



Modern Slavery Statement

2025



Chief Operating Officer Statement



Richard Wilson
Chief Operating Officer

Modern slavery has no place in our society, and as a wealth and investments group, we recognise the responsibility we hold in helping to eradicate it from both our own operations and across the wider financial system we influence. Global value chains are complex, and risks can exist in unexpected places, which is why staying alert is so important.

Our role as stewards of our clients' capital means that respecting human rights is fundamental to everything we do. We integrate modern slavery risk considerations into our investment processes, our stewardship activities, and our engagement with the companies and partners with whom we work. We expect high standards from ourselves and from everyone who works with us.

Over the past year, we have strengthened our approach through enhanced due-diligence processes, deeper supply-chain visibility, and more targeted training for employees in higher-risk roles. We continue to learn from industry peers, civil-society groups and global initiatives that help raise standards across our sector.

While we have made progress, the persistence of modern slavery worldwide means that continued vigilance is essential. We are committed to continual improvement, ensuring that our actions reflect both our values and our responsibility to the individuals and communities who may be affected by our business.

This statement explains the steps we have taken this year to assess and address the risk of modern slavery across our operations and value chain. I remain fully committed to this important work and to ensuring that we act with integrity in everything we do.

Introduction

Aberdeen Group plc (Aberdeen) is committed to transparency, demonstrated through our Modern Slavery Statement, prepared in accordance with the UK Modern Slavery Act 2015 (the Act). This statement outlines our efforts and activities aimed at identifying and protecting people impacted by modern slavery within our operations¹ and across our value chain for the year ended 31 December 2025.

Our definition of modern slavery is aligned with that of the United Nations (UN) and we use modern slavery as an umbrella term that includes forced labour and human trafficking.

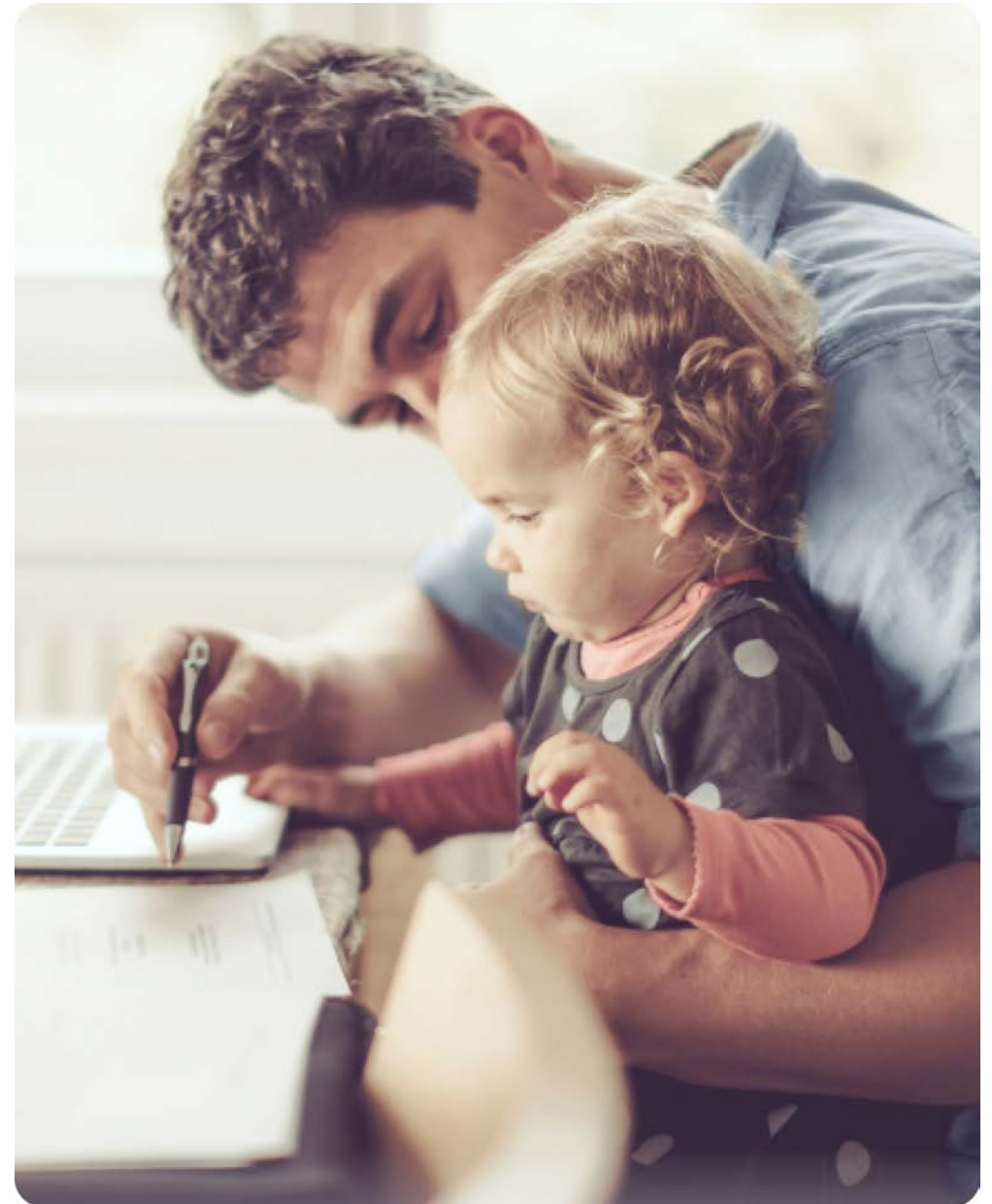
The Act requires organisations to report on modern slavery annually, encouraging economy wide transparency. At Aberdeen, we strive to align with the UK Government's reporting guidance and regularly review our approach, amending as required to align with stakeholder expectations. Oversight of our approach to modern slavery is provided at senior management level, with Richard Wilson, our Chief Operating Officer, acting as Executive Sponsor of this statement.

The UK financial services industry has a key role to play in combatting modern slavery and forced labour. As a wealth and investments group, we recognise the significant role our industry plays in detecting and protecting people from modern slavery.

To support our efforts to identify and protect people from modern slavery, we

have adopted international standards, including the UN Guiding Principles on Business and Human Rights and the International Labour Organisations (ILO) Declaration on Fundamental Principles and Rights at Work. As a signatory to the UN Global Compact, we are led by its principles on human rights and labour standards and share our progress annually through our sustainability disclosures.

This statement describes our approach to modern slavery across Aberdeen's activities and value chain. While our corporate sustainability strategy provides central governance and oversight, we recognise that exposure to modern slavery varies across our businesses. As a result, we operate decentralised frameworks to address these risks across our operations, supply chain, and investments. This enables business areas to implement targeted approaches to identify, mitigate, and remediate modern slavery issues. Aberdeen remains committed to preventing modern slavery and to continually strengthening our approach to deliver meaningful impact.



