

# **abr dn** **Human Rights** **Statement**

Our Approach 2021

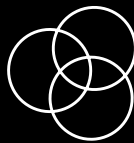
**abr dn.com**

## Our purpose

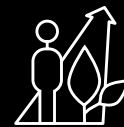
# Enabling our clients to be better investors



Technology and insight help empower clients to make better decisions



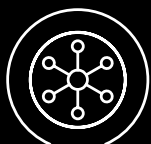
Powerful partnerships help to enhance the expertise that we offer



Enabling clients to invest responsibly helps us to build a better world

## Our connected global team

Clients worldwide trust us to find future-fit investment opportunities globally to deliver the outcomes they want.



We manage and administer £542 billion of assets for clients



We have around 5,000 employees globally



We have 800 investment professionals in over 30 locations



Learn more about our business online visit [www.abrdn.com](http://www.abrdn.com)

# Our business

Our business is structured around three vectors, focused on the constantly changing needs of our clients.



## Investments

Across markets globally, we build investment solutions to enable clients to create more opportunities for their futures.

Our investments solutions are built on the strength of our insight, generated from wide-ranging research, worldwide investment expertise and local market knowledge. Our teams collaborate across regions, asset classes and specialisms, connecting diverse perspectives, working with clients to identify investment opportunities that suit their needs.

### Fee based revenue

**£1,231m**

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**£464bn AUM**



## Adviser

Our platform technology and tools help UK wealth managers and financial advisers create more opportunities for their clients and their businesses.

We provide technology, expertise and support to make it easy for our clients to run their business and deliver the outcomes their clients want. We offer content and experiences that can be personalised to suit every type of business and client, giving advisers powerful data and insight to make better decisions.

### Fee based revenue

**£178m**

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**£76bn AUA**



## Personal

Our personal wealth business offers tailored services to help individuals in the UK create financially secure futures in a way that works for them.

We integrate a full range of services from high-quality financial planning and discretionary investment management capabilities, through to hybrid advice and digital investing tools. Our proposed acquisition of interactive investor transforms and broadens these capabilities.

### Fee based revenue

**£92m**

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**£14bn AUMA**



# Introduction

## Our commitment

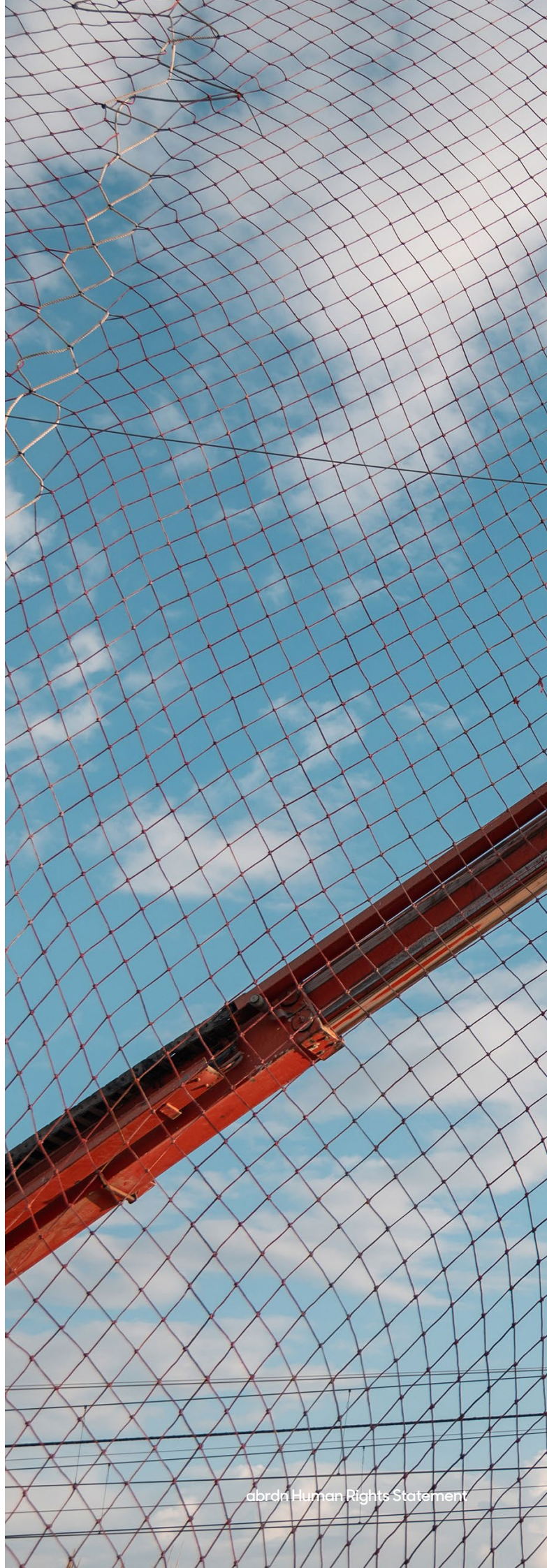
We want to enable our clients to be better investors. As investors, we recognise the impact that human rights issues can have on our investments and the role we can play in stimulating progress. We have put assessments of risks and opportunities arising from human rights at the heart of our environmental, social and governance (ESG) approach.

