

J. Rothschild Capital Management Limited

STATEMENT FOR FINANCIAL YEAR ENDING 31 DECEMBER 2022

This statement is made with respect to the obligation of J. Rothschild Capital Management Limited (“JRCM”) pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”) and constitutes JRCM’s slavery and human trafficking statement for the financial year ending 31 December 2022.

JRCM does not tolerate modern slavery and human trafficking, in any form, and is committed to acting ethically and with integrity in all our business dealings and relationships.

BUSINESS STRUCTURE AND ORGANISATION

JRCM is an Alternative Investment Fund Manager authorised and regulated by the Financial Conduct Authority. JRCM’s registered office is 27 St James’s Place, London, SW1A 1NR, and is the wholly owned subsidiary of its parent RIT Capital Partners plc (“RIT”). RIT is an investment trust listed on the London Stock Exchange. RIT does not manufacture, produce or retail any physical goods or services, and neither has a supply chain related to such activities nor an annual turnover.

RISKS IN JRCM’S SUPPLY CHAIN AND DUE DILIGENCE PROCESS

The UK Financial Services industry is not directly within a high-risk sector for modern slavery. JRCM does not manufacture, produce, or retail any physical goods, and has no supply chain related to such activities. Our main suppliers are typically professional advisers, however JRCM does use routine services that support the operation of its business including, cleaning, and maintenance of its office premises and JRCM reviews such suppliers’ modern slavery policies and practices at the point of contract renewal and as part of the approval process for new suppliers.

RESPONSIBLE INVESTMENT POLICY

As a signatory of the United Nations Principles for Responsible Investment, JRCM’s Responsible Investment Policy incorporates environmental, social and corporate governance considerations (which includes modern slavery and human trafficking) across our investment analysis, investment management and active ownership processes.

FURTHER STEPS

JRCM understands that meeting its responsibilities under the Modern Slavery Act 2015 requires an ongoing review of its internal practices in relation to its supply chain, and the operation of its business. To ensure all those in our supply chain and contractors comply with our values we will continue to take the following steps to combat slavery and human trafficking:

- Identify and assess potential risk areas in our supply chains;
- Mitigate the risk of slavery and human trafficking occurring in our supply chain;
- Monitor the potential risk areas in our supply chains; and
- Review and update this statement annually.

Approval

This statement was approved by the Board of Directors of JRCM and signed by a director:

ANDREW JONES, CHIEF FINANCIAL & OPERATING OFFICER

A handwritten signature in black ink, appearing to be 'Anf' followed by a long horizontal stroke.

J. ROTHSCHILD CAPITAL MANAGEMENT LIMITED

Date: August 2023