

Polygon¹: Modern Slavery Statement

This statement comprises the modern slavery statement of Polygon for the financial year 2018 in compliance with the Modern Slavery Act 2015 (“Act”).

Modern slavery is a crime and a violation of fundamental human rights. References to modern slavery in this statement mean 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.

Polygon supports the aims of the Act. We are committed to acting ethically and with integrity in all our business dealings and relationships; and to implementing and enforcing effective systems and controls designed to ensure modern slavery is not taking place anywhere in our business or our supply chain.

Polygon is a global investment firm with a goal of creation of investment alpha based on a disciplined, repeatable, research-driven process. It manages open-ended hedge fund and private equity vehicles across a number of strategies.

Polygon conducts its business in ways which help enable it to prevent modern slavery. These include:

- compliance with anti-bribery laws;
- compliance with anti-money laundering legislation;
- systems and controls for the prevention of financial crime;
- our whistleblowing policy;
- our code of conduct; and
- training on our policies and procedures, particularly anti-bribery, anti-money laundering, the prevention of financial crime and the prevention of modern slavery.

Polygon checks the sources of the funds it manages and the clients it takes on in order that Polygon is not used to launder the proceeds of criminal activity, which includes that obtained through modern slavery. Additionally, Polygon encourages its staff to report any malpractice at the earliest possible stage.

Polygon’s supply chain is limited as we do not produce, manufacture or retail any physical goods and therefore have no supply chain related to such activities. Polygon operates

¹ Polygon includes Tetragon Financial Group Limited and its subsidiaries, including Polygon Global Management Limited, TFG UK RE Ltd, and Polygon Global Partners LLP. Polygon Global Partners LLP is authorised and regulated by the UK Financial Conduct Authority.



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predominantly in the UK where the risk of modern slavery in its business and supply chain is considered low in the Global Slavery Index.

By publishing this anti-slavery statement on our website, we are demonstrating that Polygon has a zero tolerance policy to modern slavery. We expect all with whom we do business to comply with our values and ethics.

We remain committed to minimising the risk of modern slavery and human trafficking in our business and supply chain.

This statement has been approved by Tetragon Financial Management's Executive Committee.

Patrick Dear

Head, Tetragon Financial Management's Executive Committee

May 2019