



Modern Slavery and Human Trafficking Policy (“the Policy”)

General Philosophy

The aim of this document is to outline Corran Capital’s policy on the prevention of modern slavery and human trafficking in its business operations and supply chain including steps employees must take to report a breach.

Aim and Scope

The Policy explains Corran Capital’s global approach to the prevention of modern slavery and human trafficking in its business operations and supply chain. The Policy applies to all employees at all levels, partners, and officers of Corran Capital and to temporary workers, consultants, contractors, agents and subsidiaries acting for, or on behalf of, Corran Capital within the UK and overseas (“associated persons”).

The Policy does not form part of any employee's contract of employment and we may amend it at any time.

The Policy Framework

Modern Slavery Legislation

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, child, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Corran Capital does not accept any form of modern slavery or human trafficking and works actively against it. Corran Capital is committed to acting ethically and with integrity in all business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of its supply chains.

Corran Capital is also committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery throughout our supply chains, consistent with disclosure obligations under modern slavery legislation. The same high standards are expected from all of our contractors, suppliers and other business partners, and as part of contracting processes and our supplier code of conduct, we include specific prohibitions against the use of forced, child, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and expect that suppliers will hold their own suppliers to the same high standards.

Responsibility for the Policy

The Compliance Officer has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.



The Compliance Officer has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

Compliance with the Policy

All employees must ensure that they read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for Corran Capital or under its control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Employees must notify their line manager and the Compliance Officer as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future.

Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of the business or supply chains of any supplier tier at the earliest possible stage.

If an employee believes or suspects a breach of this policy has occurred or that it may occur, they must notify the Compliance Officer as soon as possible.

If an employee is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, they must raise it with their line manager or the Compliance Officer as soon as possible.

Corran Capital aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. Corran Capital is committed to ensuring no one suffers any detrimental treatment as a result of reporting their suspicion in good faith that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If anyone believes that they have suffered any such treatment, they should inform the Compliance Officer immediately.

Communication and awareness of this policy

Training on the Policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for Corran Capital, and regular training will be provided as necessary.

The commitment of Corran Capital to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.



Breaches of the Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

Corran Capital may terminate relationships with other individuals and organisations working on its behalf if they breach the Policy.