Colchester® GLOBAL INVESTORS

Modern Slavery – Assessing Risk in a Global Bond Portfolio

October 2021

Heathcoat House
20 Savile Row
London W1S 3PR
United Kingdom
Tel: +44 207 292 6920

885 Third Avenue
24th Floor
New York, NY 10022
United States of America
Tel: +1 646 472 1800

6 Battery Road #40-02A
Six Battery Road
Singapore 049909
Singapore
Tel: +65 3158 0222

Suite 1403, Level 14,
20 Hunter Street,
Sydney NSW 2000
Australia
Tel: +61 2 8599 2132

Index Tower, Unit 403
Dubai International
Financial Centre
Dubai, United Arab Emirates
Tel: +971 5 0463 5370

Modern slavery is a term that is used to cover practices such as forced labour, debt bondage, forced marriage and human trafficking. It is a human rights violation and exploitative crime with devastating consequences for the health and wellbeing of its victims. The International Labour Organisation (ILO) estimated 40 million people were victims of modern slavery around the world in 2016, approximately 5.4 victims for every thousand people. Clearly, the most severe physical and psychological harm of modern slavery are borne by its victims, but it also has a range of serious negative consequences for society at large. An estimated $150 billion each year is generated in annual earnings from slavery[1], however the profits are privatized while the costs – in social assistance to victims, preventative measures and law enforcement efforts - are socialised. Modern slavery also prohibits individuals from realising their full potential to contribute socially and economically to society. It also creates unfair business environments as those countries or societies that tolerate or engage in modern slavery may benefit from an unjust competitive advantage arising from lower labour costs. In effect, modern slavery causes a loss in productivity and diminished economic multiplier effects as a result of (i) locking up human potential, and (ii) the inefficient allocation of capital that is diverted to deal with its consequences.

Understanding the drivers of modern slavery

Modern slavery is a multi-faceted issue: the supply of vulnerable individuals, demand for cheap products and labour that drives exploitation, and an enabling environment where the justice and regulatory systems allow the crime to continue. The most prevalent form of modern slavery is forced labour and this disproportionately affects people in more vulnerable circumstances, such as children and young people, undocumented migrants, and those living in poverty.

Findings from the 2018 Global Slavery Index (GSI)[2], carried out by the Walk Free Foundation[3] identified North Korea and Eritrea as the worst countries for modern slavery. The governments in those two countries are believed to be complicit in forced labour. Other countries with very large modern slavery problems are usually marked by conflict, highly repressive regimes, widespread poverty, or high levels of corruption. When we analyse those countries with the greatest vulnerability to modern slavery it is clear that a country's stage of economic development and income level is a critical factor. Chart 1 shows the relationship between a country's vulnerability to modern slavery (as measured by the Global Slavery Index Vulnerability Model[4]) and that country's GDP per capita. Those countries with the greatest vulnerability are strongly correlated with those with the lowest levels of income. A similar relationship can be found between modern slavery vulnerability and the level of public sector corruption[5] in a country (R^2 = 0.78). We posit that a high level of systematic corruption is a strong indicator of weakness in a country's governing system, which in turn provides an enabling environment where modern slavery risks are elevated.

[1] Source: PRI A blueprint for mobilizing finance against slavery and trafficking, Sept 2019.

