

Point72 Europe (London) LLP

Modern Slavery Act Transparency Statement

INTRODUCTION

This statement is made by Point72 Europe (London) LLP (the “**Firm**” or “**we**”) pursuant to section 54(1) of the Modern Slavery Act 2015 (the “**Act**”). This constitutes the Firm’s modern slavery statement for the financial year ended December 31st 2022.

Under the Act modern slavery means “slavery, servitude, and forced or compulsory labour” and “human trafficking”. References to modern slavery in this statement have the same meaning.

The Firm acknowledges the importance of compliance with the Act and its purpose to stop modern slavery. 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, in compliance with the Firm’s obligations under the Act.

The Firm has reviewed the requirements of the Act, and the Firm considers the risk of modern slavery within its business and supply chain to be low. The Firm is committed to ensuring that its business is fully-compliant with the requirements of the Act and to taking appropriate steps designed 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 applicable laws and regulations in conducting their businesses.

BUSINESS AND ORGANISATIONAL STRUCTURE

The Firm is part of the Point72 group of asset management entities. Point72 is a diversified, research-driven, multi-strategy global asset management firm. The Firm provides portfolio management and related services to its parent Point72 Asset Management L.P. as well as to certain of its subsidiaries. The Firm makes discretionary investment management decisions on behalf of a number of funds and managed accounts for which Point72 Asset Management L.P. and certain of its subsidiaries act as the principal investment manager. The Firm operates long/short equity, global macro and quantitative investment strategies. 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 ACT FOR THE FINANCIAL YEAR ENDED 31 DECEMBER 2022

- **Supply Chain Review:** As a financial services firm, the Firm is operated by a highly skilled and professional workforce and has a limited supply chain. The Firm considers the risk of modern slavery within its business or supply chain to be low. The goods and services the Firm purchases in connection with the provision of the Firm’s asset management services are limited to areas such as professional services, real estate, facility management, office equipment, software and catering in the UK. In addition, the Firm sources its services primarily from the UK and other low-risk countries where modern slavery is not prevalent.
- **Employment Practices, Culture & Values:** The Firm has in place a Code of Ethics programme and employees are also required to complete a Code of Ethics attestation annually. The Firm believes that its Code of Ethics and employment policies and procedures are fair, transparent and implement positive working practices for all colleagues. The Code of Ethics is in place to embed the principles of ethics, integrity, trust, honesty, fairness and respect to the highest standard. Employees receive regular training on the Firm’s compliance policies, culture, and values.

In addition the Firm is committed to creating and sustaining a diverse workforce and sustaining a work environment where its people feel comfortable being themselves. As evidence of this, the Firm has in place a Diversity & Inclusion Working Group. This Working Group includes key members of the Firm and one of its primary aims is to develop ideas and initiatives that will improve company culture and staff inclusion. The Firm is committed to implementing and enforcing systems and controls to safeguard against modern slavery.


- **Training:** The Firm ensures that its people are trained in its business standards and culture, so that policies and procedures are appropriately implemented. In particular, employees receive training on a variety of human rights related issues, including, but not limited to, equal employment opportunity, diversity and inclusion, money laundering, economic sanctions, bribery and corruption. Employees are required to report behaviour that does not comply with internal procedures and external regulations and laws.
- **Operations Committee & Risk Management:** The Firm’s Operations Committee, the Firm’s governing body, receives periodic reporting from the Group’s Audit and Operational Risk Committee, specifically in relation to the Firm. This committee oversees assurance activities related to governance, enterprise risk management, and control and provides authority and direction to Group Internal Audit in carrying out auditing and consulting engagements. The Group Audit and Operational Risk Committee also oversees enterprise risk management activities and the vendor due diligence programme.

The Firm’s whistleblowing policy allows employees to file reports openly or anonymously. If issues are identified in relation to modern slavery, these may be reported to the Operations Committee.

The effectiveness of the steps taken to ensure there is no modern slavery in the business or supply chain of the Firm will be kept under periodic review.

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

This statement has been approved by the Firm’s Operations Committee and signed on its behalf by a designated member on 9 January 2023.



.....

Name: Will Tovey

Position: Head of UK

Date of Approval: 9 Jan 2023