

# **Modern Slavery Statement**

Modern Slavery Act statement for the financial year ending 31st December 2023

This Modern Slavery statement is made by the following entities:

- LGT Wealth Management UK LLP;
- LGT Wealth Management US Limited
- LGT Wealth Management Limited;

This statement covers the reporting entities for financial year ending 31<sup>st</sup> December 2023 and sets out the actions we have undertaken to assess and address modern slavery risks within our operations and supply chain in line with the United Kingdom's Modern Slavery Act 2015. For the purposes of this document, references to 'LGT WM' is a reference to LGT Wealth Management UK and its partnering entities.

## **LGT WM's Structure**

LGT WM is a professional services firm providing investment management services and financial advice to clients and is regulated by the Financial Conduct Authority (FCA). LGT WM employs over 650 people and has business operations in the United Kingdom and Jersey.

LGT WM is part of the private banking group LGT WM, owned by the Princely Family of Liechtenstein. LGT WM is a leader in the field of integrating sustainability, the highest standards in occupational health and safety and the observation of human rights and labour law into all facets of its businesses, including its supply chain. We follow the lead of LGT WM in adhering strongly to these principles. Furthermore, in 2022, LGT WM set out its duty as a financial organisation to respect human rights, and its adherence to the UN Guiding Principles on Business and Human Rights, and the responsibility to implement the UN "Protect, respect and remedy" framework. LGT WM is a member and signatory of the following initiatives:

- International Bill of Human Rights (including Universal Declaration of Human Rights)
- UN Guiding Principles on Business and Human Rights: Implementing the UN "Protect, respect and remedy" framework (2011)
- UN Global Compact
- International Labour Organization's Declaration on Fundamental Principles and Rights at Work
- OECD Guidelines for Multinational Enterprises
- Liechtenstein Initiative – Finance against Slavery and Trafficking (Fast Initiative, Blueprint 2019)
- Principles for Responsible Banking (PRB)
- Principles for Responsible Investment (PRI)

As part of our commitment to combating modern slavery, all staff are issued with an Employee Handbook upon joining the Firm and this includes a section on Modern Slavery. This section informs staff of how Modern Slavery is addressed and monitored at LGT WM and aims to provide the tools for staff to spot. We fully support

the government's objectives to eradicate all forms of modern slavery and human trafficking.

## **Supply Chain**

LGT WM's Management has given careful consideration to Section 54 "Transparency in Supply Chains" of the Modern Slavery Act and its implications for our procurement of services and goods. The reporting entities have a large mix of suppliers ranging from long-standing partnership relationships to more ad-hoc/short term contracts. LGT WM has no direct supply chain relationships in manufacturing and infrastructure, both sectors with a higher risk of modern slavery, but we engage with suppliers who do. In addition, LGT WM sources products and services to support our services to staff and clients, including (but not limited to):

- Property and Utilities;
- Facilities Management, maintenance and cleaning;
- Information technology, including software and hardware purchasing, networking, peripherals and consulting services;
- Human resources such as benefits, training and recruitment services;
- Financial services, including banking services and data feeds;
- Marketing services including sponsorship, events, media engagement and hospitality;
- Professional services including Travel, accounting, audit, legal and tax consulting.

## **Modern Slavery Risk in our Operations and Supply Chains**

### **In LGT WM's Operations**

Given the nature of our operations and the profile of our workforce, we consider the risk of Modern Slavery occurring in our operations to be very low however we maintain a number of procedural safeguards throughout our operational processes to minimise said risks from occurring.

All employees have remuneration packages that exceed the national living wage. To remain competitive and ensure we offer all employees a fair wage, salaries are benchmarked against similar roles within the financial industry yearly. There are also recruitment policies in place stipulating legal working age requirements. Additional pre-employment checks are made on the legal working status of all potential employees, employees are subject to verifications pre-employment including 6 years of employment and education references, confirmation of any qualifications and a basic DBS and credit check.

