



Acadian Asset Management

Modern Slavery Statement

Financial Year ended 31 December 2021

This Modern Slavery Statement (“Statement”) is made pursuant to the Modern Slavery Act 2018 (Cth) (the “Act”). This statement is made and published jointly on behalf of Acadian Asset Management LLC and its wholly-owned affiliated entities Acadian Asset Management (Australia) Limited, Acadian Asset Management (Singapore) Pte Ltd, and Acadian Asset Management (UK) Limited (collectively referred to throughout the statement as “Acadian”, “we”, “us” or “our”).

Acadian is committed to operating our global business lawfully and only working with suppliers that are aligned to our values. Acadian is strongly opposed to slavery and human trafficking. We expect our suppliers to operate in accordance with all applicable modern slavery laws including those prohibiting human slavery and slavery like practices, human trafficking and child labour. We value and observe all laws regarding corporate social responsibility, environmental and workplace safety protection and staff inclusion and diversity. We have a whistleblower protection policy and an external hotline for staff and suppliers to use.

1. Our structure

Acadian Asset Management LLC is based in Boston and is the parent company and 100% owner of each global affiliate. Details of each entity in the structure are outlined below:

- Acadian Asset Management LLC is registered as an investment adviser with the U.S. Securities and Exchange Commission.
- Acadian Asset Management (Singapore) Pte Ltd, (Registration Number: 199902125D) is licensed by the Monetary Authority of Singapore.
- Acadian Asset Management (Australia) Limited (ABN 41 114 200 127) is the holder of Australian Financial Services License number 291872 (“AFSL”).
- Acadian Asset Management (UK) Limited is authorized and regulated by the Financial Conduct Authority (‘the FCA’) and is a limited liability company incorporated in England and Wales with company number 05644066.

2. Our business

Acadian is a quantitative, systematic investment manager that invests on behalf of institutional investors such as pension funds, endowments, governments and foundations. Acadian uses an array of disciplined, quantitative investment techniques and analytical models for active stock selection as well as country, sector and currency valuation. Acadian’s strategies include multi-asset, managed volatility, emerging markets, global equity, small-cap, long/short, and non-U.S. equity strategies.



3. Our approach

Acadian has zero tolerance for any form of slavery-like practices.

Acadian further believes that non-financial considerations may impact investment returns and risk, and hence we integrate an analysis of such issues in our systematic investment process. Acadian became the first quantitative manager to sign the United Nations Principles for Responsible Investment (UN PRI) in 2009, demonstrating our recognition of the importance of Environmental, Social and Governance (“ESG”) issues.

Acadian’s commitment to human rights is supported by policies that identify, assess and mitigate risks of modern slavery and human trafficking. These include, but are not limited to our:

- Anti-Bribery and Corruption Policy;
- Anti-Discrimination Policy;
- Anti-Money Laundering and Counter-Terrorism Financing Policy;
- Code of Conduct;
- Fraud Policy;
- Responsible Investment Statement;
- Vendor Management Framework; and
- Whistleblower Policy.

Our relevant internal processes and procedures designed to mitigate the risks of modern slavery and human trafficking include, but are not limited to the following:

- We annually monitor and review the effectiveness of relevant internal policies and how these have been implemented across our global business;
- We undertake a risk assessment and due diligence on proposed and existing key suppliers; and
- Our employees and contractors have access to a hotline and an external web-based reporting service provider to anonymously report or raise any concerns of suspected improper, unethical or corrupt behaviour and misconduct.

Training & Awareness

Acadian employees who hold director positions on the Board of each global entity have been provided with specific training on modern slavery. All Acadian employees receive at least annual Code of Ethics and compliance training which covers the policies mentioned above. Future developments may include developing general staff awareness training and targeted training for staff involved in the engagement of suppliers and our investment teams.



