

INVESTCORP CREDIT MANAGEMENT EU LIMITED

UK MODERN SLAVERY ACT 2015 SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”) and sets out the steps that Investcorp Credit Management EU Limited (“ICMEU”) has taken during the financial year ending 30 June 2019 to ensure that slavery and human trafficking are not taking place in any part of its supply chain or its own business.

Investcorp Credit Management EU Limited

ICMEU is a UK based global credit manager with business lines comprised of:

- Sourcing European credit investments to be part of actively managed collateralized loan obligation (“CLO”) vehicles and other actively managed portfolios;
- Managing portfolios of credit investments for issuers of CLO securities, for the alternative investment fund managers (“AIFMs”) of certain alternative investment funds (“AIFs”) and for other collective investment undertakings, via investment management and sub-investment management agreements;
- Promoting investments in CLO securities in compliance with exemptions under the Prospectus Directive and in AIFs in compliance with the EU Alternative Investment Fund Managers’ Directive (“AIFMD”);
- Managing credit investments in managed accounts; and
- Acting as the sponsor to securitisations in certain CLO vehicles to which it acts as portfolio manager and, in connection therewith, holding retained risk positions in the CLO securities issued by those vehicles as required by applicable law.

Our Values

ICMEU is committed to the highest ethical standards, reflected in its corporate values. We have a zero-tolerance approach to modern slavery and human trafficking and we are committed to ensuring that it has no presence in our supply chains or in any part of our business. We are committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place.

Our Policies

Policies relevant to the combating of modern slavery and human trafficking include the ICMEU Responsible Investment Policy, the Investcorp Code of Conduct, the Investcorp Human Resources Policies and other Investcorp Group policies to which we are subject and which ensure against risks within our own business. ICMEU will also not knowingly do business with contractors, business partners or suppliers who violate equivalent standards.

Furthermore, the Investcorp Group Whistleblowing Procedures encourage any member of staff who wishes to raise any concerns related to the activities of our businesses including any circumstances which may give rise to an enhanced risk of slavery or human trafficking.

Risk assessment and due diligence

As our business is in full compliance with all applicable employment laws, we assess the risk of modern slavery in our own business as very low.

Most of our suppliers provide services to help to run our offices such as, catering, utilities, IT, telecoms, travel, recruitment, stationery, supplies and professional services, therefore, we assess the risk of modern slavery in our suppliers to be low.

As an asset management company, ICMEU has a relatively straightforward supply chain model which is built around its core business lines. Given the nature of ICMEU's advisory business, we believe there is a very low risk of slavery or human trafficking in connection with these activities.

Furthermore, ICMEU takes due diligence measures to identify and to address the following additional potential concerns:

- our recruitment procedures, employment terms and internal policies are maintained and implemented in full compliance with all applicable employment laws and regulations. We invest heavily in the professional development, health and wellbeing of all our staff;
- if we have any concerns over the possible incidence of modern slavery within our supply chains, we will work with the relevant supplier to investigate the concern and, if appropriate, to implement swift remedial action (which may include termination of the underlying contract). In determining the appropriate remedial action, consideration will be given to the action(s) which will deliver the safest and best outcome for the potential victims of modern slavery. We expect our suppliers to engage constructively and responsibly, and to show their determination and willingness to rectify issues promptly and effectively.

Effectiveness and Performance Review

For the financial year covered by this statement, we did not identify any incidence or significant risk of slavery in our business or supply chains. But it is fully recognised that this task requires constant vigilance. We continue to monitor and review our policies relating to slavery and human trafficking.

Staff Awareness

All new staff are provided with and briefed regarding the Investcorp Code of Conduct and other relevant policies. Furthermore, we require all staff to provide an annual declaration confirming their adherence to the Investcorp Code of Conduct and other relevant policies.

This Statement

This statement has been considered and approved by the Board of Directors, which will review and update it annually. In accordance with the requirements of the Act, this statement is published on our website with a link on the home page.

Peter Goody, Chief Operating Officer

For and on behalf of Investcorp Credit Management EU Limited
28 February 2020