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BlueCrest Capital Management (UK) LLP / BC Capital Management Services Limited

UK Modern Slavery Act: Slavery and Human Trafficking Statement

The Modern Slavery Act 2015 (the "Act") addresses the role of businesses in preventing modern slavery in their supply chains and organisations. To comply with the Act, BlueCrest Capital Management (UK) LLP ("BCMUKLLP") and its affiliate BC Capital Management Services Limited ("BCMSL") must publish a slavery and human trafficking statement (the "Statement") for each financial year. This is the Statement relating to the **financial year ended 31 March 2022** for each of BCMUKLLP and BCMSL (referred to together as "BlueCrest" for the purposes of this Statement).

Organisation and Business Model

BlueCrest is part of a group of related entities that is involved in the business of investment management for their affiliated entities. BCMUKLLP's UK affiliate BCMSL provides services, including staffing services, to BCMUKLLP.

BlueCrest's investment management business consumes various services including research services from investment research firms or banks, technology from technology service providers, data centre services, data from data providers, services of financial exchanges and financial market platforms, and services offered by banks and broker dealers. BlueCrest hires full time and part time staff, and contractors.

For the day-to-day running of its office, BlueCrest engages the services of suppliers including office cleaning staff for day and evening shifts, caterers, couriers, food, drink and plant suppliers, waste management services and building and equipment maintenance.

As part of a group engaged in the business of investment management, BlueCrest considers that the risk of its connection with modern slavery or human trafficking is low, while acknowledging that risks can be present in all businesses. BlueCrest has no tolerance for BlueCrest or parties involved in its supply chain having any connection with modern slavery or human trafficking.

Modern Slavery

BlueCrest is committed to help combat slavery and human trafficking. BlueCrest seeks to ensure that BlueCrest's own business and its supply chains are free from slavery and human trafficking. BlueCrest intends to continue to implement systems and controls to minimise, as far as possible, the risk of slavery or human trafficking in its business and supply chains. BlueCrest expects its suppliers to have controls in place against the use of labour subject to slavery or human trafficking as reflected in their anti-slavery statements. BlueCrest will not knowingly deal with any organisation that is connected with slavery or human trafficking.

Approach

1. *Due Diligence*

To assess the possible extent of BlueCrest's exposure to the risk of slavery and human trafficking in its supply chain and therefore its business, BlueCrest conducted an annual review of its supply chain

during the financial year. The criteria used to evaluate suppliers are the types of services provided and the location from where services are provided.

BlueCrest's business as an investment manager operating in global liquid financial markets with skilled industry professionals is low risk from a slavery and human trafficking perspective, as it utilises a high level of technology and skilled labour.

BlueCrest has, however, identified that some parts of BlueCrest's supply chain could pose a greater potential risk of the use of enslaved labour/slavery and human trafficking. The suppliers of products and services that may pose a higher risk involve those employing unskilled staff, those that use sub-contractors of varying size and location, and staff involved in certain businesses including cleaning, catering, office and building maintenance, recycling and courier services ("Relevant Suppliers").

In response to such potential risk, due diligence is conducted on the higher risk Relevant Suppliers such as cleaning staff who provide a service located in the firm's office, who tend to originate from outside the United Kingdom and generally do not speak English as a first language. The firm requires anti-slavery statements from these suppliers. Where full time sub-contracted staff are employed on BlueCrest premises, the firm proactively reviews and approves pay rises on a periodic basis.

2. *Recruitment*

All direct staff of BlueCrest are subject to background checks to ensure they have the right to work and are appropriate applicants. Among other procedures, as part of the onboarding process, staff are required to provide verification of identity, references and are subject to criminal records and other checks.

3. *Background checks on Relevant Suppliers*

BlueCrest's background checks include checks on any Relevant Suppliers at onboarding to confirm whether they have been named in negative press associated with their business. The firm also contacts Relevant Suppliers who provide material services to BlueCrest in order to obtain their current slavery and human trafficking statement.

4. *Procurement*

BlueCrest reviews any potential Relevant Supplier at onboarding and requests information regarding relevant policies with respect to modern slavery and human trafficking.

5. *Education*

BlueCrest provides annual training for key stakeholders in BlueCrest's business about modern slavery including the firm's senior management, procurement, facilities, compliance, legal and human resources staff.

Statement Review and Approval

This Statement was **approved on 3 October 2022**, by the directors of BC Capital Management Services Limited and the board/designated members on behalf of the members of BlueCrest Capital Management (UK) LLP.