1. Refers to Aberdeen Group plc and each of its UK subsidiary commercial organisations; see page 19

Introduction

Our ambition is to be the UK's leading Wealth & Investments group

interactive investor

As the UK's second-largest direct-to-consumer investment platform by AUA and number one by net flows¹, ii offers a self-directed investing and trading platform that enables individuals in the UK to plan, save and invest in the way that works for them.

Who we serve

- Lower confidence savers
- Self-directed investors
- Sophisticated traders

Adviser

Our Adviser business, the UK's third-largest advised platform by AUA², provides financial planning solutions and technology for UK financial advisers which enables them to create value for their businesses and their clients.

Who we serve

- Financial advisers

Investments

Our capabilities in our investments business are built on the strength of our insight – generated from wide-ranging research, worldwide investment expertise and local market knowledge.

Who we serve

- Institutional clients with bespoke needs
- Wholesale platforms and distribution partners
- Individual investors

1. Source: Fundscape, Direct Matters Q4 2025 report.

2. Source: Fundscape, The Platform Report Q3 2025, and latest available peer company information. Excludes Curtis Banks AUA.

[For more on the financial performance of our businesses, click here](#)

Our purpose

To enable our clients to be better investors

Our cultural commitments

We put the client first

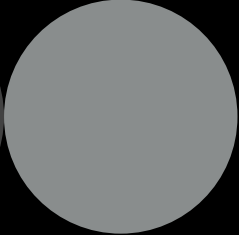
We are empowered



We are ambitious



We are transparent



Our sustainability ambition

Our sustainability ambition is to enable inclusive growth and a credible environmental transition for our clients, people and tomorrow's generation. We believe this is responsible business.

Business overview

Business overview
December 2025

99%

of employees completed training on modern slavery and recognising warning signs

4,000+

employees worldwide

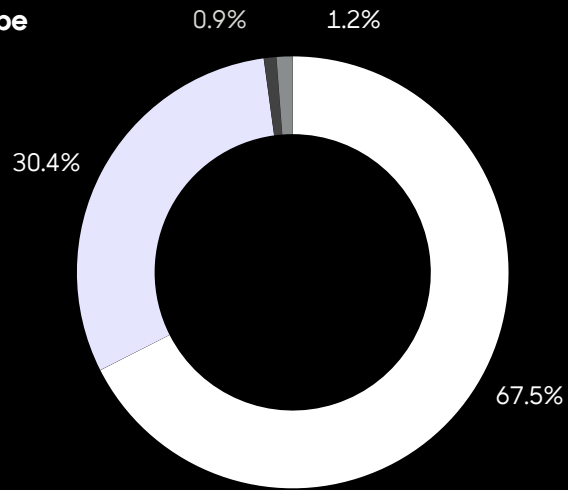
20+

Offices in more than 20 countries worldwide

We are proud of our inclusive environment and are committed to involving and listening to all our colleagues through our Global Colleague Council, employee networks and regular all-employee engagement sessions and surveys.



Worker type



- Employees¹
- Outsourced
- Contractors
- Other²

1. Permanent, fixed term, interns, secondees, international assignments.
2. Consultant, external secondees.

Australia
Belgium
Brazil
China
Denmark
France

Germany
Ireland
Italy
Japan
Luxembourg

Malaysia
Netherlands
Singapore
South Korea
Spain
Sweden

Switzerland
Thailand
United Arab Emirates
United Kingdom
United States

Business overview continued

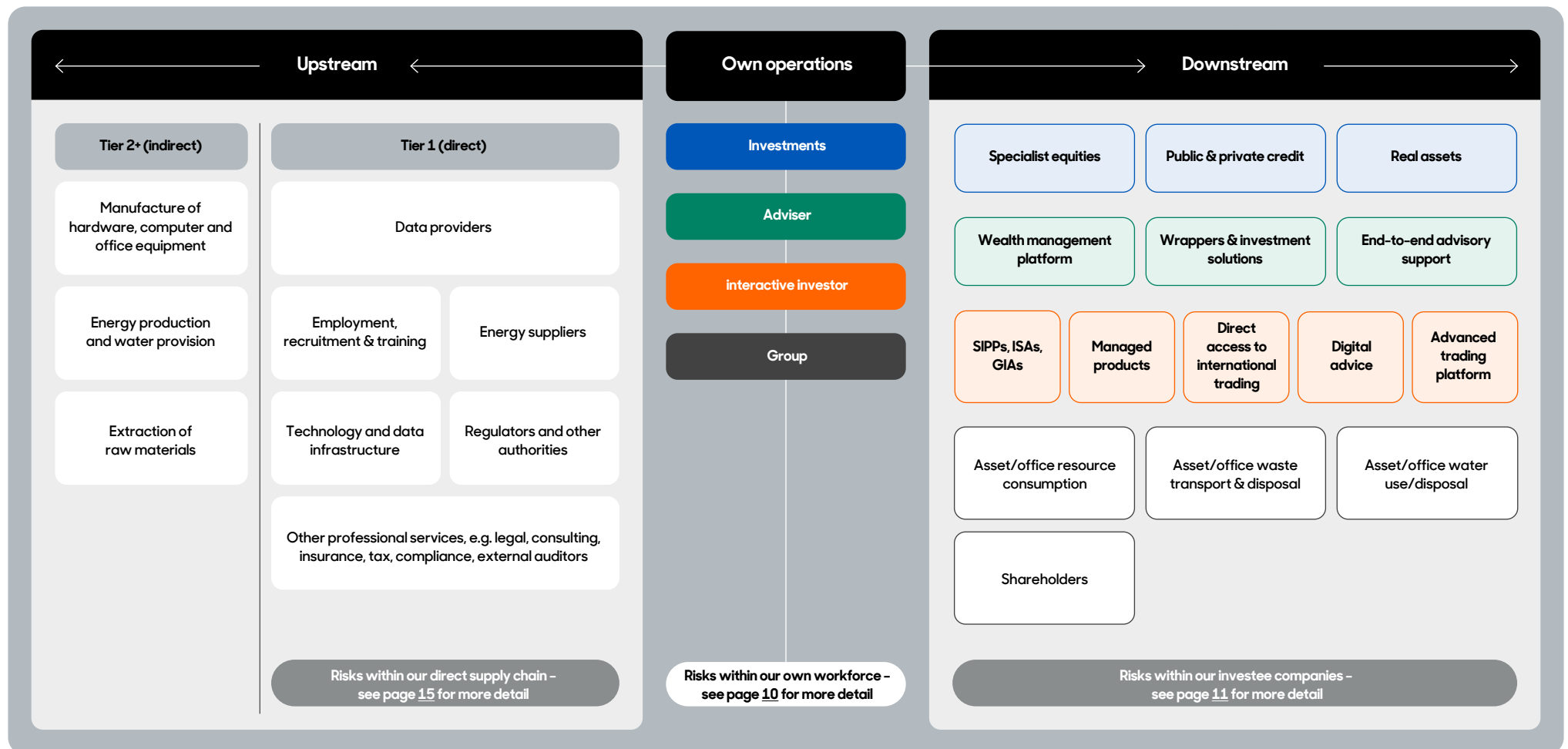
Aberdeen value chain and modern slavery risks

