



MODERN SLAVERY STATEMENT

BAILLIE GIFFORD GROUP

Financial year ending April 2022

BAILLIE GIFFORD



INTRODUCTION

Modern slavery is a crime resulting in an abhorrent abuse of human rights. It takes various forms, such as slavery, servitude, forced or compulsory labour, child labour and human trafficking. As a firm that looks to uphold high ethical and compliance standards at all times, we strive to ensure that we adhere to all relevant laws and treat our staff and suppliers with the utmost respect.

We consider it our responsibility to take all reasonable steps to ensure that any Baillie Gifford employee or individuals working within any of our operational supply chains (Suppliers) or Investee Entities are not being exploited, that they are safe and that relevant employment, health and safety and human rights laws, and international standards are obeyed. This is a responsibility we take seriously and includes a zero-tolerance approach to modern slavery.

As a regulated investment management firm, we believe that there is overall a low risk of modern slavery or human trafficking in our supply chains. Nevertheless, we are committed to taking all reasonable steps in order to ensure that there is no modern slavery or human trafficking in our supply chains and expect that all of our Suppliers and Investee Entities adhere to similar high standards as set out in our Baillie Gifford Supplier Code of Conduct, our Environmental Policy and our Stewardship Approach – ESG Principles and Guidelines.

This statement sets out the requirements of the UK Modern Slavery Act 2015, the Republic of Ireland Criminal Law (Human Trafficking) Act 2008, as amended by the Criminal Law (Human Trafficking) (Amendment) Act 2013, and the Australian Modern Slavery Act 2018¹, and Baillie Gifford's approach to combating modern slavery and human trafficking during 2021/22 and the steps which we will continue to take in 2022/23 in order to prevent modern slavery and human trafficking from taking place within our Suppliers and Investee Entities.

OVERSIGHT AND GOVERNANCE

Baillie Gifford's Anti-Financial Crime Group is responsible at Baillie Gifford Group level² for overseeing internal systems and controls to prevent or detect modern slavery. It also reviews periodic reports from the Compliance Department on the operation and effectiveness of the firm's systems and controls against modern slavery.

The Anti-Financial Crime Group reports to the Group Compliance Committee that is responsible for the systems and controls relating to regulatory compliance at Group level.

¹ Baillie Gifford Overseas Limited is registered with the Australian Securities and Investments Commission ('ASIC') as a foreign company under the Corporations Act 2001 (Cth) ('Corporations Act') and holds a foreign Australian financial services licence No: 528911 ('Foreign AFS Licence').

² For Baillie Gifford Investment Management (Europe) Limited, the firm's Compliance Officer oversees internal controls to prevent or detect modern slavery, reporting to Baillie Gifford Investment Management (Europe) Limited's Board.

