



aberdeen

Aberdeen Group plc Modern Slavery Statement

2024

[aberdeenplc.com](https://www.aberdeenplc.com)



Tracey Hahn
Chief People Officer

Far from declining, the instances of modern slavery and forced labour have increased in recent years. We know that geopolitical crises and the growing numbers of economic migrants and asylum seekers attempting to make their way to the West, increase the risk of people being exploited by criminals. Women and children are especially vulnerable to trafficking and exploitation.

Modern slavery takes many forms, from human trafficking and forced labour, to bonded labour and child slavery. This is truly a global crisis, and developed nations are not immune.

Businesses have a critical role to play and, at Aberdeen, we remain committed to being an industry leader in tackling these issues. We are working hard to promote best practice across our operations, supply chain and the companies we invest in, and we are making it clear to our clients and customers – those who invest with us and who we work with – that modern slavery has no part in our society, or our business.



Introduction



Aberdeen Group plc (Aberdeen) is committed to transparency and integrity, as demonstrated through our Modern Slavery Statement, prepared in accordance with the UK Modern Slavery Act 2015. This document details our efforts and activities for the year ending 31 December 2024, aimed at preventing modern slavery within our operations and throughout our value chain.¹

In our commitment to combatting modern slavery, we have adopted the United Nations (UN) definition of modern slavery as an umbrella term including forced labour, human trafficking, and forced marriage. Our approach is further informed by international standards including: the United Nations' (UN) Guiding Principles on Business and Human Rights, the International Bill of Human Rights, and the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work. We are a signatory to the ten Principles of the UN Global Compact and communicate progress annually through our Sustainability and TCFD Report.

The UK financial services industry has a key role to play in combatting modern slavery and forced labour. The UK Modern Slavery Act established essential reporting requirements for businesses across all sectors, setting a foundation for transparency. Within Aberdeen, we strive for best practice in this area and, in publishing our statement, we regularly review our reporting practices and include additional content and disclosures where appropriate.

As we acknowledge in our statement, we recognise the importance of assuming the presence of modern slavery and forced labour within our value chain and the responsibility we bear in taking steps to safeguard victims.

Our statement also describes our investment approach concerning modern slavery, as well as a wider consideration of the broader human rights issues that are relevant for our business model.

Aberdeen remains committed to its contribution to the prevention of modern slavery, continuously seeking ways to enhance our practices and make a meaningful impact.

Tracy Hahn, our Chief People Officer, is the Executive Sponsor of our Modern Slavery Statement.

¹ Refers to Aberdeen Group plc and each of its UK subsidiary commercial organisations; see page 21.

At a glance

We are a Wealth & Investments group...

UK savings and wealth platforms

interactive
investor (ii)

As the UK's second-largest direct-to-consumer investment platform by AUA and number one by net flows¹, ii offers a self-directed investing and trading platform that enables individuals in the UK to plan, save and invest in the way that works for them.

Our clients:

Individuals that are:

- Lower confidence investors
- Self-directed investors
- Active/expert investors

2024 Adjusted operating profit
£116m (2023: £114m)

2024 AUM
£77.5bn (2023: £66.0bn)

2024 Cost/income ratio
58% (2023: 60%)

Adviser

Our Adviser business, the UK's second-largest advised platform by AUA², provides financial planning solutions and technology for UK financial advisers which enables them to create value for their businesses and their clients.

Our clients:

- Financial advisers

2024 Adjusted operating profit
£126m (2023: £118m)

2024 AUMA
£75.2bn (2023: £73.5bn)

2024 Cost/income ratio
47% (2023: 47%)

Specialist asset management

Investments

Our capabilities in our investments business are built on the strength of our insight – generated from wide-ranging research, worldwide investment expertise and local market knowledge.

Our clients:

- Insurance companies
- Sovereign wealth funds
- Independent wealth managers
- Individuals
- Pension funds
- Platforms
- Banks
- Family offices

2024 Adjusted operating profit
£61m (2023: £50m)

2024 AUMA
£369.7bn (2023: £366.7bn)

2024 Cost/income ratio
92% (2023: 94%)

¹ Source: Fundscape, Direct Matters Q4 2024 report.

² Source: Fundscape, The Platform Report Q3 2024. Excludes Curtis Banks AUA.

...delivering valued outcomes for our customers



Our purpose

To enable our clients to be better investors

Our cultural commitments

**We put the
client first**

**We are
empowered**

**We are
ambitious**

**We are
transparent**

Our sustainability ambition

Our sustainability ambition is to enable inclusive growth and a credible environmental transition for our clients, people and tomorrow's generation. We believe this is responsible business.