In our operations, we are champions of fair work across abrdn and we focus on creating an inclusive environment for our colleagues to succeed, which ultimately delivers better outcomes for our clients and investors. We extend our commitment to the suppliers we work with, and we are constantly challenging ourselves to keep improving. We take our responsibilities on human rights seriously and ensure that our commitments are at the heart of who we are.

Our actions are informed by international standards including: the United Nations' (UN) Guiding Principles on Business and Human Rights, International Bill of Rights<sup>1</sup>, the Core Conventions of the International Labour Organisation (ILO), and the ILO Declaration on Fundamental Principles and Rights at Work.

Our commitment is to embed respect for human rights throughout our business. We know that in order to achieve this we must work together, with all our people, clients, our suppliers, and the communities we engage with to help shape a better future.

<sup>1</sup> Comprising of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights.









# Operations

## Our operations

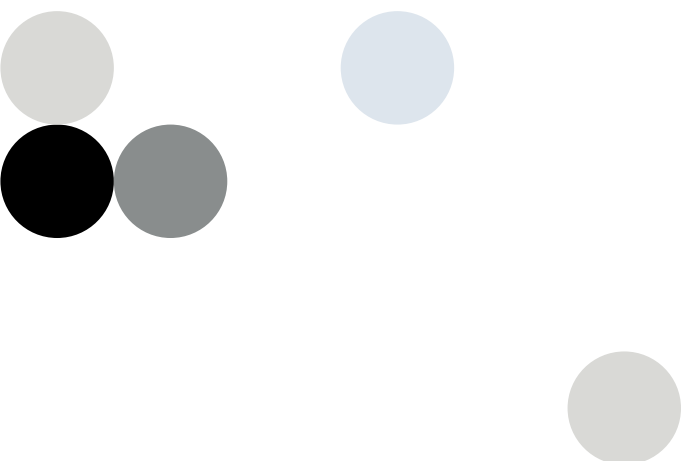
We are headquartered in Scotland and listed in London, with over 5,000 employees in over 40 locations globally.

We work with around 5,000 suppliers who provide us with various goods and services. The majority of our spending is with suppliers of fully managed outsourced services, IT, professional services, and goods and services related to the management of our premises. We also have significant and valuable financial investments in leading companies in the UK, India and China.

The UK financial services industry is not considered a high risk sector for human rights, but we also recognise that the biggest impact we can make is through our investment approach, engaging directly with high-risk companies and encouraging better practices.

## Governance

Our Board supports our commitment and the policies, procedures and standards of conduct we apply. These are listed in the **appendix**. Our risk management function monitors compliance with our key risk policies. Our Labour and Human Rights Working Group has cross-business representatives from procurement, sustainability, human resources, risk, diversity and inclusion and sustainable investment, data privacy, public affairs, legal and anti-financial crime. It ensures we continuously review and improve our approach to managing our salient human rights issues. This statement is reviewed annually.



## Statement scope

This statement applies to every employee and officer in every abrdn wholly owned entity and we encourage equal commitments from our suppliers and associated businesses.