As a wealth and investments group, we are aware of our responsibility to identify and protect people from modern slavery throughout our operations and value chain. To support this, we adopt a decentralised

approach to modern slavery risk management, enabling business areas to implement tailored, activity-specific frameworks where risk exposure is elevated. This ensures that higher-risk

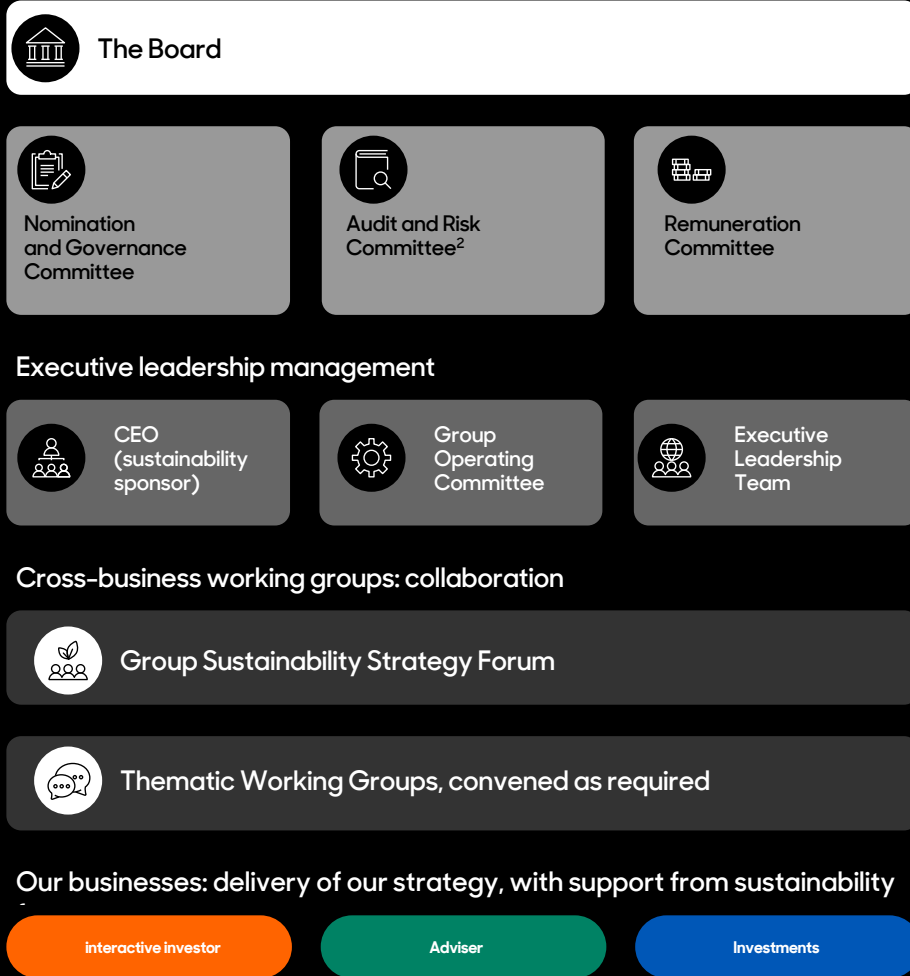
business activities are subject to proportionate governance, with tailored due diligence and monitoring. We believe this approach supports effective risk identification, mitigation and accountability,

while remaining responsive to the differing risk profiles across our operations and value chain.



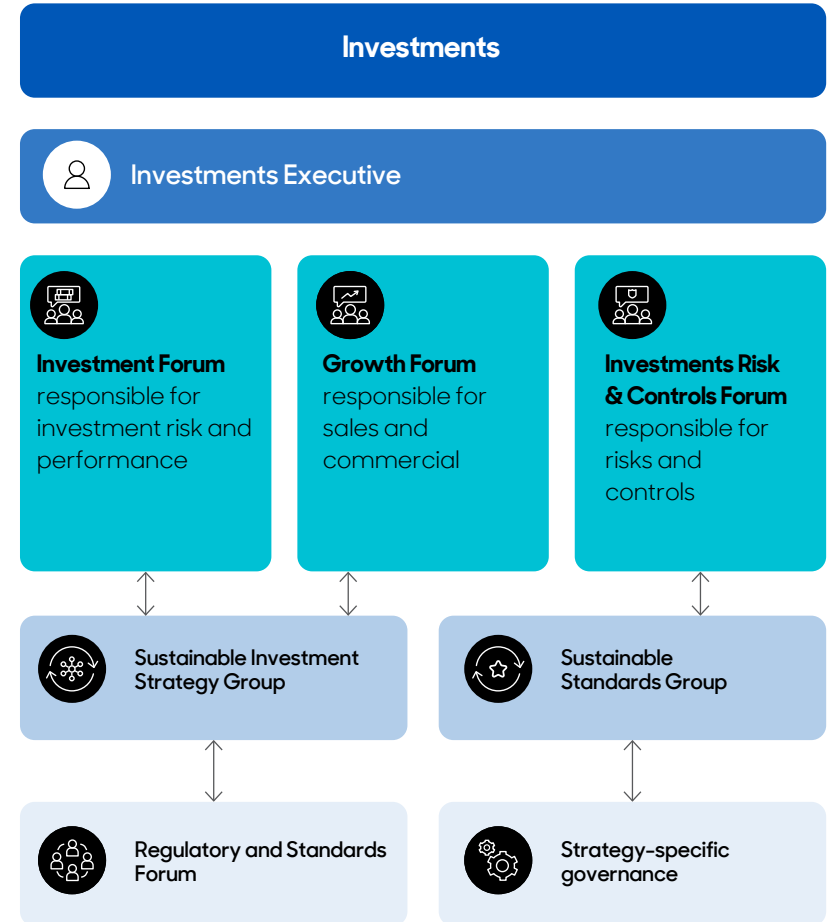
Business overview continued

Governance



1. Aberdeen Group plc governance structure is as at 31 December 2025.
 2. The Audit and Risk Committee was formed in August 2025, following the merger of the Audit Committee and the Risk and Capital Committee.

Our Investments business has additional governance bodies in place, as outlined below:



Our policies

Our policies

We have a number of policies and statements, which collectively demonstrate our approach to identifying and mitigating modern slavery risks and human rights impacts.

