



## ANTI MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Applicable to Curlew Capital Ltd, its subsidiaries and funds under its management collectively referred to as 'Curlew'.

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Modern slavery takes various forms including conventional slavery, servitude, forced labour and human trafficking. All of these have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Curlew is committed to upholding human rights in all aspects of the way we do business and we recognize that modern slavery is a crime and a violation of fundamental human rights.

We are committed to ensuring there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our anti-slavery policy reflects our commitment 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 anywhere in our supply chains.

In order to provide our services and expertise we procure a range of goods and services from third party suppliers who may, in turn, enter into sub-contracts with their own suppliers; We have a zero tolerance to slavery and human trafficking and expect all those with our supply chain to comply with our values and ethics.

We have included in our employment contracts an obligation that staff should comply with all codes, procedures and policies adopted by Curlew, including our own Code of Conduct policy. In addition, and importantly, staff are issued with our Whistleblowing policy which encourages and facilitates the reporting of any suspected business malpractice of any kind.

To ensure a high level of understanding of modern slavery and compliance with these policies amongst our staff, we arrange appropriate training for those involved in procurement and our supply chains.

Compliance with these and other related corporate policies is overseen by Curlew's Director of Operations, reporting directly to the Board.