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 2023.

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 $570 billion in assets under advisement as at 31 March 2024, over 21 offices globally, and investment teams supported by 410 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 At Allspring, we believe we have a responsibility to ensure that our business is conducted in a responsible way and we are committed to respecting human rights. Allspring's respect for the protection and preservation of human rights is guided by the principles set forth in the United Nations Universal Declaration of Human Rights. Further, we acknowledge the United Nations Guiding Principles on Business and Human Rights ("Guiding Principles") as the recognised framework for corporations to respect human rights in their own operations and through business relationships.

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 organisations 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 recognise, 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 Management 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.

Where relevant to their line of business and function, employees receive training on policies and procedures that pertain to products and services we provide to our clients and customers. This includes training on our Anti-Bribery and Corruption, Anti Money Laundering (AML) and Know Your Client (KYC) policies and practices. All newly hired employees are assigned Code of Conduct training and current employees are assigned Code of Conduct training on an ongoing basis. Employees are periodically required to affirm their compliance with the Code of Conduct.

Supply Chain due diligence#

Allspring's relationships with third party service providers are managed in a risk-based manner, striking an appropriate balance between ensuring that business objectives are met and identifying, mitigating and managing material risks presented by those relationships including the third party's compliance with laws and regulations. Allspring conducts both initial and on-going due diligence risk assessments on its third parties. As part of the risk assessment, third parties are requested to confirm whether they conduct due diligence for modern slavery on their suppliers and whether their suppliers in turn conduct due diligence for modern slavery on their own supply chains.

Following this risk-based approach, third parties are screened for financial health, cyber security issues, OFAC compliance and negative news, including news related to modern slavery infractions. Potential matches are reviewed and addressed directly with suppliers.

Investments

In 2023, Allspring provided dedicated training regarding modern slavery to all investment team members. This training covered the prevalence and impacts of modern slavery, areas of high risk, and mechanisms to analyse company efforts and engage companies to identify and reduce risk. Dedicated resources related to data, regulations, and engagement were also created and made readily available to investment teams. These resources will be maintained on an ongoing basis for investment team use.

Our investment decision-making processes include assessing companies' risk exposure, risk management and performance. Many of our investment teams have integrated environmental, social and governance issues, including human and labour rights into their decision-making process, and in some cases, investments are subject to norms-based screening. This screening identifies companies that have a high risk or potential risk of violating widely accepted corporate sustainability principles that cover areas such as human rights, labor standards, the environment, and corruption. The screening also identifies companies that are subject to exclusion based on our exclusion criteria.

Allspring is also a signatory to the U.K. Stewardship Code and the United Nations-supported Principles for Responsible Investment, which promote ESG integration and investor engagement on ESG issues. Modern slavery is one of the issues on which we engage companies when material. In our engagements,# we evaluate companies' human capital and supply chain management to strengthen our understanding of their practices and policies to identify and mitigate risks, and, where appropriate, to improve transparency by encouraging companies to enhance their disclosures.

Monitoring and an evolving process

Exposure to controversial holdings, including companies involved in modern slavery, is monitored at the Firm level and reported to senior management on a periodic basis.

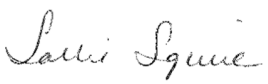
Third party service providers are monitored on an ongoing basis for financial health, cyber security issues, OFAC compliance and negative news, including news related to modern slavery infractions. Any material findings are reviewed and escalated with the vendor directly if needed.

We strive to maintain practices that prevent and identify modern slavery. We know that this must be a continuing effort, with ongoing work to reassess our practices and our approach in light of changing global circumstances and an evolving global policy environment. We are also committed to engaging with a range of stakeholders on these important topics.

Approval

The Allspring UK Board approved this statement on 17 June 2024 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