

Modern Anti-Slavery and Human Trafficking Statement 2018

Sanne recognizes that modern slavery is a crime and a violation of fundamental human rights and we are committed to acting ethically and operating with integrity in regards to all aspects of our business. This is the second statement made on behalf of Sanne Group plc and other group companies pursuant to the Modern Slavery Act 2015, and sets out the steps that we have taken during the financial year ended 31 December 2018 and continue to take, to prevent modern slavery from taking place in our supply chain or within our business.

This modern slavery statement covers all companies within and associated with the Sanne Group plc group of companies (“Sanne”) for the financial year ended 31st December 2018.

About our business

Sanne is a leading global provider of outsourced alternative assets and corporate services. We operate across global markets and service clients from 18 locations across Europe, North America, Asia and the Middle East and Africa. We are people-focused and employ more than 1,400 people worldwide.

More information about our business can be found here at www.sannegroup.com/about-us

Organisational Structure

Sanne operates across four segments. Three segments cover the performance of SANNE’s Alternatives business across the Group’s three regions (Europe, Middle East and Africa, Asia-Pacific & Mauritius and North America) whilst the fourth segment covers the global reporting of Corporate and Private Client services.

Policies

We operate a number of internal policies that reflect our zero-tolerance approach to modern slavery and demonstrate our commitment to ensure that we are conducting business in an ethical and transparent manner.

Human Rights Policy

Sanne is committed to respecting human rights, including the prevention of modern slavery and human trafficking in our business operations and supply chains. Our human rights policy covers the entire Sanne group and reflects our commitment to acting with fairness, respect and integrity.

Anti-Slavery Policy

We have a dedicated Anti-Slavery Policy that sets out our stance on modern slavery and reflects our commitment to acting ethically and with integrity in all our dealings, relationships and supply chains.

Whistle blowing Policy

Our employees also have the benefit of our whistleblowing policy, which provides a framework for all employees to raise a concern regarding any wrongdoing in the workplace without fear of reprisals or detriment. All metrics relating to Whistleblowing activity are internally reviewed and reported to the Audit Committee on a quarterly basis. The effectiveness of our Whistleblowing policy was also reviewed by the Audit Committee during 2018.

Our Supply Chain

We have a zero tolerance approach to modern slavery and human trafficking and we expect the same high standards from all of our contractors, suppliers and business partners. As part of our contracting processes, we have standard clauses included in all our new supplier contracts covering obligations on human rights and the prevention of modern slavery. These will also be included on the renewal of all existing supplier contracts.

Due Diligence

Risk management is at the core of our day-to-day activities and there was a strong focus in 2018 on strengthening our internal controls framework. The group performs extensive due diligence on its clients based on jurisdictional requirements in line with The Financial Action Task Force recommendations.

Next Steps

During 2019, we intend to undertake a review of the effectiveness of our Anti-Slavery policy and will roll out our new Ethics and Standards of Conduct policy which will set out the values and behaviours which all Sanne employees are expected to adhere to. This will reinforce our commitment to operate a culture of trust, openness and integrity within our business.

We will continue to raise awareness as part of our wider approach to risk management and Sanne is committed to educating our employees in relation to the implications of the Modern Slavery Act across our business.

This statement has been approved by the Board of Directors of Sanne Group plc and will be updated annually in line with the reporting requirements of the Modern Slavery Act.

This statement was approved at a board meeting of Sanne Group plc held on 26 June 2019 and signed by James Ireland, Director and CFO.