Over  
**5,000**  
employees

Offices in over  
**40**  
locations globally



- 
- |             |               |                        |
|-------------|---------------|------------------------|
| • Australia | • Ireland     | • Spain                |
| • Belgium   | • Italy       | • Sweden               |
| • Brazil    | • Japan       | • Switzerland          |
| • Canada    | • Luxembourg  | • Taiwan               |
| • China     | • Malaysia    | • Thailand             |
| • Denmark   | • Netherlands | • United Arab Emirates |
| • France    | • Singapore   | • United Kingdom       |
| • Germany   | • South Korea | • United States        |



# Identification of salient human rights issues



We look at a range of potential human rights impacts resulting from activities we are involved in, and prioritise those likely to be the most severe were they to occur. This is based on the level of impact to the rights holder, how widespread the issue could be and the complexity of remedying the issue. We established a working group to consider how our practices should evolve to respond to the pandemic, and how the crisis could impact on human rights across our business operations.

We view our salient human rights issues through the eyes of the rights holder, as defined by our Labour and Human Rights Working Group, drawing on internal expertise and conversations with external bodies. The table below lists these and the mitigation actions we are taking.

Rights holder	Salient human rights issue	Key Policies, Statements and Accreditations	Actions we are taking
Our clients	Data privacy	<ul style="list-style-type: none"> <li>• Privacy Notices</li> <li>• Cookie Policy</li> <li>• Social Media Policy</li> <li>• Privacy and Data Protection Policy</li> <li>• Conduct Risk Policy</li> <li>• Products and Services Policy</li> <li>• Anti-Financial Crime and Anti-Bribery Policy</li> <li>• Conflicts of Interest Policy</li> </ul>	Privacy notices are available on our websites. Privacy information is also provided depending on the routes that clients interact with abrdn. We also provide annual mandatory training on data privacy and information security.
	Customer inclusion	<ul style="list-style-type: none"> <li>• Global Code of Conduct</li> <li>• Vulnerable Customers Policy</li> </ul>	We listen to the needs of all of our clients and consider their diverse requirements within our products.
Our supply chain	Fair wages	<ul style="list-style-type: none"> <li>• Global Third Party Code of Conduct</li> <li>• Procurement, Outsourcing and Third Party Management Policy</li> <li>• UK Living Hours and Living Wage Employer</li> </ul>	<p>Our supplier code of conduct sets out what we expect from suppliers.</p> <p>We are an accredited Living Wage and Living Hours employer</p>
	Preventing modern slavery	<ul style="list-style-type: none"> <li>• Modern Slavery Statement</li> </ul>	Our Modern Slavery Statement details the steps we have taken to help prevent modern slavery in our operations, supply chain and investment approach.
Our communities	Inequality	<ul style="list-style-type: none"> <li>• Charitable Giving Approach</li> </ul>	Through our charitable giving approach we are helping to tackle inequality globally.
Our investments	Various - dependent on country and sector	<ul style="list-style-type: none"> <li>• Human Rights Approach</li> </ul>	Human rights considerations are integrated into our investments approach.
Our people	Protection from discrimination, bullying and harassment	<ul style="list-style-type: none"> <li>• Speak Up policy</li> <li>• Bullying and Harassment policies (region-specific)</li> <li>• Global Diversity and Inclusion Policy</li> </ul>	Our policies ensure we meet legal requirements but our framework for action goes beyond this to create a diverse and inclusive workplace
	Safe and secure work	<ul style="list-style-type: none"> <li>• Health and Safety Policy</li> <li>• Blended Working</li> </ul>	We have followed local government guidelines throughout the COVID-19 pandemic. Blended working is our default way of working globally. We continue to support safe working in the office and at home.



# Identification of salient human rights issues



## Ethical conduct

We want to ensure that all our stakeholders have a clear path to raise any human rights concerns with us. We will listen to our rights holders and contact details are on our website. If our employees have any concerns, we encourage them to report this to their manager. An independently managed and confidential Speak Up hotline and web reporting is available if employees would like to raise a concern anonymously.

All concerns raised are taken seriously and any victimisation, harassment, discrimination or bullying of anyone raising a concern will not be tolerated and will be considered a disciplinary matter.

We also advertise this hotline to our suppliers who can use this in the same way. All concerns raised are investigated and outcomes can result in changes to processes and, where appropriate, disciplinary measures.



# Our investments



## Our approach for investments

We recognise the impact of human rights issues on our investments and the role we play in driving progress. As well as driving social change, there is a strong investment case for promoting human rights. That is why assessing

the risks and opportunities of human rights issues has been a core part of our approach for years. Our human rights approach for investments is built around six areas of focus.