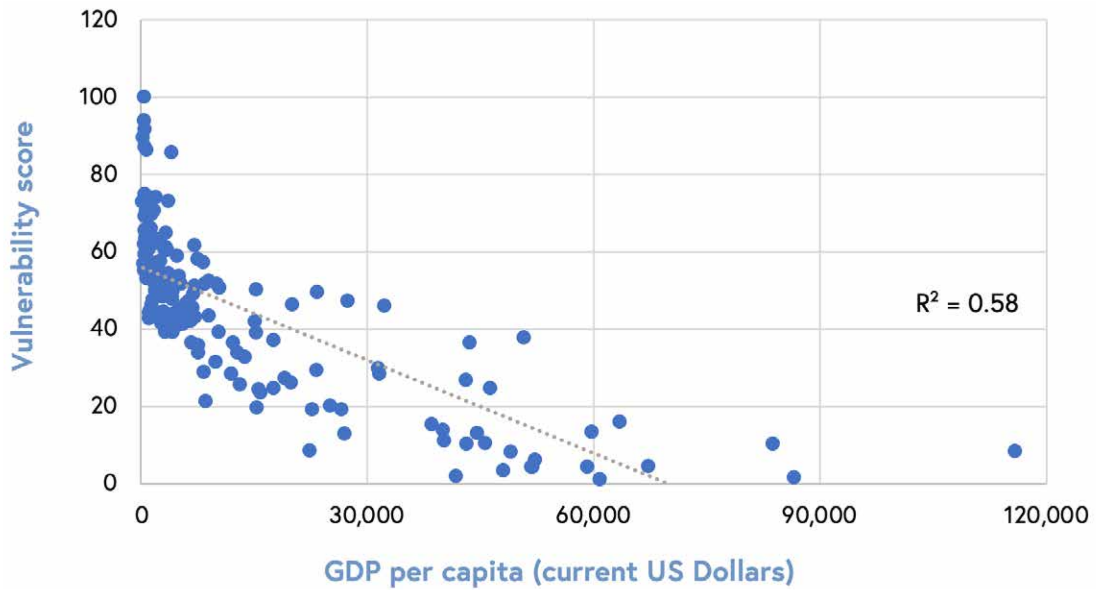
[2] The 2018 Global Slavery Index provides a country by country ranking of the scale and prevalence of modern slavery, as well as assesses country-level vulnerability and governmental responses.

[3] The Walk Free Foundation is an independent international human rights organisation based in Australia.

[4] The Global Slavery Index Vulnerability Model provides a risk score for 167 countries based on an analysis of data covering 23 risk variables across five major dimensions: Governance Issues, Lack of Basic Needs, Inequality, Disenfranchised Groups and Effects of Conflict.

[5] Based on the Corruption Perceptions Index, 2020 www.transparency.org/cpi.

Chart 1: Relationship Between Modern Slavery Vulnerability and GDP Per Capita



Source: Data: Global Slavery Index 2018; GDP per capita data from the World Bank using latest available data for each country (data used ranged from 2018 to 2020). The following countries have been omitted due to data issues: North Korea, Eritrea, South Sudan, Syrian Arab Republic and Venezuela.

How governments have responded

Governments have a central role to play in tackling modern slavery through their national legislation, strengthening policies and enforcement mechanism as well as establishing broader prevention and protection efforts. We have noted that in recent years, government engagement with the business community on modern slavery risks has increased. In 2015 the UK Modern Slavery Act was enacted, a landmark legislation, which consolidated a number of related criminal offences into a single piece of legislation under the umbrella term of modern slavery. The Act was also the first of its kind to require businesses to report on the risks and steps taken to eliminate modern slavery in their supply chains. The disclosure requirements of this Act drove a change in business culture and heightened the awareness of forced labour in business and supply chains. Since then, a number of other countries have followed the UK's footsteps.

For example, France adopted a corporate duty of vigilance law in 2018 and the Australian government introduced its own Modern Slavery Act in 2020. In June this year, Germany passed the Supply Chain Due Diligence Act which will come into force in 2023. We are seeing similar progress in Canada where draft modern slavery legislation is currently before the Senate. In addition, initiatives such as the biennial *List of Goods Produced by Child or Forced Labor* published by the US Department of Labor aims to raise public awareness about forced and child labour around the world and to promote efforts to combat them. Lastly, the commitment made by world leaders in adopting the 17 Sustainable Development Goals (SDG) at the 2015 UN Summit has given further impetus to end modern slavery. SDG Target 8.7 calls for immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking by 2030[6].

[6] United Nations Sustainable Development Goal 8. https://sdgs.un.org/goals/goal8.

Colchester's Approach

At Colchester we value bond markets using real yields and currencies by their real exchange rates. Valuations are then adjusted to take into consideration both the strength of a country's balance sheet using traditional sovereign balance sheet analysis, and an assessment of Environmental, Social and Governance (ESG) factors in the country we are investing in. Countries are assigned a proprietary Financial Stability Score (FSS) which is determined through an extensive assessment of the macro-economic environment, debt and external sustainability, policy framework, and a comprehensive range of ESG factors. The evaluation of modern slavery risks in a country is one of many ESG factors that we assess. In our view, the Walk Free Foundation's Global Slavery Index (GSI) currently provides the best and most comprehensive estimate of the prevalence of modern slavery, as well as assessments of country-level vulnerability and the strength of governmental responses across 167 countries.

