

SLAVERY & HUMAN TRACKING STATEMENT 2021

INTRODUCTION

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (“the Act”) and constitutes Wellington Management International Ltd’s (“WMIL”) Slavery and Human Trafficking Statement (“Statement”) for the financial year 1 January 2021 to 31 December 2021 (“financial year 2021”).

The Act prompts us to review our business and supply chain to identify where the highest risk of encountering modern slavery exists. Our review for the financial year 2021, found that no changes to policy nor approach are required to ensure that WMIL continues to meet its obligations under the Act.

OUR BUSINESS AND STRUCTURE

Wellington Management is engaged exclusively in investment management. We serve as a trusted adviser and strategic partner to investors in more than 60 countries worldwide. We offer capabilities that span nearly all segments of the global capital markets. Our investment solutions, which are tailored to the unique return and risk objectives of institutional clients, draw upon our robust body of proprietary research and collaborative culture. We encourage independent thought and healthy debate. As a private partnership, we believe our ownership structure fosters a long-term view that aligns our perspectives with those of our clients. WMIL is a subsidiary of Wellington Management Group LLP.

OUR APPROACH TO THE ACT

Our corporate sustainability strategy (WellSustain) commits us to incorporate socially and environmentally sustainable behaviour into all our business activities. We do this through sound governance and engagement with our employees, our community and our environment. We take our obligations related to the prevention of slavery and human trafficking seriously. We are committed to taking appropriate steps to ensure the requirements of the Act are met within our business and supply chain.

RISKS OF MODERN SLAVERY PRACTICES IN OPERATIONS AND SUPPLY CHAIN

As a professional financial services organisation, WMIL considers the risk of modern slavery within its business operations in the United Kingdom to be low.

SUPPLY CHAIN & PROCUREMENT PROCESS

The nature of our business along with the high standards we have for ourselves and that we expect from our suppliers is reflected in our overall assessment that the risk of slavery and human trafficking in our supply chain is low.

As an investment manager, we have a relatively simple supply chain built around supporting our investment management practice. The external vendors we procure goods and services from primarily fall into four broad categories:

- **Professional & Employee Related Services:** firms that provide legal, tax, audit, and accountancy advice; external training and recruiting consultants; as well as employee insurance and benefit providers.
- **Workplace Services:** the services that support the running of our day-to-day business (e.g., cleaning, catering, office equipment maintenance services and property management)
- **Technology & Data Services:** the systems, software and hardware purchased to provide the technology infrastructure required to undertake our business; also includes market data services.

- **Travel Services:** as a global organisation serving clients in more than 60 different countries, we engage a number of travel service providers (please note travel continued to be significantly impacted in 2021 as a result of COVID-19)

Wellington Management has a centralized procurement function responsible for global vendor management. Within that function, there is a Third Party Risk Management (TPRM) team. TPRM is responsible for initiating the due diligence review process for new and existing suppliers that we deem to be high risk.

To assess and reduce the risk of slavery and human trafficking in our supply chain, we undertook a review of suppliers paid during the financial year 2021. We also reviewed our procurement and vendor oversight processes. As part of our initiative to identify and mitigate slavery and human trafficking risk, we have taken a risk-based approach to our evaluation. Each supplier is evaluated on a case-by-case basis. This evaluation is based on a combination of the supplier's geographic location(s) and the sector(s) in which it operates. Particular consideration is given when a supplier operates in a region and/or industry that has been determined to be more susceptible to slavery and human trafficking.

SUPPLIER ADHERENCE TO OUR VALUES

We have a zero-tolerance policy for modern slavery and human trafficking and expect those in our supply chain to comply with our values. Where applicable, a modern slavery clause will be included in our contractual agreements. WMIL may also request a supplier provide information regarding the necessary actions it has taken to prevent or remediate modern slavery in its business or supply chain. We may also request an annual certification to confirm appropriate provisions are in place. Third party service providers are systematically identified and reviewed for potential modern slavery risks at onboarding based on risk factors such as the third party's industry and country of operation. On a periodic basis, the subset of the vendor population meeting these high-risk criteria are compared against the broader service provider population to validate that applicable third parties presenting potential modern slavery risk have been identified, and that the associated risk has been reviewed and appropriately mitigated where applicable. Should any supplier be found to use modern slavery in any part of their supply chain and/or their business, it will result in remediation discussions and ultimately could result in contract termination.

Over this reporting period, we have made progress in implementing actions to assist in addressing the modern slavery risks associated with our supply chain. These include reviewing and, where necessary, updating due diligence procedures and reviewing our suppliers' statements specifically related to Modern Slavery Information.


OUR BUSINESS POLICIES AND PRACTICES

In addition to our procurement process, WMIL has policies that support our efforts to reduce the risk of slavery and human trafficking within our business. These policies include:

- Code of Ethics
- Safe Work Environment Policy
- Equal Employment Opportunity, Discrimination & Harassment Policy
- Global Escalation of Concerns Policy and associated hotline
- Statement of policy on the prevention of corrupt practices
- Health & Safety Policy (UK)

We will continue to utilise our corporate sustainability strategy, procurement procedures, and employment policies to raise awareness of the Act with employees and suppliers to help mitigate the risks of slavery and human trafficking in our business.

This statement was approved by the Board of Wellington Management International Ltd on 25 May, 2022.

DocuSigned by:

Signed: _____
Name: Edward J. Steinborn
Title: Director