

Cain International

UK Modern Slavery Act Transparency Statement

Introduction

The UK Modern Slavery Act 2015 (“**MSA**”) requires organisations of a certain size which undertake commercial business in the UK to publish a “slavery and human trafficking” disclosure statement (this “**Statement**”) for each financial year.

Cain International’s group of companies (“**Cain**” or “**we**” or “**us**”) is committed to combating modern slavery and human trafficking across its business operations and supply chains. In accordance with Section 54 of the MSA, Cain has prepared this Statement for the financial year ending December 2024.

Our Business

Cain is a privately held investment firm, operating in the UK, Europe, and the US. Founded in 2014, Cain focuses on investments in real estate equity, and experiential businesses.

Cain carries out business in the UK through Cain International Advisers Limited (“**CI Adviser**”) along with certain other group entities that are not required to prepare a statement under the MSA. CI Adviser is an Appointed Representative of Langham Hall Management LLP, an entity authorised and regulated by the UK’s Financial Conduct Authority. CI Adviser’s principal place of business is in London.

Steps Taken

Policies:

- Code of Ethics: Cain's Compliance Manual features a Code of Ethics that outlines our dedication to ethical and responsible business conduct. All employees must certify annually that they understand and adhere to the Compliance Manual.
- Whistleblowing Policy: Cain upholds high standards of honesty and integrity in business practices. Cain’s Whistleblowing Policy explains procedures for raising concerns and assures zero tolerance for retaliation.
- Financial Crime Policies: Cain’s Anti-Bribery and Anti-Money Laundering policies are in place to counter financial crime and the handling of illicit funds. Since modern slavery and financial crimes often intersect, these policies contribute to the prevention of both money laundering and modern slavery.

Employees:

Cain reviews and monitors its employment practices and policies to make sure that it upholds and preserves the highest standards for all employees. Cain employs individuals in both the UK and the US and adheres to employment practices and policies that protect against modern slavery and human trafficking. This includes non-discriminatory hiring practices, employment screening, clear

workplace behavior guidelines, and processes for addressing staff concerns. We also require our recruitment agencies to comply with all applicable legal requirements.

Suppliers:

Cain believes the risk of modern slavery within our business and supply chains to be low given the nature of services provided by our third-party vendors. Our third-party vendors primarily include professional services firms that specialize in the following: legal, accounting, consulting, fund administration, property management, and information technology. Cain is aware that some third-party vendors that provide services such as cleaning and catering to Cain owned properties, may carry higher risks. Cain believes the risk of modern slavery with these third-party vendors to be low given the limited nature of these services and the geographic location of the services performed.

Training:

Cain promotes awareness of the MSA and takes steps to educate our employees.

In 2025, we will continue to build on our initiatives to ensure that employees are equipped with the knowledge and understanding to recognize and combat modern slavery.



Jonathan Goldstein
Chief Executive Officer