

SHENKMAN CAPITAL MANAGEMENT, INC. (referred to herein as “Shenkman”, “we” and “our”) is an independently owned global investment advisory firm registered with the United States Securities and Exchange Commission. Shenkman manages assets for a predominantly institutional client base, with offices located in New York, NY, Stamford, CT, and London, UK.

Shenkman aims to employ the highest ethical and professional standards and is strongly opposed to slavery, servitude, forced or compulsory labour and human trafficking (together “modern slavery”). Shenkman will not knowingly support or conduct business with any organisation involved in such activities.

Shenkman’s team is primarily comprised of professionally qualified and skilled individuals and, consequently, we consider the risk of modern slavery occurring within our business to be low. All new team members are provided with a copy of Shenkman’s Team Member Handbook which includes a Whistleblowing Policy and Non-Discrimination and Anti-Harassment Policy. Such policies make clear that Shenkman is firmly committed to a bias-free work environment and that all forms of unethical and unlawful behavior are opposed.

Shenkman is a PRI (Principles for Responsible Investment) signatory. As lenders to high yield companies, we believe that Environmental, Social and Governance (“ESG”) considerations are an important part of our obligation to clients and critical to our investment analysis. ESG risk factors, such as employee relations, diversity, slavery, labor standards in the supply chain and transparency are integrated into our research process and tools as a matter of policy.

As an investment management firm with relatively simple supply chains, predominantly comprising of business and professional services organizations, we believe that there is a limited risk of modern slavery taking place. Shenkman expects all of its vendors to operate in a responsible, ethical and transparent way and in compliance with all applicable laws and regulations.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Shenkman’s Slavery and Human Trafficking Statement for the financial year ended 30 June 2020.

This statement has been approved by Shenkman’s Board of Directors.

Mark R. Shenkman

President and Founder