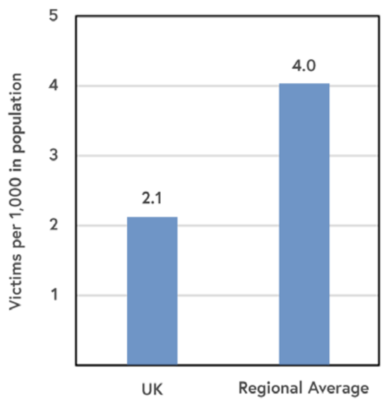
In addition, we also recognise that the problem of modern slavery is symptomatic of a number of Social and Governance factors such as poverty levels, labour standards, institutional credibility and the control of corruption.

Figure 1 below outlines the main inputs into our modern slavery assessment. In addition to the Global Slavery Index, we also look to some of the main ESG indicators that we assess as part of the quantitative analysis in all our country assessment research. Ratification of international labour standards is an important starting point as it reflects a country's commitment (or lack thereof) to an internationally agreed baseline of protection for workers and therefore has clear implications in the context of modern slavery and labour exploitation. Key aspects of human development, such as poor living conditions (proxied by general life expectancy), poverty and lack of education, are also found to be associated with high risk of exploitation. Lastly, governance is a key consideration as modern slavery is often enabled by systemic weaknesses such as corruption, poor law enforcement, or lack of victim protection mechanisms in place.

Figure 1: Country Dashboard of Global Slavery Index measurements and other relevant ESG indicators

United Kingdom

Global Slavery Index (GSI)
GSI est. prevalence of modern slavery in population



GSI estimated number of people in modern slavery: 136,000

GSI Vulnerability Score: 11.1 / 100

GSI Government Response Score
AAA AA A **BBB** BB B CCC CC CC D

Labour Standards	Year of ratification
Freedom of Association and Right to Organise	✓ 1949
Right to Organise & Collective Bargaining	✓ 1950
Forced Labour	✓ 1931
Abolition of Forced Labour Convention	✓ 1957
Equal Remuneration Convention	✓ 1971
Discrimination (Employment)	✓ 1999
Minimum Age	✓ 2000
Worst Forms of Child Labour	✓ 2000

Human Development Index (HDI)	
Index (+1 to 0) & country rank (2019)	0.932/#13
Life expectancy at birth	81.3
Expected years of schooling	17.5
Mean years of schooling	13.2
Gross national income (GNI) per capita (2017 PP$)	46,071

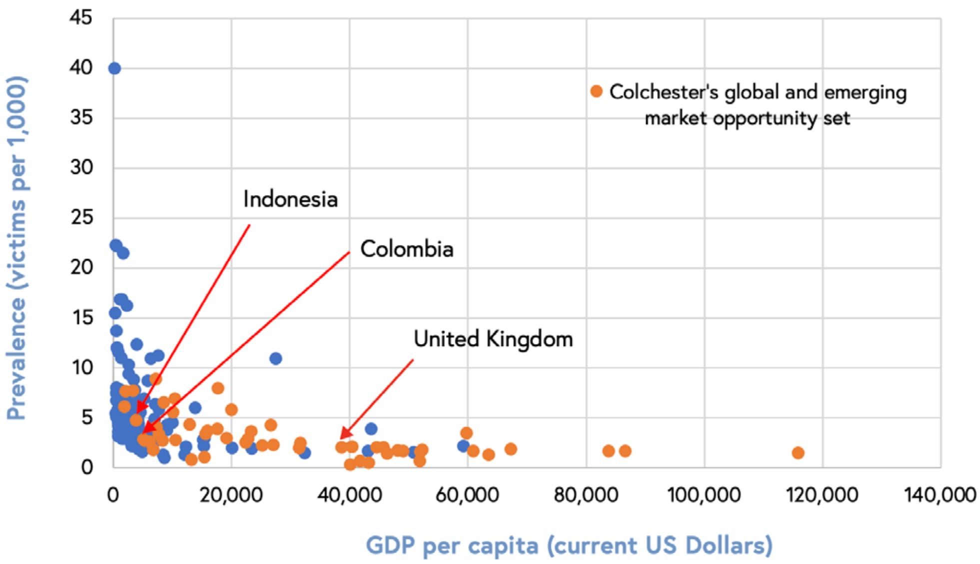
Worldwide Governance Indicators	Percentile Rank
Voice and Accountability	90.6
Political Stability & Absence of Violence	63.8
Government Effectiveness	90.4
Regulatory Quality	93.8
Rule of Law	91.4
Control of Corruption	93.8

