

# Modern Slavery Transparency Statement



This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (the "Act") and constitutes the slavery and human trafficking statement for the financial year ended 31 December 2023 for Man Group plc and its relevant subsidiaries ("Man Group").

The use of the term "modern slavery" in this statement includes slavery, servitude, any type of forced or compulsory labour and human trafficking as defined in the Act.

## Organisational structure, business, and supply chains

Man Group is a global active investment management firm focused on delivering attractive performance and client portfolio solutions, deploying the latest technology across our business to help ensure we stay at the forefront of our evolving industry. We provide long-only, alternative, and private markets products on a single and multi-manager basis. We develop bespoke solutions and fund of hedge fund services which utilise the firm's advanced technology, infrastructure, and expertise. We continuously invest in technology, talent, and research as we strive to deliver the best results for our clients. Across our six investment managers, we manage USD 161.2bn<sup>1</sup> for our global clients. Further details on our business, organisational structure and operations can be found on our website: <https://www.man.com/about-us>.

## Our Commitment

One of Man Group's core business values is that of responsibility: we expect our people to do the right thing and conduct our business with the highest standards of integrity. We require high standards of ethical behaviour throughout the business; policies and procedures exist to ensure that employees and contractors at all levels understand and maintain these standards.

As an investment management firm, we have relatively simple supply chains largely comprising of business and professional service organisations. As a result, we believe there is limited risk of slavery or human trafficking taking place within our business or supply chains. Despite the limited risk, Man Group is committed to ensuring that modern slavery does not exist within our supply chain or any part of our business. We have a zero-tolerance approach to slavery and human trafficking and expect businesses within our supply chain to comply with those values. Man Group will not support or deal with any business knowingly involved in slavery or human trafficking.

## Policies in relation to slavery and human trafficking

As mentioned above, we have several policies and procedures which help ensure that employees and contractors understand and maintain the highest standards of ethical behaviour. Man Group regularly reviews its policies and processes to evaluate standards and conduct relating to ethical and social responsibility. Below is a list of the policies, procedures, statements and standards to which we adhere:

- Our **Global Code of Ethics, Business Principles and Staff Handbooks**, reflect Man Group's commitment to always act ethically and with integrity across our business relationships.
- We seek to attract and elevate the best talent and foster a fair and inclusive workplace where everyone has the opportunity and support to reach their full potential. As part of this, we have a zero-tolerance approach to discrimination and harassment of any form. We hold ourselves accountable to the highest standards of behaviour, as set out in our **Global Inclusion Statement**.
- Our **Anti-Bribery and Corruption policy** sets out standards which all staff are expected to adhere to and sets out the principles of due diligence to ensure that those standards are extended to those with whom Man Group conducts business.
- Our **Human Rights Statement** gives information on our recognition and promotion of human rights around the world; we are active members of the United Nations Global Compact and are guided by internationally

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<sup>1</sup> as at 30 September 2023

recognised frameworks such as the Guiding Principles on Business and Human Rights. We will not tolerate discrimination or harassment of any kind and call out behaviour that is against our values.

- Our Global **Whistleblowing policy** details how any concerns can be confidentially raised, investigated and managed. We provide both internal and external contact points for employees and contractors to use. If our staff wish to ensure their anonymity, they can use our whistleblowing hotline or online reporting service which is operated by an external provider. They can also communicate directly with any governmental, regulatory, self-regulatory, or law enforcement authority regarding or with respect to alleged or suspected violations of law. The Global Whistleblowing policy is sponsored by the Group CEO and is subject to independent oversight by the Man Group plc Board's Audit and Risk Committee.
- Man Group is committed to ensuring the health and safety (H&S) of its employees and any other persons who may be affected by Man's activities. We recognise our responsibility to provide and maintain a safe working environment to prevent ill health, occupational injury and promote mental wellbeing. Our commitment is set out in our updated **Man Group Health and Safety Policy Statement** endorsed by the Group CEO. Man Group adheres to a structured H&S management system, which defines Man's minimum H&S standards, to support the safe delivery of Man Group services globally.
- For those working at Man Group in the UK a 'right to work' check is always completed to ensure that workers have the appropriate rights to work and are aware of their rights and responsibilities associated with doing so. Our Staff Handbooks and employment contracts highlight aspects of the employment relationship between Man Group and staff members including pay, hours of work, termination rights and the grievance procedure to ensure that all staff are aware of their contractual rights.
- Man Group is firmly committed to Responsible Investment ('RI'), as codified in the **United Nations-supported Principles for Responsible Investment ('PRI')**. Our commitment to RI is fundamental to our corporate strategy, both as a listed company ourselves and in the manner for which we provide investment services to our clients and beneficiaries. We are signatories to the UK Stewardship Code 2022, details of which can be found on our website: [Responsible Investment | Man Group](#).
- Through the **Man Group plc Charitable Trust**, Man Group is committed to promoting education, with a focus on literacy and numeracy, and to supporting charitable causes more broadly through employee engagement programmes.

