third parties, including the general public and law enforcement agencies, and adjust our approach accordingly. If no such reports are received, the procedures are deemed to be performing adequately.

We have also made relevant personnel aware of the LLP's position on modern slavery and human trafficking as well as the requirements of the Act).

### **Approval**

This statement was approved on 12 August 2024 by the LLP's members and is made pursuant to section 54(1) of the Modern Slavery Act 2015. This statement relates to actions and activities during the financial year 1 April 2023 to 31 March 2024.

**Signed by Ben Kitchener – Designated Member**



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**For and on behalf of the members of Tudor Capital Europe LLP**