These policies have been developed by SMEs within the business with the support of industry bodies and external expertise. We ensure all regions and markets have policies that are appropriate and relevant to the legislation they are governed by.

To align with best practice, we also consult international human rights standards such as:

- Core Conventions of the ILO.
- ILO Declaration on Fundamental Principles and Rights at Work.
- UN Guiding Principles on Business and Human Rights.

Our two key policies which integrate modern slavery principles into our operations and supply chain are our [Global Code of Conduct](#), and [Global Third-Party Code of Conduct](#).



Global Code of Conduct¹

Our code describes the principles and standards that we hold ourselves to and what we ask all our employees to consider in every decision and action that they take.



Global Third-Party Code of Conduct

Our code sets out the standards we expect from our third parties. It specifically highlights our wider interest and focus on ensuring that human rights and labour standards are respected.

We are transparent about our expectations and these documents are publicly available [here](#) so that third-party stakeholders are clear on our expectations. For our employees, these documents are also hosted internally on our intranet and disseminated through relevant training modules.



1 Colleagues from interactive investor attest to an independent Code of Conduct upon joining the company, and do not follow the Aberdeen attestation process.

Our policies continued

Aberdeen global policies

In addition to our Global Code of Conduct and Global Third-Party Code of Conduct, Aberdeen has a range of policies that apply to all employees globally. The following policies outline further steps we take to mitigate modern slavery risks in our operations and value chain. These policies reflect our culture and an understanding that effective policies can, through the adoption of best practice and safeguards, act as barriers to some of the downstream risks which can exist or be exploited with respect to modern slavery, forced labour and human rights abuses.



Global Talent Acquisition Policy

We are passionate about attracting and empowering exceptional talent to thrive within our organisation. Our recruitment approach is designed to open doors – enabling people to move into and across the company, unlocking opportunities for growth and innovation. Guided by our commitment to diversity, equality, and inclusion, we aim to build a workforce that reflects the richness of our clients and the communities we serve globally. By embracing diverse perspectives in the broadest sense, we create a stronger, more dynamic organisation – one where everyone can contribute, belong, and succeed.



Global Procurement, Outsourcing and Third-Party Management Policy

This policy is applicable to all Aberdeen colleagues and subsidiaries and sets the standards for the business in relation to managing supplier relationships and related risks.



Global Immigration Support Policy

This policy details how we will support candidates and colleagues who require immigration support.



Global People Policy

Sets out the standards to which the business must adhere in relation to managing Aberdeen's people risks.



Global Speak up Policy

Recognising the importance of multiple reporting channels and the ability to raise concerns anonymously, an independent Speak Up service is available globally to clients, colleagues, third parties and anyone who may wish to raise a concern about our conduct. The service is managed independently by Safecall and is available 24 hours a day, seven days a week, in multiple languages. UK colleagues can contact the Speak Up reporting line on 0800 915 1571 – and all other countries can find locally available lines on our global intranet. Anyone can contact Speak Up via an online form on the dedicated website, www.safecall.co.uk/file-a-report

Our policies continued

The following policies apply to UK Aberdeen employees¹:



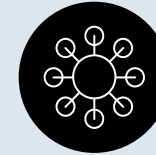
Anti-bullying and Harassment Policies

We are committed to providing an inclusive workplace where all forms of difference are valued, and which is free from any form of unfair or unlawful treatment. We support fully the right of all people to be treated with respect and dignity. This policy explains the approach we take to resolving concerns at work relating to bullying, sexual harassment and harassment.



Grievance Policy

A grievance is a concern, problem or complaint that is raised with us. This could be a concern about work, working conditions or relationships with colleagues. It could also include a concern that is beyond our control, for example, client relationships, which we will investigate as far as we can to resolve the concern. This policy details how the company will approach the investigation of colleague concerns.



Vetting Policy

This policy covers our position on conducting background checks, also known as vetting, when applying for a role (as an external or internal candidate) or as part of regular checks for colleagues in regulated roles.



Disciplinary Policy

Explains the approach taken when we identify conduct or performance issues affecting our people's ability to fulfil their role. Having a clear framework to manage these issues helps us to maintain satisfactory standards of conduct and clarify expectations around improvement in performance where necessary.

ii policies



ii Code of Conduct & local policies

ii maintains its own independent Code of Conduct and local policies, which are aligned with Group standards.

¹ interactive investor (ii) policies are applicable to ii employees only.

Our people

Our people

Raising concerns

If our employees identify any issues relating to modern slavery, including labour conditions, they are asked to report to their manager in the first instance. If they feel uncomfortable raising their concern using their normal reporting line, or wish to do so anonymously, a confidential hotline, Speak Up, is available. Speak Up is operated by Safecall, an independent organisation recognised globally as a leading authority on whistleblowing.

All concerns raised are taken seriously and any victimisation, harassment, discrimination or bullying of anyone will not be tolerated. We also advertise the hotline to our third parties who can use the service in the same way. We investigate all concerns, and outcomes can result in changes to processes and, where appropriate, disciplinary measures and dismissal.

Our Audit and Risk Committee has oversight of our whistleblowing arrangements, with the chair of the committee acting as our whistleblowing champion. In 2025, we received no reports related to modern slavery via Speak Up. If modern slavery were to be found within our operations or supply chains, this would be disclosed and remedied in compliance with our commitment to the United Nations' 'Protect, Respect and Remedy' framework.

Our Global Third Party Code of Conduct details our requirement that third parties take a zero-tolerance approach to modern slavery, bribery and corruption. Our third parties and their workers are encouraged to report any concerns to their Aberdeen contact as soon as practically possible through their own whistleblowing hotline or confidentially through Aberdeen's Speak Up service.

Training

To raise employee awareness of both modern slavery and the Speak Up arrangements available to them, both topics are highlighted in our Global Code of Conduct for employees.

Our Global Code of Conduct describes the principles and standards to which we hold ourselves and ask all our employees to consider in every decision and action they take. All employees receive training on the content and meaning of the Code and are required, at least annually, to confirm that they have read and agree to abide by its principles.

Fair work

Ensuring secure, paid, and safe employment through our operations and supply chain is a key way to reduce modern slavery risks. Paying a living wage ensures workers, especially those in sectors and roles at greater risk of modern slavery, have sufficient income to support themselves and their dependents. Through employment contracts and accreditations, as a UK Living Wage and Living Hours employer, we commit to paying all our employees fairly, and that working hours are not excessive.¹ All employees must have a right to work in the country of employment and minimum age standards are always upheld.

In the UK, these living wage and living hours commitments also apply to third-party workers operating in our offices. Our Global Third-Party Code of Conduct sets out expectations for all third parties we work with globally, including alignment with fair pay and ethical employment standards.

