MODERN SLAVERY ACT 2015

This statement is made on behalf of Exor Capital LLP (“Exor LLP”), EXOR Investments Limited (“Exor Ltd”), and Exor Capital II LLP (“Exor II LLP”) under section 54(1) of the Modern Slavery Act 2015 for the Financial Year 2021.

Exor’s businesses

Exor LLP is an FCA-regulated investment manager which acts as manager of a Luxembourg fund, and Ireland domiciled funds (the “Funds”). Its Corporate Partner, Exor Ltd, carries out service and proprietary investment activities. Exor LLP is also the Corporate Partner of Exor II LLP which provides advisory services to Exor LLP. All entities are based in London.

Exor LLP, Exor Ltd and Exor II LLP are referred to in this statement as the “Exor entities”.

Given the nature of their businesses, the Exor entities believe that the risk of Modern Slavery arising within their businesses, or within the businesses of their suppliers, is limited.

Supply chains

The supply chains used by the Exor entities consist primarily of:

- Third party outsourcing and professional services firms providing services to the Exor Entities such as banking, IT, legal and audit;
- Third party administrative services relating such as catering, cleaning, payroll and staff benefits.

Policy on Slavery and Human Trafficking

The Exor entities expect their employees, contractors and suppliers to prevent acts of modern slavery and human trafficking from occurring within both their businesses and supply chains.

The Exor entities have corporate policies in place on a range of areas including Money Laundering, and Whistleblowing policies under which employees are encouraged to report concerns of non-compliance with FCA rules or statutory obligations, including those under the Modern Slavery Act, to the relevant Compliance department.

Due diligence

In any procurement process appropriate due diligence is conducted to assess the extent of the Exor entities’ exposure to the risk of slavery. Measures which are applied proportionately in accordance with the Exor entities’ assessment of the level of risk associated with the particular supplier may include due diligence on a new suppliers practices and procedures and contractual assurances as to compliance with and notification of any failure to comply with applicable laws.
Training

Staff at Exor entities receive training on a periodic basis which touch on a variety of areas including but not limited to, Whistleblowing, Money laundering, bribery and corruption. The Legal and Compliance Departments are available to provide on-going advice to such staff.

July 2021.