

## **BlueCrest Capital Management (UK) LLP**

### **Modern Slavery Act 2015 Slavery and Human Trafficking Statement**

The Modern Slavery Act 2015 (the “Act”) addresses the role of businesses in preventing modern slavery in their supply chains and organisations. To comply with the Act, BlueCrest Capital Management (UK) LLP (“BCMUKLLP”) and its affiliate BC Capital Management Services Limited (“BCMSL”) must publish a slavery and human trafficking statement (the “Statement”) for each financial year. This is the Statement relating to the financial year ended 31 December 2016 for each of BCMUKLLP and BCMSL.

### **Organisational Structure**

BCMUKLLP and BCMSL (referred to together as “BlueCrest” for the purposes of this Statement) are part of a group of related entities that is involved in the business of investment management. BCMUKLLP is an investment firm authorised and regulated by the Financial Conduct Authority. BCMUKLLP’s UK affiliate (and designated member) BCMSL provides services to BCMUKLLP.

As part of a group engaged in the business of investment management, BlueCrest considers that the risk of its connection with modern slavery or human trafficking is relatively low, while acknowledging that risks can be present in all businesses. BlueCrest has no tolerance for any involvement of BlueCrest or its supply chain having any connection with modern slavery or human trafficking.

### **Modern Slavery Policy**

BlueCrest is committed to help combat slavery and human trafficking. BCMUKLLP has during 2016 introduced a policy which seeks to ensure that BlueCrest’s own business and its supply chains are free from slavery and human trafficking. BCMUKLLP will continue to implement systems and controls to minimise, as far as possible, the risk of slavery or human trafficking in its business and supply chains. BCMUKLLP expects its suppliers to have controls in place against the use of labour subject to slavery or human trafficking as reflected in their anti-slavery statements. BCMUKLLP will not knowingly deal with any organisation that is connected with slavery or human trafficking.

### **Approach**

#### *1. Due Diligence*

To assess the possible extent of BlueCrest’s exposure to the risk of slavery and human trafficking in its supply chain and therefore its business, BCMUKLLP has during 2017 conducted a review of BlueCrest’s supply chain. The criteria used to evaluate suppliers included the types of services provided and the location from where services are provided.

BCMUKLLP’s business as an investment manager operating in global liquid markets with industry professionals is a low risk industry from a slavery and human trafficking perspective, utilising a high level of technology and skilled labour.

However BCMUKLLP identified that some parts of BlueCrest's supply chain could pose a greater potential risk, i.e. third party suppliers of products and services involving staff engaged in, for example, cleaning, catering, maintenance and courier services ("Relevant Suppliers").

## *2. Recruitment*

All direct staff of BlueCrest are subject to background checks to ensure they have the right to work in the relevant jurisdiction and are appropriate applicants. Among other procedures, as part of the onboarding process, staff are required to provide verification of identity, references and are subject to criminal records and other checks.

## *3. Background checks on Relevant Suppliers*

BCMUKLLP has during 2016 carried out checks on any Relevant Suppliers to confirm whether they have been named on any watch lists or have material relevant negative press associated with their business. We also contacted Relevant Suppliers who provide material services to BlueCrest in order to explain our expectations of compliance with the Act and seek confirmation that they comply with the Act, including requesting copies of Relevant Suppliers' slavery and human trafficking statements where relevant.

## *4. Procurement*

BCMUKLLP reviews any potential Relevant Supplier and requests information regarding relevant policies with respect to modern slavery and human trafficking.

## *5. Education*

BCMUKLLP will educate key stakeholders in BlueCrest's business about modern slavery including senior management and procurement, facilities, and human resources staff.

## **Statement Review and Approval**

This Statement was approved on 10 November 2017 by the directors of BC Capital Management Services Limited, both in its own capacity and in its capacity as designated member on behalf of the members of BlueCrest Capital Management (UK) LLP.