

*This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. It constitutes the Santander Asset Management UK Limited Slavery and Human Trafficking statement for the financial year end 31 December 2022.*

## **Santander Asset Management UK Limited**

### **Modern Slavery Statement 2022**

#### **1. Introduction**

Our purpose at Santander Asset Management UK Limited ("SAM UK") is clear, from retail clients to global institutions, we are here to deliver investment solutions that evolve according to our clients' needs.

SAM UK is strongly opposed to slavery and human trafficking and will not knowingly support or conduct business with any organisation involved in such activities. We are committed to maintaining high ethical standards – adhering to laws and regulations, conducting business in a responsible way. We always keep customers at the heart of what we do, while also treating all stakeholders with honesty and integrity and doing business with organisations that share this commitment.

This is Santander Asset Management's fifth statement pursuant to the Modern Slavery Act 2015 (the "Act") and sets out our steps to preventing slavery and human trafficking in both our workforce and supply chain.

#### **2. Approach and Risk Profile**

Following the introduction of the Modern Slavery Act 2015 (the "Act") we review how effectively we prevent slavery and human trafficking in our business and supply chain. We want to take all reasonable steps to make sure we are not supporting modern slavery.

Our Santander Group Human Rights policy sets out our umbrella commitment on protecting human rights in its relations with stakeholders. This policy takes into account the UN Guiding Principles on Business and Human Rights, and explicitly rejects forced labour and child exploitation. At SAM UK, our position is that we will not enter into or maintain relationships with persons and/or entities known to be involved in human rights abuses such as child labour and modern slavery. SAM UK does not have any business dealings, including travel to, from or through any sanctioned territory subject to the UN, EU and/or US sanctions regimes.

Given the nature of our business and our workforce, the modern slavery risk within our own workforce is extremely minimal. The principal area of modern slavery risk for SAM UK arises in relation to our relationships with third parties, particularly our supply chain.

#### **3. Structure and Supply Chain**

We currently work with a range of external suppliers and intra-group companies to purchase the goods and services we need to run our business. The vast majority of which are based in the UK, Western Europe or North America; places identified by the Walk Free Foundation's Global Slavery Index 2018 as having low prevalence and vulnerability levels for Modern Slavery and high levels of government response. In addition, the main categories of purchasing spend at SAM UK relate to technology, operations, and investments which are generally considered to present a lower risk of modern slavery. However, we continue to assess the modern slavery and risk presented by our supplier profile on an ongoing basis.

#### **4. Policies in Relation to Slavery and Human Trafficking**

SAM UK recognises the importance of risks arising from the supply of services or goods and we have a series of policies and processes to manage these.

Our specific "Third Party Risk Management and Outsourcing Policy" and supporting guides include processes to identify, assess, manage, and report potential risks in our supply chain. These mandate the requirement for an assigned Service Director and Service Manager (i.e. contract managers) for each supplier, with responsibility to minimise risk, including risks relating to modern slavery.

From a Human Resources and Compliance perspective, SAM UK has a number of policies that help prevent Modern Slavery and Human Trafficking. These include the Company's Employee Handbook, Referencing & Vetting Policy, Whistleblowing Policy, Anti-Bribery & Corruption Policy, Santander General Code of Conduct Policy and SAM UK specific Code of Conduct Policy. SAM UK policies are reviewed on a regular basis. In addition to this, certain Compliance policies are circulated to employees for annual attestations of understanding and compliance.

#### **5. Due Diligence Process in Relation to Slavery and Human Trafficking**

In accordance with SAM UK policy, our core third party suppliers must complete supplier due diligence as part of their on-boarding. This includes questions related to Modern Slavery and additional information dependent on the type of service the supplier provides and the associated risks.

The owners of third-party relationships at SAM UK are responsible for managing both their suppliers and services, and to support this they are required to complete service and risk assessments periodically.

#### **6. Our People, Culture and Training**

As our workforce is predominantly made up of professionally qualified and skilled employees, we consider the risk of modern slavery occurring directly within SAM UK, to be extremely minimal.

We are committed to supporting our colleagues in an inclusive environment which empowers people, encourages individuality and promotes collaboration. We support our people to achieve a balance between their work and personal commitments through generous family leave policies which offer a range of flexible working arrangements.

We are a living wage employer and have committed to meeting the living wage for all our employees. Every employee has a contract of employment that sets out the terms and conditions of their employment. Part-time and Fixed Term employees are offered terms of equal value to our Full-Time colleagues. All employees are signposted to our employee handbook which makes it clear we oppose all forms of unfair discrimination or victimisation.

We occasionally engage with third party suppliers to provide additional contractor resources based on business demand. We work in compliance with the UK's Agency Worker Regulations in respect of non-permanent workers who are employed by a third party agency and who work under our supervision and direction.

All of our employees and contractors are required to go through a vetting process, which includes ensuring they have a right to work in the UK. This is effective at ensuring our employees and contractors have not been subjected to human trafficking.

All new employees to SAM UK, undergo a corporate induction and mandatory training programme. This introduces new employees to the standards and values we operate under and the conduct we expect from our employees.

Our whistleblowing policy is supported by annual training for all colleagues, and we have a zero-tolerance approach to victimisation of whistleblowers.

Additionally, all our employees undertake the following mandatory training modules on an annual basis, as a minimum: Consumer Duty, Whistleblowing, Data Protection, Conduct Rules, Financial Crime Essentials, Market Conduct Essentials, Operational Risk Management, Conflicts of Interest, Equality in the Workplace, and Health and Safety.

Notably, Anti-Money Laundering, Fraud, Anti-Bribery and Corruption, Sanctions and Tax Evasion are discussed in depth within Financial Crime Essentials. Ethical, regulatory and legal responsibilities are covered within Market Conduct Essentials, and employee diversity and professional code of conduct are covered within the Equality in the Workplace module. Our Whistleblowing training explains when to raise a concern and how to raise a concern through the appropriate channels. Our Conduct Rules training explains the 6 individual conduct rules, how these apply to specific roles and the differentiation between conduct staff, certified staff and senior managers.

#### **7. Actions taken in 2022**

- Completion of mandatory training modules by all employees to include Financial Crime awareness, covering Anti-Money Laundering, Fraud, Anti-Bribery and Corruption, Sanctions and Tax Evasion.
- Review of current supplier list and agreed minimum contractual terms and the requirement to review suppliers' human trafficking and modern slavery statements periodically.
- Successfully onboarded a new provider to further enhance supplier onboarding and screening capabilities, including adverse media screening.

#### **8. Targets for 2023**

- Roll out Modern Slavery Training Programme to all employees.

Signed by **Pak Chan**

Chief Executive Officer, Santander Asset Management UK Limited

30 June 2023

*The Modern Slavery Statement 2022 was approved by the Board of Santander Asset Management UK Limited on 30 June 2023*