



CCM(UK)LLP Modern slavery & Human Trafficking statement

Introduction

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Cheyne Capital Management (UK) LLP and our affiliated UK entities have taken and are continuing to take to ensure that modern slavery or human trafficking are not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Cheyne Capital has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

Cheyne Capital is a diversified Alternative Investment Manager, managing a number of investment funds and vehicles. We do not deal in any hard goods or manufactured items, and have no offices in, nor purchase any goods from, any developing countries.

Our high risk areas

We do not believe we have any high risk areas in relation to slavery, servitude, human trafficking or forced labour.

Our policies

We operate a number of internal policies and procedures to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment process. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

Our suppliers

Cheyne does not have a traditional manufacturing supply chain. We do not purchase goods produced in developing countries for on-sale or integration into our products. Cheyne oversees the provision of financial services to support the investment funds and vehicles it manages. Predominately this includes the supply of fund administration services, trading and execution services and asset custody services. We also work with suppliers who support our office facilities. To ensure compliance with our zero tolerance policy of all those in our supply chain we undertake regular monitoring that consists of:

1. Seeking evidence that suppliers have appropriate anti-slavery policies and procedures in place.
2. Identifying those suppliers who provide some services in locations other than developed countries.
3. Certification from relevant suppliers that they have undertaken staff training on the risks of modern slavery and human trafficking.

We may terminate any contract at any time should any instances of modern slavery come to light.

Training

We provide training to our staff so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our firm or supply chain.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, suppliers, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Approval for this statement

This statement for the financial year ending 2017 was approved by the Executive Committee on 26 September 2017.



Jonathan Lourie
CEO, Cheyne Capital Management (UK) LLP

Date: 26 September 2017