Health and safety

Our colleagues work in low-risk physical environments. Health and safety risk assessments are conducted for all work activities and regular audits are conducted by an external party on our UK premises. We aim for zero reportable accidents and 95% of risks to be controlled at the point of audit. All accidents and incidents are investigated. Further details are available in our Responsible Business annexe, published on our website [here](#).

¹ Living Hours accreditation does not apply to interactive investor

Our Investments

Our investments

Our approach for investments

As a specialist asset manager, we understand that perhaps the biggest impact we can have on modern slavery is through our investments on behalf of our clients.

Our social approach for investments is built around six areas of focus. We exercise our rights and responsibilities as an investor through our engagement and voting activities and seek to be transparent about our approach and its outcomes.

Additionally, we have developed a proprietary internal scoring framework to supplement company-level research. The scores are visible to our investment teams and can be broken down to focus on management of specific ESG issues, including human rights and modern slavery related risks.

The expectations for our investments are based on our understanding of their risk. In forming our view, we draw on internationally recognised standards, such as the UN Global Compact, industry best practice and our internal research capabilities.

Research and data



We provide social and human rights insights and thematic research across asset classes and regions to further support our investment teams.

Investment integration



Through our social framework, we are able to support the integration of social and human rights considerations into investment decision-making.

Active ownership



Active ownership enables us to challenge companies' existing practices and norms constructively.

Collaboration and influence



Industry initiative engagement signals our commitment to social and human rights issues and supports reputational risk management and client trust.

Disclosure



We seek to be transparent about our approach to engagement and voting activities and their outcomes.

Client solutions








Understand our clients' expectations and support investment solutions that can help deliver their aims.

Our Investments continued

Sustainable Investment research and insights

Human rights represent one of our thematic research pillars, which are aligned with the UN Sustainable Development Goals (SDGs). Within the Society pillar, research on modern slavery issues is undertaken by our Sustainable Investment team, where we have analysts that undertake thematic research and have subject matter expertise. In addition, we have sustainability expertise embedded across our investment teams and complement this through collaboration across asset classes, sharing research, experiences and insight.

Our research and insights are aligned to four key sustainability themes

	NATURE	CLIMATE TRANSITION	SOCIETY		GOVERNANCE AND BUSINESS ETHICS
Sustainable Development Goals	UN GLOBAL COMPACT: ENVIRONMENT		UN GLOBAL COMPACT: LABOUR		UN GLOBAL COMPACT: HUMAN RIGHTS
	UN GLOBAL COMPACT: ANTI-CORRUPTION				
					
Topics	<ul style="list-style-type: none"> • Natural capital data • Related policy and regulation • Biodiversity • Land, sea and freshwater use change (including deforestation) • Resource use (including water and circular economy) • Pollution (including plastics) 	<ul style="list-style-type: none"> • Climate data (Climate scenario analysis, carbon metrics) • Related policy and regulation • Decarbonisation alignment • Carbon markets • Credible transition leaders • Low carbon technology • Fuels of the future 	<ul style="list-style-type: none"> • Working conditions • Health & safety • Diversity, equity & inclusion • Staff development & talent retention • Labour relations 	<ul style="list-style-type: none"> • Modern slavery • Supply chain issues • Inequality • Land rights • Food & nutrition • Data privacy • Community relations 	<ul style="list-style-type: none"> • Anti-bribery & corruption • Audit issues • Board composition, diversity • Remuneration • Director independence • Shareholder rights • Accountability • Cyber security • Tax
ESTABLISHING AUTHENTIC AND CREDIBLE INSIGHTS & POSITIONS ON SUSTAINABILITY ISSUES THAT INFLUENCE INVESTMENT DECISIONS					

Our Investments continued

Collaboration and influence

Providing support and actively engaging with a range of industry associations and human rights organisations can increase our influence and provide valuable forums for discussing best practice. We collaborate on a number of initiatives to encourage action and transparency.

We are members of the Investor Alliance for Human Rights, Good Work Coalition, and support the UN Guiding Principles (UNGPs) Reporting Framework, the Principles for Responsible Investment (PRI), and the UN Global Compact. These memberships provide us with valuable insights into emerging issues, best practices, and approaches for managing risks and opportunities.

As a signatory of the PRI, we have access to collaborative engagement initiatives and guidance on human rights matters and are currently part of their Advance initiative, which supports investor stewardship on human rights.

Active ownership

We recognise that modern slavery and human rights issues can impact the long-term success of a company. Through our engagement and voting activities we seek to improve the financial resilience and performance of investments.

Our approach can vary between asset classes as a result of the different rights available. Further information on our active ownership process is covered in detail in our [Engagement Policy](#) and our annual [Stewardship Report](#).

Using our influence through engagement and voting

As a large global investor, we use our influence to promote improvements that strengthen long-term resilience, through constructive engagement with companies and issuers. We typically prioritise engagement with companies and issuers in the below situations:

- The business model and/or collective activities have a high potential for adverse social harm.
- We believe there are gaps between human rights policy and its implementation.
- We have identified the operating context or environment as high risk.
- The company or issuer has a known history of adverse impacts.
- Reports from affected groups or rights-holder representatives raise significant concerns.

We encourage companies and issuers to use the UNGPs to guide their approach to identifying and managing social and human-rights issues.

Thematic engagement – Decent work

In 2025, our social thematic priorities centred on two core areas: living wages and workplace culture, safety, and conduct – with specific attention to high-risk sectors such as mining, where poor oversight and hazardous labour conditions have been recognised as structural risk factors in global modern-slavery benchmarks.

Ongoing review and monitoring

We recognise that modern slavery risks evolve due to regulatory shifts, supply chain complexity and data gap issues. Given that no single dataset is reliable, we will continue to explore multiple tools to reduce the information gap. We will continue to review and strengthen our approach, investment and stewardship processes. Where relevant, we may participate in policy consultations that address the disclosure and data quality gaps.

Case Study

Strengthening labour risk management in an Asian real estate fund

Overview

As part of our commitment to assessing and addressing risks of modern slavery and labour exploitation across our investments, our investments business undertook enhanced due diligence on an Asian real estate fund that was focused on the development and management of modern logistics facilities. The review was triggered by the identification of a potentially material labour-rights risk during early screening: the possibility of forced labour in construction supply chains, specifically relating to Uighur Muslim workers in China.

During pre-investment assessment, the team carried out an ESG due-diligence review of the General Partner (GP), informed by the SASB Materiality Map and our internal Responsible Investment Framework. The GP's documentation referenced labour standards within their contractor-selection process; however, there was limited detail on how these requirements were monitored, implemented or verified in practice.

Given the operating environment and heightened global scrutiny around forced labour risks in the region's construction sector, we identified a significant risk that inadequate oversight could potentially expose workers to forced or bonded labour practices, delays or non-payment of wages and unsafe working conditions.

