



ANTI-SLAVERY AND ANTI-TRAFFICKING STATEMENT

The statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the 'Act'). This statement sets out the steps to be taken by Alken Asset Management Ltd and constitutes our slavery and human trafficking statement, for the current financial year.

ABOUT

Founded in 2005, the Firm has a team of 20 people, with headquarters in London, UK. The principal activity of the company is the management of managed accounts through investment in European equities mainly. The Firm's objective is to maximise its client's returns by carefully researching each investment case that is being made.

POLICY STATEMENT

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as delivery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty buy another in order to exploit them for personal or commercial gain.

We have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity on all our business dealings and relationships and to implementing and enforcing effective systems to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains.

OUR POLICIES

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business. Our Anti-Slavery and Anti-Trafficking Policy reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

The prevention, detection and reporting of modern slavery in any part of our business or throughout our supply chain is the responsibility of all those working for us, with us or under our control. Our employees are required to avoid any activity that might lead to, or suggest, a breach of this statement. All employees are required to read, understand, and comply in full of our Anti-Slavery and Anti-Trafficking Policy.

We also operate a Whistleblowing Policy, which encourages our employees to report any concerns or wrongdoings which extends to any human rights violations like modern slavery. All reports will be fully investigated, and appropriate remedial action taken.

DUE DILIGENCE AND ASSESSMENT OR RISK

Our business activity takes place in England, and our contractors and suppliers are also based in the UK. More precisely, the Firm is only active in the management of its managed accounts. It is therefore highly unlikely for the Firm to face a slavery and human trafficking issue. We are however closely monitoring any risk that the Firm could be exposed to, we regularly update our Policies in this regard, we have trained the staff accordingly and we are ready to act promptly to adapt our processes if the Firm was to engage in activities where the risk would be higher or if anything non-compliant was to be flagged.

ALKEN ASSET MANAGEMENT

25 Savile Row, London, W1S 2ER, United Kingdom Tel +44 (0)20 7440 1900 www.alken-am.com