Business overview

December 2024

Worker type

99%

of employees completed training on modern slavery and recognising warning signs

More than

4,000

employees globally

Offices in more than

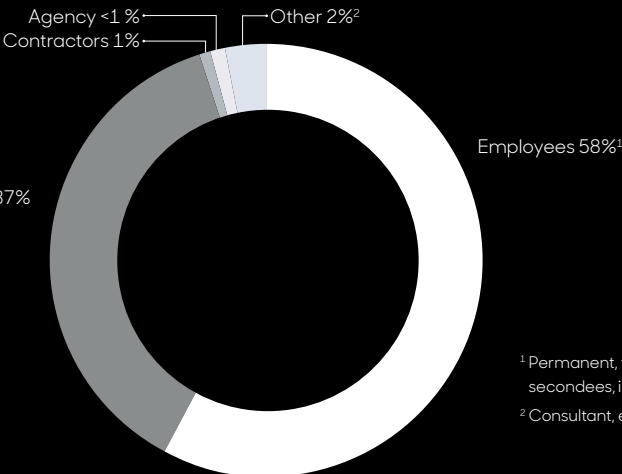
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countries globally

80%

Colleagues represented by an association or trade union

We are proud of our inclusive environment and are committed to involving and listening to all our colleagues through our Global Colleague Council, employee networks and regular all-employee engagement sessions and surveys.



¹ Permanent, fixed term, interns, secondees, international assignments.

² Consultant, external seconded.

Global locations



- Australia
- Belgium
- Brazil
- China
- Denmark
- France
- Germany
- India
- Ireland
- Italy
- Japan
- Luxembourg
- Malaysia
- Netherlands
- Singapore
- South Korea
- Spain
- Sweden
- Switzerland
- Thailand
- United Arab Emirates
- United Kingdom
- United States

Our investments

Our approach for investments

As a specialist asset manager, we understand that perhaps the biggest potential impact we can have on modern slavery is through our investments on behalf of our clients. We recognise the impact of human rights issues on our investments and believe there is a strong investment case for promoting human rights.

That is why assessing the risks and opportunities of human rights issues has been a part of our approach for years. Our social approach for investments is built around six areas of focus.

We exercise our influence as an investor through our engagement and voting activities and seek to be transparent about our approach and its outcomes.

The expectations for our investments are based on our understanding of their risk. In forming our view, we draw on internationally recognised standards, industry best practice, our internal research capabilities, and the perspectives of stakeholder representative groups (e.g., NGOs and trade unions). Human rights represent one of our thematic research pillars, which are aligned with the UN Sustainable Development Goals (SDGs).

Within our Sustainable Investment team, which leads on sustainability strategy development for our Investments business, we have analysts that undertake thematic research and have subject matter expertise. This team works in collaboration with multiple areas across the business and provides support to colleagues in their investment decision making, including support on labour and human rights issues.

Our Investments business publishes its position on multiple sustainability issues related to labour and human rights on our website. These include statements on **business and human rights**, **labour and employment**, and **government and human rights**.

Aberdeen focus area	Aim
Research and Data	To meet and exceed clients' expectations and uphold our responsibility to respect human rights.
Investment Integration	
Client Solutions	
Active Ownership	
Collaboration and Influence	
Disclosure	



Further detail on our approach to Human Rights for investments is published **here**

Our investments



Assessing and understanding risk

We recognise that certain geographies and sectors are at a higher risk of modern slavery, so we prioritise our investment research and engagement on this basis.

Internal research

Our Sustainable Investment team produces insights that discuss the implications of trends across asset classes. We use internal communication channels to share these insights and, where there is wider client or industry value, we also publish on our website.

Within direct real estate, modern slavery and human rights are included as aspects in our outsourcing contracts with property managers. In addition, we screen our tenants to check for Politically Exposed Persons (PEPs) and sanctions. This ensures that risks are being managed appropriately down our supply chain and through the management of our properties.

To support company-level research, we have developed our Environmental, Social and Governance (ESG) House Score. The scores – calculated using over 100 Key Performance Indicators (KPIs) – are visible to our investment teams and can be broken down to focus on management of specific ESG issues, including human rights-related risks in direct operations and in the supply chain.

Aberdeen's investment business has developed proprietary tools that add top-down human rights insight to our research:

- Our Global Macro ESG Index was launched in 2018 to help monitor progress towards the UN's 17 SDGs. It evaluates over 150 countries based on 20 ESG indicators, including those measuring social group inequality (IDEA, V-Dem). This index is available to investment desks across asset classes and is used to inform investment decisions.
- Our Emerging Market Debt Team has developed a proprietary 'ESGP' framework to assess over 90 emerging market issuers, considering environmental, social, governance and political factors, and aligning with nine UN SDGs. This framework, which evaluates indicators like income, healthcare, and education, assigns a direction of travel to each country and compiles a comprehensive ESGP score. By incorporating this framework, we enhance our investment process with a deeper understanding of financially material risks, including those arising from social inequalities and political instability, which are particularly pertinent in emerging markets.

