

Slavery and Human Trafficking Statement

Introduction

This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 (the “Act”) and constitutes the slavery and human trafficking statement (“**Statement**”) for the financial year ending 31 December 2020 for Naya Capital Management UK Limited (“**Naya Capital**”).

Organisation Structure

Naya Capital is an investment management firm, authorised and regulated by the Financial Conduct Authority in the United Kingdom to provide investment management services to collective investment schemes and managed accounts (the “**Funds**”).

Naya Capital’s Policies on Modern Slavery

Naya Capital’s anti-slavery policy reflects its commitment to acting ethically and with integrity in all of its business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking practices are not taking place anywhere in its business or supply chains. Naya Capital will take appropriate and reasonable measures to minimise such risks, considering the nature of services with which it is being provided.

This Statement will be reviewed annually and updated where necessary to reflect changes in circumstances and actual practice.

Naya Capital’s Approach to Slavery and Human Trafficking

Naya Capital administers a suitable risk-based approach to minimise the risk of slave labour.

As a provider of investment management and advisory services, Naya Capital has a relatively simple supply chain – the key suppliers are providers of business support services (such as IT and professional services), investment research, equipment and office management. Naya Capital is nevertheless committed to preventing acts of modern slavery and human trafficking from occurring within both Naya Capital’s business and its supply chain.

Based on the above, the relative risk exposure to slavery, human trafficking and forced labour is low given the nature of the business undertaken, and the level of professional skills required in Naya Capital’s supply chain. Nevertheless, as a general principal, Naya Capital endeavours to deal only with suppliers who conduct their business in a lawful and ethical manner, including adopting business practices that prevent or eliminate modern slavery and human trafficking from taking place.

As part of Naya Capital’s initiative to identify and mitigate risk in connection with its business and/or supply chains (as applicable) Naya Capital endeavours to:

- identify and assess potential risk areas;
- mitigate the risk of slavery and human trafficking occurring in our business; and

- monitor potential risk areas.

Training and Monitoring

Relevant training is provided, as deemed appropriate, to Naya Capital's staff, to ensure an appropriate level of understanding of the risks of modern slavery and human trafficking.

Naya Capital is committed to reviewing its processes on an ongoing basis to ensure that there is no modern slavery in any aspect of its business.

This statement is made pursuant to section 54(1) of the Act and constitutes Naya Capital's slavery and human trafficking statement for the financial year ending 31 December 2020.