



COMMANDER
ASSET MANAGEMENT

Modern Slavery and Human Trafficking

Annual Statement

Year Ended 31st December 2023

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT:

Introduction

This policy statement is published pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”) and constitutes Commander Asset Management Ltd’s [“CommanderAM” or the “Firm”] Slavery and Human Trafficking statement for the financial year ending 31st December 2023.

The statement sets down CommanderAM’s commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

Organisational structure

CommanderAM is a limited company and a UK asset management firm which is regulated in the UK by the Financial Conduct Authority.

The firm does not belong to any group or have a place of business in any other country apart from the UK.

Our business and employees

We are committed to ensuring that anyone who works for CommanderAM benefits from a working environment in which their fundamental human rights are respected and that anyone we do business with shares these principles.

With particular relevance to our investment process of the funds and accounts to which we provide investment management services, environmental, social and governance (ESG) factors are integrated throughout our investment process.

We provide fair working conditions for all our employees, including written terms and conditions governing their employment, remuneration, working hours, health and safety, resting time, holiday entitlements and benefits.

All employees have documentation necessary to evidence that they are legally entitled to work in the UK and no-one under the legal minimum age for admission to work is employed by CommanderAM.

Risk Assessment

We do not tolerate slavery and/or human trafficking in our business or supply chains. The Firm encourages members of staff to raise any concerns, whether relating to modern slavery and human trafficking or otherwise, at the earliest opportunity and, through its whistleblowing guidance, provides a framework for doing so. Furthermore, CommanderAM is required to act in accordance with the FCA’s rules on a variety of issues relating to corruption, bribery and money laundering.

Our supply chain is relatively limited and mainly sourced from the UK and comprises of contracts for financial services with suppliers and trading counterparties to support our asset management and fund management company activities. We also engage the services of suppliers to support our office activities on a day-to-day basis. We do not produce, manufacture, or retail any physical goods and as such we have no supply chain relating to those activities.

Therefore, we consider that, overall, the risk of slavery and/or human trafficking in our supply chain is low.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply

chain and our business, we provide appropriate training to relevant members of staff. The Firm encourages employees to raise any concerns in accordance with the Firm's Whistleblowing Policy.

Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

We have the following policies and procedures in place which we believe reduce the likelihood that our business is exposed to or inadvertently supports slavery or human trafficking: These policies include and cover; Inducements, Gifts, Benefits and Anti-Bribery Policy and Procedures; Anti-Money Laundering and Counter Terrorist Financing Procedures and Whistle Blowing Policy.

Due Diligence Processes for Slavery and Human Trafficking

When entering into a relationship with a new counterpart, depending on the significance of the relationship and perceived risks, we conduct due diligence and endeavor to seek assurances from the relevant counterpart in relation to its approach to restricting slavery and human trafficking in its business and supply chains. Where we might identify suppliers as higher risk, we endeavor to seek periodic assurances.

For the year ending 31st December 2023, we believe that none of our current service providers expose the Firm to slavery or human trafficking risk.

Identification and action

In the event that any instances of human trafficking or modern slavery are discovered within the business or our supply chain, the matter would be escalated to the Board. The Board would agree the next steps - which could include immediately terminating the relationship with the relevant supplier and notifying the relevant authorities. A log of any risks identified, and action taken will be maintained by the Firm's Compliance Team.

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary.

The Board of Directors endorses this policy statement and is fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

Name: Mark Randall

Position: CEO on behalf of the Board of Commander Asset Management Ltd