

# SCHONFELD STRATEGIC ADVISORS (UK) LLP

## Statement on Modern Slavery

#### 1. Introduction

This statement is published by SSA (UK) 1, Ltd, SSA (UK) 2, Ltd and **Schonfeld Strategic Advisors (UK) LLP** ("SSA UK") (together the "Firm", "we", "our" or "us") pursuant to Section 54 of the UK Modern Slavery Act 2015.

#### 2. Firm Overview

SSA UK is a UK Limited Liability Partnership with its registered office at: 54 Jermyn Street, London SW1Y 6LX, London, United Kingdom. It is authorised and regulated by the UK Financial Conduct Authority with firm reference number 816269.

#### 3. Organisational Structure

SSA UK is a sub-advisor to Schonfeld Strategic Advisors LLC, a Delaware limited liability company having its principal place of business at 460 Park Avenue, New York, NY 10022. Schonfeld Strategic Advisors LLC is registered as an investment adviser with the Securities and Exchange Commission, providing discretionary investment advisory services to private pooled investment vehicles as well as non-discretionary investment advisory services to affiliated family office clients

#### 4. Policy regarding Modern Slavery and Human Trafficking

We are committed to maintaining the highest possible ethical and legal standards across our business, and as part of that commitment, it is our policy not to tolerate modern slavery, servitude, forced labour or human trafficking in our business activities or employment arrangements. We expect each of our suppliers to comply with applicable laws in conducting its business and to operate a fair and ethical workplace for its staff.

#### 5. Members and Employees

The substantial majority of our members and employees carry out highly skilled activities, and all staff received remuneration and benefits that exceed those required by applicable laws and regulations. The risk of our staff being subject to modern slavery is low.

We seek to provide a safe, healthy and desirable workplace. Our staff benefit from the protections afforded by employment law in the United Kingdom, relevant aspects of which are reflected in our policies and procedures. We are satisfied that there is no evidence of any act of modern slavery or human trafficking involving our members or employees.

#### 6. Supply Chain

Our business activities are limited to the provision of investment management services on a sub-advisory basis. As such, we have a limited supply chain that includes providers of financial data, software, and investment research, as well as suppliers of office equipment and services related to non-core activities such as cleaning, catering and transportation. The risk of modern slavery in our supply chain is relatively low when compared to businesses that manufacture or sell physical goods, or businesses that operate in regions at higher risk of modern slavery.

We will not knowingly deal with, support, or purchase goods or services from suppliers engaged in modern slavery, human trafficking or other practises criminalised by the Act. Any supplier or service provider found to violate our ethical business expectations may be subject to termination of the business relationship.

### 7. Existing Policies

We operate policies and procedures designed to ensure compliance with applicable law and regulation. We believe these policies and procedures are relevant to our efforts to detect and prevent modern slavery and human trafficking in our business and supply chain, including policies relating to money laundering, bribery, whistleblowing and escalation, harassment and discrimination, equal opportunity, and remuneration.

#### 8. Training and Awareness

We have taken steps to inform all members and employees of our policy regarding modern slavery and human trafficking. All our staff receive annual training, including in relation to the Act, and are

encouraged to report in good faith any issues or concerns relating to, amongst other things, potential ethics, human rights, legal, or regulatory violations.

## 9. Review and Approval

The effectiveness of our efforts to ensure that modern slavery and human trafficking are not taking place in our business or supply chain will be kept under periodic review. This statement was approved by the management committee of Schonfeld Strategic Advisors (UK) LLP in June 2020.