4. Our operations and supply chains

Vendors and suppliers that we believe are material to our business are mostly based in the US. Our supply chains consist primarily of the provision of professional support services such as office facilities, insurance, technology and hardware, travel, records and information management services. The sector within which we operate is highly regulated and generally assessed as being at low risk of modern slavery situations being present within it. Each Acadian office is located in countries which have been assessed, by the Global Slavery Index, as having a lower prevalence of modern slavery, together with active government responses to dealing with the issues. However, we recognize that through our supply chain we can be indirectly exposed to the risk of modern slavery.

Acadian has a global review process over its key suppliers as part of its vendor management framework. The assessment includes a review of key controls, policies, data privacy practices (where relevant) and IT infrastructure to assess whether the vendor is meeting expected standards. The ongoing assessments examine vendors' operating environments specific to contracted services and the relative effectiveness of specific controls to deliver those contracted services.

Risk Assessment classification drives the approach to vendor evaluation in terms of frequency and breadth/depth of the assurance. Modern slavery risk has been incorporated into the risk assessment classification. The decision to conduct detailed due diligence on a supplier takes a risk-based approach, considering factors such as the goods or services, country of origin, vendor and spend level.

Acadian employees and contractors.

Our greatest expenditure is in remuneration. Overall, the risk of modern slavery within our direct employees and contractors is low as we rely on a highly skilled professional workforce located in highly developed low risk countries and in a very competitive labour market. We offer competitive salary and benefits to our employees and this is regularly reviewed against market data to ensure it remains competitive against our peers. We only use reputable recruitment firms and comply with all relevant local laws and regulations. We regularly review our global recruitment procedures and providers, as well as our arrangements for employees and contractors' welfare by championing mental and physical wellbeing.

All employees are provided with a copy of our employee handbook upon commencement with the firm. The employee handbook sets out that we expect the highest standards of ethics and integrity and makes clear that we oppose all forms of unfair discrimination or victimization. This includes a specific section highlighting the firm's zero-tolerance of modern slavery and human trafficking in any part of its business. All employees are also provided with a copy of our Code of Ethics with compliance with a Code of Ethics a condition of employment.

Corporate, investment management and operations

Our corporate, investment management and operations suppliers are primarily professional services organizations or large financial institutions located in low-risk countries such as US, UK, Singapore and Australia.



Our suppliers fall into the following categories:

- Real estate: the offices we work in;
- Technology: such as the IT hardware and software and print services that support our business;
- Business services: the products that we purchase in our offices, for example furniture, stationery and marketing items as well as the services that we use in our offices such as catering, security and cleaning;
- Travel services: organising and booking our travel and accommodation requirements; and
- Professional services: services such as external training services, external consultants and contractors and legal support services.

Our approach to preventing and mitigating the risk of modern slavery in these areas is set out as follows:

- We deal with reputable businesses within the US and internationally.
- Our Code of Ethics reinforces our commitment to legal and ethical business conduct.
- We provide a secure channel as part of our Whistleblowing Policy, for individuals to report violations of the Code of Ethics, which may include for example instances of modern slavery.
- We will continue to minimize modern slavery risks in our supply chain by monitoring and collaborating with our first tier suppliers as part of our vendor management framework.

In the event that we discover a case of modern slavery within our supply chain, we will first seek to work with the supplier to implement corrective and remedial action (including appropriate training). Only where appropriate will we seek to terminate our agreement with them.

Working in the Coronavirus context

Due to the location of our business activities, office locations, and the ability of our professional staff to easily work from home, our day-to-day business activities and supply chains were not disrupted by the COVID-19 pandemic and we experienced no increased modern slavery risk.

5. Modern slavery risks within investments

Investment process

Sustainability considerations are embedded throughout Acadian's investment process. This includes systematic assessments of:

- **Political risk and Rule of Law** – the political rights and stability of countries, the rules of society, the quality of contract enforcement, property rights, the likelihood of crime and violence.
- **Social Inclusion** – country level themes aligned to the UN Sustainable Development Goals including material well-being, social development and equality, perceptions of happiness and deprivation.
- **Voice and Accountability** – the extent to which a country's citizens are able to participate in selecting their government, as well as freedom of expression, freedom of association, and a free media.
- **Control of Corruption** – perceptions of the extent to which public power is exercised for private



gain, including corruption and capture of the state by elites and private interests.

