

Modern Slavery Act Statement

Introduction

In 2015, the UK Government enacted the Modern Slavery Act (“MSA”), designed to address all forms of human trafficking and slavery, including compulsory or coerced labour, deprivation of personal freedom or facilitating the movement of people for exploitation. Section 54 of the MSA requires organisations carrying out business in the UK with a certain turnover to prepare and publish a slavery and human trafficking statement for each financial year.

This statement is published on behalf of Denham Capital Management (UK) LLP (“Denham UK”) in line with the requirements of the UK’s MSA, in respect of the financial year ending 31 December 2019. Denham Capital Management (UK) LLP acts as a sub-advisor to Denham Capital Management LP (“DCM”) and is authorized and regulated by the Financial Conduct Authority in the UK. References to “we,” “us,” “our” or the “firm” are in relation to Denham. Denham UK does not meet the turnover threshold for the year in question but nonetheless expresses its commitment to end human trafficking and slavery.

Our Business

DCM is a leading energy- and resources-focused global private equity firm. The firm makes direct investments in businesses involving international power, oil and gas, and mining. We recognize our role as an investor affords us the opportunity to promote responsible environmental stewardship and socially responsible development, including fulfilling our responsibility to respect human rights. Both DCM and Denham UK are committed to operating their business to best-in-class environmental, social, governance (ESG) standards. Denham UK employs a full-time ESG manager who among other concerns is sensitive to the issues the MSA covers and seeks to prevent any occurrences of such issues within DCM’s portfolio. Both DCM and Denham UK fully support the principles outlined in the MSA and take a zero-tolerance approach to modern slavery and human trafficking.

Supply Chain Assessment

As our business relates to alternative asset investments and professional services, our supply chain is relatively limited. In 2019, we took the following steps as part of our recurring ESG efforts to ensure that the risk of slavery and human trafficking is identified and adequately addressed in our business and supply chain:

- Due diligence to determine risk assessment prior to a party’s engagement or our involvement in a project;
- Contractual requirements requiring vendors and counterparties to comply with applicable laws and regulations; and
- Engaging with vendors whom we consider to have high ethical standards of their own.

Training

In order to raise awareness, Denham UK has provided and will continue to provide training as to the requirements, considerations and provisions of the MSA to targeted employees who are responsible for engaging and managing vendors. Denham UK’s ESG Manager together with DCM’s Assistant CCO are primarily responsible for this, and report to the board of Denham UK.

If any issues are identified in relation to the MSA, these will be reported to our Board of Directors (the “Board”) and if necessary, to the appropriate authorities.

Approvals

This statement was approved by the members of the board of Denham Capital Management (UK) LLP on April 15, 2020.