Source: Global Slavery Index 2018; Human Development Index (HDI) 2019; Worldwide Governance Indicators 2019; Colchester Global Investors.

ESG factors, including modern slavery, are systematically integrated into our sovereign risk assessment framework. Countries with strong financial balance sheets and good ESG standards will receive a high Financial Stability Score (FSS) which results in a premium being added to their valuation. Conversely, a higher incidence of modern slavery is often commingled with other poor ESG factors, and together this leads to a lower FSS within our investment valuation framework. This results in a discount being applied to the valuation, thereby lowering the overall attractiveness of the country's bonds and currency in our portfolio construction.

In our assessment, Colchester's portfolios generally have a relatively low exposure to modern slavery. Our Global Bond program is predominantly invested in bond markets of high income, developed economies and most countries in this opportunity set have a low prevalence of modern slavery. Whilst the prevalence of modern slavery risks is higher in our Emerging Market program, Colchester typically has a bias to be invested in the higher quality segment of this investment universe, thereby reducing those risks at the margin. This can be seen in Chart 2 which plots the estimated prevalence of modern slavery for all the countries in the Global Slavery Index against each country's GDP per capita. The countries that are currently in both Colchester's global and emerging market opportunity set are coloured in orange. As can be observed, the countries in our opportunity sets have a relatively low prevalence of modern slavery with the vast majority (over 80%) having a prevalence of less than five per thousand. For countries where there is a high prevalence, or where we assess modern slavery to be of particular concern, we will then try to understand this within the broader context of the country's macro-economic environment and other country specific factors that may be driving this. Furthermore, we will seek to understand the government's response, and whether the issue is being addressed by the authorities.

Chart 2: Relationship Between Modern Slavery Prevalence and GDP Per Capita



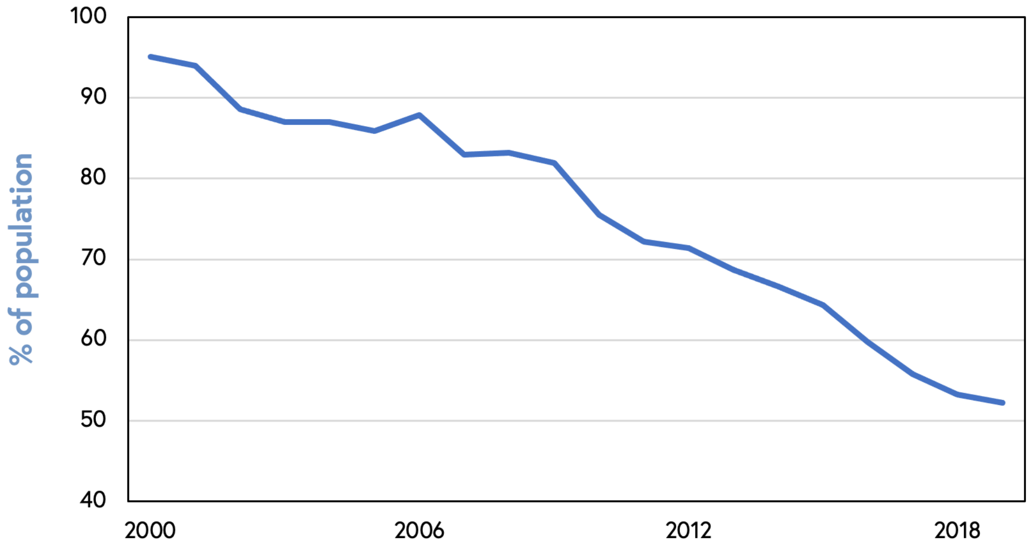
Source: Global Slavery Index 2018; GDP per capita data from the World Bank using latest available data for each country (data used ranged from 2018 to 2020). The following countries have been omitted due to data issues: North Korea, Eritrea, South Sudan, Syrian Arab Republic and Venezuela.