Business engagement

We expect companies in which we invest to report to shareholders regarding policies, practices, and the performance of all the steps taken to address modern slavery issues. We also recognise that, as a global investor, we are often in a position of influence, which can be used to drive positive change. We focus on developing an open and ongoing dialogue with investee companies about their progress. These discussions add valuable insights to our investment approach.



Our investments: case study

McDonald's is an American multinational fast-food chain, with the majority of operations being run as franchises. Our Active Ownership team has had an ongoing engagement with McDonald's throughout 2024 on the topics of bullying, harassment, sexual harassment and discrimination concerns.

It took us a long time to arrange a call with the company, only receiving information already available on the website, via email, four months later. We are concerned that throughout 2024, bullying and harassment allegations continue to be made by employees of McDonald's.

In addition to this, we have been involved in a UK focused modern slavery collaborative engagement which has also been in contact with McDonald's to better understand the remedy provided to victims of forced labour. Similarly, communication from the company has been limited.

As per our engagement policy, we consider escalation on a case-by-case approach and aim to identify risks early and set measurable milestones with investee companies. We have set a number of milestones with McDonald's, focused on workplace culture and due diligence, that we continue to review.

We have been disappointed with McDonald's communication in 2024, taking a considerable amount of time to receive a response which didn't directly address our concerns. This lack of communication has weakened our view of the company, and we felt it appropriate to apply an internal corporate governance warning to the company. We will continue to monitor progress against the milestones set with the potential to further escalate if required. We hope to engage in constructive dialogue with the company in 2025.



Our investments



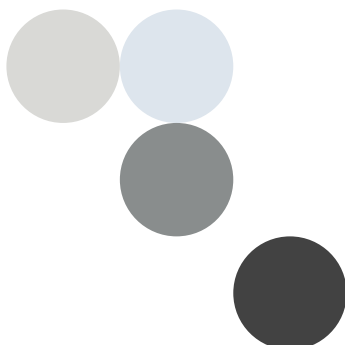
Driving wider progress

We participate in a wide array of multi-stakeholder collaborations, including with industry peers and non-governmental organisations. Through these, we gain insights and advocate for improved corporate practices.

We are members of the **Investor Alliance for Human Rights** (IAHR), the **Principles for Responsible Investment** (PRI), signatories to the UN Global Compact, and a founding member of The Investor Forum.

Our collaborative approach

We have maintained our involvement in the '**Find It, Fix It, Prevent It**' investor initiative, launched by CCLA. Working with industry organisations and academics, CCLA expects UK businesses to find and help victims of modern slavery within their operations and supply chain. We are also a member of '**Investors Against Slavery and Trafficking APAC**', an investor-led initiative addressing modern slavery, labour exploitation and human trafficking in the Asia Pacific region. The group was modelled on the work of CCLA and focuses on collaborative engagement with companies in Asia Pacific.



Our people



Raising concerns

If our employees identify any issues relating to modern slavery, including labour conditions, they should report to their manager in the first instance. If they feel uncomfortable raising their concern using their normal reporting line, or wish to do so anonymously, a confidential hotline, Speak Up, is available. Speak Up is operated by Safecall, an independent organisation recognised globally as a leading authority on whistleblowing.

All concerns raised are taken seriously and any victimisation, harassment, discrimination or bullying of anyone will not be tolerated. We also advertise this hotline to our third parties who can use this in the same way. We investigate all concerns and outcomes can result in changes to processes and, where appropriate, disciplinary measures and dismissal. Our Audit Committee has oversight of our whistleblowing arrangements, with the chair acting as our whistleblowing champion. In 2024, we received no reports related to modern slavery via Speak Up.

If modern slavery were to be found within our operations or supply chains, this would be disclosed and remedied in compliance with our commitment to the United Nations' **'Protect, Respect and Remedy' framework**.

Our **Global Third Party Code of Conduct** details our requirement that third parties take a zero-tolerance approach to modern slavery, bribery and corruption. Our third parties and their workers are required to report any concerns to their Aberdeen contact as soon as practically possible through their own whistleblowing hotline or confidentially through Aberdeen's Speak Up service.

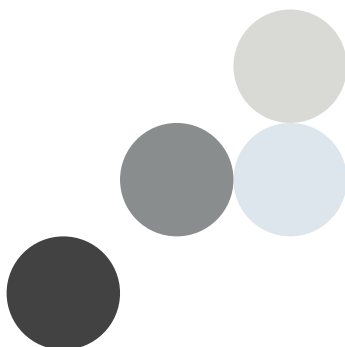
Training

To raise awareness amongst our employees of both modern slavery and the Speak Up arrangements available to them, both topics are highlighted in our **Global Code of Conduct** for employees.

Our Global Code of Conduct describes the principles and standards to which we hold ourselves and ask all our employees to consider in every decision and action they take. All our employees receive training on the content and meaning of the code and are required, at least annually, to confirm that they have read and agree to abide by its principles.

