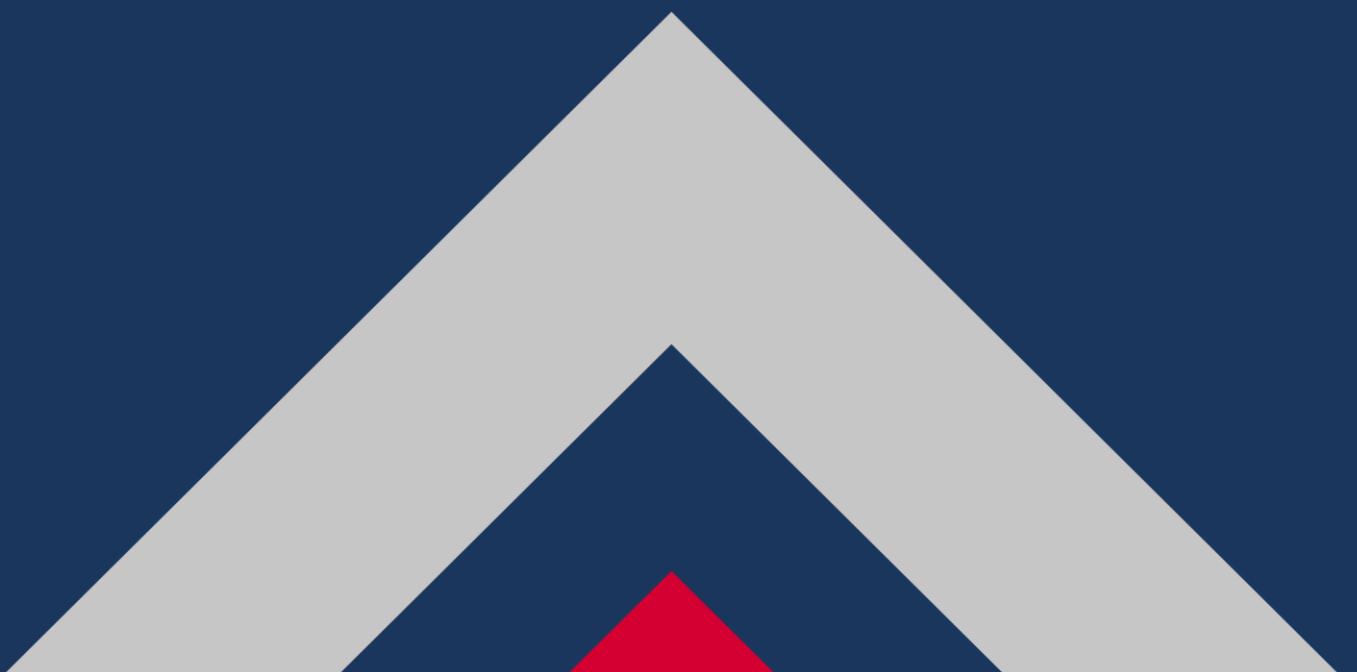


Modern Slavery Act 2015

Information leaflet



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What is modern slavery?

Slavery is the status or condition of a person over whom any or all of the powers attaching to the right of ownership are exercised. A 'slave' is every person under such status or condition (Slavery Convention, Geneva, 1926). Slavery may take the form of human trafficking, forced labour, servitude, forced or servile marriage, descent-based slavery and domestic slavery.

A person is considered to be suffering modern slavery if:

- They cannot exercise their rights.
- They are subject to slave activities, forced labour, etc.
- They live under threat.
- They are subject to inhumane living conditions (lack of food, poor health conditions, degrading housing conditions, etc.).

The use of slavery in the production of goods and services

Nowadays, most products and services go through a series of members of a long supply chain (including producers, manufacturers, and wholesalers and retailers) before reaching their final destination. These members globally and individually take part in the production and sale processes until the products or services reach their final destination or recipient. For this reason, it is not always easy for a company to state that there have been no cases of modern slavery in their supply chain.

In this regard, the way a company operates and manages their supply chain can affect the probability of slavery being part of the final product or service or not. Consequently, it can also affect the validity and credibility of the statement of absence of modern slavery before the legislator or any stakeholders within an organisation.

The **Modern Slavery Act 2015** holds companies responsible for slavery and human trafficking in their own business and supply chains. For this reason, companies must take action in this respect.

Modern slavery act: what do companies have to do?

Organisations subject to the **Modern Slavery Act 2015** must prepare and issue a statement every year on the measures they have implemented throughout the financial year in order to guarantee that neither slavery nor human trafficking take place in their own business or supply chain.

This Act applies to all organisations with a turnover (company and subsidiaries) of at least 36 million pounds, and with offices or operations in the United Kingdom.

What action has the Allfunds Bank Group implemented to comply with the modern slavery act?

ALLFUNDS BANK GROUP is totally committed to comply with the **Modern Slavery Act 2015**. For this reason, as part of their due diligence process, they have their own General Code of Conduct and General Supplier Selection Process.

Based on this General Process, all suppliers of the **ALLFUNDS BANK GROUP** undergo an assessment process which evaluates the risk of infringement of the **Modern Slavery Act 2015**, and must accept the **Code of Conduct for suppliers** of the **ALLFUNDS BANK GROUP**. Additionally, the **ALLFUNDS BANK GROUP** reserves the right to ask suppliers for additional information on their compliance efforts and/or require their participation in additional monitoring or social accountability activities to confirm whether suppliers observe the **Modern Slavery Act 2015**, in general, and the **Code of conduct for suppliers** of the **ALLFUNDS BANK GROUP**.

Any worker of the **ALLFUNDS BANK GROUP** who becomes aware that a supplier has breached the **Modern Slavery Act 2015** or the **Code of Conduct for Suppliers of the ALLFUNDS BANK GROUP** must inform the financial department.

Supporting Information

Additionally to the information provided in this leaflet, and so that recipients are completely informed about the UK Modern Slavery Act 2015, **ALLFUNDS BANK GROUP** encourages their workers, suppliers and any other stakeholders to visit the official website of the [Modern Slavery Act](#). This website includes a general description of the Modern Slavery Act and other supporting documents for ease of understanding.