We highlight two country case studies below to provide an insight into how we at Colchester think about and integrate our assessment of modern slavery into our analysis of countries.

Indonesia

Indonesia has a relatively high modern slavery prevalence at an estimated 4.7 victims per 1000[7]. The main challenges that Indonesia faces with regards to modern slavery are largely related to poverty. Although we acknowledge that Indonesia still requires considerable targeted action to address modern slavery problems, when we look at a broad range of factors in the country, we believe that Indonesia has been making significant progress. We have seen impressive economic development over the past two decades: the achievement of low and stable inflation, a reduction in government debt and critically an improvement across a broad range of governance indicators. This has resulted in a remarkable reduction in the national poverty level as shown in Chart 3. In 2000, the World Bank estimated that 96% of the population were living on less than $5.50 a day. By 2019 this had fallen to 52%, lifting over 40% of the population out of poverty. As discussed above, poor households are particularly vulnerable to exploitive working conditions as they struggle to secure income and meet basic needs. By improving economic conditions and reducing poverty, the government is reducing the main contributors to modern slavery in the country. In our opinion, the current level of modern slavery in Indonesia needs to be assessed in the context of the historic levels of poverty and the remarkable achievements made to date.

Chart 3: Reduction in poverty headcount ratio ($5.50 a day, 2011 PPP$)



Source: World Bank, data as at 2019.

Digging deeper to understand the issue, it appears that one of the industries where Indonesia still suffers most from modern slavery is fishing. The country is a vast archipelago with over 17,000 islands, which makes the policing of the industry very difficult. When this issue first gained international attention, almost all of the forced labour working on fishing platforms were young boys under the age of 14[8]. It is to be commended that the government recognised the severity of this issue and has been making progress since to clamp down on such illegal activity. These efforts include the establishment of local anti-trafficking task forces in all 34 provinces (as part of The National Task Force to Combat Trafficking in Persons), increased funding for services to assist the withdrawal of children from hazardous child labour, conditional cash transfer programs and educational scholarships for poor children, as well as a general improvement in access to education. We view these efforts as a persuasive indication of the government's willingness and commitment to undertake serious action to address modern slavery issues.

[7] Global Slavery Index 2018 Dataset, Walk Free, available from: www.globalslaveryindex.org.

[8] Transnational Organized Crime in the Fishing Industry (Vienna: UN, 2011).

Indonesia is a market that Colchester is invested in (at the time of writing) across both our Global Bond and Emerging Markets programs. As an active investor in Indonesia, we have maintained active engagement with the country. In the past seven years we have made six trips to the country. During these visits, we have met with relevant parties within the central bank, finance department, political analysts, companies and various other institutions. Over the years, we have observed that on ESG, the level of governance has seen significant improvement, but challenges remain with regards to education, action against corruption and the continued use of informal labour in significant parts of the economy. In our last in-person country visit in 2019, we had discussions with relevant parties within the central bank and Ministry of Finance around Indonesia's low and narrow tax base. With government revenue only averaging 15% of GDP[9], our opinion is that this needs to increase over time if Indonesia is to make the necessary investments required in areas of healthcare, education and social assistance for the country to continue its economic development and lift more people out of poverty and other exploitative circumstances.

Colombia

In contrast to Indonesia (discussed above), Colombia has a much more moderate level of modern slavery prevalence, with an estimated 2.7 victims per 1000[10]. Nonetheless, it still faces significant challenges arising both, from its own legacy of political violence, social tensions, and extreme inequality and, more recently, from a significant migrant flow arising from turmoil in its neighbour.

In Colombia, the effects of conflict and terrorism have negatively impacted upon the country for many years. Internal conflict between the government and various insurgent groups, including the Revolutionary Armed Forces of Colombia (FARC), has left as many as 220,000 dead and 5.7 million people displaced in the last 50 years[11]. Conflict situations which result in a breakdown of rule of law, social structure, and physical security have been found to be one of the strongest external drivers of modern slavery. The vulnerable are the most at risk of exploitation when "order" breaks down, and this manifested itself in Colombia with the recruitment of children into FARC under the threat of violence or even death.