Focus	Objective	Aim
Research	Provide high-quality human rights insights and thematic research across asset classes and regions. This draws on corporate and economic research, as well as insights from human rights organisations (such as NGOs and trade unions) and academia.	<p>Drive positive outcomes for our clients by integrating high-quality human rights insights into investment decision-making.</p> <p>Fulfil our responsibility to respect human rights by using leverage to challenge practices and influence positive change.</p>
Investment Integration	Understand the potential financial impacts of human rights risks and opportunities across regions and sectors, integrate these into our investment decisions and understand the implications for our portfolios.	
Client Solutions	Understand client expectations in relation to human rights issues and incorporate this into our stewardship approach. For products with specific labour and human rights criteria, additional research and consideration is made for capital-allocation decisions.	
Engagement & Voting	Better understand investee management of human rights risks and opportunities. Consider the rights holder perspective through discussion with human rights organisations (such as NGOs and trade unions) and academia. Use leverage to challenge investee practices and encourage improvements through engagement and voting.	
Collaboration	Collaborate with human-rights-related industry associations and participate in relevant initiatives. Engage with peers and policymakers to stimulate improvements and best practice.	
Disclosure	Disclose how we use our leverage to influence practices in our engagement and voting reports.	





# Our investments: case study



## Our approach in action: Mining sector

Central to the economies of many countries and regions, the mining sector faces a challenge due to historic breaches of human rights relating to labour issues and interactions with vulnerable communities.

Such breaches can ultimately lead to regulatory action, operational disruption, and reputational damage, which can negatively affect investment performance. As such, the mining sector is widely considered to be 'high risk' for human rights issues.

External research and voluntary disclosure on human rights have historically been weak and recent controversies have highlighted the need for enhanced transparency across the sector. It is also important to reflect that the operational impact of mining operations can be extensive and ethical engagement with local communities plays a significant role.

In 2021, we carried out a priority thematic engagement with nine of our significant mining holdings to establish a deeper understanding of the salient human rights issues for each company. Our focus aligned to the key aspects of due diligence identified by the UN Guiding Principles for Business and Human Rights (UNGPS) and the OECD Guidelines for Multinational Enterprises. We assessed each company through a series of conversations with senior staff, including CEOs, and updated our ESG House Scorecards to reflect our deepened understanding.

We subsequently recommended upgrading four companies for good practices, such as positive community engagement, transparent disclosure, and clear focus on salient human rights issues. Three companies were also downgraded, versus their previous score, for a deemed lack of progress.

Our findings across the sector support the move to escalate human rights and community engagement approaches to be on par with health and safety practices, and incorporated into established processes where possible. There is also a need for enhanced and verifiable disclosure, particularly in relation to engagement with community groups and reporting via grievance mechanisms. It is critical for companies to be able to demonstrate a tailored approach to their community engagement, which accounts for regional variances due to location and community characteristics.

We will continue our engagement with our key holdings in this sector and will revisit identified milestones for each company to measure progress on this critical issue.



# Our clients

Our business is focused on the constantly changing needs of our clients globally, from individuals to institutions. We have a number of policies to ensure we are protecting their rights, and treating them fairly. These are detailed in the **appendix**.

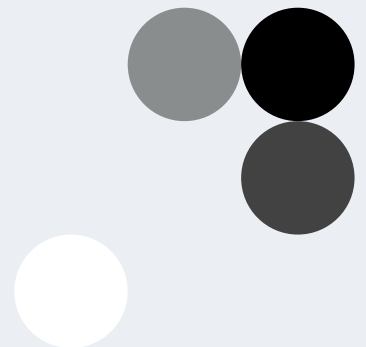
## Identified salient human rights issues

Our human rights oversight group identified information security and data privacy as well as customer inclusion as our current salient human rights from the perspective of our clients. This was based on potential impacts to rights holders and to abrdn. A data breach, for example, could impact a large number of our clients. Whilst the potential to exclude clients by not serving their specific needs could negatively impact individuals' financial and mental wellbeing.

## Customer inclusion: Supporting vulnerable customers

As part of our strategy to enable our clients to be better investors, we recognise that customers need access to products and services that meet specific needs. Through our governance framework, we identify groups who need priority care, to ensure none of our customers are left behind. For example, we support customers' additional visual needs via large font or braille updates, as well as sign-language, language interpretation, and other necessary adaptations, should they be needed.