## Risk assessment of third parties and due diligence processes

Man Group has adopted a materiality approach within our due diligence processes to understand where the risks of modern slavery are greatest. This approach is used to prioritise our activities and oversight when checking for the presence of modern slavery within our supply chain.

We provide clear guidance and training to all our teams on how to alert management to any suspected incidents of slavery and human trafficking. Our template services agreements include a specific reference to the Act as well as a general requirement for third parties to provide services in accordance with all applicable laws and regulations. In addition, our new supplier form requires new suppliers to confirm that they either comply with the Act (for UK-based suppliers) or that they have not, directly or indirectly, committed any slavery, forced labour or human trafficking offences (for suppliers based outside the UK).

Our Supplier Code of Conduct outlines the minimum standards Man Group expects of its suppliers, as pertaining to considerations around any economic activities, impact to the environment, and engagement with our wider communities. It includes the expectations we have upon our suppliers and sub-contracted suppliers in relation to modern slavery. All new suppliers are screened using the Refinitiv World-Check database, with ongoing screening conducted by Man Group's KYC Team on a regular basis.

As a signatory to the PRI, Man Group seeks to manage financially material environmental, social and governance (ESG) factors alongside all other relevant investment risks, viewing ESG analysis as a natural complement to traditional financial analysis. Accordingly, we believe these factors may carry long-term, systemic implications for our portfolio companies.

Among social considerations, labour practices pose an often-overlooked risk, particularly with respect to how a company manages its supply chain. As a multi-strategy asset manager, Man Group believes that examining social and labour practices helps to mitigate such risks.

## Training

In order to ensure that our staff have a comprehensive understanding of the risks of modern slavery in our supply chain and our business, we have provided training to all employees which explains the provisions of the Act, the definitions of various forms of modern slavery including servitude, human trafficking and forced labour and the action that employees should take should they become aware of, or suspect the presence of, modern slavery within Man Group or its supply chain.

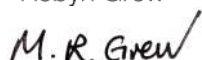
## Monitoring effectiveness at tackling modern slavery

As a group we understand the importance of assessing the effectiveness of our approach to modern slavery and are committed to ensuring ongoing improvement and adherence to policies and procedures. This includes:

- Continuing to deliver modern slavery training to all our employees annually.
- Embedding the ongoing third-party due diligence reviews and monitoring into Man Group's risk framework continues through the ongoing development of the Third-Party Risk Management Framework.
- Maintaining our commitment to developing our policies to support the changing environment in which we operate.
- The Man Group ESG Analytics tool provides investment teams with both portfolio and issuer-level ESG scoring and considers material social issues where relevant, including supply chain labour issues and modern slavery. This enables investment teams to monitor social risks via the tool in addition to conducting their own research. In addition, we have licensed multiple ESG datasets across the firm and have access to thousands of granular ESG metrics, including company-level social data, which investment teams may use to inform investment decision-making.
- The Man Group Stewardship Code details the ways in which it engages with companies it invests in, as well as how Man Group exercises voting rights and manages actual and potential conflicts of interest. For issues relating to labour practices and modern slavery, Man Group engages systematically at a firm-level via our centralised Stewardship team, collaboratively along with other institutional investors and at a fund-level through investment teams engaging directly.
- We are registered on the UK Government Modern Slavery Statement registry and submit statements online to enhance transparency and accessibility in line with Government requirements.

The Man Group plc Board has approved this statement on behalf of Man Group. This statement will be reviewed on an annual basis and published on the Man Group website, which can be viewed from our homepage at [www.man.com](http://www.man.com). This statement will also be published on the Modern Slavery Statement Registry <https://modern-slavery-statement-registry.service.gov.uk/>.

Robyn Grew

A handwritten signature in black ink that reads 'M. R. Grew'.

CEO, Man Group plc on behalf of Man Group

Date: 28/02/2024

## Appendix – List of Man Group entities that have approved and adopted the Modern Slavery Transparency Statement

- Man Strategic Holdings Limited
- Man Group Holdings Limited
- Man Group Operations Limited
- Man Group Limited
- Man Solutions Limited
- Man Group Investments Limited
- GLG Partners LP
- Man GLG Partners LLP
- AHL Partners LLP
- Man Investments Limited
- Man Investments Finance Limited
- Man Group Treasury Limited
- Man Worldwide Operations Management Limited
- Man Investments Holdings (Netherlands) B.V.
- FA Sub 3 Limited
- Mount Granite Limited
- Man Fund Management UK Limited