Health and safety

Our colleagues work in low-risk physical environments. Health and safety risk assessments are conducted for all work activities and regular audits are conducted by an external party on our UK premises. We aim for zero reportable accidents and 95% of risks to be controlled at the point of audit. All accidents and incidents are investigated. Further details are available in our **Sustainability and TCFD Report 2024**.



Our suppliers

Our impact as Aberdeen extends beyond our direct operations and the investment decisions we make on behalf of our clients to include the goods and services we purchase from third parties.

The provision of these goods and services can have a variety of adverse impacts on people and the environment which can be exacerbated by industry type, location, and size of the third-party.

We are particularly alert to the impacts of labour and human rights risks, relating to modern slavery and all its forms, in our supply chain. This is due to alarming trends indicating an increase in the global prevalence of modern slavery. It is our objective to identify, mitigate and remedy modern slavery risks in our supply chain and, ultimately, to protect victims from this form of exploitation.

This is a significant undertaking for all organisations, due to the complex nature of global supply chain networks and the lack of full transparency beyond tier 1 suppliers. Tier 1 suppliers are a company’s most significant partners, directly conducting business and providing essential components or services. This is especially pertinent in Financial Services supply chains, where exposure to modern slavery risk from supply chain activity is less overt due to the nature of the goods and services provided by suppliers.

To support efforts in overcoming these challenges we have an established approach to assess, mitigate, and remedy modern slavery risks associated with our suppliers. Additionally, we communicate our human rights and modern slavery expectations to employees and third parties through our **Global Code of Conduct** and **Global Third-Party Code of Conduct**.

Our supply base

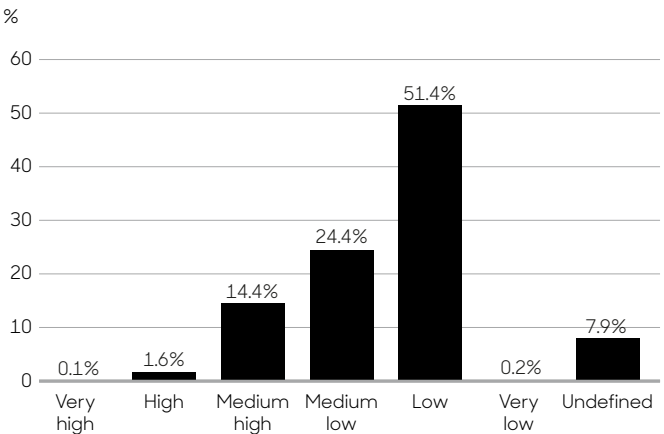
In 2024, we assessed 1,301 of our more than 2,500 suppliers, in line with the scope of our third-party risk management framework, for modern slavery risks. The outcome of this assessment indicated that our tier 1 supply base had a predominantly low exposure to modern slavery risks. There were a very low number of suppliers with elevated modern slavery risk. On further assessment, these suppliers were deemed to have appropriate processes in place to identify, mitigate and remedy modern slavery issues, should they emerge.

This has been supported by our lack of findings regarding modern slavery incidents in our supply base. We did not find, nor were we informed of, any instances of modern slavery or forced labour in 2024.

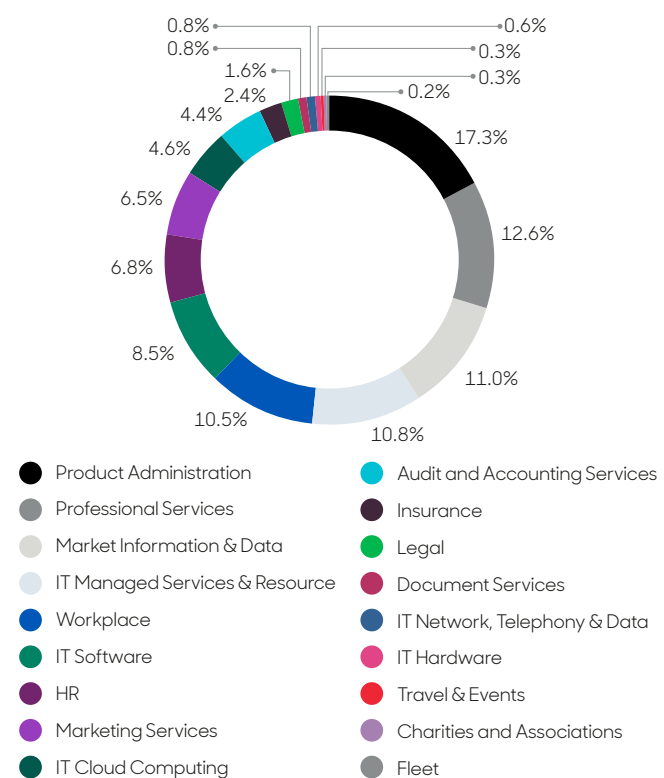
We acknowledge that this absence of detection does not automatically translate to absence, and the risk of

modern slavery being present in our supply chain remains. We remain committed to collaborating with our suppliers to identify, mitigate, and remedy instances of modern slavery.

