

SLAVERY & HUMAN TRAFFICKING STATEMENT 2018 – 2019

INTRODUCTION

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”) and constitutes the Slavery and Human Trafficking Statement (the “Statement”) for the financial year 06 April 2018 to 05 April 2019 (the “financial year 2018 – 2019”) for Wellington Management International Ltd (“WMIL”).

The Act has prompted us to review where our business and supply chain have the highest risk of encountering modern slavery. The review of financial year 2018-2019, found no changes to the policy and approach were required to ensure Wellington 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 worldwide and we offer capabilities that span nearly all segments of the global capital markets. Our investment solutions, tailored to the unique return and risk objectives of institutional clients in more than 55 countries, draw on a robust body of proprietary research and a collaborative culture that encourages 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 and during the financial year 2018 – 2019 had branches operating in Frankfurt, Germany and Dublin, Ireland.

OUR APPROACH TO THE ACT

We are committed through our Corporate Sustainability Initiative (CSI) to incorporating socially and environmentally sustainable behaviour into everything we do through sound governance, engagement with our employees, our community and our environment. We take our obligations in relation to the prevention of slavery and human trafficking seriously and are committed to taking appropriate steps to ensure the requirements of the Act are met within our business and supply chain.

SUPPLY CHAIN & PROCUREMENT PROCESS

The nature of our business activities and the high standards which we expect from both our suppliers and ourselves 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 fall into 4 categories:

- Professional & Data Services — such as legal, tax, audit/accountancy advice; market data services; external training providers
- Business & Real Estate services — services which support the running of its day to day business, for example cleaning, catering and print room services and the leasing of our office space
- Technology — systems, software and hardware purchased to provide the technology infrastructure required to undertake our business
- Travel — as a global organisation serving clients in many different countries, our staff undertake a significant amount of global travel so we engage with a number of travel service providers

We have a centralized procurement function responsible for Wellington Management's vendor management processes globally. Within this function, there is a Third Party Risk Management (TPRM) team that initiates the due diligence review process for new suppliers as well as existing suppliers that we have deemed to be high risk.

In order to assess and reduce the risk, we undertook a review of suppliers paid during the financial year 2018 – 2019, along with 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, based on a combination of both its geographic region and the sector(s) in which it operates, taking into account regions and industries that have been determined to be more susceptible to slavery and human trafficking.

SUPPLIER ADHERENCE TO OUR VALUES

We have a zero tolerance policy to modern slavery and human trafficking and expect that those in our supply chain will 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 modern slavery in its business or its supply chain or request an annual certification to confirm appropriate provisions are in place. 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.

OUR BUSINESS POLICIES AND PRACTICES

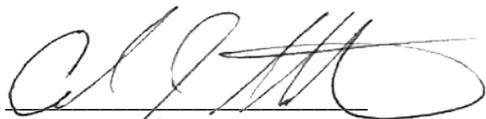
In addition to our procurement process, WMIL has a number of policies which support us in our efforts to reduce the risk of slavery and human trafficking within our business, including:

- Code of Ethics
- Safe Work Environment Policy
- Equal Employment Opportunity, Discrimination & Harassment Policy
- Statement of policy on the prevention of corrupt practices

We will continue to utilise our CSI, 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 in London on 22 April 2019.

Signed:



Name: Edward J. Steinborn

Title: Director