

Och-Ziff Management Europe Limited

Modern Slavery Act Transparency Statement

Introduction

This statement is made by Och-Ziff Management Europe Limited (the “**Firm**” or “**we**”) pursuant to Section 54(1) of the Modern Slavery Act 2015 (the “**MSA**”) in respect of the financial year ended 31 December 2017.

The Firm acknowledges the importance of compliance with the MSA and its purpose to stop slavery, servitude and forced or compulsory labour, and human trafficking. The Firm is committed to conducting its business with integrity and without modern slavery in either the business or its supply chains and to being transparent in its approach, consistent with the Firm’s obligations under the MSA.

After having reviewed the requirements of the MSA, the Firm considers that its business and supply chain are at low risk of involving instances of modern slavery. Nonetheless, the Firm is committed to taking appropriate steps designated to ensure there is no modern slavery in its supply chain or in any part of its business. The Firm expects its suppliers to comply with all applicable laws and regulations in conducting their businesses.

Business and Organisational Structure

The Firm is a member of the Och-Ziff Capital Management Group (the “**Group**”) and acts as a sub-investment manager to its parent OZ Management LP and OZ Management LP’s wholly owned subsidiary, OZ Management II LP. The Firm makes discretionary investment management decisions on behalf of a number of funds and managed accounts for which OZ Management LP and OZ Management II LP act as the principal investment manager. The Firm is authorised and regulated by the Financial Conduct Authority (“**FCA**”) and is subject to the requirements of the FCA Rules.

Steps the Firm has taken to address the MSA for the financial year ended 31 December 2017

- **Supply Chain Review:** As a financial services business, the Firm is operated by a highly skilled workforce and has a limited supply chain. We consider the risk of slavery or human trafficking existing within our business or supply chain to be low. The goods and services we purchase to allow the delivery of our asset management services are limited to areas such as professional services, real estate, facility management, office equipment, software and catering in the UK.
- **Employment Practices, Culture & Values:** We believe our Code of Ethics (the “**Code**”) and employment policies and procedures are fair, transparent and implement positive working practices for all of our colleagues. The Code is in place to embed the principles of trust, honesty, objectivity, fairness and respect for oneself and others. All staff of the Firm

must read, understand and comply with the Code, policies and procedures that are applicable to them. These are kept under review and enhancements are made where appropriate. Regular training is provided to all staff around the Firm's culture and values. The Group is committed to implementing and enforcing systems and controls to safeguard against modern slavery, human trafficking and harmful working practices.

- **Business Risk Committee & Whistleblowing:** The Business Risk Committee considers activity that poses reputational risk to the Firm. Our current whistleblowing policy allows our employees to file reports openly, confidentially or anonymously through our Employee Hotline. If issues are identified in relation to modern slavery, these may be reported to the Business Risk Committee.

The effectiveness of the steps taken to ensure there is no slavery or human trafficking in the business or supply chain will be kept under periodic review. The Firm will seek to raise awareness and educate all staff about modern slavery and the importance of its eradication generally.

The Firm will periodically review and, as appropriate, update this statement.

This statement has been approved by the Firm's Board and signed on its behalf by a director on 8 April 2019.

For and on behalf of

Och-Ziff Management Europe Limited



Name: Ghassan Ayoub

Position: Director

Date of Approval: 8 April 2019