

MODERN SLAVERY TRANSPARENCY STATEMENT

For financial year ending 31 December 2022

This statement has been published in accordance with the Modern Slavery Act 2015 (the “Act”), which requires organisations in the UK with an annual global turnover in excess of £36 million to publish an annual statement setting out the measures taken to prevent modern slavery and human trafficking in the organisation and its supply chains.

It sets out Marble Bar’s actions to understand all potential modern slavery risks related to its business, and to put in place steps that are aimed at ensuring there is no slavery or human trafficking in its own business and supply chains.

Modern slavery is a crime and can take various forms. The use of the term “modern slavery” in this statement includes slavery, servitude, any type of forced or compulsory labour and human trafficking, as defined in the Act. Our organisation is committed to preventing slavery and human trafficking in its corporate activities, and ensuring its supply chains are also free from slavery and human trafficking.

Our Business

Marble Bar is a UK based investment manager that specialises in equity oriented, absolute return strategies. We champion the collaboration between human and machine, in pursuit of consistent alpha generation for our clients.

As at 31 December 2022 we managed USD2.2bn in assets under management and had 50 employees, the majority of whom work from our London office.

The nature of our business is investment management. Our supply chains are relatively simplistic and we do not have multiple layers of contracting and sub-contracting. We also do not operate in or partner with organisations based in global locations where labour laws do not exist or are not enforced, resulting in lack of protection for workers. We therefore believe there is little risk of slavery or human trafficking occurring either within our business or within our supply chains.

Steps Taken to Mitigate Against the Risk of Modern Slavery and Human Trafficking

We have policies and procedures in place to help ensure that employees and contractors maintain the highest standards of ethical behaviour. These are reviewed regularly and include policies on Whistleblowing, Training & Competence and Anti Bribery, along with our Code of Ethics and Compliance Manual.

We have a staff handbook which sets out expectations around responsible and ethical conduct, and which contains our equal opportunities policy along with grievance procedures. We also have rigorous right to work and background screening processes in place for all those who are hired to work for us.

Individual contracts set out information governing the employment relationship between Marble Bar and its employees, such as pay (with all employees being paid above London Living Wage), hours of work, and termination rights so that all employees are fully aware of their employment rights.

All new joiners are required to complete “Working with Respect” training when they join Marble Bar, and will undergo a mandatory Compliance induction. It is also a requirement for all Marble Bar employees to attend annual Compliance training.

Governance and Oversight

This statement has been approved by the Audit & Risk Committee and will be reviewed and updated on an annual basis. It will be published on our website.

Date Approved: 9 November 2023

Signed: *Michael DiIorio*

Mike DiIorio, CEO – Marble Bar