

Modern Slavery Statement

23 June 2017

1. Introduction

This statement sets out the steps taken by Aspect Capital Limited (“Aspect”) during the year ended 31 December 2016 to minimise risks associated with modern slavery. Modern slavery means offences of servitude, slavery, forced or compulsory labour and human trafficking. We do not tolerate these activities in any part of our own business or our supply chain.

2. Our Business and Supply Chain

Aspect is a London-based investment manager which applies a systematic and quantitative approach to investment management, with the aim of generating high-quality and diversifying returns for its clients' portfolios. As at the date of this statement, Aspect employs over 130 employees and manages approximately \$6.4 billion.

Aspect is headquartered in London, with offices and a small number of employees in Stamford, Connecticut in the United States and in Hong Kong (the “Aspect Group”). Our overseas offices are primarily focused on sales and distribution activities.

As a financial services business the Aspect Group's supply chain is relatively short and predominantly comprises data and IT services, professional services from our lawyers, accountants and other advisers, and office cleaning and other office facilities services.

3. Our Policy

Our Global Compliance Manual applies to everyone in the Aspect Group. It outlines our commitment to comply with all relevant laws wherever we operate and to maintain the highest standards of professionalism, integrity, ethics and respect for human rights. We do not tolerate modern slavery taking place within the Aspect Group or our supply chain.

4. Our Due Diligence Processes

We have undertaken the following steps to combat the risk of modern slavery taking place in any part of the Aspect Group or in any of our supply chains:

4.1. Review of the Aspect Group and supply chain

- In conducting our modern slavery risk assessment, we took into account the following factors: (i) Aspect's industry sector; (ii) the countries in which the Aspect Group operates; (iii) the complexity and composition of the Aspect Group's supply chain; and (iv) the composition of the Aspect Group's workforce and of our supply chain's workforce.
- Measured against this framework, Aspect's business model and the Aspect Group's supply chain are generally characterised by low volume, high value work activity. There is limited reliance on seasonal, low paid or low skilled workers, who are most vulnerable to exploitation, and in extreme cases, potentially could be subjected to modern slavery.

4.2. Risk control, monitoring and compliance

- Where we have identified areas of potentially higher risk in the Aspect Group or our supply chain, we have enhanced our internal polices and controls, and where applicable, directly contacted suppliers in writing, reminding them of our values, ethical standards and respect for human rights. We have not, and will not,

engage suppliers who are unable to meet the standards that the Aspect Group has implemented and follows itself.

- All employees are expected to report any concerns about modern slavery in accordance with our Whistleblowing Policy, which is readily accessible on our internal website and in our Global Compliance Manual. Through this policy any allegations will be dealt with in a formal and confidential manner.

4.3. Updates and enhancements to Aspect policies, systems and controls

- We have updated and enhanced our Global Compliance Manual and other relevant internal policies which now specifically address the risks of modern slavery.
- These policy enhancements formally confirm our opposition to modern slavery and implement due diligence and ongoing compliance monitoring procedures including in respect of higher risk suppliers.

4.4. Raised awareness

- As our Global Compliance Manual must be read and acknowledged by all Aspect Group staff each year, we have ensured that all Aspect Group employees are aware of the risk of modern slavery.
- In particular, the Global Compliance Manual summarises our relevant policies, systems and controls in this area and the need to involve Aspect's Legal team if there are any specific concerns.

Our Organisational Development, Risk and Legal teams are involved in ensuring this process works effectively and will monitor it regularly, adapting as necessary to the changing needs of our business.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Aspect Group's Modern Slavery transparency statement for the financial year ended 31 December 2016.

Signed on the board's behalf by:



Jonathan Greenwold
General Counsel
Aspect Capital Limited for and on behalf of itself and the Aspect Group
23 June 2017