The risk was assessed as both financially and socially material, with the potential to affect asset performance, reputation and compliance with emerging regulatory requirements.

Engagement objectives and outcomes

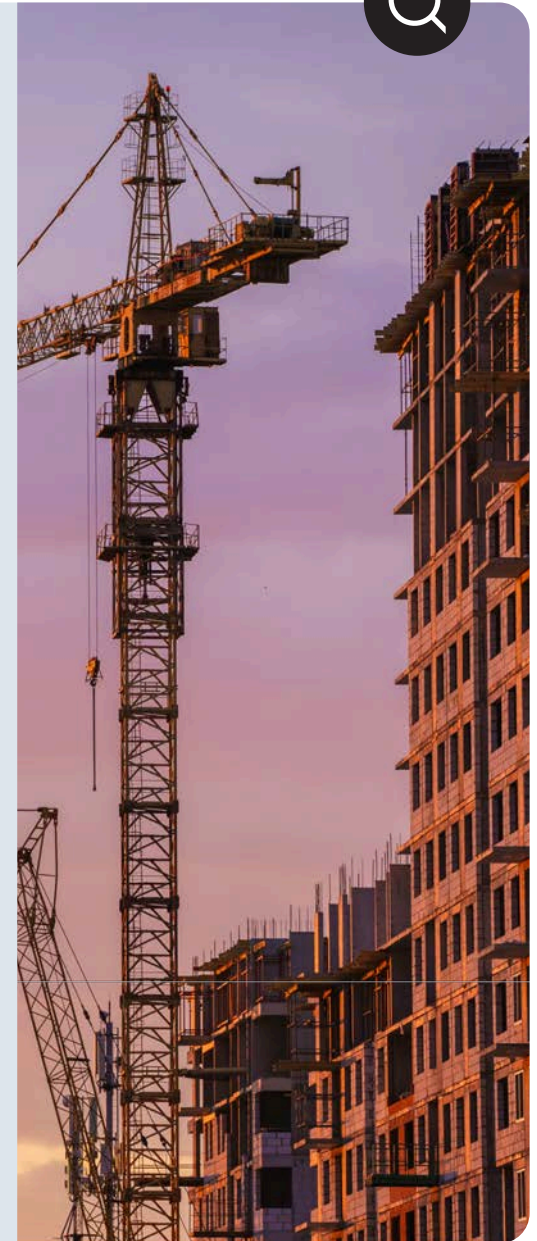
Before proceeding with investment approval, we engaged with the GP to understand how they could develop and articulate a clear pathway to mitigating modern-slavery risks. In response, the GP introduced several enhancements to its labour-management systems, including:

- Strengthened contractor insurance coverage for occupational accidents and safety liabilities.

- Introduction of bank-based salary payments in line with local regulations to ensure timely and traceable wage distribution.
- Enhanced third-party oversight covering review of safety practices, verification of labour-rights compliance, oversight of worker training, and transparent health-exposure reporting.

Following implementation, a follow-up review confirmed the effectiveness of the measures implemented, including assessment of training records and site-level practices. The review found continued alignment with the GP's strengthened ESG and labour-rights commitments, supported by ongoing transparency and independent oversight.

Ongoing monitoring is maintained through the completion of our annual ESG questionnaire.



Our suppliers

Our suppliers

Aberdeen’s impact extends beyond our own operations to the goods and services we procure. These can pose risks to people and communities, and are influenced by factors such as industry, geography, and supplier size. We recognise that human rights risks – particularly modern slavery – may be present within our supply chain and we remain vigilant to this risk.

Our objective is to identify, mitigate, and address modern slavery risks within our supply chain, helping to safeguard those most vulnerable to exploitation. While inherent modern slavery risks within the financial services supply chain are generally lower compared with other sectors, low risk does not mean no risk, and areas of heightened vulnerability may exist within extended value chains. This complexity, coupled with limited visibility beyond direct supplier relationships, makes proactive third-party engagement essential.

Through the controls and processes we applied in 2025, we were not made aware of any instances of modern slavery within our supply chain. We recognise, however, that the absence of identified cases does not guarantee the absence of risk. We therefore remain vigilant and continue to work collaboratively with our third-party partners to monitor, manage and mitigate modern slavery risks.

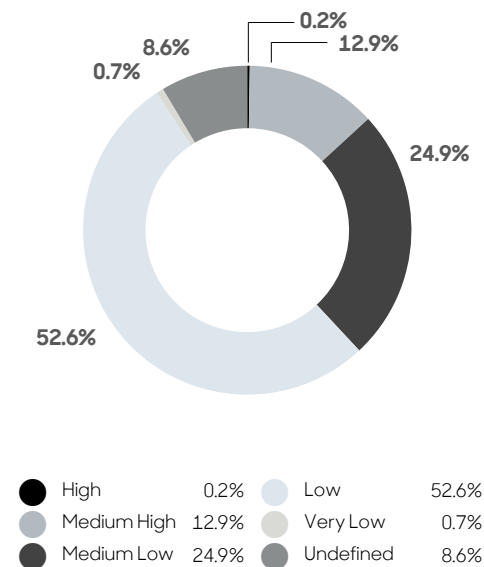
We have mapped our third parties and assessed their inherent modern slavery risks with the support of EcoVadis IQ. In 2025, we engaged with over 2,000 third parties globally. These third parties support our global operations, primarily through service-based procurement including IT services, software, market data, professional services, property management, and HR-related services. While the majority of suppliers were identified as low risk, a small number were deemed as having an elevated risk.

Beyond our direct third-party relationships, our ability to assess modern slavery risks across the broader supply chain is limited by a lack of visibility and transparency. We therefore, rely on our third parties to maintain robust policies, due-diligence processes and controls to identify, prevent and address modern slavery risks within their own value chains.

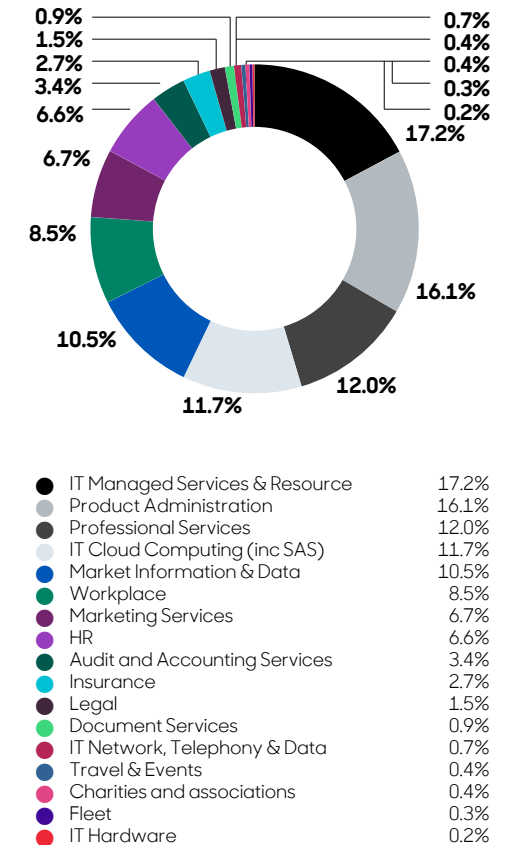
Where instances of modern slavery are identified, we expect our third parties to inform us promptly and take appropriate corrective action.

