

SEP '25

LMR Modern Slavery Statement

SEP 2025

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LMR Transparency Statement on Modern Slavery Act

This statement is made by LMR Partners LLP and LMR Management Services Limited (together, “LMR” or “We”) and is published pursuant to the Modern Slavery Act, 2015.

This statement outlines the steps that LMR has committed to take to help detect and prevent modern slavery during the 2024/2025 financial year, ending 31 March 2025.

Business Overview and Risk Assessment of Supply Chain

Founded in 2009, LMR Partners is a multi-strategy investment manager with offices in London, Hong Kong, New York, Zurich, Dubai and Dublin. LMR has almost 400 employees worldwide, and approximately \$11 billion in assets under management.

LMR takes a risk-based approach to its supply chains. As a financial services business, LMR employs highly skilled labour and has a supply chain predominantly limited to reputable counterparties and service providers. Accordingly, it is believed that the risk of exposure to modern slavery is relatively low. LMR is nonetheless committed to adopting appropriate measures to continuously assess, identify and alleviate the risk of modern slavery occurring within the business and wider supply chains.

Addressing Modern Slavery

Internal Policies

LMR has a number of internal policies relevant to combating modern slavery (not exhaustive):

- **Whistleblowing Policy:** The Whistleblowing Policy actively encourages staff to raise concerns relating to any illegal activity occurring within the business, or malpractice conducted by clients, customers and third parties. Employees can also whistleblow directly to any global regulator.
- **Workplace Environment Policy:** The health, safety and wellbeing of employees and visitors working in an environment free of discrimination, harassment and violation is paramount.
- **Recruitment Policy:** All new employees are subject to extensive, independent background screening checks, aiding the detection of any untoward activity.
- **Global Compliance Policies and Procedures Manual** – which reflects and sets out our process in relation to anti-bribery and whistleblowing.
- **Global LMR Employee Handbooks** – which reflects LMR’s commitment to act ethically and sets out our processes in relation to equal opportunities and working conditions.

Due Diligence Procedures

LMR carries out appropriate due diligence to third-party providers prior to engagement. Modern slavery is one of the key criteria to this process, with LMR requesting to see a copy of the supplier’s modern slavery statement where relevant.

In addition, LMR carries out thorough 'Know Your Customer' checks, key to identifying human trafficking activities.

Training

All staff are equipped with the knowledge to help identify human trafficking risks through regular Compliance training which covers relevant area including financial crime, whistleblowing, and the FCA and other global regulatory conduct rules.

LMR will continue to review internal policies and practices each financial year to further ensure modern slavery is not occurring in the business and supply chain.

This statement is approved by LMR's Governing Body of LMR in September 2025.

Signed by:



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Shane Cullinane

Chief Operating Officer

July 2025

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