

STATEMENT ON MODERN SLAVERY AND HUMAN TRAFFICKING

This Statement on Modern Slavery and Human Trafficking for the year ending December 31, 2020 sets out the steps we have taken and are taking to ensure that slavery and human trafficking (defined in the UK Modern Slavery Act 2015 (the “MSA”)) are not taking place within our business and our supply chain.

Our Business

P1F is a UK Registered company, having been founded in 2015 to support post-conflict redevelopment in Sri Lanka. It has since evolved to support development using trade, trade finance, and development finance, with transactions and projects in the UK, Sri Lanka, China, Australia and US.

Our goal has been to be a trusted partner that can deliver challenging mandates in extreme circumstances, and where our motivation is to build these trusted relationships globally by being safe, secure and effective in our execution.

Our work has led us to support in project financing, trade finance, crisis-response (post-conflict), and international trade crisis-response, notably in supporting the UK Government during the Covid-19 crisis. Whilst we were founded focusing on the use of Real Estate as the vehicle for regional economic development, our strength has been our trusted global relationships, our understanding of international trade and finance, and our integrity in being transparent and open in our dealings, so that our small team can be highly effective in difficult circumstances.

An area we are actively supporting is the One-Belt-One-Road (or "BRI") Initiative, where our interests in supporting sustainable urbanisation in Emerging Markets, all amidst the Climate crisis, requires innovative thinking, multi-disciplinary teams, and strategic development finance to support growth. The BRI offers a framework for support in some of the fastest growing Emerging Markets, which we are incredibly excited in supporting, and which we believe offers great potential for large populations to achieve better standards of living and a better quality of life.

Respect for Human Rights

As a global trading firm, P1F Limited recognizes and takes seriously its responsibility to help protect, preserve and promote human rights around the world. Examples of such rights are articulated in the United Nations Universal Declaration of Human Rights. While national governments bear the primary responsibility for ensuring human rights, we believe that the private sector can and should play a role in championing these fundamental rights. Our respect for human rights is fundamental to and informs our broader business; it guides us in how we treat and train our employees, and how we work with clients and our vendors. In tandem with our [Principles](#), our [Code of Business Conduct and Ethics](#) articulates P1F Limited’s’ commitment to integrity and honesty in everything we do, and plays an important role in determining our responsibilities as corporate citizens. They help to inform our business selection process and to guide our business decisions and judgments. An example of this is articulated in our [Environmental and Social Framework](#), which as part of our approach to environmental and social risk management provides that we will not knowingly finance or participate in any potential transactions where there is credible evidence of child labor, forced labor or human trafficking.

Employees

P1F Limited is dedicated to creating a workplace that respects each employee’s human rights, and ensures that the interactions of our people with clients, vendors and other business partners are consistent with the regulations and laws in the jurisdictions in which we operate.

We are committed to equality of opportunity in employment to all qualified persons. Although particular legal

provisions and formulations may differ in the various locations in which we do business, our principles are the same globally. Our firmly held belief is that concern for the personal dignity and individual worth of every person is an indispensable element in the standard of conduct that we have set for ourselves.

Supply Chain

We do not tolerate slavery, forced labor, child labor or human trafficking in any form and will not knowingly work with vendors who engage in these practices. We screen all vendors against an extensive set of media, government and regulatory sources in order to identify potentially adverse information, including human rights-related information, both during the on-boarding process and on an ongoing basis. At a minimum, we expect our vendors and their supply chain to fully comply with all applicable laws and regulations in the conduct of their business, including in relation to slavery, forced labor, child labor and human trafficking. In addition, we expect our vendors to meet appropriate standards related to labor practices, wages and workplace safety.

Monitoring and Reporting

As set out in our Code of Business Conduct and Ethics, P1F Limited is committed to conducting every element of its business according to the highest standards of integrity. Our processes, both in our business and in our supply chain, are designed to ensure that we, and those in our supply chain, are taking the steps required to ensure that slavery and human trafficking are not taking place. Key to this is maintaining robust governance processes for the purposes of on-going monitoring of our effectiveness in this area.

Pursuant to our governance processes, employees are obligated to report immediately any business conduct or other conduct of which they become aware that might raise a legal or ethical issue (including human rights issues, such as slavery and human trafficking) for the firm and any instance where it is observed that anyone is being treated in a manner inconsistent with the firm's non-discrimination policies. To encourage reporting, we provide a number of internal reporting channels for dealing with potential adverse matters on a divisional basis.

Our Continuing Commitment

We will continue to engage with our people and our vendors to raise awareness and to take further steps to ensure that slavery and human trafficking are not taking place within our business and our supply chain. This Statement on Modern Slavery and Human Trafficking for the year ended December 31, 2020 has been approved by the Directors of the P1F Limited.



Naveen Anandakumar
Managing Director, P1F Limited.

Signed: November 23, 2020