

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement provides an update on the commitment that Fidelity International has made to combat slavery and human trafficking. This statement, approved by the Boards of FIL Holdings (UK) Limited on 13 June 2024 and FIL Life Insurance Limited on 19 June 2024 is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the "Act") and constitutes our slavery and human trafficking statement in respect of the financial year ended 31 December 2023.

This statement is published on the [Fidelity International UK website](#) and is also published, with historic statements, on the [UK government online registry](#).

FIL Holdings (UK) Limited is a private limited company registered in England and Wales (registered number 06737476) and is the parent company for:

- (1) the following companies authorised and regulated by the Financial Conduct Authority:

- FIL Investments International
- FIL Investment Advisors (UK) Limited
- Financial Administration Services Limited
- FIL Investment Services (UK) Limited
- FIL Pensions Management
- FIL Wealth Management Limited

- (2) other unregulated companies.

FIL Life Insurance Limited is a private limited company registered in England and Wales (registered number 03406905) authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority. All such companies are members of the Fidelity International group of companies and are registered in England and Wales with their registered address being either 4 Cannon Street, London EC4M 5AB or Beech Gate, Millfield Lane, Lower Kingswood, Tadworth, Surrey, KT20 6RP.

Our Approach

Fidelity International does not tolerate modern slavery in our operations and takes a risk-based approach when managing it in our supply chain and investments.

Our Investment Process

Our investment process actively considers modern slavery and human trafficking among other environmental, social and governance (“ESG”) issues.

Managing supply chain risk has the potential to protect and enhance investment returns for our customers. Our ESG analysis complements our financial analysis and incorporates modern slavery and human trafficking considerations to help manage these risks. We also aim to encourage better practices through our engagements with investee companies. Further information on our minimum requirements for sustainable investing activities, including integration of these social considerations, can be found in our [Sustainable Investing Principles](#).

Due Diligence

We undertake an in-depth assessment of our investee companies and rate each company according to ESG factors. This assessment is part of our due diligence and, where material, includes indicators related to employee management and supply chains.

We also undertake a top-down modern slavery risk assessment. The methodology used for this assessment uses external sources and considers geographic, industry and category risk. We note that many of our investees may not control the sites of risk exposure but have these risks in their own supply chains. We also recognise that modern slavery risks may exist in the supply chains of our holdings in low-risk geographies. However, we take a risk-based approach that seeks to engage with investees in known high-risk geographies.

Engagement

We proactively engage with a number of investee companies to discuss modern slavery, human rights, labour management and health and safety in the workplace. The aim of these engagements is to encourage better practices amongst our investee companies to increase transparency and disclosure regarding supply chain management and to encourage systematic monitoring of human rights in their supply chain. We seek to drive change through a variety of methods including one-on-one dialogue, company meetings, shareholder resolutions and proxy voting. We engage with companies directly or form coalitions with other investors with similar objectives to increase our influence.

We have a formal thematic engagement group which focuses on modern slavery engagements. The group includes individuals from the sustainable investing team across various jurisdictions, including United Kingdom, Hong Kong and Australia. The engagement programme prioritises companies based on criteria including risk

to people, financial exposure to companies and our ability to influence investee companies. We report on the progress of engagement on a bi-annual basis to relevant members of the organisation.

We embed in our [voting principles](#) that we will vote against the election of members of a company's board of directors and other appropriate proposals where, in our view, the company has not met the minimum standards of monitoring and overseeing itself and its suppliers with regard to human rights and minimising the risk of modern slavery or human rights violations occurring within its organisation or supply chain.

We are a founding member of Investors Against Slavery and Trafficking Asia Pacific ("IAST APAC") established in 2020, member of the Steering Committee and co-chair of the engagement workstream. IAST APAC comprises of approximately 49 investors with AU\$12 trillion in Assets Under Management (AUM) which seek to work with companies in the Asia Pacific region on how they can effectively act on human rights risks within their operations, specifically focusing on modern slavery and labour exploitation in the supply chain.

Our Supply Chain

Fidelity International does not tolerate modern slavery or human trafficking within its business operations and takes a risk-based approach regarding its supply chain. Given the professional and regulated nature of our business, the fact that our supply chain is primarily services, and no material services are located in high-risk countries, we have a low risk of modern slavery or human trafficking within our business operations and supply chain.

