

## **Modern Slavery Statement 2020**

### *Introduction*

This statement constitutes our slavery and human trafficking statement and is made pursuant to section 54 of the Modern Slavery Act 2015 (“MSA”) by Squarepoint UK Holdco 1 Limited, Squarepoint UK Holdco 2 Limited and Squarepoint Capital LLP (“SC”) (together, “Squarepoint UK”, “we” or “us”) for the financial year ended 31 December 2020.

### *Our business and structure*

Squarepoint Holdings Limited and its affiliates (together, “Squarepoint Group”) operates an independent asset management business and provides discretionary investment advisory services to certain privately offered pooled investment vehicles. SC is a sub-manager that conducts discretionary management functions on behalf of the funds during the UK business hours. SC is authorised and regulated by the Financial Conduct Authority in the United Kingdom.

### *Our supply chain*

Squarepoint UK's business operates in a sector and region which it considers are low risk for modern slavery. We are nonetheless committed to taking appropriate steps designed to ensure there is no modern slavery or human trafficking in our supply chains or in any part of our business. We expect our suppliers to comply with all applicable laws and regulations in conducting their businesses.

### *Policies, Awareness and Training*

We are committed to conducting business honestly, fairly and with due skill, care and diligence. Our Compliance and FCA Manuals contain various policies which are in place to embed these behaviours in the culture of the business. The Compliance Manual includes a Code of Ethics and policies on bribery, anti-money laundering (AML), counter-terrorism financing (CFT) and whistleblowing. All employees must confirm they have read and understood the Compliance Manual. Both Manuals are designed to address compliance with applicable laws and regulations and to assure employees that reports of a compliance issue will be viewed favourably by senior management.

New hires of Squarepoint UK receive compulsory training on AML, CFT and market abuse. The training is refreshed annually for all employees. The effectiveness of the steps taken to ensure there is no slavery or human trafficking in our business or supply chain will be kept under periodic review. We will seek to raise awareness and educate our staff about modern slavery and the importance of its eradication generally.

We are monitoring the heightened modern slavery risks associated with Covid-19 and its impact on our business and supply chains to maintain the safety and well-being of our staff. An increased area of risk that we have identified relates to the hire of additional cleaning staff as a result of Covid-19. We believe the training offered to relevant staff with procurement responsibilities mitigates this by helping them recognize the risks of modern slavery and human trafficking. We will continue to integrate learnings from the pandemic into our future modern slavery preventative measures and adhere to government guidelines on how we carry out our work and manage our projects and those suppliers who are working alongside us.

This statement has been authorised by the boards of directors of Squarepoint UK on 19<sup>th</sup> February 2021