



# Modern Slavery Statement

December 2025

## Transparency Statement on the UK Modern Slavery Act 2015

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Slavery and Human Trafficking Statement and Interim Statement ("Statement") for the financial year ending 31 December 2025 for 17 Capital LLP ("17Capital").

This Statement outlines 17Capital's policy, approach and status in relation to the Modern Slavery Act 2015.

### 17Capital Background

17Capital is authorised and regulated in the UK by the Financial Conduct Authority ("FCA").

Further information and background on 17Capital can be found at <https://www.17capital.com/>

### 17Capital Governance

The 17Capital Board of Directors consists of the following members:

- Pierre-Antoine de Selancy;
- Augustin Duhamel (also on ESG Committee);
- Andrew Moysiuk
- Armen Panossian
- Matthew Pendo; and
- Todd Molz.

Further information on the members above can be found at <https://www.17capital.com/team/>

### Policy on Slavery and Human Trafficking

17Capital is committed to respecting human rights in all its operations and external business interactions.

It is the policy of 17Capital not to tolerate slavery and human trafficking practices within its business and supply chains. 17Capital will take appropriate and reasonable measures to minimise the risk of this taking place in line with the nature of services provided.

This Statement, including the policy, approach and status will be reviewed annually and updated where necessary to reflect changes in circumstances and actual practice.

### Due Diligence and Risk Assessment

17Capital seeks to implement an appropriate risk-based approach to minimise the risk of slave labour. This includes consideration of supply chains and investment portfolios.

Whilst it is acknowledged that risk factors are present in all global supply chains and across all sectors, it is believed that 17Capital's overall risk exposure to slavery, human trafficking and forced labour is low in relative terms given the nature of the business undertaken and the skillset required (i.e. largely skilled labour).

Where there is a potential risk, we consider this is potentially more likely to be indirect via our supply chains, rather than directly.

17Capital will endeavour to undertake appropriate risk assessments / actions designed to minimise the risk of slave labour within their employment, supply chain and investment management practices, where relevant.

17Capital completes an annual review of (i) its structure, business and supply chains to identify the main risks to slavery and human trafficking in its business and supply chains, (ii) the measures already in place to address such risks, and (iii) any additional measures that may be warranted in light of such risks.

### 17Capital Staff:

- 17Capital continually reviews and monitors its employment practices to ensure it promotes its culture of managing long term relationships and maintaining a world class team, which demonstrate integrity, diversity and collaboration.
- Regular dialogue between those charged with governance and the People and Talent team, together with 17Capital's policy and processes and employee handbook, ensures that slavery or human trafficking does not exist with respect to the recruitment or ongoing employment of 17Capital's permanent staff, temporary staff or contractors.
- 17Capital staff are already protected by relevant laws and regulations, which are fully reflected in the firm's policies and procedures.
- Contractors and consultants utilised by 17Capital carry out highly skilled activities and are therefore deemed low risk.
- 17Capital conducts periodic training for all employees to ensure they are equipped to identify possible indicators of slavery and human trafficking and respond both effectively and proportionately.

### Investments:

- 17Capital's investment team is required to comply with its Sustainability Policy and approach to responsible investment, which includes topics such as slavery and human rights. These elements are considered during the ESG due diligence and monitoring process.
- The Sustainability Policy is practically implemented and built into the pre-investment process through the ESG questionnaire, which includes specific reference to human rights violations and labour standards.
- The investment teams monitor ESG considerations throughout the life of an investment. An annual ESG questionnaire is also completed using information from underlying fund managers, including specific references to human rights violations and labour standards as part of the ongoing investment monitoring.

### Suppliers:

- As an asset management company, 17Capital has a relatively straightforward supply chain model which is built around its core financial practice, maintaining its global offices and supporting its technological infrastructure.
- A review of our supplier list is carried out on an annual basis, which concentrates on our largest suppliers and those which are from industries or regions which may pose a higher risk of slavery or human trafficking.
- All suppliers which are considered to potentially pose a higher risk are subject to a more detailed review and/or formally contacted to request details of their practices and policies with respect to Modern Slavery. There are no known matters of concern, but this statement will be updated if any subsequently arise.

## Approval and Ongoing Commitment

This statement has been approved by those charged with governance of 17Capital. The statement will be reviewed and updated as required annually to reflect 17Capital's ongoing commitment to detecting and preventing slavery and human trafficking in its business and supply chains. This statement is signed by Augustin Duhamel (Managing Partner) and Jack Mathew (Chief Compliance Officer).



for and on behalf of all 17Capital Partners 01.06.2026