

MODERN SLAVERY ACT ANNUAL TRANSPARENCY STATEMENT FOR YEAR ENDED DECEMBER 31, 2019

INTRODUCTION

Walter Scott & Partners Limited ("**Walter Scott**"), is committed to preventing acts of modern slavery and human trafficking from occurring within both its business and supply chains.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 of the United Kingdom ("Modern Slavery Act").

ORGANISATIONAL STRUCTURE

Walter Scott has been established since 1983 to manage global equity portfolios for institutional investors around the world, such as pension funds, endowments, foundations, public funds and financial organisations.

Our main offices are based in Edinburgh, United Kingdom, and we procure goods and services from approximately 350 vendors globally.

GOVERNANCE AND POLICY

We are committed to acting ethically, with integrity and promoting work environments that engender conditions of freedom, equality, security and dignity. Walter Scott expects its employees, contractors and suppliers to prevent acts of modern slavery and human trafficking from occurring within both its business and supply chains and has policies (including its Human Rights Statement) and codes of conduct (including the Employee Code of Conduct and the Supplier Code of Conduct) in place to establish standards expected across our business activities. Our governance framework and related corporate policies empower our employees and contractors to report and escalate any concerns of unethical conduct, whether relating to modern slavery, human trafficking or other matters.

As part of our continued commitment to responsible supply chain management and sustainable procurement, and in response to the Modern Slavery Act, we adhere to the Bank of New York Mellon Corporation ("**BNYM**") Supplier Code of Conduct that has been enhanced by clarifying requirements in this area. The Supplier Code of Conduct, which is available on the BNYM website (www.bnymellon.com), applies to all vendors in our supply chain globally. It describes the expectations we have of our vendors to conduct business responsibly, including with respect to compliance with the requirements of applicable slavery, forced labour, child labour and human trafficking laws. The Supplier Code of Conduct describes Walter Scott's commitments regarding social responsibility, health and safety, labour and human rights, ethics and other responsible business practices.

All vendors engaged in providing products and services to Walter Scott are expected to act in accordance with the Supplier Code of Conduct, including by aligning their guidelines, policies and practices with the Supplier Code of Conduct and by communicating and enforcing its provisions throughout their organisations and supply chains. A violation of the requirements or the Supplier Code of Conduct may lead to review or termination of our relationship.

Our Employee Code of Conduct and our policies on Whistleblowing, Escalation and Speaking Up, Reporting of Illegal or Unethical Conduct and Non Retaliation and Suspicious Activity Reporting empower our employees and contractors to report concerns in confidence without fear of retaliation.

R I S K A S S E S S M E N T

We have evaluated the nature and extent of our exposure to the risk of modern slavery and human trafficking in industries and geographies that we perceive to be of higher risk. Based on this risk evaluation, we introduced mandatory training to our key procurement staff, specifically addressing the identification of risks of slavery and human trafficking within our supply chain. We will continue to assess the risks associated with our business and supply chain and expand the scope of our focus, as necessary.

T R A I N I N G

We acknowledge that educating our staff is fundamental to ensuring potential human rights and modern slavery risks are identified and managed. Our refresher training for employees and contractors includes a Code of Conduct, with specific focus on:

- conducting business in full compliance with all applicable laws and regulations, and in accordance with the highest ethical standards; and
- being willing to take a stand to correct or prevent any improper activity.

In addition, we have provided training to our entire procurement organisation on modern slavery and human trafficking, and on our role in identifying and managing the risk of such activities.

C O N T I N U I N G E F F O R T S A N D C O M M I T M E N T

We will continue to assess our practices and engage with our employees, contractors and supply chain vendors to raise awareness and manage the risk of modern slavery and human trafficking occurring in our organisation and supply chain.

This statement is made in accordance with Section 54 of the Modern Slavery Act 2015 of the United Kingdom and constitutes Walter Scott's modern slavery and human trafficking transparency statement for the year ended December 31, 2019

Signed by



Jane Henderson

Managing Director

Walter Scott & Partners Limited