Modern Slavery Act Statement

This statement is made on behalf of Allspring Global Investments Holdings, LLC itself and relevant UK subsidiaries that are subject to the requirements of section 54 of the UK Modern Slavery Act 2015 (the "Act") in respect of the financial year ended 31 December 2022.

Allspring Global Investments™ is the trade name for the asset management firms of Allspring Global Investments Holdings, LLC, a holding company indirectly owned by certain private funds of GTCR LLC and Reverence Capital Partners, L.P. It includes but is not limited to; Allspring Global Investments (UK) Limited ("Allspring UK")

Background

Under section 54 of the Act, commercial organisations that supply goods or services, carry on business in the UK and meet the annual turnover threshold of at least £36m from the provision of goods and services must publish an annual slavery and human trafficking statement. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Our Business

Allspring Global Investments™ is an independent asset management firm with more than $530 billion in assets under advisement, over 20 offices globally, and investment teams supported by 480 investment professionals. Allspring is committed to thoughtful investing, purposeful planning, and inspiring a new era of investing that pursues both financial returns and positive outcomes. For more information, please visit www.allspringglobal.com.

Policy, due diligence and risk assessment

Given the nature of the services we offer as an asset manager, Allspring and our supply chains are comprised of business and professional service organizations and have minimal contact with the countries and sectors that are generally considered to have a risk of modern slavery and human trafficking.

Our Employees

Employees are responsible for conducting the company's business honestly, fairly, and ethically. Employees are required to follow the Code of Ethics Policy and all other employee and company policies and procedures; and all applicable laws and regulations. Employees have a duty to speak up whenever they see or suspect unethical or illegal activity. Employees must recognize, to the best of their ability, unethical or illegal conduct. All Employees are responsible for raising concerns about such conduct.

The Allspring Complaints and Whistleblower Policy establishes the expectations and requirements for effectively and consistently handling, assessing, and reporting such conduct. Allspring reviews all allegations received to ensure proper tracking, reporting, and escalation.

Supply Chain due diligence

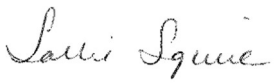
The Allspring Third Party Management Policy incorporates initial and ongoing risk assessments to provide assurance of alignment with Allspring strategic goals and other business initiatives, and each third party's ability to comply with laws and regulations as well as Allspring policies. Specifically, as part of the risk assessment third parties are requested to address how their organization and supply chains conduct appropriate due diligence on modern slavery and human trafficking.

Additionally, a comprehensive screening is completed for all third parties to ensure they do not appear on any government sanctions list and to identify any adverse media related to the entity and its senior executives. Potential matches are reviewed and dispositioned. Once on-boarded third parties are subject to on-going due diligence including the review of negative news alerts, financial health score alerts, cyber security alerts plus OFAC monitoring.

Approval

The Allspring UK Executive Committee approved this statement on 16th June 2023 pursuant to section 54(1) of the Modern Slavery Act 2015.

Executive Signer



Sallie Squire

Allspring Chief Operating Officer

Executive Signer



Dan Morris

Allspring UK Chief Executive Officer