

MODERN SLAVERY ACT ANNUAL TRANSPARENCY STATEMENT

FOR YEAR ENDED DECEMBER 31, 2024

STATEMENT OF COMMITMENT

Polunin Capital Partners Limited ("Polunin"), is committed to managing its business responsibly, ethically and with due respect for human rights. We take steps to mitigate the risk of modern slavery and human trafficking within both our business and supply chains.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 of the United Kingdom ("Modern Slavery Act") and constitutes Polunin's slavery and human trafficking statement.

ORGANISATION AND SUPPLY CHAIN

Polunin was established in 2001 to provide emerging markets listed equity investment strategies for institutional investors. We employ 18 people at our offices in London, United Kingdom. We procure products and services from over 80 vendors globally. We outsource some functions to external service providers, which occasionally entails employees of our service providers working onsite at our London office. We engage professional services firms for legal, compliance and accountancy services among others, and we enter into contracts with financial services counterparties for brokerage services across a number of developed and developing countries. Like most service sector firms, we purchase a stationery, IT hardware and other office related products, and we engage external firms to clean and maintain our office infrastructure. We do not operate in sectors identified by the International Labour Organisation as high-risk for modern slavery, but we recognise that some of our suppliers may do.

GOVERNANCE AND POLICY

We are committed to acting ethically, with integrity and promoting a work environment that engenders conditions of freedom, equality, security and dignity. Our Code of Business Conduct and Code of Ethics clearly set out certain minimum expectations that Polunin has for all employees. Employees are expected to conduct the firm's business in full compliance with both the letter and the spirit of the law and any other policies and procedures that may be applicable to them. This includes the Modern Slavery Act.

Our governance framework and related corporate policies empower our employees and contractors to report and escalate any concerns of unethical conduct, whether relating to modern slavery, human trafficking or other matters. Our Code of Ethics and our Whistleblowing Policy empower our employees and contractors to report concerns in confidence and without fear of retaliation.

In 2019, the Financial Conduct Authority (FCA) introduced the new Senior Managers and Certification Regime (SMCR). This introduced new Conduct Rules for staff. The rules include a requirement to act with integrity; to act with due skill, care and diligence; and to observe proper standards of market conduct. Senior Managers are also subject to an additional set of Conduct Rules. All relevant staff at Polunin receive regular training on these Conduct Rules.

RISK ASSESSMENT

We consider the risk of slavery and human trafficking in our business to be very low, given the nature of our services and straightforward supply chains; we have therefore adopted a proportionate and risk-based due diligence approach to assess the risk of modern slavery and human trafficking in our supply chains. We have reviewed all our material suppliers for this purpose, considering such elements as geography of the supplier's services, the nature of the services provided (for example whether the services include physical labour, manufacturing or professional services such as legal or consultancy) as well as other relevant factors such as the regulatory status of the supplier. This has not raised any concerns.

TRAINING

We acknowledge that educating our staff is fundamental to ensuring potential human rights and modern slavery risks are identified and managed. Our current on-boarding and refresher training for both new and existing employees and contractors includes a Code of Ethics, with specific focus on:


- Conducting business in full compliance with all applicable laws and regulations, and in accordance with the highest ethical standards; and
- Being willing to take a stand to correct or prevent improper activity

As a financial services firm, we also provide financial crime training (including anti-money laundering, terrorist financing and anti-bribery) to all members of staff across the firm on a regular basis.

In addition, periodic training is provided to our procurement team designed to raise awareness of modern slavery and human trafficking, and on the role they can play in identifying, reporting, and managing these risks.

CONTINUING EFFORTS AND COMMITMENT

We will continue to carry out an annual review of material suppliers and new contractual clauses with material suppliers that are considered to present a higher risk for Modern Slavery Act purposes. By encouraging our staff to speak up if they have concerns about working conditions and by regularly monitoring our suppliers, we expect to be able to identify issues of modern slavery and human trafficking, should they occur. If we identify modern slavery risk factors within our supply chain, it is not our intention to simply end a relationship, rather we would aim to engage with the relevant stakeholder to try and resolve the issue. Any instance where modern slavery is identified or where reasonable suspicion of actual modern slavery is identified will be reported to the UK Government's modern slavery helpline. We are committed to engaging with our core suppliers to encourage full compliance with the Modern Slavery Act.



Douglas Polunin
Director, CEO

Polunin Capital Partners Limited, 23rd May 2025