## **Modern Slavery Act Statement**

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (UK) ('MSA') and applies to the following entities: EG Private Limited (EGP) and EG Manager UK LLP (EGM UK), collectively referred to as the 'UK Group', 'We', or 'Our'.

### **Our business**

Engineers Gate Manager LP and its affiliates, (collectively, "Engineers Gate") is a global investment management firm founded in 2014. Engineers Gate, which has its headquarters in New York, USA, employs a global multi-strategy investment approach. Our employees are compensated with wages and benefit packages that exceed legal requirements, and they perform highly skilled activities in a professional and ethically governed workplace. We are satisfied that there is no evidence of any act of modern slavery or human trafficking in our business and supply chains involving our employees.

#### Our structure

EGM UK operates as a sub-advisor to Engineers Gate and is managed and controlled by EGP, its UK-based managing member. EGM UK is an Appointed Representative of Capricorn Fund Managers Limited, which is authorised and regulated by the Financial Conduct Authority ("FCA") in the United Kingdom.

## Our supply chain

The UK Group takes a risk-based approach to its supply chains. 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 and human trafficking is not prevalent. We are nonetheless committed to taking appropriate steps designed 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 implemented a range of policies designed to ensure compliance with all applicable laws and regulations, including those related to money laundering, bribery, issue escalation, equal opportunities, non-harassment, and non-discrimination. These policies are regularly reviewed and reinforced through ongoing training and awareness programs. The UK Group has an Employee Handbook that outlines our commitment to ethical conduct and provides guidance on our processes related to workplace policies, including equal opportunities, working conditions, anti-bribery measures, and whistleblowing. Although we believe there is low risk of our vendors having involvement in modern slavery and trafficking in their services to us, 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 promoting compliance with our supply chains.

This statement is made in accordance with section 54(1) of the MSA and constitutes the UK Group's slavery and human trafficking statement for the financial year ending 2024.

This statement was approved by EG Private Ltd, the managing member of EG Manager UK LLP on 19 August 2024.

**EG MANAGER UK LLP** 

By: EG Private Ltd, its managing member

Name: Gavin Boyle

Title: Director