

Modern Slavery Statement

This statement is made on behalf of IQ EQ Administration Services (UK) Ltd (“IQ EQ UK”) pursuant to section 54 of the Modern Slavery Act 2015 (the “Act”). IQ EQ UK provides administration and related services to collective investment funds. The group to which IQ EQ UK belongs, the “IQ EQ Group”, is a professional services firm which helps global investors focus on investing and preserving capital in a sustainable and complaint compliant manner. IQ EQ UK and the IQ EQ Group recognises that modern slavery is a crime and a violation of fundamental human rights, which can take various forms (see introduction below) and we are committed to conducting our business ethically within all our operations and our supply chains and in the international efforts to abolish all forms of modern slavery.

The statement describes the steps that the IQ EQ UK and the wider IQ EQ Group have taken during the financial year ended 31 December 2022 to seek reassurance that slavery and human trafficking is not taking place in any of our supply chains or in any part of our business.

Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain. For this statement we use the term “modern slavery” as an umbrella term that covers all situations of exploitation that a person cannot refuse or leave, for whatever reason.

We are committed to conducting our business ethically within all our operations and our supply

chains and in the international efforts to abolish all forms of modern slavery. More information about our business can be found on our website.

Our policies

We are committed to ensuring that modern slavery has no place in or around our business or our supply chains. Our commitment to acting ethically and with integrity and in line with all applicable national and international laws, conventions, standards, and protocols is reflected within our Modern Slavery Standard, our Code of Conduct, and other documents, for example our Employee Handbook.

Within our Code of Conduct, we state our commitment to maintaining the highest levels of legal and ethical standards in the conduct of its business, and we state the importance of our reputation for compliance with all applicable laws and rules, and for honesty and integrity. Furthermore, our code of conduct defines a shared set of behaviours and standards that sustain and support our core values, and in doing so, safeguarding our clients’ interests, supporting the Group’s reputation and integrity, and protecting our shareholders from any undue risk.

Our Code of Conduct makes it clear that all employees are expected to apply the principles stated within our various policies to their day-to-day roles.

Procedures Adopted to Assess and Manage Slavery

As a professional services firm with relatively short supply chains, we believe the risk of modern slavery within our own business and our supply chain is low. By value, the majority of our

suppliers are financial and professional services. Other suppliers include providers of IT, software, and office and stationary equipment.

Where the risk profile is higher e.g. catering, office cleaning, and other facilities management services, we will endeavour to implement enhanced due diligence where possible.

Despite the relatively low risk, we recognise the importance of combatting slavery and human trafficking. We are committed to ensuring that modern slavery is not taking place within our business or within our supply chains. We have a set of risk management principles which provide guidance to support the sound conduct of business and effective management of risk throughout the organisation, and we have adopted a risk-based approach to monitor our business and suppliers.

We continued our review of our sustainability and ESG-related policies, processes, and procedures which began in 2021, in 2022. This included:

- Continued review of our Modern Slavery Standard to better reflect our zero-tolerance approach to modern slavery and our commitment to acting ethically and with integrity in all our business dealings and relationships. A new Modern Slavery Standard will be implemented in 2023.
- In relation to our supply chains:
 - We are committed to engaging ethical suppliers that provide quality products and services. In late 2022 we started assessing and monitoring exposure to modern slavery and other human rights risks amongst our top 100 suppliers. This process will run into 2023
 - We have also begun a review of our procurement practices across the Group which includes the updating of our due diligence questionnaire to comprise specific questions on the supplier's methods and policies on ESG-related risks
 - We have begun the roll out of our supplier code of conduct which looks to ensure that our suppliers' commitment to eradicating Modern Slavery is similar to ours
- We began a review of our whistleblowing policy, processes, and procedures which continues into 2023

- We will identify and start tracking appropriate performance indicators in 2023 including ensuring employees are trained on understanding modern slavery, and tracking any questions or concerns that our people, or indeed external stakeholders, may have about modern slavery in our business or our supply chain
- We will review the effectiveness of the steps we have taken to ensure that slavery and human trafficking is not taking place in the second half of 2023

Recruitment and Employment

- In relation to our employees:
 - We continue to seek to attract and retain professionals who share a commitment to our values
 - Our employees are hired in accordance with robust and fair recruitment policies and procedures and are expected to adhere to our Code of Conduct, which reflects our commitment to acting ethically and with integrity in all our business relationships. We began a review of our recruitment processes in 2022 and roll out continues into 2023.
 - We believe that we have appropriate recruitment processes and procedures in place, including conducting eligibility to work in the jurisdiction checks for all employees which helps to safeguard against modern slavery
 - Most of our colleagues are full time and all colleagues have Terms and Conditions which are in line with prevailing employment law

Training and Ethical Standards

We understand that a key part of our commitment to combat modern slavery is to ensure all colleagues understand what modern slavery is and that they comply with the highest ethical standards and act with integrity. We embed this in our business via the IQ-EQ Values and our Code of Conduct. For 2023, our intention is to provide all employees with training on human rights and anti-modern slavery. The training will include what modern slavery is and what indicators to look for.

Further Steps

While we believe that our actions to combat modern slavery risks are, and will be effective and appropriate, we recognise that we need to remain vigilant. We are therefore committed to reviewing our policies and procedures periodically to ensure that they are sufficiently robust to mitigate the risk of modern slavery occurring in our business and supply chains.

In FY 2023 we will:

- Update the Modern Slavery Standard
- Review, monitor and drive awareness of modern slavery among our top 100 suppliers
- Continue the roll out of our supplier code of conduct
- Complete the review of our whistleblowing policy, processes, and procedure
- Provide all employees with training on human rights and anti-modern slavery
- Identify and start tracking appropriate performance indicators

This Statement was approved by the Board of Directors of IQ EQ Administration Services (UK) Ltd on 20th June 2023