Modern Slavery Act 2015

Slavery and human trafficking statement for the Financial Year 2024 GAM (U.K.) Limited and its subsidiaries identified in Schedule 1

Introduction

This statement is issued by GAM (U.K.) Limited (the "**Company**"), a company incorporated under the laws of England and Wales and a member of the GAM Holding AG group ("**GAM**"), on behalf of itself and its UK subsidiary entities who are required to make a statement (as identified in Schedule 1) (together, the "**Relevant Entities**"), in compliance with section 54 of the Modern Slavery Act 2015 (the "**Act**"). This statement constitutes the Relevant Entities' modern slavery and human trafficking transparency statement for the financial year ended 31 December 2024 and sets out the Relevant Entities' approach to the prevention of slavery, servitude, forced or compulsory labour (together, "**Modern Slavery**") within the relevant organisation and its supply chains.

GAM's business

The GAM group is one of the world's leading independent asset management groups focused on active investing. GAM group entities manage investments for a wide range of clients, including institutions, wholesale intermediaries and financial advisers. GAM is headquartered in Switzerland and is listed on the SIX Swiss Exchange.

As the Company's trading subsidiary entities are regulated investment management entities, primarily operating in major financial centres, and given the nature of the services procured from suppliers, the Relevant Entities believe the risk of Modern Slavery arising within their businesses, or within the businesses of their suppliers, to be limited.

Supply chains

The Relevant Entities' supply chains include:

- third party distribution companies and platforms that enter into arrangements to distribute or promote GAM's proprietary investment funds and investment strategies;
- third party outsourcing and professional services companies that provide a range of professional services to the Relevant Entities, including IT services, legal advice, audit and payroll services;
- third party commercial real estate, cleaning, office equipment and supplies and services required to support staff in the Relevant Entities' offices; and

- third party providers of private healthcare, employee benefits and other associated services required to support the Relevant Entities' staff.

Policy on Slavery and Human Trafficking

The Relevant Entities are committed to ensuring that their supply chains are free of any slavery and/or human trafficking and will not knowingly support or do business with any supplier who is involved in such activities. The Relevant Entities expect their employees, contractors and suppliers to prevent acts of modern slavery and human trafficking from occurring within both their businesses and supply chains. The Relevant Entities have corporate policies in place under which employees are encouraged to report concerns of non-compliance with FCA rules or statutory obligations, including those under the Act, to the relevant Compliance or HR department. Any concerns raised in respect of the Act will be escalated to senior management for review and investigation.

Due diligence processes

In any procurement process appropriate due diligence is conducted to assess the extent of the Relevant Entities' exposure to the risk of slavery. This includes measures such as:

- incorporation of questions in procurement documents covering the service provider's or supplier's working practices; and
- placing a contractual obligation on the service provider or supplier to comply with all applicable laws which, where relevant, would include compliance with the Act.

The above measures are applied proportionately in accordance with the Relevant Entities' assessment of the level of risk associated with the particular supplier. Consideration is given to the nature of products or services and the locations from which those products are made, or services provided.

Training

All staff at Relevant Entities with responsibility for procurement from third party suppliers receive appropriate training on their obligations under the Act and how best to meet those obligations. Training is also made available to new joiners and, on a biannual basis, to all of GAM's staff globally. In addition, the Legal and Compliance Departments provide on-going advice and support to all staff, as required.

Approval procedure

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and was approved by the Relevant Entities' Boards of Directors as follows:

GAM (U.K.) Limited	18 February 2025
GAM International Management Limited	18 February 2025
GAM London Limited	18 February 2025
GAM Sterling Management Limited	27 February 2025
GAM Systematic Holding Limited	18 February 2025
GAM Systematic Services Limited	18 February 2025

Schedule 1

Subsidiary entities required to make a statement

GAM International Management Limited

GAM London Limited

GAM Sterling Management Limited

GAM Systematic Holding Limited

GAM Systematic Services Limited