

Modern Slavery Act Statement

for the financial year ending: December 31st, 2024

Introduction

The Modern Slavery Act requires Zebedee Capital Partners LLP (“Zebedee” or the “Firm”) to produce a “slavery and human trafficking statement” detailing the steps it has taken to prevent modern slavery within its business and supply chains. Whilst Zebedee is a small firm with a limited supply chain, the Firm recognises its responsibility to uphold ethical standards and combat modern slavery in all its forms.

Zebedee’s Business Activities & Risk Profile

Zebedee is regulated by the Financial Conduct Authority (“FCA”) and its only business activity is to provide investment management services to one alternative investment fund (“AIF”) and trading advice to separately managed accounts. All investment vehicles follow the same European long short equity investment strategy. Zebedee is only based in the UK, employs a small team of long standing industry professionals and primarily works with regulated financial institutions, professional service providers and technology vendors. As a provider of investment management services to professional clients and eligible counterparties, Zebedee operates in a business sector which is at comparatively low risk of exposure to modern slavery.

Zebedee’s Approach to Combatting Modern Slavery

As part of its commitment to ethical business practices, Zebedee seeks to ensure that its supply chains and business activities are free from modern slavery and human trafficking. To achieve this, Zebedee has taken the following steps:

- It conducts due diligence on key suppliers and service providers to assess any modern slavery risks.
- It requires suppliers to comply with all applicable laws, including the Modern Slavery Act.
- It maintains a culture of integrity, ensuring all staff are treated fairly and work in a safe environment.
- All Zebedee staff are protected by appropriate, documented personnel policies including:
 - Grievance procedures
 - An equal opportunities policy
 - A bullying & harassment policy
 - A whistleblowing policy
 - Appropriate health & safety policies.
- Provision of training to relevant staff to raise awareness of modern slavery risks.
- Zebedee has in place a responsible investment policy to cover its investment management activities.

Assessing and Managing Risk

Given the nature of the Firm's business activities, the risk of modern slavery occurring with Zebedee's direct operations is low. Nevertheless, Zebedee acknowledges that potential risks in external supply chains, particularly in outsourced services such as IT, office facilities and professional services may occur. Zebedee remain vigilant in monitoring these areas and modern slavery checks are incorporated, as appropriate, within the onboarding process for a new supplier.

Ongoing Commitment

Zebedee is committed to reviewing and improving the Firm's approach to its modern slavery risk management and the Firm's policies and procedures will be updated, as necessary. The Firm will continue to monitor its supply chains for any potential risks.

Approval

This statement has been approved by Zebedee's governing body for the financial year ending December 31st, 2024.

Signed by:



Julian Edwards, Chief Executive & Partner

On behalf of Zebedee Capital Partners LLP

5th February 2025