

## **IAM Invest Limited - Modern Slavery and Human Trafficking Statement**

Slavery and human trafficking are abuses of human rights, and IAM Invest Limited (“IAM” or the “Company”) is committed to combatting slavery in all forms. This statement is made by IAM in accordance with the requirements of section 54 of the U.K. Modern Slavery Act 2015 (the “Act”) and sets out the steps IAM has taken during the financial year ending 31 December 2020 to aim to ensure that slavery and human trafficking do not take place in any part of our business or our supply chains.

### **About IAM Invest Limited**

IAM Invest Limited is a private limited company registered in England & Wales (company no: 04007950) which is a subsidiary of IAM Capital Group PLC. IAM Invest Limited, the FCA regulated subsidiary, is the investment manager of Integrated Investments SICAV-SIF, a Luxembourg specialised investment fund and a newly launched IAM Capital Fund S.C.A. SICAV -RAIF, a Luxembourg reserved alternative investment fund. Integrated Investments SICAV-SIF, an EU regulated alternative investment fund (the “AIF”) subject to strict risk management and administrative oversight, has been the lead investor in many of the group’s investments. IAM caters to a select range of investors including financial institutions, family offices, and other qualified investors. IAM enables investors to participate in selected opportunities through this regulated investment vehicle. IAM is committed to being a purpose-led organisation that exists to ‘create better outcomes’ for all our stakeholders:

- Our people – by providing an environment in which they can thrive and develop.
- Suppliers and partners – by treating them fairly and encouraging them to deliver.
- Investors – by delivering attractive returns.
- Society – by acting as a responsible business for the communities we serve.

### **Policies and Procedures**

IAM has several policies in place that aim to ensure ethical conduct and fair and equitable treatment takes place within its business. IAM strives to provide a safe environment and ensure the safety and wellbeing of all our workers. IAM ensures appropriate procedures are in place to prevent any breaches to international human rights standards, including the United Nations’ Universal Declaration of Human Rights (the “UDHR”), the International Labour Organisation (the “ILO”) core conventions on Labour Rights, and the Act.

### **The Conduct Rules**

As a Financial Conduct Authority (“FCA”) regulated investment Firm, IAM Invest Limited and its employees are subject to the FCA’s Senior Manager’s and Certification Regime (“SMCR”). As part of SMCR, the Firm and its employees are obliged to follow the “Conduct Rules”, these are;

1. You must act with integrity
2. You must act with due care, skill, and diligence
3. You must be open and co-operative with the FCA, the PRA and other regulators
4. You must pay due regard to the interests of customers and treat them fairly
5. You must observe proper standards of market conduct

The Conduct rules apply to the Firm and its employees not just during the course of its regulated activity but at all times. IAM Invest Limited mandates that its staff abide by the Conduct rules at all time, inclusive of and not limited to their activities in the hiring of staff and on-going management of personnel.

### **Equal Opportunity Policy**

IAM is committed to the principles of equality of opportunity for all its employees. IAM aim's to ensure that all applicants and employees receive equal treatment regardless of sex, gender, age, race, disability, marital status, religion, creed, colour, sexual orientation, gender identity or expression, citizenship status, national origin, veteran status, pregnancy, or any other classification protected by law. All employment decisions will be made in a non-discriminatory manner.

### **Dignity at Work**

IAM is committed to providing a safe working environment free of harassment and bullying in which all individuals are treated with respect and dignity. Employees and contractors have the right to enjoy a workplace that is conducive to high performance, promotes equal opportunity, and prohibits bullying and harassment. IAM will not tolerate bullying, harassment or other types of inappropriate behaviour directed by or toward any individual including, supervisor/manager, contractor, vendor, customer, visitor, director, or other business partner. All allegations of bullying and harassment will be investigated and, if appropriate, disciplinary action will be taken. IAM will also not tolerate victimisation of a person for making allegations of bullying or harassment in good faith or supporting someone to make such a complaint.

### **Anti-Bribery and Corruption**

In accordance with the UK Bribery Act 2010 (the "Act"), IAM reminds its staff and contractors that it is illegal to give, receive, facilitate or encourage others to pay or receive bribes for and on behalf of IAM. IAM strictly enforces compliance with this legislation through an established Anti-Bribery Policy (see the Compliance Manual), a Gifts & Entertainment Policy, MIFID II Inducements Policy as well as ongoing staff training on bribery and corruption.

### **Whistleblowing**

IAM operates an open, transparent, and comprehensive whistleblowing policy whereby any individual involved in IAM's business can anonymously raise concerns about any practices that they may have concern. These matters could not only be criminal but policy breaches, concerns pertaining to business practice or any other issue of concerns. IAM has laid out a formal Whistleblowing Policy in its Compliance Manual provided to all staff and contractors of IAM. Once a report has been made, IAM will endeavour to deal with any concerns raised under this procedure quickly and efficiently. IAM will need to make preliminary enquiries to decide whether a full investigation is necessary. If such an investigation is deemed necessary then, depending on the nature of the misconduct, the initial concerns will be either:

- Investigated internally (by senior management); or

- Referred to the appropriate external person (for example, the Firm's external auditors, the FCA or the police) for investigation.

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**Signature**

**Emanuel Arbib**

**Chief Executive Officer**

**Date: 18/11/2020**