

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 2024 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 alternative investment management firm focused on pursuing outperformance for sophisticated clients via our Systematic, Discretionary and Solutions offerings. We deploy the latest technology across our business to help ensure we stay at the forefront of our evolving industry. We provide single and multi-manager investment strategies, underpinned by deep research and span public and private markets, across all major asset classes with a significant focus on alternatives. We manage USD 174.9bn¹ for our global clients, and the billions of retirees and savers they represent. 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 six core business principles 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 comprised 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

- 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.
- Our **Global Inclusion Statement** sets out our standards of behaviour in order 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.
- Our **Anti-Bribery and Corruption policy** sets out standards which all staff are expected to adhere to along with 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 recognised frameworks such as the Guiding Principles on Business and Human Rights.
- 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.
- Our Man Group **Health and Safety Policy Statement** sets out our commitment to ensuring the health and safety (H&S) of our 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

¹ as at 30 September 2024

commitment is 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 completed to ensure that workers have the appropriate status to work and are aware of any associated responsibilities. Our Staff Handbooks and employment contracts detail our peoples' employment relationships including pay, hours of work, termination rights and the complaints and grievance procedures 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'). This commitment 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 have been signatories to the UK Stewardship Code for four consecutive years and, in 2024, joined the Japan Stewardship Code. More details can be found on our website: [Responsible Investment | Man Group](#).
- Through the **Man Group plc Charitable Trust**, Man Group commits 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 process

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 onboarding process for suppliers requires they 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 of 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 recognises that responsible investing is integral to our duty to act in the best long-term interests of investors, shareholders, and stakeholders. We 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 can impact long-term value creation for the companies in which our funds and mandates invest. 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 provide 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.
- Continuing to develop the centralised Third-Party Risk Management Framework and broadening of due diligence processes.

- Maintaining our commitment to developing our policies to support the changing environment in which we operate.
- The Man Group ESG Analytics tools provide investment teams with portfolio and issuer-level ESG scoring, enabling monitoring of material social issues where relevant, including supply chain labour issues and modern slavery. 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.
- Man Group's Stewardship Codes outline how we engage with companies that we invest 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, at the stakeholder level through collaboration with institutional investors and at a fund-level via direct engagement by investment teams.
- 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. This statement will also be published on the Modern Slavery Statement Registry <https://modern-slavery-statement-registry.service.gov.uk/>.



Robyn Grew

CEO, Man Group plc on behalf of Man Group

Date: Feb 26, 2025

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

- AHL Partners LLP
- Man Group Investments Limited
- FA Sub3 Limited
- GLG LLP
- GLG Partners LP
- Man Group Limited
- Man Group Operations Limited
- Man Group Treasury Limited
- Man Investments Finance Limited
- Man Investments Limited
- Man Solutions Limited
- Man Strategic Holdings Limited
- Mount Granite Limited
- Man Fund Management UK Limited