

27 October 2017

MONARCH ALTERNATIVE CAPITAL (EUROPE) Ltd- MODERN SLAVERY ACT STATEMENT

INTRODUCTION

We recognise the importance of ensuring that our business is conducted in an ethical and responsible manner. We welcome the Modern Slavery Act ("MSA") and the transparency it encourages and are committed to eradicating any risk of slavery and human rights abuses taking place in and around our organisation.

BUSINESS OVERVIEW

Monarch Alternative Capital (Europe) Ltd ("**Monarch**"), is a wholly owned subsidiary of Monarch Alternative Capital LP. Monarch is an established and recognized investment firm, focused on distressed debt investing across the globe.

Monarch's parent has an office in New York and Monarch is located in London. Together, our team consists of more than 65 employees, including more than 20 investment professionals.

This statement is published on behalf of Monarch on a voluntary basis.

SUPPLY CHAINS

As an office based firm authorised by the Financial Conduct Authority to provide certain regulated products and services, we consider the risk of modern slavery, servitude or human trafficking existing within our business or supply chains to be relatively low. The goods and services we purchase to allow the delivery of our services is limited and primarily relates to professional services, property, facility management and maintenance, catering and information technology. We expect our suppliers to operate fair and ethical workplaces.

RISK MANAGEMENT

In summary, as part of our initiative to identify and manage risk:

- Monarch seeks to advance and develop its systems to better (a) identify, assess and monitor potential higher risk areas in our supply chains, (b) reduce the risk of slavery and human trafficking occurring in our supply chains through enhanced contract term controls (to the extent appropriate and obtainable), (c) train our employees, to develop their awareness of the risks involved and the need to manage them, and (d) protect whistle blowers.
- We will, as far as reasonably possible, maintain established relationships with our key suppliers and ensure that expectations of business behaviour are transparent and

consistent.

IMPLEMENTATION

Responsibility for implementing the objectives in this statement will fall to our office manager.

The office manager will oversee the progress of our efforts in this area. Should they identify any issues, they will report back to our senior management team directly.

MSA TRAINING

As part of the wider MSA process, Travers Smith, one of the UK's leading independent law firms, will provide training to educate on the importance of maintaining effective systems to ensure slavery and human trafficking is not taking place in our supply chains.

MONITORING AND REPORTING

If any MSA issues are identified, these will be immediately reported to senior management. More general issues relating to this MSA policy statement will be reported back to the firm's board of directors on an annual basis.

This statement will be reviewed annually and published on our website.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (albeit on a voluntary basis) and constitutes Monarch's slavery and human trafficking statement for the financial year ending 31 December 2016.

The Monarch board approved this statement on October 27 2017.

Signed on behalf of Monarch Alternative Capital (Europe) Ltd



Matt Glowasky
Chief Executive

Date: 27 October 2017

Next Review: October 2018