Supplier modern slavery risk



Service type by spend concentration



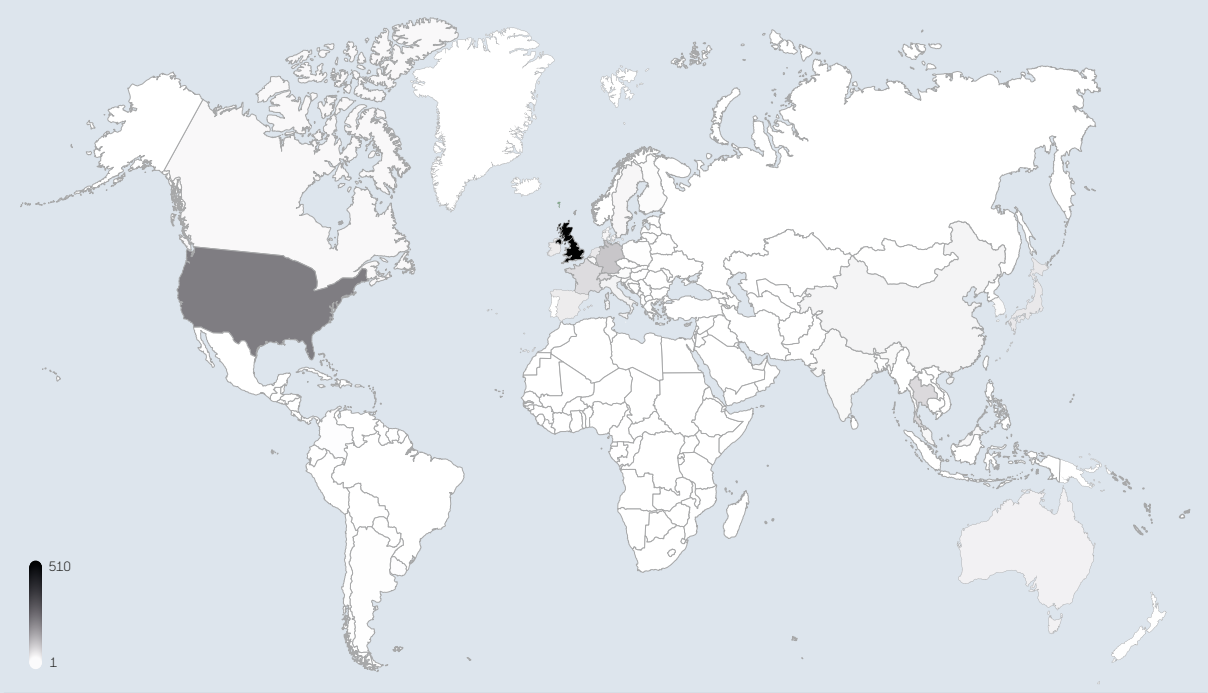
Source: Aberdeen Group plc spend data 2024.

These graphs provide oversight of the type of services we receive and the location they are provided from as part of our commitment to transparency. The risk highlighted in our supplier modern slavery chart is an inherent assessment of modern slavery risk. It does not show a detailed analysis of modern slavery compliance of the underlying businesses.

Data insights

Our partnership with EcoVadis, a world leading sustainability rating platform, has enabled us to enhance our supplier modern slavery risk oversight. Throughout 2025, we will further expand our use of EcoVadis IQ to support our objective to mitigate and remedy modern slavery risks in our supply chain and improve oversight of our human rights risks. The visualisations in this section have been created using data from Ecovadis IQ.

Supplier concentration by location



Country	Concentration	Country	Concentration
United Arab Emirates	6	Israel	2
Argentina	1	India	10
Austria	6	Italy	17
Australia	18	Japan	31
Belgium	11	South Korea	7
Canada	9	Cayman Islands	2
Switzerland	41	Lithuania	1
Chile	1	Luxembourg	33
China	15	Monaco	1
Colombia	2	Malaysia	11
Cyprus	1	Netherlands	31
Germany	79	New Zealand	1
Denmark	12	Poland	1
Spain	25	Sweden	12
Finland	4	Singapore	42
France	47	Thailand	51
United Kingdom	510	Taiwan	3
Hong Kong	30	United States	200
Republic of Ireland	25	Uruguay	2

Supplier management

To support our modern slavery identification and mitigation efforts we have an established assessment and assurance process through our Global Third-Party Risk Management Framework.

Supplier assessment

Our third-party assessments align with the expectations set out in our Global Third-Party Code of Conduct and requires in scope third parties to detail whether they have Board, or Executive, oversight in their direct operations and supply chain. This includes whether they produce a Modern Slavery Statement, as well as disclosures on the Equality Act 2010 (Gender Pay Gap Information) Regulations 2017.

