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columbiathreadneedle.com

Modern Slavery Act 2015 Statement - for financial year ending 31 December 2024, and in respect of Thames River Capital LLP only for financial year ending 31 March 2025

This statement is made by Columbia Threadneedle Investments on behalf of relevant subsidiaries that are subject to the requirements of Section 54 of the UK Modern Slavery Act 2015 (the “**Act**”) in respect of the financial year ending 31 December 2024, and in respect of Thames River Capital LLP only for financial year ending 31 March 2025.

Modern slavery, forced or compulsory labour, servitude and human trafficking are severe violations of fundamental human rights and freedoms. We are committed to respecting human rights, ensuring we do not infringe the rights of others and addressing the risk or instance of modern slavery within our operations and supply chains.

The Act

The Act requires those organisations which supply goods or services, carry on a business (in whole or part) in the UK and have a turnover of £36 million or more to publish a Modern Slavery Statement each financial year detailing steps they have taken to ensure there is no modern slavery or human trafficking in their business and supply chains. We recognise our responsibility to respect and uphold human rights and we take this responsibility seriously.

Our organisation

We are a leading global asset manager operating under the brand name of ‘Columbia Threadneedle Investments’ (“**Columbia Threadneedle**”). Columbia Threadneedle is part of the global asset management group of Ameriprise Financial, Inc (NYSE:AMP) (“**Ameriprise**”), a leading US-based financial services provider. Columbia Threadneedle manages US\$645 billion of assets for institutional and retail clients globally and has a presence in 17 countries. Columbia Threadneedle has approximately 2,400 people including approximately 600 investment professionals around the world.¹ For more information on our business, please see our website:

www.columbiathreadneedle.co.uk

Columbia Threadneedle is committed to high standards of ethical behaviour. We are continuing to evolve practices to combat modern slavery and human trafficking and will endeavour to build on our efforts year on year.

Modern slavery risks in our operations and supply chains

To the best of our knowledge, we do not support any business involved in modern slavery and have taken the steps set out in this statement to continue to monitor and prevent this.

Due to the nature of the services we provide within the financial services industry and our employee base, we consider that the risk of modern slavery and human trafficking to our direct employees is low. Columbia Threadneedle operates robust recruitment processes that prohibit the primary indicators of modern slavery-like practices such as: withholding of worker identity or immigration documents; the use of child labour; and engaging with recruiters or labour brokers, who do not comply with the local labour laws.

However, there remains a risk that our operations may be indirectly linked to modern slavery because of our

¹ As at 31 December 2024.

business activities, including via our investments and customer activities and the supply chains we rely on to support these activities.

The entities that make up Columbia Threadneedle engage with a diverse range of suppliers who provide products and services, including those relating to business activities that Columbia Threadneedle outsources as part of its own service delivery and product offerings to customers.

Services from third party suppliers which we consider to be medium risk include personnel recruitment, advertising and marketing, information technology, business operations, travel, hospitality, call centre and real estate services.

Columbia Threadneedle also engages with suppliers who present a higher risk because they employ workers who provide cleaning and catering services.

Policies which reduce the risk of modern slavery and human trafficking

Columbia Threadneedle, as part of Ameriprise, complies with the following policies and procedures, which are reviewed and updated annually. These examples do not refer to modern slavery or human trafficking explicitly, but contain requirements and guidance that show the steps we take in practice to reduce the risk of modern slavery and human trafficking in our business dealings and relationships.

Global Code of Conduct

We operate under the Ameriprise Global Code of Conduct, which applies to everyone working for one of our business areas or affiliates. It requires each person, among other things, to comply with the Code, act with integrity, follow applicable laws, rules and regulations and report ethical concerns promptly.

Third Party Risk Management Policy

The Ameriprise Third Party Risk Management Policy aims to establish effective and sustainable third party risk governance. It applies to third parties engaged across Ameriprise, its affiliates and subsidiaries (note that some engagements by funds managed by Columbia Threadneedle are out of scope of this policy). It includes acknowledgement of personnel risk (including employment practices) and sub-contracting risk.

Please see the 'Suppliers' section below for further information on our third party risk assessment process.

Whistleblowing Policy

Columbia Threadneedle has two whistleblowing policies which apply to different parts of the business. These policies acknowledge the risk to all organisations of control failures or of unknowingly harbouring illegal or unethical conduct. They encourage a culture of openness and accountability to prevent such situations occurring or to address them if they do occur. The policies' aims are to:

- encourage staff to report suspected reportable concerns as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected;
- reassure staff that they should raise reportable concerns without fear of reprisal, even if they turn out to be mistaken; and
- provide staff with guidance on how to raise reportable concerns.

Global Anti-Bribery and Anti-Corruption Policy

The Ameriprise Global Anti-Bribery and Anti-Corruption Policy defines corruption as the abuse of entrusted power for private gain and sets out a no tolerance approach.

Background Checks & Screening Requirements Policy & Procedure

This policy details the standards for screening requirements and the procedures for carrying out background checks for new employees (temporary and permanent), intra-company transfers and current employees in the scope of the UK Senior Manager & Certification regime ("SMCR").