Our procurement process includes performing a full risk assessment on every new supplier to determine the inherent risk the supplier and its service brings to Fidelity. In addition to a full risk assessment, all suppliers which are not classed as low-risk, undergo enhanced due diligence screening activities which includes financial crime, information security, data protection assessments along with adverse screening for modern slavery, human trafficking and other human rights abuses and more standard financial stability checking.

All new suppliers and any existing suppliers which are due for renewal are required to accept the Fidelity [Supplier Code of Conduct](#) (the "Supplier Code of Conduct") which sets out the standards and behaviours we expect from our suppliers, including adherence to employment standards, non-discrimination and human rights legislation.

Our supplier management tool requires an initial attestation from all suppliers (regardless of risk rating) at the time of onboarding of their acceptance of the Supplier Code of Conduct. Additionally, all non-low risk suppliers are subjected to

a comprehensive set of requirements on monitoring the supplier's performance against its contractual obligations.

All suppliers participating in a sourcing tender event are also required to respond to a set of specific questions relating to the Supplier Code of Conduct.

In addition, our template supplier agreements require new material suppliers to comply with all applicable anti-slavery and human trafficking laws and to agree not to engage in any activity anywhere in the world that would be an offence under the Modern Slavery Act 2015 if the activity were undertaken in the UK.

Beginning of 2021, we introduced a new sustainability ratings provider which focuses on assessing the ESG performance of Fidelity's suppliers on environment, labour and human rights, ethics, and sustainable procurement. It also includes an assessment on child labour, forced labour and human trafficking practices of suppliers. These individual audit assessments assist Fidelity for ongoing monitoring and oversight and to address improvement areas identified into corrective action plans for remediation or continuous improvement. Over a third of all our suppliers have been rated and shared results of their audits, which accounts for over 70% of our overall annual spend and 64% of our highest risk suppliers. We continue to work with our suppliers with the aim of having all our critical suppliers assessed and over 80% of our spend covered.

Policies

The Code of Conduct documents our commitment to taking responsibility for societal issues and striving to assess and mitigate against modern slavery and other human rights abuses in our corporate and supply chain relationships.

The Financial Crime Prevention policy further documents the steps our business should take to assess and mitigate against modern slavery and human trafficking including in the supply chain and with any proposed acquisitions.

The Procurement Policy includes seven key principles and their associated minimum control requirements, which includes that metrics to monitor compliance and progress against the Ethics and Sustainability principles are included in the reporting packs published to various senior management forums.

The Whistleblowing Policy highlights to staff and suppliers how to raise genuine concerns about potential wrongdoing or illegal activities through the independent hotline. The policy also documents the ability to retain anonymity and confidentiality. Legal protections against repercussions or retaliation for raising concerns are also clearly documented. A new standalone category of 'Modern Slavery' has been created in 2023 for any activity raised to the Whistleblowing line

to capture potential incidents of modern slavery in Fidelity operations or supply chains.

Monitoring

Our General Counsel functions work in conjunction with our Corporate Services, HR and Procurement functions to manage any concerns and to ensure that they are reported to the relevant Accountable Executives or Boards of Directors for remedial action.

The review and oversight of sustainable investing matters are vested in the Sustainable Investing Operating Committee (SIOC). Our [Sustainable Investing Principles](#) outline how accountability for sustainable investing sits across all levels of Fidelity's governance structure.

Training

Compulsory online training is provided to all staff on an annual basis in the financial crime prevention training package. Additional compulsory training is provided to individuals in Procurement, Corporate Services and business functions involved in recruiting, sourcing, and managing a supply chain so that they are able to identify risk factors, understand the implications and assist us with the effective implementation of our policy not to tolerate modern slavery or human trafficking.

Certain members of the investment team recently attended a workshop to increase their capability on modern slavery. Additionally, we have developed comprehensive guidance on labour management and modern slavery for the investment analyst team. The guidance provides analysts with information on modern slavery risks, as well as examples of questions for engagement with companies and case studies for best practices across a wide range of modern slavery reporting and management areas.



Cara Hewitt 18-Nov-2024 | 11:31 GMT
Director

For and on behalf of FIL Holdings (UK) Limited and its subsidiaries including:
FIL Investments International
Financial Administration Services Limited
FIL Investment Advisors (UK) Limited
FIL Investment Services (UK) Limited
FIL Pensions Management
FIL Wealth Management Limited
FIL Investment Management Limited

And also duly authorised on behalf of FIL Life Insurance Limited