

Introduction

This statement is made in relation to CRUX Asset Management Ltd (“CRUX” or the “Firm”) pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”) for its financial year ending 31st March 2024.

The purpose of this statement is to set out the steps that CRUX has taken and continues to make to ensure that modern slavery or human trafficking does not take place in our business or our supply chain.

CRUX is committed to acting ethically and with integrity.

Our Business and Supply Chain

CRUX is a UK-based limited company whose sole business activity is investment management. CRUX has given careful consideration to Section 54 (Transparency in Supply Chains) of the Modern Slavery Act 2015.

CRUX does not tolerate modern slavery or human trafficking and takes a risk-based approach to its supply chain, including making enquiries where it is considered necessary to do so. The nature of our business means that the Firm does not have complex supply chains and does not procure material services from suppliers located in high risk countries. CRUX sources its services from the UK and other low-risk countries within Europe where modern slavery is not significantly prevalent. Our suppliers are predominantly regulated financial and professional services companies, including banks, data service providers, technology providers, accountants and law firms. The Firm also engages suppliers of equipment, maintenance and support services for our office in London.

CRUX believes that it undertakes appropriate due diligence in relation to new suppliers and expects our suppliers, and their supply chains, to comply with all relevant legislation and regulations in the countries in which they operate. CRUX has an escalation policy which allows employees to report issues and concerns without reprisals for doing so. The Firm’s processes relating to its corporate governance activities are included within the scope of its outsourced internal audit function. The Firm’s policies are periodically reviewed and, where necessary updated to ensure the Firm’s continuing commitment to the Act.

Training and Awareness

The Firm’s Staff handbook and Code of Ethics requires staff to act with integrity and abide by the Firm’s policies and procedures. All staff are required to attest to this on a regular basis and are provided with appropriate ongoing training to ensure they are aware of their obligations to comply with the Firm’s policies and procedures, including with respect to the risk of modern slavery.

This statement will be reviewed annually and updated as required. It has been approved by the Board of Directors for the Firm on the 21st March 2024.



Karen Zachary

Chief Executive Officer

CRUX Asset Management Ltd

21st March 2024