

Modern Slavery Act 2015

Slavery and human trafficking statement for the Financial Year 2025 GAM (U.K.)

Limited and its subsidiaries identified in Schedule 1

Introduction

This statement is issued by GAM (U.K.) Limited, a company incorporated under the laws of England and Wales and a member of the GAM Holding AG group (“**GAM**”), and applies to its UK subsidiaries listed in Schedule 1. None of these subsidiaries individually meet the reporting thresholds under the Modern Slavery Act 2015 (the “**Act**”) but are included within the scope of this statement on a voluntary basis. (together, the “**Relevant Entities**”) This statement constitutes the Relevant Entities’ modern slavery and human trafficking transparency statement for the financial year ended 31 December 2025 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

GAM is an independent investment manager that is listed in Switzerland. It is an active, independent global asset manager that delivers distinctive and differentiated investment solutions for its clients across its Investment and Wealth Management Businesses. 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.

Whilst the Relevant Entities operate in sectors and jurisdictions generally assessed as lower risk, they recognise that modern slavery risks can arise in any sector and therefore apply a risk-based approach to identifying and managing such risks within their operations and supply chains.

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

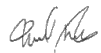
All staff at Relevant Entities with responsibility for procurement from third party suppliers receive appropriate training on their obligations under the Act and how best to meet those obligations. Training is also made available to new joiners and, on a biannual basis, to all of GAM's staff globally.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

Approval procedure

This statement is made by GAM (U.K.) Limited pursuant to section 54(1) of the Modern Slavery Act 2015 for the financial year ended 31 December 2025. It applies to GAM (U.K.) Limited and its UK subsidiaries listed in Schedule 1. None of those subsidiaries individually meets the reporting threshold under section

54 of the Act; however, they are included within the scope of this statement on a voluntary basis as part of the GAM group's approach to transparency and responsible business conduct. This approach reflects the GAM group's commitment to applying consistent standards across its UK operations, irrespective of individual reporting thresholds.

This statement was approved by the Board of Directors of GAM (U.K.) Limited on 1 June 2026 and is signed on its behalf by:



David Kemp
Director
GAM (U.K.) Limited

Schedule 1

Subsidiary entities covered by this statement (included on a voluntary basis)

GAM International Management Limited

GAM London Limited

GAM Sterling Management Limited

GAM Systematic Holding Limited

GAM Systematic Services Limited