



UK Modern Slavery Act Transparency Statement 2022

Los Angeles Capital Management LLC (the “**Company**”) is an investment adviser registered under the US Investment Advisers Act of 1940 with the US Securities and Exchange Commission¹ based in Los Angeles, California. The Company is a global equity firm engaged in managing assets for leading institutions around the world. The Company has a business presence in the UK through its wholly-owned subsidiary, LACM Global, Ltd. (the “**Subsidiary**”). The Subsidiary is registered as a UK incorporated private company and has an office in London. The Subsidiary is an entity established solely for marketing and promotional activities and does not currently undertake any investment management activities. The Subsidiary is authorised and regulated by the Financial Conduct Authority (“**FCA**”) and is subject to the requirements of the FCA’s rules.

The Company acknowledges the importance of compliance with the Modern Slavery Act 2015 (the “**MSA**”). Modern slavery, as referred to in the MSA, includes slavery, servitude and forced or compulsory labour, and human trafficking. The Company is committed to conducting its business with integrity and without modern slavery in either its business or its direct supply chain and to being transparent in its approach, consistent with the Company’s obligations under the MSA.

The direct supply chain to the Company is typical of companies in the financial sector and includes other regulated financial service providers, professional advisers, data providers, software providers, consultants and employees. The Company keeps these relationships under review, conducts regular KYC/regulatory authorisation checks (where relevant) and evaluates risks relating to modern slavery that may arise in relation to them.

The Company is committed to act ethically and with integrity in all of the Company’s business relationships. Furthermore, the Company has implemented systems and controls designed to identify slavery, servitude and forced or compulsory labour, and human trafficking sanctions that have occurred in the Company’s direct supply chain. If issues are identified in relation to modern slavery, these will be escalated to the Company’s Chief Compliance Officer. The Company also adopted a whistleblowing policy designed to protect employee that raises concerns about any risk, including relating to modern slavery.

Where it occurs in the world, modern slavery can also involve financial crime offences. The Company has several policies and procedures in place designed to prevent financial crime generally and specifically for the purpose of preventing and detecting money laundering, terrorist financing, breach of sanctions, fraud, bribery and corruption.

The Company believes that its overall modern slavery risk is very low. The business model of the Company means that it generally deals with persons that are: (i) regulated (either within the financial sector or other sectors); (ii) reputable and well-established; (iii) based in jurisdictions which have low risk of modern slavery; and/or (iv) are usually themselves either subject to anti-slavery legislation or are conducting business whose brand could be very adversely affected by the use of modern slavery and therefore could reasonably be expected to be alert to avoiding modern slavery. On occasions where it deals with persons that do not meet these criteria, the Company seeks to identify and respond to any associated modern slavery risks through the application of its systems and controls, escalating issues to the Chief Compliance Officer where necessary.

¹ Registration does not imply a certain level of skill or training.

In addition, the Company has recruitment procedures designed to help combat modern slavery through the use of reputable employment agencies to source employees and by undertaking background checks for the vetting of new employees. The Company believes its employment policies and procedures are fair, transparent and implement positive working practices for all employees. The Company aims to embed the principles of trust, honesty, objectivity, fairness and respect for others in all of its employees. All employees must read, understand and comply with the policies and procedures that are applicable to them. These are kept under review and enhancements are made where appropriate. Regular training is provided to all employees around the Company's values and conduct expectations.

The effectiveness of the steps taken to ensure there is no modern slavery in the business or direct supply chain is kept under periodic review by the Company's Compliance and Regulatory Risk Department. The Company will seek to continue to raise awareness and educate all employees about modern slavery and the importance of its eradication generally. The Company's Chief Compliance Officer reports at least annually to the Company's Board on the risk of modern slavery in its business or direct supply chain. Any instances of modern slavery identified with respect to the Company's direct supply chain will be reported to the Company's Board. All instances, suspicions or concerns raised will be treated as of very high importance and reviewed as quickly as possible. To date no such breaches or concerns have been identified.

This statement is made pursuant to section 54(1) of the MSA in respect of the financial year ended 31 December 2021 and has been approved by the Company's Board and signed on the Company's behalf by its CEO.

The Company will periodically review and, as appropriate, update this statement.

For and on behalf of
Los Angeles Capital Management LLC

/s/ Daniel Allen

Name: Daniel Allen

Position: CEO

Date: September 8, 2022