

**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, Boca Raton, FL and London, UK.

Shenkman aims to employ the highest ethical and professional standards and is strongly opposed to slavery, servitude, forced or compulsory labor and human trafficking (together “modern slavery”). Shenkman will not knowingly support or conduct business with any organization 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. Shenkman encourages team members to refer qualified candidates for open positions and, where required, works with reputable recruitment agencies. 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. We believe that companies with strong governance and attention to social and environmental issues have a positive impact on society and can make for highly attractive investments.

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. Relevant department heads are responsible for conducting due diligence on external service providers relating to their specific departments. As part of the diligence process, we typically meet with several potential candidates, contact existing client references, and discuss the services to be provided with industry contacts. Shenkman recognizes that sound oversight of service providers is critical to the successful operation of the firm and its clients.

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 2024.

This statement was approved by Shenkman’s Board of Directors on 25 June 2024.

**Mark R. Shenkman**  
President and Founder