ORGANISATIONAL STRUCTURE AND OUR BUSINESS

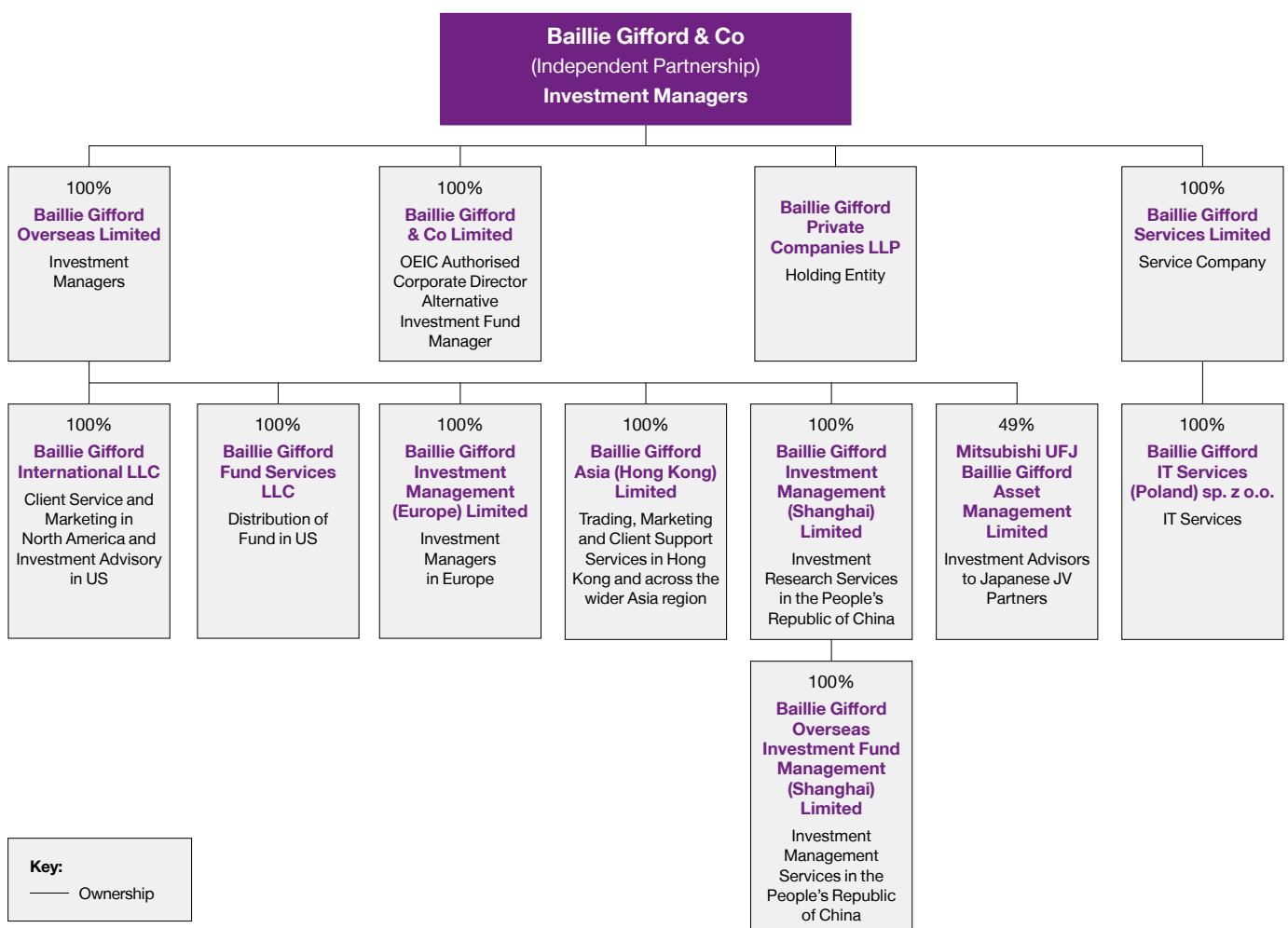
Baillie Gifford is an independent global investment management firm based in Edinburgh. Please find below details of the Baillie Gifford Group structure.

Baillie Gifford & Co, a Scottish partnership wholly owned by 47 partners, heads the Baillie Gifford Group. The partnership has three 100% owned subsidiaries, which are private limited companies registered in Scotland. A new Limited Liability Partnership was established in 2021 to support our private companies' business. It also has five indirectly 100% owned subsidiaries through Baillie Gifford Overseas Ltd, one of which has its own 100% owned subsidiary.

The partnership also has one indirectly 100% owned subsidiary through Baillie Gifford Services Limited, as well as one joint venture through Baillie Gifford Overseas Ltd

The Baillie Gifford Group has 1,684 permanent employees as of 31st March 2022. Its principal office is in Edinburgh and it has a number of international offices. As this international presence expands, modern slavery risks are considered, and appropriate mitigating measures are taken.

GROUP STRUCTURE



N.B. Additionally Baillie Gifford Life Limited, a 100% owned subsidiary of Baillie Gifford & Co, entered into members' voluntary liquidation on 28 January 2019. It is no longer carrying out insurance business and all its regulatory permissions have been cancelled.

OUR SUPPLIERS

A group of Baillie Gifford's size has hundreds of Suppliers of various size and nature, including Suppliers of IT and other office equipment and professional services from our lawyers, accountants and other advisers and consultants. We have minimal contact with the countries and sectors that are generally regarded as being the most likely to have a risk of modern slavery.

SUPPLIER ADHERENCE TO OUR VALUES

Baillie Gifford operates a zero-tolerance approach to modern slavery and human trafficking. For those in our supply chain and contractors that we deem to be higher risk, we seek to oblige these Suppliers to comply with our policies as set out in this statement and our Supplier Code of Conduct.

We have sent our Supplier Code of Conduct to all existing key Suppliers. We have also taken steps to ensure that our Supplier Code of Conduct, including our expected standards of behaviour, are acknowledged by these Suppliers. We encourage all Suppliers to inform us should they have any concerns regarding actions which may go against best practice and the principles set out in our Supplier Code of Conduct. We have received no such reports of concern to date.

Any new key Suppliers with whom we engage will receive the Supplier Code of Conduct through our due diligence process.

SUPPLIERS DUE DILIGENCE PROCESSES FOR MODERN SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we have adopted a risk-based anti-modern slavery assessment methodology to rate each of our direct Suppliers in order to determine what level of due diligence, if any, is required. This approach is designed to be proportionate to the risks identified and is supported by the existing anti-bribery and corruption work which is undertaken by our Compliance function.

