

## Modern Slavery and Human Trafficking Statement

This statement is made on behalf of Tudor Capital Europe LLP (the “**LLP**”). The LLP takes its obligations in relation to identifying, reporting and preventing slavery and human trafficking very seriously and has a zero tolerance approach to abuses of human rights. As a responsible business, the LLP is committed to taking appropriate steps to ensure that slavery and human trafficking does not occur within any part of its business or supply chains.

The LLP is an alternative investment asset manager with non-UK affiliates in the USA, Singapore and Australia (collectively “**Tudor**”). Tudor does not deal in physical goods or manufactured items which are the activities involving the highest risk of slavery or human trafficking. Furthermore, the majority of the countries in which Tudor operates are not ranked as high risk by the Global Slavery Index. Nevertheless, the LLP acknowledges that it needs to remain vigilant when conducting business and this Statement affirms the LLP’s intention to act ethically in its business relationships.

### Steps taken to combat modern slavery

The LLP operates a number of policies and processes that assist in the prevention of slavery and human trafficking in its operations:

- **Global Whistleblowing Policy:** Tudor encourages all of its employees, members, clients and other business partners to report any concerns related to our direct activities and our supply chains without fear of retaliation.
- **Tudor Group Code of Ethics:** Tudor strives to maintain the highest standards of conduct and ethical behaviour in its operations, including managing its supply chain.
- **Modern Slavery and Human Trafficking Training:** All employees and members are provided training annually.
- **Recruitment process:** All of Tudor’s personnel are vetted prior to commencing work and are required to provide evidence of their eligibility to work in the UK.
- **Due Diligence process:** The LLP takes various factors into consideration before partnering with a new supplier or continuing business relationships with existing suppliers. These include the LLP (i) requesting that new suppliers provide the LLP with their policies and procedures on the prevention of slavery and human trafficking in its operations; and (ii) periodically reviewing existing suppliers for their continued compliance.

The LLP judges the effectiveness of its policies and processes via the number of reports it receives from employees, members and third parties, including the general public and law enforcement agencies. If no such reports are received, the procedures are deemed to be performing adequately.

The LLP has also made relevant personnel aware of the LLP’s position on modern slavery and human trafficking as well as the requirements of section 54(1) of the Modern Slavery Act 2015 (the “**Act**”).

### Actions Taken During This Financial Year:

The LLP undertook the following actions this financial year:

1. **Modern Slavery Training:** The LLP provided training on modern slavery. This initiative aimed to enhance awareness, ensure understanding of legal obligations, and provide our staff with the knowledge, process and procedures to recognise and address potential risks.
2. **Supplier Reviews:** When deemed necessary, the LLP conducted a risk-based review of its suppliers with a focus on modern slavery concerns. An integral aspect of this review was to confirm their adherence to



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modern slavery standards. The suppliers within the scope of this review demonstrated an understanding of the Act and the obligations stemming from it.

**Ongoing Commitment**

Tudor will continue to monitor potential risk areas identified in its supply chains.

**Approval**

This statement was approved on 23 August 2023 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 2022 to 31 March 2023.

**Signed by Ben Kitchener – Designated Member**

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