After many years of negotiations, the Colombian government and FARC finally signed a peace deal, which was ratified in November 2016, effectively marking an end to the conflict. The final peace agreement included special provisions to integrate children associated with FARC back into society and to pardon those who were under the age of 18 when they committed acts during the armed conflict. This is an important provision, and step towards supporting survivors of slavery and their reintegration into society.

Not only is Colombia dealing with its past, but it is also having to cope with an influx of refugees from Venezuela. It is estimated that more than 5.6 million refugees and migrants have left Venezuela as a result of the political turmoil, socio-economic instability, and the ongoing humanitarian crisis there[12]. In recent years, an estimated 2 million migrants from Venezuela have entered Colombia. Many of these refugees and migrants have entered illegally without documents or any legal status. The desperation and poverty typically associated with such displaced migrants heightens modern slavery risks and exposes them to exploitation and forced informal labour. There is usually limited regulation or oversight in these situations. In a commendable effort to combat this, Colombia made a bold humanitarian gesture in February 2021 by introducing a Temporary Protection Status (TPS) program for many of these displaced individuals. The TPS allows Venezuelan migrants without formal status the ability to register and have legal status in Colombia for the next 10 years. This allows refugees to enter the formal job market and access the country's national health care and education system. The TPS program will greatly reduce the risk factors and governance issues that can increase the prevalence of modern slavery for migrants.

[9] This is the 10 year average in government revenue ending December 2020. Data source: International Monetary Fund, World Economic Outlook Database, April 2021.

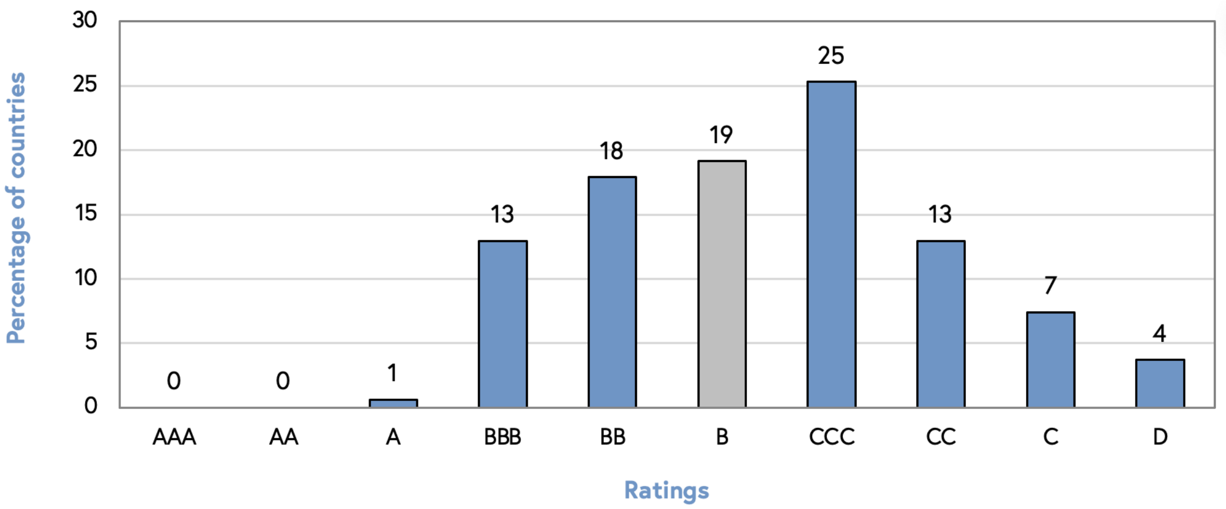
[10] Global Slavery Index 2018 Dataset, Walk Free, available from: www.globalslaveryindex.org.

[11] Source: Council on Foreign Relations, Colombia's Civil Conflict, Jan 2017.

[12] Based on March 2020 government figures obtained from International Organisation for Migration (IOM).

Colombia's positive efforts to address the fallout from its own past, and to assist and protect refugees arriving from Venezuela, are reflected in its commendable ranking on the Government Response Index which is a component of the Global Slavery Index (GSI). The Government Response Index assesses the actions governments are taking to respond to modern slavery. Countries are ranked on how effective and comprehensive their response to modern slavery is, as well as on reintegration and supportive government policies and measures to address vulnerability. Colombia's rating is a "B", which ranks it around the middle of all countries considered (Chart 4). In our opinion, given its history and current migrant pressure, this is a strong result and positive endorsement of the government's efforts in this arena.

