

SLAVERY AND HUMAN TRAFFICKING ANNUAL STATEMENT

June 2022

Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the "Act") and constitutes the Company's (as defined below) slavery and human trafficking statement for the financial year ending December 31, 2022 (the "Relevant Term"). This statement was approved by the Board on June 15, 2022. It will be reviewed (and where necessary, updated) on an annual basis.

EnTrust Global Ltd. (the "Company" or "we"), is a private company limited by shares incorporated in England and Wales. For the Relevant Term, the Company oversaw its affiliates or branches in Australia, Dubai, Hong Kong, Beijing, Korea and Singapore. The Company is engaged exclusively in the business of investment management and distribution.

Under section 54 of the Act, commercial organisations that supply goods or services, carry on business in the United Kingdom and meet the annual turnover threshold of at least £36m from the provision of goods and services must publish an annual slavery and human trafficking statement. Modern slavery takes various forms, such as slavery, servitude, human trafficking, as well as forced and compulsory labour, 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. It is a crime and a violation of fundamental human rights.

Our Business

We are an alternative investment management and advisory business. The Company considers, given the nature of the services that we offer, that the risk of involvement in modern slavery and human trafficking is low. Our workforce consists almost entirely of skilled professional employees. However, we have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems to ensure that modern slavery and human trafficking are not taking place anywhere in our own business or supply chain. This commitment is a focus area in dealing with all suppliers, contractors, business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

The Company has a robust recruitment and onboarding process with multiple checks built in to ensure all individuals employed by the

Company have the right to work in the United Kingdom, are paid a fair salary in compliance with all relevant rules and regulations, and are not subjected to human trafficking or forced labour.

We maintain a reputation for conducting our business activities in the highest ethical and professional manner. All employees are expected to comply with EnTrust Global's Code of Conduct which sets out basic principles designed to guide our employees, officers and directors. All employees, officers, and directors must conduct themselves in accordance with this Code and seek to avoid even the appearance of improper behaviour.

Our commitment to creating and sustaining a diverse workforce is absolute and sustaining a work environment where our people feel comfortable bringing their full selves to work and are empowered to reach their full potential is a priority. We emphasise fair treatment of people, as demonstrated by our anti-discrimination and conduct-related policies. Relevant policies are reinforced through regular diversity and inclusion training.

Our Due Diligence and Risk Mitigation Processes

We also believe that the risk of modern slavery at our vendors and suppliers is minimal. Given the nature of our business, we do not sell physical goods for which components or raw materials are sourced. We pride ourselves on our reputation for conducting our business activities in the highest ethical and professional manner and we expect our suppliers to adhere to these same standards and principles. The Company's supply chain includes the following types of third-party suppliers (many of which are also independently subject to the provisions of the Act):

- banks, broker-dealers and other third parties that distribute investment funds managed by the Company and its affiliates;
- audit, compliance, law and accounting firms that provide professional services for the Company;
- investment managers and advisors that provide investment management and advisory services for the institutional and high net worth individual clients for whom the Company provides separately managed accounts;
- commercial real estate, cleaning, office supply and related service providers required to support the day-to-day operations of the Company and its subsidiaries; and
- payroll providers, pension fund managers and providers, private healthcare and dental care providers, employee benefits providers and other associated service providers.

To a lesser extent, we utilise other services such as food, cleaning services, and purchase off-the-shelf goods such as technology

equipment, and stationery. Given the limited nature of our business relationships with these vendors, we believe that the risk of modern slavery at these vendors is low and we note that we do not have the practical ability to assess each of their employment practices or supply chains.

As part of its initiative to identify and reduce the risk of slavery and human trafficking occurring within our supply chain, the Company:

- ensures that all legal obligations are complied with in the recruitment and on-boarding process;
- recruits, promotes and develops its people on the grounds of merit and capability alone;
- conducts due diligence to assess the risk of slavery or human trafficking, and monitors potential risk areas in our supply chains; and
- ensures that whistle-blowers, if any, are protected.

The Company uses the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- where possible it has built, and intends to continue to build, long standing relationships with its third-party service providers and suppliers;
- places obligations on its suppliers and service providers to comply with all applicable laws which, where relevant, would include compliance with the Act;
- has analysed a sample set of suppliers to validate their adherence to the Act by reviewing their website declarations;
- in light of Covid-19, has implemented relevant policies in the supply chain, including social distancing measures and paying statutory sick pay, where applicable;
- has appointed an anti-slavery officer to help coordinate activities and increase awareness;
- our recruitment, employment and internal policies remain in full compliance with all applicable laws and regulations;
- will continue to build capability so that our employees understand what steps should be taken to prevent modern slavery in our supply chains; and
- we reserve the right to audit any of our suppliers and, as appropriate, will require them to take specific measures to ensure that the risk of slavery is significantly reduced. We expect our suppliers to engage constructively and responsibly, and to remedy any issues in a timely manner. In the event of a failure to resolve the situation rapidly and satisfactorily, we will terminate the contract.

We continue to look for ways to improve on the above actions to ensure that robust, effective, proportionate and focused processes are in place to identify and rapidly address the risks of slavery wherever they occur in or business or supply chains.



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Director

Date: 15 June 2022