Each Supplier is considered on a case-by-case basis, based on a combination of both its geographic region and the sector within which it operates.

Depending on the risk rating that we assign to a Supplier, the following due diligence measures are considered:

- Check Supplier's website for modern slavery statement or equivalent;
- Include appropriate modern slavery clauses in contractual terms where necessary with the assistance of our commercial contract checklist;
- Conduct internet search for any modern slavery related adverse media;

- Request annual certification from Suppliers to confirm that they have appropriate modern slavery provisions in place;
- Provide a copy of Baillie Gifford's current Modern Slavery Statement to Suppliers identified as high risk;
- Provide a copy of Baillie Gifford's current Supplier Code of Conduct to key Suppliers;
- Consider information requests to evidence steps the Supplier has taken to combat modern slavery;
- Consider onsite Supplier visit to discuss/review Supplier's procedures.

Suppliers are assigned a modern slavery risk rating and due diligence is completed based on this rating on an ongoing basis as part of the anti-modern slavery risk assessment. The risk rating of Suppliers is kept under review throughout the course of the engagement for those identified as medium or high-risk Suppliers.

OUR POLICIES ON MODERN SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our Suppliers and Investee Entities. This statement reflects our commitment to acting in an ethical manner and with integrity and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place in our supply chains and Investee Entities.

This statement is supported by our ESG Principles and Guidelines and our Anti-Bribery and Corruption (including Anti-Modern Slavery) Policy and Supplier Code of Conduct which is overseen by the Anti-Financial Crime Group which reviews our approach to combating modern slavery and human trafficking³. Baillie Gifford's Code of Ethics sets standards and expectations on all partners and staff in upholding the highest level of ethical conduct in their day-to-day business. In addition, our recruitment process requires the risk of any modern slavery or human trafficking to be taken into consideration. All employees who join us are subject to checks to ensure that they are genuine applicants, including verification of identity, references, evidence of qualifications and criminal record checks.

OUR INVESTMENTS

Baillie Gifford manages money on behalf of some of the largest institutional and professional investors from around the world. We manage global, international and regional equity, multi-asset and fixed income mandates. We invest globally and have investments across many sectors.

As transparency grows and the research becomes more established, we will continue to review and develop our modern slavery approach to improve our due diligence and response to this area. Modern slavery and companies' treatment of their workers

³For Baillie Gifford Investment Management (Europe) Limited, the firm's Compliance Officer carries out this oversight, reporting to Baillie Gifford Investment Management (Europe) Limited's Board.

are becoming increasingly important to our analysis of the companies in which we invest.

INVESTEES ENTITIES ADHERENCE TO MODERN SLAVERY AND DUE DILIGENCE PROCESSES FOR MODERN SLAVERY

We monitor all current Investee Entities for a range of Environmental, Social and Governance issues including human rights.

We expect all holdings to operate in accordance with the principles and standards set out in the United Nations Global Compact, which includes human rights and labour centric principles. We expect our holdings to respect internationally accepted human rights and labour rights throughout their business operations and value chain. This should include the maintenance of health, safety and wellbeing management systems, particularly in high-risk sectors; the management of exposure to labour and human rights risks throughout their value chain, especially human slavery; and encouraging positive relationships with local communities. We would also expect all potential and current Investee Entities to have in place policies and procedures in relation to combating modern slavery. Investors and relevant departments are encouraged to be alert to scenarios involving these wider considerations as part of initial due diligence and/or ongoing interactions with Investee Entities on an ongoing basis.

As part of our ongoing initiative to identify and mitigate modern slavery risk in our holding companies we perform the following steps:

- We instruct an external provider to perform a regular review of entities we invest in under the 10 principles as outlined by the UN Global Compact and related standards including the (Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights), as well as their underlying conventions. This is an effective tool to keep abreast of developments or issues in a timely manner.
- We engage directly with Investee Entities with material challenges in this area and address concerns as part of the decision-making process. Ongoing oversight and engagement with Investee Entities is also undertaken throughout our relationship with the firm as part of our stewardship work.

For further information on our approach to investments, please refer to the ESG Principles and Guidelines.

TRAINING

Baillie Gifford is committed to raising awareness of the issues of modern slavery with employees. To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains, we have provided tailored training to key staff involved in supply chain management and facilities management. We also provide awareness to all staff through biennial Anti-Financial Crime e-learning. We monitor compliance with this training requirement.

INTERNAL REPORTING

Should any of our staff become aware of any potential modern slavery risks within the business or within any Suppliers and Investee Entities they are encouraged to report such concerns using the procedures as outlined in the Anti-Bribery and Corruption (including Anti-Modern Slavery) Policy and the Baillie Gifford Group Whistleblowing Policy.

