

## **AQR CAPITAL MANAGEMENT (EUROPE) LLP**

### **UK Modern Slavery Act Statement 2024**

#### **1. Foreword**

AQR Capital Management (Europe) LLP (“**AQR Europe**” or the “**Firm**”) is a limited liability partnership established under the laws of England and has its principal place of business in the UK. This statement sets out the Firm’s efforts to ensure that modern slavery does not take place in its business or supply chains.

AQR Capital Management, LLC (“**AQR LLC**”) is a limited liability company incorporated under the laws of the State of Delaware and has its principal place of business in the United States of America.

AQR Europe is an indirect subsidiary undertaking of AQR LLC (together, “**AQR**”). To the extent applicable, AQR is committed to eliminating modern slavery from its business and supply chains.

This statement relates to the financial year ending 31 December 2024. In this statement, the term “**modern slavery**” is used to include slavery, servitude and forced or compulsory labour and human trafficking, all of which are abuses of a person’s freedoms and rights.

#### **2. Firm’s Business and Organisation**

AQR Europe carries on various business functions on behalf of AQR, primarily in relation to its European asset raising business and related client servicing activities. AQR Europe is authorised and regulated by the Financial Conduct Authority (the “**FCA**”) of the United Kingdom as a full-scope UK Alternative Investment Fund Manager (“**UK AIFM**”) managing assets of an EU-domiciled AQR Lux Funds, an open-ended investment company with variable capital (“**SICAV**”), which qualifies as an alternative investment fund (“**AIF**”) in the sense of the EU’s AIFM Directive.

Given the nature of AQR’s business (asset management services) and its workforce (skilled labour), AQR believes that there is no material risk of modern slavery in AQR’s workforce and that the risk of modern slavery in its vendor base is minimal.

#### **3. Policies and Procedures**

AQR is committed to adhering to the highest standard of business conduct; compliance with the law and regulatory requirements; and best practice.

As a firm authorised and regulated by the FCA, AQR Europe adheres to the twelve Principles set out in the FCA Handbook, which include conducting business with: ‘Integrity’ (Principle 1); ‘Skill Care and Diligence’ (Principle 2); and with effective ‘Management and Control’ (Principle 3).

Policies in AQR Europe’s Employee Handbook provide for the fair treatment of employees and the Firm is committed to a policy of equal opportunities. These policies apply to all terms and conditions of employment (e.g., recruiting, promotions, training, discipline, terminations, compensation, etc.).

As part of AQR’s commitment to ethics and compliance, it encourages all employees to escalate any issues or concerns they may have to their manager, Compliance, Legal or Human Resources. To provide its employees with an additional means to report their issues or concerns, AQR also offers an anonymous telephone hotline. The AQR Compliance Hotline is independently administered by a third-party compliance solutions company. Employees may submit their issues or concerns via the telephone hotline anonymously and without fear of reprisal.

These policies are incorporated in AQR Europe’s Employee Handbook and AQR’s Business Conduct Manual and Code of Ethics. It is a requirement for all AQR Europe’s staff to read these documents and certify that they have done so.

Further, AQR expects companies which it invests in to comply with all relevant laws and regulations, including those relating to modern slavery and human trafficking, where applicable.

AQR is also committed to helping its clients achieve their Environmental, Social, and Governance (ESG) objectives, where desired. Please refer to [aqr.com/ESG](https://aqr.com/ESG) for more details.

#### **4. Vendors and Vendor Management**

AQR Europe's primary third-party vendors are professional services firms (such as legal counsel or accounting firms), as well as information technology, software, and data analytics services. Considering the nature of the services provided by those third-party vendors, the Firm believes that the risk of modern slavery and human trafficking is minimal in relation to the services they provide.

On behalf of the segregated managed accounts and funds that AQR manages for its clients and investors, AQR maintains trading relationships with counterparties that include US and non-US banks, broker-dealers, central counterparties and other regulated financial institutions. Counterparties are reviewed by AQR's Risk Team on a periodic basis with oversight from the Enterprise Risk Committee.

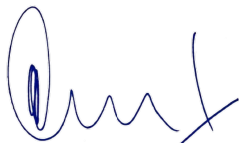
#### **5. Closing statement**

AQR intends to continue to consider and review the risk of modern slavery taking place in its business or supply chain, including through considering the business that the Firm engages in; the services the Firm provides; and the ongoing monitoring of compliance with existing policies and procedures.

This statement is made voluntarily but with reference to section 54 of the Modern Slavery Act 2015.

Approval

This statement was approved by the Responsible Investment & Stewardship Committee of AQR Capital Management, LLC on 20 January 2025.

A handwritten signature in blue ink, appearing to read 'Philip Gough', with a large, stylized flourish at the end.

Philip Gough  
Managing Director

AQR Capital Management (Europe) LLP