Indicator	Performance
Number of reported instances of modern slavery in our upstream value chain	0
Percentage of third parties screened for modern slavery risks	99 %
Percentage of procurement team having completed role specific modern slavery training	100 %

Supplier modern slavery risk



Spend by service type



Our suppliers

Tier 1 suppliers by country and inherent modern slavery risk^{1,2}

Country	Suppliers	Risk	Country	Suppliers	Risk	Country	Suppliers	Risk	Country	Suppliers	Risk	Country	Suppliers	Risk
Argentina	1	Medium Low	Chile	2	Very Low	Gibraltar	1	Very Low	Malaysia	31	Medium Low	Singapore	78	Medium Low
Australia	25	Very Low	China	33	Very High	Hong Kong	58	High	Mauritius	1	Very Low	South Africa	2	Medium Low
Austria	14	Very Low	Colombia	1	Medium High	India	11	High	Monaco	1	Very Low	South Korea	10	Very Low
Belgium	23	Very Low	Czechia	1	Very Low	Ireland	44	Very Low	Netherlands	47	Very Low	Spain	49	Very Low
Brazil	1	Medium High	Denmark	27	Very Low	Israel	1	Low	New Zealand	1	Very Low	Sweden	21	Very Low
Canada	10	Very Low	Finland	5	Very Low	Italy	48	Very Low	Norway	3	Very Low	Switzerland	80	Very Low
Cayman Islands	1	Very Low	France	58	Very Low	Japan	69	Very Low	Poland	1	Very Low	Thailand	80	Medium High
			Germany	157	Very Low	Luxembourg	54	Very Low	Portugal	3	Very Low	Taiwan	2	Medium Low
												United Arab Emirates	8	High
												United Kingdom	719	Very Low
												United States	243	Very Low
												Uruguay	1	Very Low
												Vietnam	2	Very High

● Very High
 ● High
 ● Medium High
 ● Medium Low
 ● Low
 ● Very Low

● Suppliers

- Geographic modern slavery risk is assessed using EcoVadis IQ, which draws on the Walk Free Foundation Global Slavery Index.
- Geographic risk indicators are used as an initial screen and are combined with industry risk and spend by procurement category to assess overall supplier modern slavery risk.

2,000+

Third parties

44

Countries

Supplier Governance

Supplier governance

Our approach to mitigating modern slavery risks in our supply chain is anchored in the following global policies:

- Global Procurement, Outsourcing & Third-Party Management Policy – requires modern slavery and labour rights assessments for all in-scope third parties.
- Global Third-Party Code of Conduct – outlines labour and human rights standards expected of suppliers including prohibitions on the use of forced labour, child labour, and human trafficking aligning with the UNGPs on Business and Human Rights, ILO Core Conventions, and OECD standards.
- Global Speak Up Policy – an independently operated, multilingual hotline enabling confidential reporting for employees, suppliers, subcontractors, and third-party workers.

To support these policies, we apply a structured third-party risk management framework that operationalises our commitments in practice.

This framework evaluates modern slavery risk through a multi-layered assessment process, ensuring that the principles set out in our policies are embedded into the way we onboard, monitor and manage third parties.

Our approach includes:

- Inherent risk assessments
- Third-party due diligence questionnaires
- Ongoing monitoring
- Subject matter expert review of elevated-risk suppliers.

Due diligence

Our due diligence process is restricted to suppliers providing services rated as medium to very high risk. It is designed to check that third parties engaged by Aberdeen meet our expectations on labour and human rights as outlined in our Global Third-Party Code of Conduct. Our process includes:

- Screening third parties prior to onboarding
- Checking alignment to the Global Third-Party Code of Conduct
- Reviewing third parties' own modern slavery statements and labour policies
- Escalation processes for any concerns identified during due diligence or contract delivery.

Where modern slavery-related risks or gaps in controls are identified, we work directly with suppliers to investigate the issue, and expect them to strengthen their processes.

In 2025, we identified three suppliers with gaps relating to the absence of documented labour and human rights policies. Following further review, each supplier confirmed that no modern slavery instances had occurred. All three were small to medium-sized businesses

providing financial services to Aberdeen, and each engaged constructively to address the identified gaps.

Grievances and reporting

Should an incident of modern slavery be identified during supplier onboarding or during the delivery of their service, we will move quickly to investigate the issue in collaboration with the third party impacted. If a claim is substantiated, we will take steps to support the impacted third party.

Suppliers and their workers are encouraged to raise concerns either through their own internal whistleblowing channels or via Aberdeen's independently operated, multilingual Speak Up hotline.

Remediation

We regard any confirmed instance of modern slavery as a serious breach of contract. If a supplier is involved in an incident of modern slavery, we expect them to provide effective remedy to the affected individual(s), consistent with recognised human rights standards.

Aberdeen's involvement in remediation will depend on the nature of the breach, the extent to which it is connected to our business activities, and the degree of leverage we have with the supplier. In all cases, any remediation actions will prioritise the rights, safety and wellbeing of the victim.

Where a supplier fails to cooperate with us to investigate, mitigate or remedy an identified issue, we will take proportionate steps in line with our contractual terms, which may include exiting the relationship.

Training

In 2025, our Procurement team completed mandatory training, as well as additional role-specific modern slavery training. The aim of the role-specific training is to raise awareness of the issue and the processes in place to identify, mitigate and remedy, should a human rights concern be identified in our supply chain.

Evaluation and continuous improvement

In 2025, we identified no instances of modern slavery, nor were we notified of any modern slavery instances in our supply chain. We acknowledge that this absence of detection does not translate to no occurrences, and the risk of modern slavery being present in our value chain remains.

We continue to assess the effectiveness of our approach and aim to strengthen this as required. Planned improvements include:

- Introduction of modern slavery indicators in management reporting, such as risk exposure and the percentage of high-risk suppliers with mitigation plans.
- Increase in additional training for those engaging with third party suppliers.

Oversight of outsourced services

Case Study

Supplier governance in action

Applying enhanced oversight to our most material outsourced service providers through a risk-based approach – helping to identify and manage potential labour and human rights issues.

As part of our commitment to responsible third-party management, Aberdeen applies enhanced oversight to outsourced service providers that deliver important business services. One such provider is a supplier of operational finance support services, based in India.

