

Modern Slavery Act Statement

Brawn Capital Management (Singapore) Pte. Ltd. and its owned and controlled affiliates (Brawn Capital) are committed to maintaining the highest ethical standard in every aspect of our business - whether it is in our investment decisions, our relationships with clients, fellow employees, or the public. Brawn Capital is committed to cultivating a culture of integrity and excellence.

This Statement sets out our approach taken during the fiscal year ending 31 December 2022 to ensure that slavery and human trafficking do not occur in any of our supply chains or any part of our business.

Our Commitment

Brawn Capital is committed to ensure that there is no modern slavery or human trafficking in any part of its business or supply chains. In addition, Brawn Capital is a signatory to the United Nations Principles for Responsible Investment (PRI). Brawn Capital has a dedicated team, working together with its compliance, legal and investment teams, which drives a robust environmental, social and governance (ESG) program and contributes to the policies and procedures to mitigate the risk of modern slavery taking place in our business and our supply chain.

Organizational Structure and Policies

Brawn Capital is an asset manager established in Singapore in 2019, dedicated to furthering the expansion of renewable energy. The Group has offices in Singapore, Hong Kong and Japan, and invests in renewable energy assets across Japan, Taiwan and Vietnam.

Brawn Capital has in place an Employee Handbook and a Compliance Manual, both which are available to all employees, that takes modern slavery issues into account. These include, but not limited to, those relating to equal opportunity, harassment, non-compliant activity reporting mechanism etc.

Supply Chain Due-diligence

As an asset manager, Brawn Capital is responsible for raising capital, risk assessment, investment decisions, investment management, and the provision of administrative services with respect to asset management. Brawn Capital offers institutional investors in the United Kingdom, the United States of America and Asia Pacific, an opportunity to invest in renewable energy projects in Asia Pacific that are sourced by its on-the-ground development partners.

The funds managed by Brawn Capital invest in renewable energy projects at the various stages, such as development, construction, and operation. Brawn Capital's supply chain includes developers, construction companies, operators and other service providers, and these parties are subject to a thorough due diligence process, both before the business relationship commences and on an ongoing annual basis, using our ESG Questionnaire. The process is conducted and reviewed by the investment management team and senior management, with assistance from the legal, compliance and ESG teams. Any adverse findings from the due diligence shall be raised to the ESG Committee and the Board of Directors for deliberation on whether to proceed with the business relationship or not.

Compliance Training

All Brawn Capital employees must attend an annual compliance training and complete an annual attestation to confirm attendance. Compliance training includes issues relating to modern slavery and human trafficking, and all employees are made aware of the latest developments and obligations to combat modern slavery and human trafficking, in order to protect the company, its shareholders, its investors and fellow employees.

Next Steps

Brawn Capital periodically reviews the effectiveness of the relevant internal policies and how these have been implemented across our business areas. Such periodic reviews are carried out to ensure that internal policies and procedures remain relevant vis-à-vis current business practices and risks. In addition, to ensure that our operations and supply chain manage modern slavery risk, Brawn Capital continues to raise awareness and educate our employees on issues relating to modern slavery and human trafficking, monitor our supply chains.