

PELHAM CAPITAL LTD

MODERN SLAVERY STATEMENT

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Introduction

Pelham Capital Ltd ("Pelham") has made the following statement on modern slavery and human trafficking pursuant to section 54 of the UK Modern Slavery Act 2015 (the "Act").

The Act sets out a range of measures on how modern slavery and human trafficking should be dealt with in the UK to combat modern slavery from occurring in business supply chains and organisations.

Business and Organisation Structure

Pelham Capital Ltd is an investment manager which is authorised and regulated by the UK Financial Conduct Authority ("FCA") to undertake investment management activities on behalf of its clients, which are a range of collective investment schemes classified as Alternative Investment Funds (AIFs) under the EU Alternative Investment Fund Managers Directive ("AIFMD").

Our policy

Pelham firmly believes in operating its business in an ethical manner and with high standards of integrity as expected of an FCA regulated entity. We are opposed to the use of any supply chains and services which may involve slavery, human trafficking or forced labour. To the best of our knowledge we believe this is not the case, but in the unlikely event that anything of this nature is identified then we reserve the right to take the necessary action, which includes a duty to notify the UK Home Office and termination of the relevant contract.

Supply Chain Review and Due diligence

Pelham does not deal in manufactured items, hard goods, and it does not have offices in any developing countries, nor does it purchase any goods from developing countries.

Our review has concluded that the services we provide and the supply chains which are used by Pelham are highly unlikely to involve any human trafficking or slavery.

As entities involved in investment management Pelham only has a limited supply chain, and this involves the use of reputable service providers.

Risk Assessment

From Pelham's review of its existing supply chain and service providers we believe the perceived level of risk is low.

Controls and Review Process

Pelham uses only reputable service providers and suppliers. As part of its on-boarding process we will review any supplier and request information on their hiring process and working practices. We will also confirm with the potential supplier our strict prohibition on the use of any supply chains and

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services which may involve slavery, human trafficking or forced labour. Pelham will undertake periodic reviews of its suppliers where it appears there is a potential risk involving a service provider.

This statement will be reviewed annually and where necessary this will be updated to reflect any changes in our practices regarding the use of supply chains and services that could be impacted.

Staff Awareness

All Pelham staff are aware of our policy especially those who are specifically involved in the on-boarding of any suppliers. If there are any concerns then these may be reported to senior management at Pelham.

Approval

This statement has been approved by the Pelham Governance & Risk Committee on 11 December 2018.

Signature:



Name: Hadyn Cunningham

Title: Chief Executive Officer

Date: 19 December 2018