In line with our Global Procurement, Outsourcing & Third Party Management Policy and Global Third-Party Code of Conduct, we take a structured, risk-based approach to identifying, assessing and managing the labour and human rights risks that may arise within this relationship.

Identifying risk

Modern slavery risks are assessed for all in-scope third parties through our global third-party risk management framework. This assessment considers a range of inherent risk factors, including geography, service category, supplier size and criticality. On this basis, the India-based finance support provider is subject to enhanced review and monitoring.

Due diligence and ongoing monitoring

At onboarding and on an annual basis, the supplier undergoes a proportionate and risk-based approach to due diligence. This includes confirmation of compliance with Aberdeen's Global Third-Party Code of Conduct, which prohibits all form of modern slavery, and sets expectations on working conditions, worker treatment, grievance mechanisms and freedom of association. The supplier also provides Aberdeen with relevant disclosures, internal policies and training programmes. Responses are reviewed by internal risk domain owners, with follow-up actions identified where gaps or areas for improvement are noted.

In addition to annual due diligence, ongoing oversight is managed through quarterly business reviews, designed to identify emerging risks over the life of the relationship. This includes ongoing modern slavery risk assessments informed by country-level indicators and service-specific risk factors,

alongside media and event monitoring. Oversight is further supported by regular governance reviews and reinforcement of expectations under the Global Third-Party Code of Conduct, including awareness of Aberdeen's independently operated Speak Up hotline for third-party workers.

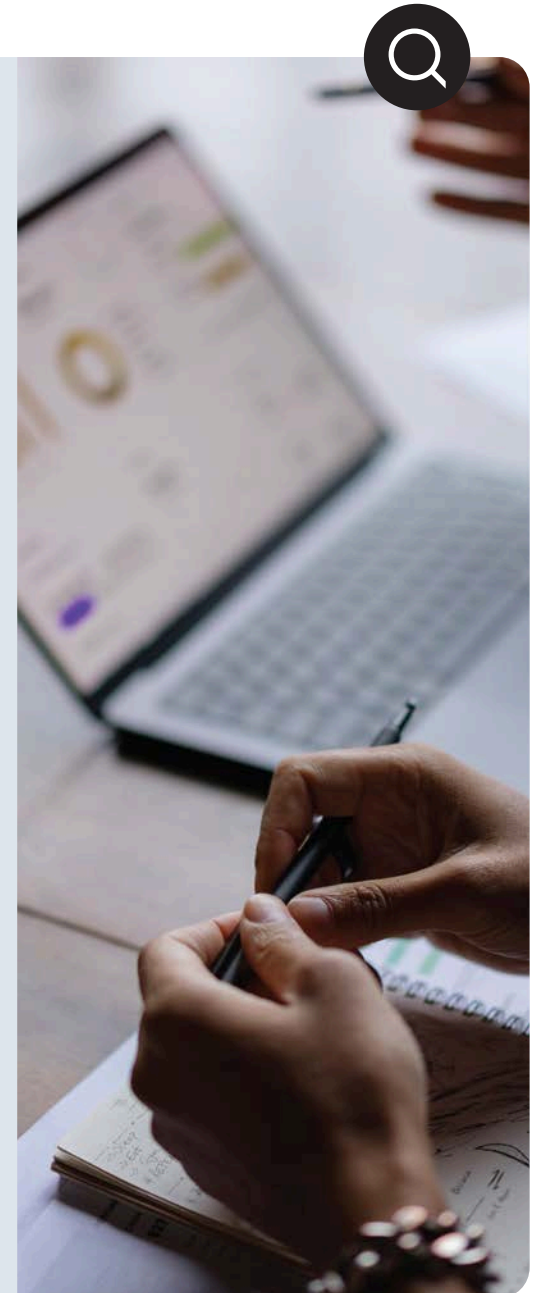
Remediation and escalation

Any identified modern slavery incident within the supplier's operations or value chain would be investigated promptly in collaboration with the supplier.

Continuous improvement

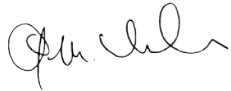
Since the relationship began in 2023, no instances of modern slavery have been identified or reported in connection with services provided by the supplier to Aberdeen.

Our relationship with the supplier supports Aberdeen's ongoing efforts to strengthen oversight of potential labour and human rights risks across our supply chain and we continue to monitor the effectiveness of our approach and improve when required.



Board approval statement

This Statement was approved by the Board of Directors of Aberdeen Group plc on 23 June 2026 and by each qualifying Aberdeen Group plc Subsidiary Board between 24 April and 17 June 2026. It has been signed off by the Chief Executive Officer.



Jason Windsor
Chief Executive Officer

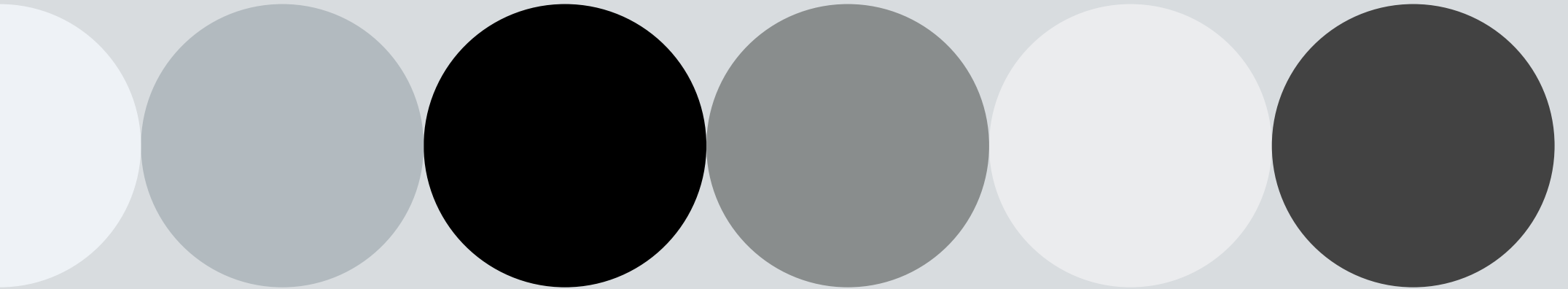
This Statement has been adopted by the Board of Directors on behalf of the following companies:

- Aberdeen Corporate Services Limited
- abrdr Fund Managers Limited
- abrdr Holdings Limited
- abrdr Investment Management Limited
- abrdr Investments Limited
- Elevate Portfolio Services Limited
- interactive investor Services Limited
- Aberdeen Platform Limited
- Tritax Management LLP¹

1. Tritax Management LLP is a subsidiary of Aberdeen Group plc. It operates under its own regulatory policies, appropriate to its business. Please refer to their website at: tritax.co.uk/esg/policies-and-reports.

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