We also ask for clarity on the systems used to achieve oversight and obtain worker feedback, attracting and developing workers, diversity and inclusion, pay equity, mental health and health and safety, amongst other key requirements. On completion of our due diligence assessment, the third-party's response is reviewed by the business with support of subject matter experts (SMEs).

Escalation process

Should an incident of modern slavery be identified during supplier onboarding or during the delivery of their service we will move quickly to investigate the issue in collaboration with the third party impacted. If a claim is substantiated, we will take steps to support the impacted third party.

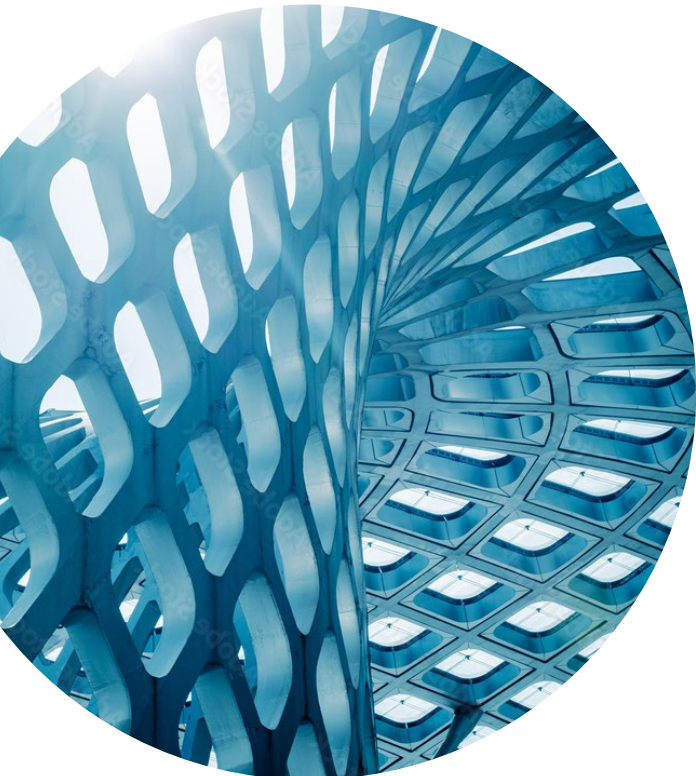
A finding of this nature could be viewed as a material breach of our Global Third-Party Code of Conduct, which suppliers are obliged to adhere to. As such, should a supplier be involved in an incident of modern slavery and they fail to cooperate with Aberdeen to mitigate and remedy the issue, we will take proportionate steps, and may exit agreements as per our terms.

Speak Up

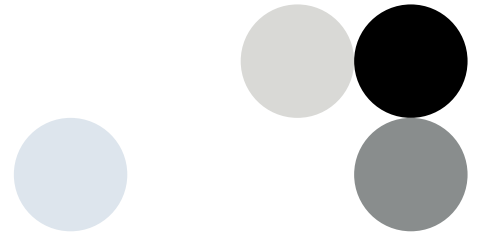
We can only act on what we know, and therefore we require our suppliers to share incidents of modern slavery within their supply chains as soon as they are made aware. Suppliers should share this directly with their Aberdeen contact. However, should they feel uncomfortable doing so, we provide suppliers access to our whistleblowing service, Speak Up.

Increasing awareness

To support with colleague awareness, especially those that engage with suppliers, training on labour and human rights issues is available. This training covers modern slavery identification and remedy.



Fair treatment



Prompt payment

Good practice is also about getting the fundamentals right. Our approach is to provide certainty for those we work with that they will be treated fairly and can count on us as a responsible and fair business partner.

Our standard payment term is to pay all third parties within 30 days of receipt of invoice (unless the third-party requests otherwise). We also have clear statements of work in contracts such as catering, cleaning, and outsource contracts which outlines hours and services required.

The UK's **Fair Payment Code (FPC)** rewards businesses that adopt fair payment practices with their suppliers. Aberdeen achieved the exemplar 'Gold' category in recognition of our approach to paying suppliers within 30 days.

Paying a living wage

Ensuring secure, paid, and safe employment through our operations and supply chain is a key way we reduce modern slavery risks. Paying a living wage ensures workers, especially those in sectors and roles at greater risk of modern slavery, have sufficient income to support themselves and their dependents. Through employment contracts and accreditations, as a UK Living Wage and Living Hours employer, we commit to paying all our employees fairly, and that working hours are not excessive.¹ All employees must have a right to work in the country of employment and minimum age standards are always upheld.

In line with our commitments, we require all UK third parties to also pay employees the Living Wage if they are working on our premises. We also require our third parties to meet any Living Wage legislation in the territories that they supply services to us or, if no legislation is in place, they must commit to paying their employees a fair and equitable wage.

In October 2024 in the UK, the real Living Wage rose to £12.60 an hour (and £13.85 in London). All qualifying Aberdeen third parties have been raised to the new real Living Wage rate.