Chart 4: Government Response Index



Source: Global Slavery Index 2018.

Like Indonesia, Colchester is also invested (at the time of writing) in Colombia in both our Global Bond and Emerging Markets programs. Colchester has regularly engaged with institutions in Colombia and in early 2021, took part in investor meetings with the Finance Ministry and the Colombian Central Bank. Amongst a number of topics, we discussed the official response to the Covid-19 pandemic, especially the considerations given to mitigating the risk that the pandemic and associated public health measures may have on exacerbating existing inequalities. It is to be expected that the pandemic may have increased the risks of exploitation especially amongst those who are more vulnerable (children or those at very low incomes). It is to be commended that the government recognised these risk factors and largely targeted their Covid response package at supporting the lowest income households through payroll subsidies, and more importantly with the introduction of a new programme to support informal workers (who make up 60% of the workforce). As noted above, we were also encouraged by the government's willingness and commitment on economic and social inclusion for Venezuelan refugees via the granting of TPS. This is despite an estimated cost of 0.4% of GDP annually in near-term spending on humanitarian assistance, education and healthcare. It is a positive that the government appears to have taken a longer term view in recognising the expected benefits that migration governance can have in raising Colombia's economic potential. In doing so the government has also provided protection for a large cohort of people from potential exploitation and modern slavery risks.

Conclusion

As a responsible investor, Colchester seeks to engage with issuers on a range of ESG issues. As a government bond investor, our engagement necessarily differs from that with a company. We are limited in our ability to directly influence the prevalence of modern slavery in a country. However, we believe that we can still play an important role. By providing capital to governments who evidence a commitment to ongoing ESG progress, we contribute to the funding needed to further the country's economic development. We cannot understate the benefits that ongoing economic development brings in lifting people out of poverty and thereby mitigating one of the primary drivers of modern slavery. We would also suggest that the solutions to modern slavery are much more complex at a country level compared with those at a company. In the latter, data is more widely available and specific risks can be more readily assessed, isolated, and managed within operations and supply chains. Furthermore, asset owners and managers can directly influence company behaviour through the "voting" of their share ownership. Nevertheless, we are encouraged by the increased focus from governments globally to tackle this important issue. We believe that countries with stronger ESG metrics on average tend to produce stronger economic outcomes and this is associated with better financial market returns. This highlights the importance of combatting modern slavery.

IMPORTANT INFORMATION

Risk Disclosures

- Unless otherwise stated, this document reflects Colchester Global Investor's ('Colchester') views and opinions as of 30th September 2021. Colchester makes no representation or warranty as to the accuracy or completeness of the information in this document and disclaims all liability for any direct, indirect, consequential or other losses or damages including loss of profits incurred by you or any third party that may arise from reliance on this document.
- Nothing in this document should be construed as providing any type of investment, tax or other advice, or be considered a solicitation, recommendation, endorsement or offer to purchase or sell any financial instrument.
- This is not a research report and is not intended as such. Certain information in this document may constitute forward-looking statements. Due to the various uncertainties and actual events, the actual performance of the markets may differ materially from those reflected or contemplated in such forward-looking statements. As a result, clients/investors should not rely on such forward-looking statements in making any investment decisions.
- This document may contain information obtained from third parties, including ratings from credit ratings agencies. Reproduction and distribution of third party content in any form is prohibited, except with the prior written permission of the related third party. Third party content providers do not endorse or recommend the securities or products discussed herein, nor do they guarantee the accuracy, completeness, timeliness or availability of any information, including ratings (negligent or otherwise), regardless of the cause, or for the results obtained from the use of such content. Third party content providers give no express or implied warranties, including, but not limited to, any warranties of merchantability or fitness for a particular purpose or use. Third party content providers shall not be liable for any direct, indirect, incidental, exemplary, compensatory, punitive, special or consequential damages, costs, expenses, legal fees, or losses (including lost income or profits and opportunity costs or losses caused by negligence) in connection with any use of their content, including ratings. Credit ratings are statements of opinions and are not statements of fact or recommendations to purchase, hold or sell securities. They do not address the suitability of securities for investment purposes and should not be relied on as investment advice.
- There can be no assurance that professionals currently employed by Colchester will continue to be employed by the firm or that a level of experience or past performance is indicative of future performance or success.
- Information about how to make a complaint, any right to compensation and any cancellation rights will be provided to you upon request.