- **Human Capital** – companies with poor practices (for example, health and safety concerns, accidents or mistreatment of employees), are typically associated with labor strikes, production shutdowns, and regulatory penalties resulting in negative earnings surprises. We adopt a sector-specific approach to integrating such concerns into stock forecasts.
- **Corporate Culture** – we assess perceptions of companies’ cultures including working conditions, career opportunities, benefits, and diversity and inclusion.

Stewardship

Acadian’s Responsible Investing team manages the firm’s stewardship efforts aligned to the investment process. We define engagements as: “targeted company dialogues on ESG issues with the goal of influencing, or identifying the need to influence, management behavior and improved disclosure.”

Our stewardship efforts include both direct company engagements and collaborative engagements through our associations with the Investor Alliance for Human Rights (IAHR) and Investors Against Slavery & Trafficking (IAST).

Our discussions with companies include:

- **Labor practices** – working conditions related to labor and union rights, working hours, health & safety concerns, monitoring and management of accidents. We expect all companies to comply with internationally recognized human rights principles such as the United Nations Guiding Principles on Business Human Rights (UNGPs), a set of guidelines for countries and companies to prevent, address, and remedy human rights abuses committed in business operations.
- **Supply chain considerations** – include ILO standards in procurement policies, monitoring and engagement of suppliers, and labor rights and health and safety policies of subcontractors. We expect companies to have robust controls and governance around modern human slavery.
- **Corporate culture** – policies towards employee wellbeing, employee engagement and loyalty, training and developmental opportunities, and the promotion inclusion in all forms including advancing gender equality.

Our reactive engagements are typically driven by ESG incidents, governance concerns, and perceptions of violations of UN Global Compact Principles. This includes concerns around freedom of association and right to collective bargaining, all forms of forced and compulsory labor, child labour and discrimination in employment.

6. Actions we have taken to assess and address those risks, including due diligence and remediation processes

Acadian has taken the following steps to assess and address modern slavery risks:



1. Assessing the potential modern slavery risks in our operations and supply chains with emphasis on high risk geographical locations and business transactions.
2. Instituting a robust Code of Ethics and developing and reviewing company policies related to modern slavery.
3. Incorporating modern slavery risk assessment in our vendor due diligence of our key suppliers.
4. Incorporating modern slavery risks in our investment process.
5. Conduct company-specific engagements with the companies that we have a large exposure to and we consider having higher ESG risk, to raise awareness and influence corporate behaviour.

7. How we will assess the effectiveness of our actions

Acadian is a signatory to the Principles for Responsible Investment (PRI), a member of the Responsible Investment Association of Australia (RIAA), the Investor Alliance for Human Rights (IAHR) and Investors Against Slavery & Trafficking (IAST). As an active signatory to the PRI, we participate in the annual review of our firm's responsible investing process and policies. Our Transparency Report is disclosed on the PRI website.

We will continue to assess the effectiveness of our actions against our peers through our involvement in the above industry associations. We intend to focus on embedding our standards consistently across our operations and supply chains, as well as improving our ability to identify, manage, address and remediate modern slavery risks and impacts.

8. Approval

We have consulted the relevant companies we own or control in the development of this statement. This statement was approved by the Board of Managers of Acadian Asset Management LLC on the 30 June 2022. The Board of Managers of Acadian Asset Management LLC approved this statement on behalf of Acadian Asset Management LLC and as the parent entity of the following entities on 31 December 2021:

- Acadian Asset Management (Singapore) Pte Ltd
- Acadian Asset Management (Australia) Limited
- Acadian Asset Management (UK) Limited

A handwritten signature in black ink, appearing to read "Ross Dowd".

Ross Dowd
Co-CEO
Acadian Asset Management LLC

A handwritten signature in black ink, appearing to read "John Chisholm".

John Chisholm
Co-CEO
Acadian Asset Management LLC