For regulated roles, LGT WM conducts a standard DBS and credit check and obtains regulated employment references. With regard to the expected work pattern, all contracts stipulate an employee's expected place of work and normal working hours. In addition to this, employees are directed to the Employee Handbook which is provided to all new joiners at the point of offer outlines our flexible working and hybrid working policies.

### **In LGT WM's Supply Chains**

We consider the risk of modern slavery occurring within our UK domiciled first-tier suppliers to be very low. Given that the UK is a country with low levels of known Modern Slavery (according to the Global Slavery Index). In addition, we have concluded that the services we provide, and goods used are very unlikely to be affected by modern slavery considerations. The services that LGT WM provides to its clients are predominantly office-based and our supply chain largely consists of other regulated professions (banks, solicitors, accountants etc.) and we thus consider the slavery and human trafficking risk to be extremely low.

Consequently, we have taken no specific action during the past financial year in relation to these elements of our supply chain.

Other services procured by or on behalf of LGT WM consist primarily of data services, office, recruitment and information technology resources. LGT WM reviews and vets any external contractors to ensure that they have the requisite accreditations and are appropriately qualified for the roles they are asked to undertake. Again, these services are based in the United Kingdom and Jersey and LGT WM considers these services to be low risk in respect of slavery and human trafficking. Given this, we believe that our current procedures, coupled with our ability to rely on professional body and regulatory oversight in relation to professional services are sufficient in this regard.

In terms of goods supplied to LGT WM, the majority are goods for use in an office environment. Occasionally, LGT WM will be supplied with goods for use outside an office environment, for example, client gifts. All LGT WM personnel with purchasing responsibilities are required to adhere to the abovementioned policy when exercising their responsibilities. During the past financial year, we have not deemed it necessary to take any additional steps over and above our standard supplier approval process, but shall maintain assessment, on an ongoing basis, as to whether any additional measures are required in relation to each and every substantial acquisition of goods.

## **Planned and Ongoing Actions**

### **Operational Actions**

LGT WM has policies and procedures in place applicable to the reporting entities. This is in place to ensure that all entities' employees are working of their own free will. This includes passport and visa checks to ensure that individuals have a right to work. If staff feel that these rights are not being followed, whistleblowing procedures are clearly signposted for staff to report in confidence.

**Vendor Risk Management** In line with the external regulations and internal procedures we abide by, LGT WM takes a risk-based approach to managing our vendor relationships. This is a uniform and consistent engagement and management process where certain risks will be identified and provide a framework for mitigation. To provide more specific instances the following actions are applied:

- All events and catering suppliers are required to confirm all staff are paid national living wage.
- Additional ESG checks are being made on all new suppliers being onboarded to ensure no instances of Modern Slavery are in the public realm.

All our suppliers are required at Onboarding stage, in respect of their own supply chains, to provide appropriate assurance of their compliance with the relevant slavery and human trafficking laws. Those who are unable to provide this shall have their contracts reviewed and, if necessary, terminated.

Each new supplier and service-provider must confirm, prior to commencing its business relationship with us, that both it and its own supply-chain comply with the MSA.

## **Assessing the Results of our Actions**

If issues are identified by LGT WM staff members in relation to modern slavery, these can be reported to Human Resources or through LGT WM's internal whistleblowing procedures. External parties may use our email service Email: [lgt.let-us-know@lgt.com](mailto:lgt.let-us-know@lgt.com) or let us know in writing: LGT Group Foundation Ltd, FAO Group Internal Audit, Herrengasse 12, FL 9490 Vaduz, Principality of Liechtenstein

Despite our operations and vendor relationships being considered low risk, we will continue to assess and improve our existing controls to identify and mitigate modern slavery risk in our businesses. This includes:

- Working to enhance the level of scrutiny on outsourcing relationships to ensure suppliers are providing suitable protection against all elements of modern slavery.
- Ensure that any identified risks on the current processes are reviewed and actioned on in a timely manner.
- Understand how and where LGT WM's business operations reach across the globe (through supply chains) and assess the risk associated with that supply chain.

## **Approval**

This statement has been approved by the Management Board of LGT Wealth Management UK LLP, and signed by its designated member, on 23 March 2024, who will review and update it on an annual basis.