Health and safety

The occupational health and safety of contracted staff and third parties is important to us. We require third parties to adhere to the principles set out in our Health and Safety policy and in conjunction with their own health and safety policies and/or management system. We recognise that the wellbeing of third-party staff is an important indicator of modern slavery risks and have included this in applicable third-party due diligence assessments.



¹ Living Hours accreditation does not apply to interactive investor.



Our policies and associated documents

We have a number of policies and statements, which collectively demonstrate our approach to identifying and mitigating modern slavery risks and human rights impacts. These policies have been developed by SMEs within the business with the support of industry bodies and external expertise. We ensure all regions and markets have policies that are appropriate and relevant to the legislation they are governed by. Our policies are available on request, and our documents are available on our website.

To align with best practice, we also consult international human rights standards such as:

- Core Conventions of the ILO.
- ILO Declaration on Fundamental Principles and Rights at Work.
- UN Guiding Principles on Business and Human Rights.

Our two key policies which integrate modern slavery principles into our operations and supply chain are our Global Code of Conduct, and Global Third-Party Code of Conduct.



Global Code of Conduct¹

Our code describes the principles and standards that we hold ourselves to and what we ask all our employees to consider in every decision and action that they take.



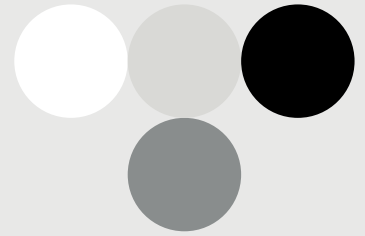
Global Third-Party Code of Conduct

Our code sets out the standards we expect from our third parties. It specifically highlights our wider interest and focus on ensuring that human rights and labour standards are respected.

We are transparent about our expectations and these documents are publicly available so third-party stakeholders are clear on our expectations. For our employees, these documents are also hosted internally on our intranet and disseminated through relevant training modules.

¹ Colleagues from interactive investor attest to an independent Code of Conduct upon joining the company, and do not follow the Aberdeen attestation process.

Our policies



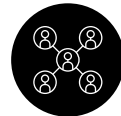
The following policies outline further steps we take to mitigate modern slavery risks in our operations and value chain. This also reflects our culture and an understanding that effective policies can, through the adoption of best practice and safeguards, act as barriers to some of the downstream risks which can exist or be exploited with respect to modern slavery, forced labour and human rights abuses.

The following policies are global:



Global Diversity and Inclusion Policy

This policy covers our approach to diversity, equity, and inclusion. We are committed to building a business that attracts brilliant talent; a business where all our people can thrive and belong, learn and develop and do their best work. We define diversity in its broadest sense and support a culture that values fairness and transparency. This is at the heart of our cultural commitments. We support the right of all people (colleagues, workers, candidates, customers, clients, and third parties) to be treated with respect and dignity. We do not tolerate any unfair treatment, discrimination or harassment (direct, indirect, harassment (including sexual harassment), victimisation or any other form of discrimination).



Global Procurement, Outsourcing and Third-Party Management Policy

Outlines our third-party risk management framework to which the business must adhere in relation to both new and existing contractual arrangements – modern slavery and labour risks are included in service risk assessments, third-party due diligence and ongoing third-party monitoring.



Global Talent Acquisition Policy

Covers the approach we take when recruiting. We are committed to creating a recruitment process that enables talent to move into and around the company. Aligning our aims to our diversity, equality, and inclusion priorities, we want to build a diverse workforce in the broadest sense, which reflects our clients, and the geographies in which we operate.



Global Immigration Support Policy

We will support the visa applications of anyone working on an international assignment or permanently relocating. We will also support new joiners who have been recruited internationally and their immediate dependants.



Global Health & Safety Policy¹

This policy sets out the standards that the business must adhere to in relation to managing Aberdeen's health and safety risks.

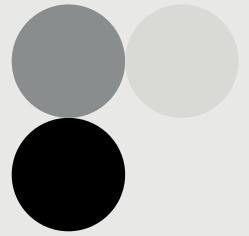


Global People Policy

Sets out the standards to which the business must adhere in relation to managing Aberdeen's people risks.

¹ Interactive investor operates under a local policy that aligns with Aberdeen's.

Our policies



The following policies apply to all UK Aberdeen employees:¹



Anti-bullying and Harassment Policies

We are committed to providing an inclusive workplace where all forms of difference are valued, and which is free from any form of unfair or unlawful treatment. We support fully the right of all people to be treated with respect and dignity. This policy explains the approach we take to resolving concerns at work relating to bullying and harassment.



Grievance Policy

A grievance is a concern, problem or complaint that is raised with us. This could be a concern about work, working conditions or relationships with colleagues. It could also include a concern that is beyond our control, for example, client relationships, which we will investigate as far as we can to resolve the concern.



