

## Modern Slavery Statement

This statement is made by Lumyna Investments Limited (“Lumyna”, or the “Company”), pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”) and constitutes our slavery and human trafficking statement in respect of the financial year ended 31 December 2019.

### Introduction

Lumyna fully supports the Act, which aims to drive out all forms of modern-day slavery and human trafficking from business practices. The Company has zero tolerance towards human rights violations and is committed to the highest standards of ethical business practice, both in our own business and in our supply chain.

### Organisation and our values

Lumyna is a UK asset management business based in London which is authorised and regulated by the Financial Conduct Authority. The Company specialises in providing UCITS compliant and alternative investment funds, distributed predominately across EMEA. Since 30th November 2018, Lumyna is owned fully by Generali Investments Holdings S.p.A, a wholly owned subsidiary of Assicurazioni Generali S.p.A..

Lumyna has 32 highly skilled professional employees (as at 31 December 2019). The Company is committed to maintaining the highest levels of integrity, fairness and responsibility and takes all reasonable steps to ensure employees and individuals working within the Company adhere to our values and code of ethics.

### Supply Chain

Lumyna’s supply chain, including its outsourcing relationships, are primarily with other financial or professional service firms and consequently the exposure to supply chain risk is considered low.

However, Lumyna intends to perform a risk-based review and as part of this mapping exercise Lumyna may discover that some parts of its supply chain could pose potential risks.

Lumyna is committed to maintaining the highest level of ethical standards in the conduct of our business and within our supply chain. We expect all of our suppliers to operate in a responsible, ethical, and transparent way and in compliance with all applicable laws and regulations.

We will continue to engage with our suppliers to reinforce the message that we will not tolerate modern slavery and human trafficking taking place within our supply chain.

### Training

We seek to act ethically in all our business relationships and all of our employees are required to undertake training on our Code of Ethics, which is designed to embed a culture of ethical behaviour in our organisation.

### Approval

The Company’s Executive Committee approved this statement on 30 June 2020. The statement will be reviewed and updated where appropriate on an annual basis.

Philippe Lopategui



Chief Executive Officer and Board Director, Lumyna Investments Limited

30<sup>th</sup> June, 2020