

MODERN SLAVERY STATEMENT

This statement is made on behalf of Aquatic Group LLC and its affiliates (including Aquatic Capital Management LLC and Aquatic Capital UK LLP) (together "Aquatic") pursuant to Section 54(1) of the Modern Slavery Act 2015 in respect of the financial year ended 31 December 2023.

Aquatic is committed to preventing acts of modern slavery and human trafficking from occurring within Aquatic's business and supply chain. This statement supports Aquatic's commitment to comply with both the spirit and the letter of the Modern Slavery Act 2015.

Our business

Aquatic is a quantitative trading and investment manager that provides services in the financial sector. Aquatic manages systematic investment strategies, combining a high-performance research and development platform with disciplined risk management.

Aquatic is part of a global group of companies headquartered in Chicago, IL, USA with additional offices in New York, NY, USA and London, UK.

Our supply chain

Aquatic does not tolerate modern slavery or human trafficking within its business and takes a risk-based approach to its supply chains.

As Aquatic's business is regulated and does not have complex supply chains, Aquatic considers that there is a low risk of modern slavery and human trafficking occurring. As an investment management firm, Aquatic's limited supply chain is predominantly made up of business and professional service organizations or providers. Nevertheless, Aquatic looks to earn and maintain trust by adhering to the highest standards of ethical behavior.

Our due diligence processes

Aquatic carefully evaluates and vets suppliers based on their market reputation prior to engaging them. This process ensures that any potential risks are identified and assessed at an early stage and ensures that Aquatic's business and suppliers meet the highest standards of ethical business conduct.

Our policies on slavery and human trafficking

Aquatic has various policies and procedures in place to ensure adherence to applicable laws and regulations, including in relation to recruitment and employment, whistle blowing, discrimination and harassment, bribery and corruption, money laundering and escalation of issues. Appropriate due diligence is also undertaken when onboarding vendors and suppliers with an expectation that all providers adhere to relevant laws. These policies and procedures are periodically reviewed to ensure they remain effective, and training is periodically provided to staff ensuring awareness.

Recruitment

Aquatic values diverse backgrounds and the business is rooted in collaboration, meritocracy, ambition, and steady determination. As an equal opportunities employer, we maintain a robust recruitment and onboarding process that includes pre-employment screening and right to work checks. Aquatic ensures staff are paid a fair salary and not subject to human trafficking or forced labor.



Training

Aquatic staff are held to high standards and principles of ethical conduct. They are expected to speak up in relation to compliance with the law, business practices and on any ethical issues. As necessary, Aquatic will assess its specific training requirements in relation to modern slavery.

This statement was approved by the Members of Aquatic Capital UK LLP and the relevant Board of Directors / Members of the other affiliated entities.