

## **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 Board of FIL Holdings (UK) Limited on 26 November 2020 and the Board of FIL Life Assurance Limited on 10 December 2020, 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 30 June 2020.

This statement will be published on the Modern Slavery Registry Website ([www.modernslaveryregistry.org](http://www.modernslaveryregistry.org)), any newly created UK government online registry and the Fidelity International UK websites.

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, Financial Administration Services Limited, FIL Investment Services (UK) Limited, FIL Pensions Management and FIL Retirement Services Limited and (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 will not knowingly support or conduct business with any organisation involved in slavery and human trafficking and aims for high standards of governance throughout our organisation.

### **Investment Process**

Fidelity International offers world class investment solutions and retirement expertise. We believe that high standards of corporate responsibility are of great importance and also have the potential to protect and enhance investment returns for our customers. Consequently, our investment process actively considers modern slavery and human trafficking among other environmental, social and governance ("ESG") issues.

We do not screen out companies from our investment universe purely on the grounds of poor ESG performance but rather adopt a positive engagement approach whereby we discuss these issues with the management of the companies in which we invest on behalf of our customers. We believe that this is the best way to encourage constructive and positive corporate change.

From 2018 and ongoing for 2021, we initiated a thematic engagement focusing on human rights in the supply chain. We are proactively engaging with investee companies to discuss modern slavery, human rights, labour management and health and safety in the workplace.

The aim of this thematic engagement is to encourage better practices amongst our investee companies to increase transparency and disclosure regarding supply chain management to ensure systematic monitoring of human rights in their supply chain. We have also joined collaborative engagements in the UK and APAC with peers in each region to use our collective voice to encourage companies to take action and prioritise modern slavery in their own operations and that of their suppliers.

Fidelity International is a signatory to the United Nations Principles for Responsible Investment (“UNPRI”), a voluntary framework for incorporating ESG issues into investment decision-making and ownership practices. Fidelity’s approach to responsible investment is consistent with the UNPRI Principles and reflects our view that ESG integration should be encouraged when it enhances long term financial return. We report annually to the UNPRI on our ESG integration practices and have received an A+ rating for the last three years.

## **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, and the fact that we do not have intricate supply chains or obtain material services from external businesses 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 non low-risk suppliers undergo enhanced due diligence screening activities which range from financial crime, information security, and data protection assessments along with more standard financial stability checking.

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. All new suppliers and any existing suppliers which are due for renewal are required to accept the Fidelity 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. Effective from 2020, a new supplier management tool has been rolled out within the organisation which requires an annual attestation from all suppliers (other than low-risk) of their acceptance of the Fidelity supplier code of conduct along with a comprehensive set of requirements on monitoring the supplier’s performance against its contractual obligations.

## **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 Boards of Directors for remedial action. We also have a clear Whistleblowing Policy published to all staff: if there are any genuine concerns about any wrongdoing or breaches of law these concerns can be raised in confidence without fear of disciplinary action.

## Training

We are in the process of enhancing training for those individuals in Procurement and Corporate Services involved in recruiting and sourcing/managing a supply chain so that they are able to identify risk factors, understand the implications and assist us with our effective implementation of our policy not to tolerate modern slavery or human trafficking.



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Peter Horrell

**Director**

For and on behalf of FIL Holdings (UK) Limited and its subsidiaries including

FIL Investments International

Financial Administration Services Limited

FIL Investment Services (UK) Limited

FIL Pensions Management

FIL Retirement Services Limited

FIL Investment Management Limited

And also duly authorised on behalf of FIL Life Insurance Limited

Date signed: 17 December 2020