

# Modern Anti-Slavery and Human Trafficking Statement

**Service defines us,  
empowers you**

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 third 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 2019 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 2019.

## **About Sanne**

Sanne is a leading global provider of outsourced alternative assets and corporate services. We operate across global markets and service clients from 20 locations across Europe, North America, Asia and the Middle East and Africa. We are people-focused and employ more than 1,800 people worldwide.

More information about our business can be found on our website at [www.sannegroup.com](http://www.sannegroup.com).

## **Organisational Structure**

Sanne operates across 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**

Whilst we recognise that the risk of slavery and human trafficking is a low risk in the financial services industry, we have a number of measures in place that ensure that our employees are protected by internal and recruitment policies, and that we can mitigate any risks in our supply chain, given we are a multi-jurisdictional organisation.

### Human Rights Policy

Sanne Group is committed to acting with integrity, respect and fairness which is supported by our human rights policy.

### 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 are protected by 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 2019.

## Due Diligence

Due Diligence Risk management is at the core of our day-to-day activities and there was a strong focus in 2019 and we continue to strengthen our frameworks in this area. We have extensive teams that assist with the on-boarding of our new clients, as a positive measure to ensure that Sanne is contributing to an active reduction in participating or assisting any negative effects of our supply chain and to ensure compliance with Anti-Money Laundering and Terrorism laws.

Similar measures are applied to our recruitment policies. We have frameworks and due diligence procedures in place to protect any new employees of Sanne to ensure fairness of treatment of all individuals.

Following our 2018 statement, we successfully rolled out new Ethics and Standards of Conduct policy, further entrenching the values and behaviours of Sanne employees for further guidance on standards and expectations of our representatives. We are committed to the ongoing education of our employees towards a risk-based model, and the education surrounding the importance of the Modern Anti-Slavery Act across the Group.

## 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 process, 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.

In addition, we actively seek to engage for third party services with reputable suppliers to ensure we are not involved in assistance of onward supply chains assisted by modern slavery or breaches of human rights. Our views and objectives are enforced by our stringent procurement policies, which are internally reviewed frequently.

During 2020, we seek to continue with this goal, and ensure that our internal policies are evolving with a risk-based framework to our exposure and supply chain.

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 4 September 2020 and signed by James Ireland, Director and Chief Financial Officer.**

**Professionalism**  
sets us apart,  
strengthens your business