



RWC Group, trading as Redwheel - Modern slavery statement for financial year ending 31 December 2022

This Statement has been published in accordance with the Modern Slavery Act 2015, which requires organisations in the United Kingdom with an annual global turnover in excess of £36 million to publish an annual statement detailing the measures taken to prevent modern slavery and human trafficking in the organisation and supply chains.

Under this Statement, modern slavery is defined as situations of severe exploitation where a person is under control due to coercion, violence, deception, or abuse of power. Modern slavery includes human rights violations such as slavery, servitude, forced labour, debt bondage, the worst forms of child labour, and trafficking for exploitation or slavery.¹ According to the International Labour Organisation, there are some 50 million people worldwide in situations of modern slavery.² Given the prevalence of modern slavery globally we recognise we may have exposure to these risks in our own operations and supply chain.

We do not tolerate modern slavery either within our business itself or within our supply chain and expect all our employees to carry out their responsibilities with integrity and respect for others, which is embedded in our organisation's culture, values, and ethics. Similarly, we expect our supply chain (whether direct suppliers or those that directly or indirectly supply our direct suppliers) to share the same values.

In this Statement we will report the activities undertaken and progress made over the course of the year and assess the effectiveness of our actions. We recognise that modern slavery is a hidden risk and that we can do more to assess and manage this risk.

Our Business

Redwheel is a multi-strategy investment manager, with 174 employees (as of 31 December 2022) including 57 dedicated investment professionals working across 7 independent teams. We manage \$21bn for our clients, from offices in London, Miami, and Singapore.

Risk Assessment and Due Diligence

We have carried out a risk-based assessment of our key suppliers, carried out by Finance and HR departments, to ascertain their use of forced labour. We have reviewed their statements, where available, on the use of forced labour to ensure that they in turn are taking what appears to us to be appropriate steps. 37% of suppliers had up to date statements available on their websites. For suppliers who have not published a written statement we requested signed agreement to our Code of Ethics and Conduct policy. All new suppliers are assessed for their ability to meet this threshold upon entry as part of our sign-off process. We will not engage with or continue working relationships with any supplier unable to verify their commitment to preventing modern slavery.

Training

¹ https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---declaration/documents/publication/wcms_762168.pdf

² https://www.ilo.org/wcmsp5/groups/public/@ed_norm/@ipecc/documents/publication/wcms_854733.pdf



Key personnel who engage are listed as owners of supplier relationships or engage with high-risk suppliers have been provided with dedicated training to combat the use of modern slavery within our supply chain. Training was provided through Thomson Reuters' online platform.

Policies

We are committed to creating a safe and secure working environment at Redwheel and have implemented a Whistleblowing Policy which sets out the process for reporting any reasonable suspicions of unethical behaviour. To date, there have been no issues raised through this channel.

We have implemented a Modern Slavery policy, which is available to all staff on our company intranet. This policy outlines the responsibilities of Redwheel and our employees in addressing modern slavery risks in the business and our supply chain.

Governance and oversight

We have prepared this Statement for the purposes of the Modern Slavery Act 2015. This Statement has been approved by the Board of Directors and will be reviewed and updated annually.

Tord Stallvik, CEO