



Modern Slavery Act Statement

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (the “Act”) and constitutes the slavery and trafficking statement for Elan Capital Management LLP (the “LLP” or “Elan”) and Elan Capital Management (Technologies) Limited (the “Ltd”) (together, the “Elan Group”) for the last financial year ending 31 March.

OVERVIEW

The Elan Group recognises the importance of ensuring that our business is conducted in a responsible way. We welcome the Modern Slavery Act and the transparency it encourages and take a zero-tolerance approach to modern slavery occurring in our business or supply chains.

BUSINESS STRUCTURE

Elan provides investment management services to an alternative investment fund which pursues investment strategies that involve investing in a wide range of securities and instruments in various jurisdictions. The LLP is an investment manager of Elan Master Fund Ltd. (the “Fund”). The Ltd is a wholly owned subsidiary of the LLP.

SUPPLY CHAINS AND DUE DILIGENCE

As a predominantly office-based business, our supply chains are relatively simple and include stationery, cleaning, refurbishment and maintenance suppliers. All service providers are required to provide their own modern slavery statement when being onboarded as a provider.

The Elan Group employs a highly skilled workforce and carries out due diligence on all its service providers and counterparties in regard to modern slavery and human trafficking. The Elan Group does not accept any modern slavery in its supply chain nor in its business. We consider our risk of exposure to modern slavery to be low, but we are nonetheless committed to adopting appropriate measures to assess exposure at onboarding of service providers and counterparties and continuing to assess these on an annual basis.

POLICIES AND PROCEDURES

The Elan Group has several internal policies designed to address our commitment in related areas. These include the following:

- Employee Handbook (the “Employee Handbook”), which includes information on the standards expected of all of our employees, including the Elan Group’s commitment to oppose modern slavery

- Anti-Bribery Policy, which outlines our zero-tolerance approach to bribery and corruption in our business activities and provides information for staff on preventing instances from occurring
- Equal Opportunities Policy, which re-iterates our commitment to fairness and tackling any instances of discrimination, harassment and victimisation
- Speak Up Policy, which allows our employees to safely and confidentially raise questions or issues of concern, which would include any issues relating to modern slavery.

TRAINING

The Elan Group conducts internal training to all staff on modern slavery both when the staff initially join the Elan Group and annually as part of the annual compliance training.

IMPLEMENTATION

Our Compliance Committee shall take responsibility for implementing the objectives considered in this statement.

The Compliance Officer will monitor progress of our efforts in this area and issues (should they arise) and report back to our Chief Compliance Officer directly.

MONITORING AND REPORTING

If issues are identified in relation to modern slavery, these must be immediately reported to Duncan Tiplady.

More general issues in relation to the running of this policy will be reported back to the Compliance Committee on a quarterly basis.

This statement will be reviewed annually and published on our website.

Approved on 21 March 2023 by the Partners of the LLP.

Approved on 21 March 2023 by the Directors of the Ltd.

Signed: _____

Duncan Tiplady

Managing Partner & COO of the LLP

Director of the Ltd