



Modern Slavery Act Statement

Introduction

This statement is made by all subsidiaries and affiliated entities in the Arrowgrass group (together “Arrowgrass”) pursuant to section 54 of the Modern Slavery Act 2015 (the “Act”) and in respect of the financial year ended 31st December 2018.

Business and Organisational Structure

Arrowgrass is a London headquartered alternative investment manager that employs a non-siloed, multi-strategy investment process across the corporate capital structure. Founded in February 2008, the firm has 118 staff working across offices in London and New York as at 1st April 2019.

Arrowgrass Capital Partners LLP is a UK limited liability partnership that is authorised and regulated by the UK Financial Conduct Authority to carry on investment management activities.

Supply Chain

Arrowgrass acknowledges the provisions of the Act, and is satisfied that there is no evidence of any act of modern day slavery or human trafficking within its own organisation.

Arrowgrass has a limited supply chain, therefore considers that there is a low risk of slavery and human trafficking within its business. Arrowgrass will not knowingly deal with, support or purchase goods or services from suppliers engaged in such practices, referring specifically to child or forced labour and human trafficking.

Arrowgrass encourages its employees to report in good faith any issues or concerns about potential ethics, discrimination, human rights, legal, or regulatory violations, including improper or unethical business practices such as fraud, bribery or money laundering. Any concerns raised are resolved in a manner consistent with the law and Arrowgrass’ internal policies and procedures. Any employee found to be in violation of these standards may be subject to disciplinary action, including termination, and any supplier or service provider found to violate our ethical business expectations may be subject to termination of the business relationship.

Arrowgrass will undertake responsibility for implementing this policy statement and its objectives.

Staff Awareness

Arrowgrass has Employee Handbooks and various policies in place to that reflect Arrowgrass Capital Partners LLP’s commitment to acting ethically, including equal opportunities, modern slavery, working conditions, anti-bribery and whistle blowing.

Arrowgrass Capital Partners LLP has taken steps to train appropriate personnel on the requirements of the Act with a view to reducing the risks of forced labour in its supply chain.

Approval

The Arrowgrass Executive Committee approved this statement on 11 June 2019.