

Point72 Europe (London) LLP / Point72 UK Limited

Modern Slavery Act Transparency Statement

INTRODUCTION

This statement is made by Point72 Europe (London) LLP (“**P72 LLP**”) and Point72 UK Limited (“**P72 Ltd**”) (collectively, the “**Firms**” or “**we**”) pursuant to section 54(1) of the Modern Slavery Act 2015 (the “**Act**”). This constitutes the Firms’ modern slavery statement for the financial year ended December 31st 2024.

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 Firms acknowledge the importance of compliance with the Act and its purpose to stop modern slavery. The Firms are committed to conducting their business with integrity and without modern slavery in either the business or their supply chains and to being transparent in their approach, in compliance with the Firms’ obligations under the Act.

The Firms have reviewed the requirements of the Act, and the Firms consider the risk of modern slavery within their business and supply chain to be low. The Firms are committed to ensuring that their business is fully-compliant with the requirements of the Act and to taking appropriate steps designed to ensure there is no modern slavery in their supply chain or in any part of their business. The Firms expect their suppliers to comply with applicable laws and regulations in conducting their businesses.

BUSINESS AND ORGANISATIONAL STRUCTURE

The Firms are part of the Point72 group of asset management entities. Point72 is a diversified, research-driven, multi-strategy global asset management firm. The Firms provide portfolio management and related services to Point72 Asset Management, L.P. as well as to certain of its subsidiaries. P72 LLP 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. P72 LLP operates long/short equity, global macro and quantitative investment strategies. P72 LLP is authorised and regulated by the Financial Conduct Authority (“**FCA**”) and is subject to the requirements of the FCA Rules.

STEPS THE FIRMS HAVE TAKEN TO ADDRESS THE ACT FOR THE FINANCIAL YEAR ENDED 31 DECEMBER 2024

- **Supply Chain Review:** As financial services firms, the Firms are operated by a highly skilled and professional workforce and have a limited supply chain. The Firms consider the risk of modern slavery within their business or supply chain to be low. The goods and services the Firms purchase in connection with the provision of the Firms’ 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 Firms source their services primarily from the UK and other low-risk countries where modern slavery is not prevalent.
- **Employment Practices, Culture & Values:** The Firms have in place a Code of Ethics programme and employees are also required to complete a Code of Ethics attestation annually. The Firms believe that their 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 Firms’ compliance policies, culture, and values.

In addition, the Firms are committed to creating and sustaining a diverse workforce and sustaining a

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

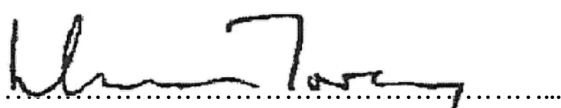
- **Training:** The Firms ensure that their people are trained in their business standards and culture, so that policies and procedures are appropriately implemented. In particular, employees receive training on a variety of human rights related issues, including, but not limited to, equal employment 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, Board of Directors & Risk Management:** The Firms' governing bodies, the Operations Committee for P72 LLP and the Board of Directors for P72 Ltd, receive periodic reporting from the Group's Audit and Operational Risk Committee, specifically in relation to the Firms. 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 Firms' 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 and Board of Directors.

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

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

This statement has been approved by the Operations Committee of P72 LLP and the Board of Directors of P72 Ltd, and signed on their behalf by a designated member and director respectively on 7 February 2025.



Name: Will Tovey

Position: Head of UK

Date of Approval: 30 January 2025