



## INTRODUCTION

Martin Currie (Holdings) Limited (“**MCHL**”) is committed to ensuring that acts of human trafficking and modern-day slavery form no part of its business or supply chains. We acknowledge our responsibility under the Modern Slavery Act 2015 (the “**Act**”) and will take steps to seek to ensure transparency within our organisation and with suppliers of goods and services with whom we contract to provide such services.

## ORGANISATION’S STRUCTURE

This statement is made by MCHL on behalf of itself, on a voluntary basis, and relevant Martin Currie group 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 30 September 2023.

These subsidiaries are:

- a) Martin Currie Limited (“**MCL**”)
- b) Martin Currie Investment Management Limited (“**MCIM**”); and
- c) Martin Currie Inc. (“**MC Inc.**”),

(collectively, together with MCHL, referred to as “**Martin Currie**”).

Our ultimate parent company is Franklin Resources, Inc., which is headquartered in San Mateo, California USA, and we form part of its group of companies. In this statement, references to “**Franklin Templeton**” mean Franklin Resources, Inc. and its subsidiaries, and references to “**we**”, “**our**” or “**us**” mean the entities making this statement.

## OUR BUSINESS

Martin Currie is a specialist investment manager within Franklin Templeton. Franklin Templeton is a global investment management organisation serving clients in over 150 countries. It is one of the largest asset managers in the world, with around \$1.4 trillion in assets under management as at the financial year end on 30 September 2023, and offices in more than 30 countries.

MCIM and MC Inc. are private limited companies which provide investment management and advisory services to investors globally through investment products which include various third party and Franklin Templeton sponsored funds and, on a managed account basis, to a range of institutional clients globally.

MCL is a private limited company that acts as the UK domiciled parent company of MCIM and MC Inc.

## OUR SUPPLY CHAINS

Our supply chains include the following suppliers:

- Administrators/brokers and trade support for institutional clients and high net worth individuals who have entered into contracts with Martin Currie group affiliates for the provision of separately managed accounts;
- Third party audit/compliance/legal and accounting support for the Martin Currie group business across all investment disciplines;



- Third party pension fund services, private healthcare and dental care providers and employee benefits providers and other associated services required to support Martin Currie group employees.

### **POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

We are committed to ensuring that none of our members of staff and none of the vendors they contract with, have any involvement in human trafficking and modern slavery. This commitment reflects our core values to put clients first, build relationships, achieve quality results and work with integrity. This approach is supported by our Anti-Bribery Policy which outlines the principles that Martin Currie follows to achieve zero-tolerance against bribery and corruption, as well as our Code of Ethics and Employee Handbook which requires our staff to uphold the highest level of ethical conduct in their day-to-day business. Additionally, our employee policies further reflect our commitment to acting ethically and with integrity in all our business relationships.

We also have whistleblowing procedures in place to encourage the reporting of unethical or illegal conduct to internal teams, as well as a confidential Compliance and Ethics Hotline run by external specialists and these procedures offer the protection of whistle-blowers.

Martin Currie is also committed to paying the voluntary living wage to all employees and ensuring third parties who provide services to Martin Currie pay their own employees a living wage

### **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

As part of our initiative to identify and reduce the risk of slavery and human trafficking occurring within our supply chains, we have adopted the following due diligence procedures.

- Where possible we build longstanding relationships with our third-party service providers and suppliers and place obligations on these suppliers to comply with all applicable laws, which, where relevant, would include compliance with the Act.
- Where we enter into arrangements with suppliers (who are based within the United Kingdom and internationally), we usually expect to have a contact in the United Kingdom, and would require this entity to ensure that any services provided internally have suitable anti-slavery and human trafficking policies and processes.
- MCIM and MC Inc are regulated in the United Kingdom by the Financial Conduct Authority (the “**FCA**”) and are therefore required to have appropriate systems and controls in place to operate a prudential and well-managed business. We see the adoption of, and compliance with, the requirements of the Act as part of the operation of a prudent and well-managed business.
- Where appropriate, we will endeavour to ensure that any Martin Currie group entity not technically required to comply with the Act but which enters into service and supply chain arrangements will also carry out initial and regular due diligence with third parties to ensure adherence to spirit of the Act.
- We carry out regular due diligence checks on our service providers and suppliers and a review of anti-slavery and human trafficking procedures is included in this due diligence.

Our procedures are designed to seek to:

- Establish and assess areas of potential risk in our business supply chains;
- Monitor potential risk areas in our business and supply chains;



- Reduce the risk of slavery and human trafficking occurring in our business and supply chains; and
- Provide adequate protection for whistle-blowers.

### SUPPLIER ADHERENCE TO OUR VALUES

The values of Martin Currie are ambition, responsibility, learning and partnership. As an organisation we believe that our values are core to everything we do and expect our suppliers to conduct themselves accordingly.

As such, we have a zero-tolerance policy to slavery and human trafficking. We expect, where relevant, those in our supply chain and contractors to comply with our values. Where applicable, contractual provisions have been put into agreements, and we will send notice of our expectations to certain providers in existing supply chain.

### EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We look to use the following types of key performance indicators to measure how effective we have been in seeking to ensure compliance with the Act:

- Completion of annual/regular due diligence reviews on certain third-party suppliers.
- Risk based approach to oversight of our third-party service providers and suppliers to ensure that resources are allocated appropriately. Risks considered include country risk, sector risk, transaction risk and business partnership risk.
- Ongoing analysis and review of the risk of slavery and human trafficking with appropriate reporting as required on the perceived risk and any action required.
- Honest and open communication with the relevant personnel of our service providers and suppliers to set our expectations of their compliance with the Act, and their understanding and compliance with our expectations.
- We have procedures in place to encourage the reporting of concerns and the protection of whistle blowers.

### TRAINING

To ensure the risks of modern slavery and human trafficking in our supply chains and our business are understood, training is being provided to relevant members of staff. The Board of Directors have been briefed on the requirements of the Act.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Martin Currie group's slavery and human trafficking statement.

Date: 19 April 2024

Jennifer Mair, Director

Martin Currie (Holdings) Limited