

SANNE

Sanne Group plc

Modern anti-slavery and human trafficking statement 2018

Approved by the Sanne Group plc board of directors on 4 May 2018

THE DIFFERENCE

Modern anti-slavery and human trafficking statement 2018

SANNE has evolved from its foundation in 1988 as a Jersey-based private client focused fiduciary business, into a leading global provider of outsourced corporate, fund and private client administration, reporting and fiduciary services with a presence in 15 global international financial centres. SANNE listed on the London Stock Exchange in April 2015 and is a constituent of the FTSE 250 index.

The sector in which SANNE operates is relatively low risk in terms of modern slavery and human trafficking in our business and we do not have an extensive supply chain. The following statement has been published on behalf of Sanne Group plc and its affiliates (the "Group") pursuant to section 54 of the Modern Slavery Act 2015.

Introduction

The Group is committed to respecting human rights and operating with integrity in regards to all aspects of its business. This statement sets out the steps the Group has taken to understand the risks posed by modern slavery and human trafficking and ensure such activity does not occur as a result of its business ventures. This statement refers to actions and activities undertaken during the financial year 31 December 2016 to 31 December 2017.

Organisational structure and business model

SANNE has a regional reporting model for its Alternatives business across Europe, Middle East and Africa, Asia-Pacific and Mauritius and North America. Corporate & Private Client services reports globally. This reporting model supports SANNE's strategy of building our international reach by recognising revenue by region. SANNE has its headquarters in Jersey and offices in Guernsey, Luxembourg, Dublin, the Netherlands, Malta, New York, Hong Kong, Singapore, Shanghai, Dubai, South Africa and Mauritius.

SANNE's business has a low risk of modern slavery and human trafficking. It involves the provision of third party outsourced fund administration services directly to our clients and therefore we do not have a supply chain encompassing more traditional definitions of 'supply of raw materials', 'distribution channels' and 'manufacturing processes'. Our clients are in the financial services sector which is not generally a sector where modern slavery and human trafficking are significant problems. Financial institutions are still likely to employ lower paid workers in support services for example security, cleaning, catering and call centres. These types of jobs are considered higher risk.

Policies

SANNE's policies, due diligence process, contractual and procurement arrangements, operate to ensure that we have effective systems and controls to ensure modern slavery is not taking place in our business or supply chain. Our staff handbook also makes it clear that staff are expected to behave ethically and operate with integrity at all times. In the event that our staff have a concern about the activities of a client or supplier they are able to do so without risk to their position under our whistleblower policy.

Clients

We perform client due diligence based on jurisdictional requirements in line with the Financial Action Task Force Recommendations.

Suppliers

We engage reputable suppliers and ensure that all contracts are in complete compliance with relevant laws and regulations.

Further steps

Following the end of our financial year in 2017 the Group has adopted an anti-modern slavery and human trafficking policy, to underline our commitment to ensuring our business and supply chain are modern slavery and human trafficking free. SANNE has also adopted a Human Rights Policy Statement applicable to our entire Group, which states the requirement to treat everyone at SANNE, and everyone with whom we come into contact, with fairness, respect and dignity.