Global Anti-Money Laundering and Economic Sanctions Policy

This policy seeks to identify and verify customer information, monitor customer transactions for unusual activity, and report suspicious activity to the relevant authorities to assist in identifying criminal activities that may be linked to money laundering, terrorist financing, or financial or trade sanctions.

Risk Assessment and Management

Employees

We aim to comply with all applicable employment standards and human rights legislation in all jurisdictions in which we operate, including in our hiring and recruitment procedures. We respect and promote diversity, equality, inclusion and human rights in our workforce.

Our organisational values are well established in the business with appraisals measuring not only performance but adherence to and demonstration of those values, including:

- Client focused;
- Integrity always;
- Excellence in all we do; and
- Respect for individuals and for the communities in which we live and work.

Training

Where relevant to their line of business and function, employees receive training on policies and procedures that pertain to products and services we offer clients. This includes training on the ethical principles in our Global Code of Conduct as well as the firm's Anti-Corruption and Anti-Bribery and Anti-Money Laundering policies. All newly hired employees must complete Global Code of Conduct training and current employees must complete Global Code of Conduct training on an ongoing basis. Our employees annually attest that they have read and understood our Global Code of Conduct.

Suppliers – corporate level

As part of our on-boarding process for key corporate level vendors and suppliers, we have a robust third party risk assessment process. Key vendors and suppliers are those who we categorise as material or having the potential for inherent risk². This process is aimed at monitoring existing and future third party relationships.

We aim to oblige all our vendors and suppliers contractually to 'comply with laws and regulations' including, in particular, the Act in respect of our UK-based vendors and suppliers. We also seek to include requirements that they have policies and procedures in place to comply with the Act and to submit to an audit / produce reports at our request.

All new and existing vendors are monitored through third party tools for modern slavery risks. Any violations of the Act result in an alert for investigation to the Third Party Risk Management team for review with appropriate compliance teams.

Suppliers – fund level

Note that some engagements by funds managed by Columbia Threadneedle are out of scope of the third party risk assessment process.

However, in respect of the real estate funds managed by Columbia Threadneedle, each of the UK-based property managers and project managers appointed on the real estate mandates have confirmed compliance with their obligations under the Act within the terms of their contract with us. We will continue to monitor this.

Please see the 'Responsible Investment' section below for further information on our approach to managing such risks in our fund portfolios.

² Our risk assessment in this context includes, but is not limited to, the risk of modern slavery.

Customers

We undertake due diligence of our customers in accordance with the Global Anti-Money Laundering and Economic Sanctions Policy described above.

Responsible Investment

Environmental, social and governance (“ESG”) factors, including human rights considerations, are integrated into our Responsible Investment approach. These factors may be reflected in our investment research, corporate engagement, voting and reporting activities. Our engagement with companies includes discussion of social risks in their operations and supply chains, which can cover areas such as worker welfare, community relations, labour standards, and workplace safety.

Our approach to stewardship is outlined in our Responsible Investment Engagement Policy and Corporate Governance Guidelines – and their respective addendums - which relate to Columbia Threadneedle’s asset management function as stewards of our clients’ assets. In our dialogue with investee companies regarding ESG practices, we may reference international frameworks and standards, including the International Labour Organization (ILO) Core Conventions, OECD Guidelines for Multinational Enterprises, UN Guiding Principles on Business and Human Rights, and others.

Columbia Threadneedle is also a signatory of the United Nations Principles of Responsible Investment and is a signatory of the UK, Japan, Taiwan and South Korea Stewardship Codes, both of which prescribe disclosures covering how we approach ESG integration and investor engagement on ESG themes.

Process of consultation and approval

Various business lines and functions within Ameriprise have been consulted to update this statement on an annual basis, including: Legal and Compliance, Third Party Risk Management, Procurement, Responsible Investment and Human Resources. Representatives in these teams review and verify the information in this statement on an annual basis based on their knowledge, records and processes. Our practices and policies will continue to evolve in line with changing requirements and expectations across the globe. We have noted the updated “Transparency in Supply Chains” statutory guidance issued on 24 March 2025 and we are in the process of carrying out a gap analysis between our statement and the updated guidance.

This statement has been approved by the boards of the Columbia Threadneedle Investments subsidiaries which fall in scope of the Act:

- Columbia Threadneedle AM (Holdings) Limited
- Columbia Threadneedle Fund Management Limited
- Columbia Threadneedle Investment Business Limited
- Columbia Threadneedle Investments UK International Limited
- Columbia Threadneedle Management Limited
- Columbia Threadneedle Real Estate Partners LLP
- Columbia Threadneedle (Services) Limited
- Threadneedle Asset Management Limited
- Threadneedle Investment Services Limited
- Thames River Capital LLP

and signed by the Head of EMEA Columbia Threadneedle Investments.



Head of EMEA & Head of Global Business Operations,
EMEA Columbia Threadneedle Investments