

## **Modern Slavery and Human Trafficking Statement 2019**

### **Introduction**

This statement is made by Quoniam Asset Management GmbH ("Quoniam" or "we") pursuant to section 54 of the Modern Slavery Act 2015 acting through its UK branch and constitutes our Slavery and Human Trafficking Statement for the financial year ended 31 December 2019.

Quoniam is committed to taking steps to ensure that human rights abuses in any way are recognised and eradicated in our business and supply chains.

### **Our Business**

Quoniam is a financial services institution in compliance with the German Banking Act and is registered with and supervised by the Federal Financial Supervisory Authority (BaFin) in Germany. In the United Kingdom our activities are subject to limited regulation by the Financial Conduct Authority (FCA). As of 31<sup>st</sup> December 2019, we had 31 billion € assets under management and employed 127 people in Germany and the UK.

We are providing quantitative asset management services to institutional clients. In the UK, we run a branch offering dedicated sales and client services to international institutional clients.

As a partner-led company with more than 20 years of expertise, we aim to be an international driving force for active quantitative asset management, achieving reliable and sustainable results for investors. We are passionate about generating added value for our clients whilst at the same time contributing positively to society. The innovative solutions we offer are based on our scientific approach, technological expertise and experience in active quantitative asset management worldwide. Our success is driven by the passion and dedication of our employees. We invest in their development and promote the curiosity and contribution of every staff member – the foundation of innovation. To strengthen the existing entrepreneurial spirit, all employees are given the opportunity to participate voluntarily in Quoniam's business performance.

We believe that the risk of modern slavery within our business and supply chains is relatively low as we are operating in the financial service sector, employ predominantly high-skilled people and engage suppliers mainly for data delivery, software and hardware products and office supplies. Despite the perceived low risk we have implemented several measures to manage the remaining risks carefully.

### **Policies and Commitment**

We are aware of our responsibility towards society, our clients and all employees. We believe that good ethics and integrity are a fundamental requirement of the investment profession. For this reason, we have documented our core values in our mission: passion, entrepreneurial spirit, technological excellence, reliability and responsibility.

We live and respect these values in our dealing with investors, clients, business partners and society at large; and do not tolerate any act of discrimination, harassment or victimisation.

Quoniam has established procedural controls for its conduct of business and developed a formalized set of policies and procedures that describe the appropriate methodology for operations in all lines of business. Such policies and procedures ensure compliance with all applicable laws, regulations and industry standards. We are reviewing our policies to include, where appropriate, commitments addressing slavery and human trafficking considerations in our business activities, supply chains and investment decisions.

Quoniam has an established whistleblowing policy in place and fosters an open compliance culture. We encourage our employees, clients and business partners to report any concerns.

### **Investment Process**

Environmental, social and governance considerations are an integral part of our investment process. When allocated appropriately money can be a force for good. Against this background, Quoniam has decided to develop a sustainability approach. In the first step Quoniam screens the investment universe based on six principles, including human rights. If mandated, we additionally integrate environmental, social and governance criteria into our investment decision process. We are a signatory of the Principles for Responsible Investment that are supported by the United Nations.

Please refer to our Responsible Investment Policy for further information.

### **Supplier Due Diligence**

We expect our suppliers to uphold the same ethical values as we do. Therefore, we perform a supplier due diligence and collect information regarding compliance with sustainability standards (e.g. duty to pay the statutory minimum wage). Supplier due diligence is performed by Governance & Business Advisory Team within the scope of contract negotiations and contract review. In addition, we have a dedicated Money Laundering and Reporting Officer and Compliance Officer whom both remain alert to the risk of Financial Crime and the risk of Modern Slavery.

In case of non-compliance, we will take any appropriate measure, including rejection or termination of any contract with such supplier.

### **Training and Awareness:**

Quoniam will use its internal communication vehicles to raise awareness of modern slavery and human trafficking risks.

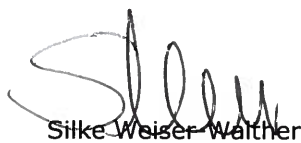
### **Approval Procedures**

This statement has been approved by our Management Board on 27 July 2020.



Nikolaus Silem

CEO



Silke Weiser-Walther

CCO & CFO