

MODERN SLAVERY STATEMENT

Financial Year: 2019-20

Modern slavery is defined as a crime and a violation of basic human rights. Modern slavery can take various forms including (but not limited to) slavery, servitude, forced labour and human trafficking. This policy applies to people working for our firm, external consultants and suppliers.

Firm Background

Clearbell is a privately-owned real estate fund management and advisory business. We invest in and advise on a diverse range of real estate projects across the UK.

Whilst we do not meet the turnover threshold set out under the 2015 Modern Slavery Act, required to produce a Slavery and Human Trafficking statement, as part of our commitment to responsible and transparent investment management we have opted to publish this policy statement.

Our Commitment

- We are committed to making investment decisions and running our business in such a way that we respect human rights, comply with current legislation and seek to follow industry standards and best practice.
- We commit to follow up with anyone who raises concerns regarding modern slavery and take the appropriate level of action, internally and/or externally as required.
- We take compliance with the Modern Slavery Act seriously and so we will review this policy statement on an annual basis to make sure it is still relevant and that any changes in legislation are reflected.

Responsibility

The CFO has overall responsibility for ensuring this policy statement complies with our legal and moral obligations, as well as ensuring that our supply chain is aware of, and adheres to our zero tolerance approach to modern slavery.

Communication

This policy statement will be published on our Company website.

Training

In addition to publishing this policy statement, we will introduce training sessions for our relevant staff where deemed necessary.

Policy Breach

Any breach of this policy by our employees could result in disciplinary action (including dismissal) and reporting to external bodies responsible for law enforcement.

We will end our business relationship with individuals and/or organisations working on our behalf if they are found to be in breach of this policy and take no remedial action.

This statement has been approved by Clearbell Capital LLP

Sally Doyle-Linden CFO
30 September 2019