Regulatory Information

- Colchester is an employee owned firm headquartered in London and has regional offices in New York, Singapore and Dubai and a representative office in Sydney, Australia.
- Colchester is authorised and regulated by the Financial Conduct Authority in the United Kingdom. Colchester is also registered with the Securities and Exchange Commission in the USA and is registered as a Commodity Trading Advisor and Commodity Pool Operator with the Commodity Futures Trading Commission.
- Colchester Global Investors Limited is licenced as a financial services provider by the Financial Sector Conduct Authority (licence number 43012) in South Africa.
- Colchester Global Investors Limited is registered with the Securities Commission of The Bahamas, as the investment manager for an investment fund licensed as a Smart Fund model 003, in accordance with the provisions of the Investment Funds Act, 2019.

- Colchester Global Investors (Singapore) Pte. Ltd holds a capital markets services licence in fund management issued by the Monetary Authority of Singapore. Colchester Global Investors (Singapore) Pte. Ltd also holds an offshore discretionary investment management services licence issued by the Financial Services Commission of Korea.
- Please note the following in respect of Colchester's regulatory status in Australia: (i) neither Colchester Global Investors Limited nor Colchester Global Investors (Singapore) Pte. Ltd. holds an Australian financial services licence for the provision of certain financial services, and both entities are exempt from the requirement to hold an Australian financial services licence under the Corporations Act 2001 (Cwlth) in respect of the financial services Colchester provides; (ii) Colchester Global Investors Limited is authorised and regulated by the Financial Conduct Authority of the United Kingdom under UK laws, which differ from Australian laws; (iii) Colchester Global Investors (Singapore) Pte. Ltd. is regulated by the Monetary Authority of Singapore under Singapore laws, which differ from Australian laws. Therefore, Australian wholesale clients are not necessarily subject to the same types of legal protections or remedies that they would enjoy if Colchester was directly subject to the Corporations Act. Colchester is entitled to offer its financial services in Australia pursuant to an exemption from the requirement to hold an Australian Financial Services Licence under the Corporations Act, on the basis, among other things, that the clients are "wholesale clients" within the meaning of the Corporations Act.
- Colchester Global Investors Middle East Limited is regulated by the Dubai Financial Services Authority for the provision of Advising on Financial Products and Arranging Deals in Investments. All communications and services are directed at Professional Clients only. Persons other than Professional Clients, such as Retail Clients, are not the intended recipients of Colchester Global Investors Middle East Limited's communications or services. Colchester Global Investors Middle East Limited is a company established in the Dubai International Financial Centre (DIFC) pursuant to the DIFC Companies Law with registration number CL 3239.
- Discretionary investment management services and funds are not and will not be marketed in Argentina by means of a public offering, as such term is defined under Section 2 of Law N° 26,831, as amended. No application has been or will be made with the Argentine Comisión Nacional de Valores, the Argentine securities governmental authority, to offer funds or discretionary investment management services in Argentina.
- Colchester Global Investors Inc. is a wholly owned subsidiary of Colchester Global Investors Limited. It is not permitted to provide investment advice or otherwise engage in a regulated activity.

THIS DOCUMENT IS INTENDED FOR PROFESSIONAL USE ONLY AND IS NOT FOR PUBLIC DISTRIBUTION. IT MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL OR EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE DISREGARD AND DELETE IT AND DO NOT DISSEMINATE THE CONTENTS TO ANY OTHER PERSON.

THIS DOCUMENT DOES NOT CONSTITUTE A PROSPECTUS OR OFFERING CIRCULAR TO SUBSCRIBE FOR ANY SECURITIES. POTENTIAL INVESTORS MUST REVIEW THE RELEVANT PRODUCT OFFERING DOCUMENTS OR INVESTMENT MANAGEMENT AGREEMENT, AND IN PARTICULAR, THE RISK DISCLOSURES SET OUT THEREIN.