OUR EFFECTIVENESS IN COMBATING MODERN SLAVERY AND HUMAN TRAFFICKING

The steps we have taken to date have enabled us to categorise and identify current risks in our Suppliers and Investee Entities and to address these with additional due diligence activities. The nature of our business activities and the high standards which we expect from ourselves and our Suppliers is reflected in the number of Suppliers currently contracted with Baillie Gifford which are regarded as low risk. We have engaged with no high-risk Suppliers since our first Statement was produced in September 2016.

We have taken the following steps during the course of 2021/2022 to strengthen our approach to combating modern slavery and human trafficking:

- Considered and monitored the impact of modern slavery/ human trafficking risks as Baillie Gifford's business expanded internationally and identified additional Suppliers to issue our Supplier Code of Conduct to as a result of this;
- Continued to assess the response of suppliers to our Supplier Code of Conduct and ensuring we receive appropriate ongoing confirmation from them.
- Monitored and reviewed modern slavery emerging risks and jurisdictions issued by international governments and reviewed our Suppliers to confirm they did not fall into these categories.
- Continued to be a member of Transparency in Supply Chains (TISC) Report, an organisation which supports UK anti-slavery work;
- Uploaded the Baillie Gifford Modern Slavery Statement to the websites of Australian Border Force, TISCreport.org and the UK Government's Modern slavery statement registry ;
- Reviewed, updated and implemented the Baillie Gifford Supplier Code of Conduct to raise awareness amongst our key Suppliers and set out the best standard practices and principles we expect from them.
- Continued with quarterly meetings between key internal departments to assess Suppliers and Investee Entities;
- Created notification tracker to ensure external assertions of potential Modern Slavery issues at investee entities are appropriately followed up and resultant actions logged;
- Reviewed our Investee Entities under the 10 principles as outlined by the UN Global Compact;
- Engaged with Investee Entities on modern slavery issues and reported transparently on our discussions;

- Executed our Modern Slavery annual training plan with 100% completion rates for this tailored training in 2021;
- Reviewed and updated current policies such as the Anti-Bribery and Corruption Policy which encompass anti-modern slavery and human trafficking;
- Utilised a standard compliance risk assessment framework for our 2021 Anti-Bribery and Corruption which incorporates our Anti-Modern Slavery Risk Assessment;
- Continued to use our commercial contract checklist in order to assess new third party Supplier contracts and those due for renewal, including an agreed form of anti-modern slavery and human trafficking wording in all contracts where deemed necessary.
- Escalated any relevant matters to the Anti-Financial Crime Group⁴, through regular reporting and responded to any queries from them.

CONTINUING PROCESSES AND FURTHER STEPS

We are committed to continuing to take the above steps, and will further enhance our approach to combating the crime of modern slavery or human trafficking during 2022/23 by way of the following:

- Monitor the impact of modern slavery/human trafficking risks as our global operational footprint expands;
- Build on our relationship with Transparency in Supply Chains (TISC) Report, an organisation which supports UK anti-slavery work, to improve our oversight and processes;
- Regularly review entities we invest in and address concerns by engaging directly with the company in line with our stewardship processes. We will develop our modern slavery approach to investments as transparency grows and the research becomes more established to improve our due diligence and response to this area;
- Continue to focus on non-listed holdings to ensure the risk of Modern Slavery is integrated into the material risk assessments;
- Continue to enhance our process in relation to the distribution and follow up of our Supplier Code of Conduct and receiving appropriate ongoing confirmation from Suppliers who have received it.

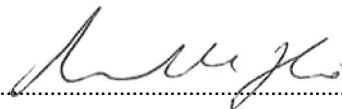
⁴ For Baillie Gifford Investment Management (Europe) Limited to the firm's Compliance Officer reporting to the Baillie Gifford Investment Management (Europe) Limited's Board.

This statement is made pursuant to the Australian Modern Slavery Act 2018, the Republic of Ireland Criminal Law (Human Trafficking) Act 2008, as amended by the Criminal Law (Human Trafficking) (Amendment) Act 2013 and section 54(1) of the UK Modern Slavery Act 2015 and has been approved by the Management Committee of Baillie Gifford & Co and Boards of Baillie Gifford Overseas Ltd, Baillie Gifford Investment Management (Europe) Limited and Baillie Gifford & Co Ltd. It constitutes the Baillie Gifford Group’s Modern Slavery Statement for the financial year ending April 2022.


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Partner of Baillie Gifford & Co and Director of Baillie Gifford Overseas Ltd

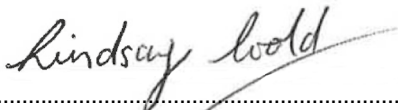
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