Global Privacy and Data Protection Policy

Sets out the principles to be adhered to by all colleagues (permanent and contingent) within Aberdeen when processing personal data of data subjects. This policy requires that risks to personal data are identified, assessed and managed with appropriate controls in place and functioning effectively to enable Aberdeen to operate within risk appetite.



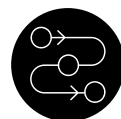
Disciplinary Policy

Explains the approach taken when we identify conduct or performance issues affecting our people's ability to fulfil their role. Having a clear framework to manage these issues helps us to maintain satisfactory standards of conduct and clarify expectations around improvement in performance where necessary.



Holiday Policy

Taking regular holidays is an important way of looking after wellbeing. We are committed to supporting our people to take time off to rest, relax and return to work refreshed.



Global Blended Working Policy

This policy sets out our current approach to Blended Working, which, at our discretion, allows colleagues to split their time between working in the office and working remotely.

¹ Interactive investor local policies apply.

Our policies

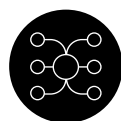


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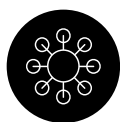
Special Leave Policy

Covers how we will support our UK employees if they need time off from work to manage commitments outside of work, deal with exceptional situations that arise, or take a career break to pursue personal interests.



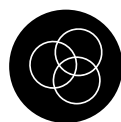
Parent Leave Policy

Covers what our people need to know for maternity, paternity, and adoption leave, including the rights of partners of birth mothers/ primary adopters.



Vetting Policy

This policy covers our position on conducting background checks, also known as vetting, when applying for a role (as an external or internal candidate) or as part of regular checks for colleagues in regulated roles. The purpose of vetting is to minimise the risk of financial crime affecting our business and ensure that we recruit the best candidates into our business. In addition, this process ensures that employees have the right to work in the country in which they are employed.



Global Speak up Policy

Recognising the importance of multiple reporting channels and the ability to raise concerns anonymously, an independent Speak Up service is available globally to clients, colleagues, third parties and anyone who may wish to raise a concern about our conduct. The service is managed independently by Safecall and is available 24 hours a day, seven days a week, in multiple languages. UK colleagues can contact the Speak Up reporting line on 0800 915 1571 – and all other countries can find locally available lines on our global intranet. Anyone can contact Speak Up via an online form on the dedicated website, www.safecall.co.uk/report.

¹ Excludes interactive investor.

Our policies and associated documents



Our clients



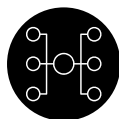
Global Anti-Financial Crime Policy

This policy sets the standards and defines clear principles for the management of financial crime risks that all areas of Aberdeen must adhere to. Aberdeen not only considers the obligation to combat financial crime as a legal and regulatory obligation; but also an ethical obligation, where countering these risks effectively contributes positively to society as a whole. Being implicated in financial crime, even as a conduit for criminals, holds severe legal and reputational risks for individuals and the company itself. Aberdeen is committed to maintaining a robust and effective anti-financial crime framework.



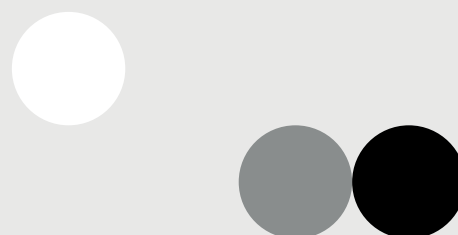
Client & Customer Policy

Sets the minimum standards that Aberdeen adheres to in relation to clients and customers and aims to ensure that the governance and oversight arrangements for products and services across Aberdeen are consistent with prevailing regulatory standards, our Global Code of Conduct, our Conflicts of Interest policy and our agreed position on usage of capital and risk appetite.



Group Competition and Antitrust Policy

This policy sets out the standards that business areas and supporting functions must adhere to in relation to competition and antitrust law compliance.



This Statement was approved by the Board of Directors of Aberdeen Group plc on 7 May 2025 and by each qualifying Aberdeen Group plc Subsidiary Board between 1 May and 2 June 2025. It has been signed off by the Chief Executive Officer.

Jason Windsor
Chief Executive Officer

This Statement has been adopted by the Board of Directors on behalf of the following companies:

Aberdeen Corporate Services Limited

abrdr Fund Managers Limited

abrdr Holdings Limited

abrdr Investment Management Limited

abrdr Investments Limited


Elevate Portfolio Services Limited

Interactive Investor Services Limited

Standard Life Savings Limited

Tritax Management LLP¹

¹ Tritax Management LLP is a subsidiary of Aberdeen Group plc. It has elected to be captured by this statement although not in scope of the MSA in 2024, to maintain best practice. It operates under its own regulatory policies, appropriate to its business. Please refer to their website, at: trifax.co.uk/esg/policies-and-reports.



This document has been published by Aberdeen Group plc for information only. It is based on our understanding as at April 2025 and does not provide financial or legal advice. Aberdeen Group plc is registered in Scotland (SC286832) at 1 George Street, Edinburgh EH2 2LL.

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