

Devon Equity Management Limited
FRN: 841960
Anti-Slavery and Human Trafficking Statement
15 November 2019

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, 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. Devon Equity Management Limited ("Devon") is committed to acting ethically and with integrity in its business dealings and commercial relationships and to implementing and enforcing effective systems and controls to help to ensure that modern slavery is not taking place within its business or supply chains.

Devon's services are provided exclusively from offices in London. Devon's directors, officers and employees are subject to a Code of Ethics which sets out high ethical standards for business conduct. Annual training is provided on the importance of ethical conduct. Devon's primary suppliers include custodians, fund administrators, IT service providers and professional services firms. Devon has considered its risk profile and that of its primary suppliers.

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and has been approved on behalf of the governing bodies of Devon.

Richard Pavry
Chief Executive Officer