We have invested in bespoke training to ensure colleagues are equipped to support and identify requirements for priority care, with specific focus on colleagues in customer facing or customer supporting roles. Through our recruitment processes, we look to ensure our future colleagues are prepared to provide inclusive services to all our customers.





# Our clients



## Information security and data privacy

Ensuring information security and data privacy is of paramount concern for abrdn. We are committed to safeguarding our information assets including any personal data shared with us. Our policies, processes and controls ensure all personal data is managed in an ethical, lawful and responsible way, in line with the privacy and data protection laws applicable to our business operations globally.

We will only ever collect and use personal data where it is necessary, fair, and lawful to do so. Privacy notices are available on the client facing websites for the abrdn Group. These detail:

- what personal information we collect and for which reasons
- how we protect personal information
- who we may be required to share it with
- clients' rights over the information abrdn holds about them.

We invest in our Business Resilience and Cyber Defence capabilities to be able to respond to disruptive events (such as cyber-attacks) rapidly and effectively. This means we can protect the best interests of our clients, shareholders and our staff and to ensure the ongoing operation of our business.

Education and awareness plays a crucial role in protecting our clients and employees. Annual Information Security and Data Privacy training is mandatory for all our employees. In addition, we provide other awareness raising activities, such as posts on our company intranet, videos and email.



# Our people



## Our people

Our impact on human rights starts with how we treat our people. As a baseline, we ensure all our people receive fair pay and benefits, equal opportunities and they have freedom of association. We provide more detail in our policies and associated documents which are in the **appendix**.

Our human rights oversight group identified safe and secure work as a priority, particularly given the impact of the COVID-19 pandemic on our colleagues' physical and mental health. They also identified protection from discrimination, bullying and harassment as our current salient human right from the perspective of our people. We want to help people meet their full potential and this can only happen in a culture which protects everyone from discrimination.

Our Global Code of Conduct articulates the ethical behaviour we expect across our company. All our colleagues receive training on the code, and are asked annually to confirm that they have read it and abide by its principles.

## Protection from discrimination, bullying and harassment

Discrimination, bullying and harassment have no place at abrdn. Our policies ensure that as a minimum, we meet the legal requirements in all the locations we operate in. These policies reiterate our commitment to providing an inclusive workplace where all forms of difference are valued and which is free from any form of unfair or unlawful treatment.

Our bullying and harassment policies explains the approach we take to resolving concerns at work relating to bullying and harassment.

We take a zero tolerance approach to issues which could constitute harassment and any concerns are managed through our bullying and harassment, and disciplinary policies. We investigate bullying and harassment claims thoroughly in accordance with our policies and procedures. We want a diverse and inclusive workplace where barriers to equal opportunities are removed in a progressive and sustained approach. Currently we are focused on achieving a better gender and ethnic minority balance, and opening up routes into our industry for those from a variety of backgrounds.

Our **Sustainability Report** provides more detail.

## Fair wages

We have been an accredited UK Living Wage employer since 2014 and are a founding member of the UK Living Hours initiative. Importantly, these commitments extend to UK suppliers working on our premises. This means they must pay workers the real Living Wage and commit to provide workers with at least four weeks' notice of shifts, a contract that accurately reflects hours worked, and a contract with a guaranteed minimum of 16 hours a week, unless the worker requests otherwise.

In 2021, we extended our Third Party Code of Conduct to cover fair and equitable wages in all of our territories. We require our suppliers to meet any living wage legislation in the territories that they supply services to us or, if no legislation is in place, they must commit to paying their employees a fair and equitable wage.

## Safe and secure work

The pandemic has resulted in a further embedding of inclusivity into our working culture. This means expanding our special leave policies and supporting colleagues with commitments outside of work. The pandemic has also imposed a new challenge, requiring us to update our office policies and spaces to be safe and secure in line with local requirements.

We have empowered our people managers to work with their teams and devise flexible solutions to balance the needs of clients with personal needs. Our default way of working globally is a blended model and we will continue to keep our approach under review. We have made it easy to change working patterns and promote different leave options, such as carers leave, to take time away from work to meet other responsibilities. Through our governance processes and senior leaders, we continue to monitor developments across our global operations and will always prioritise colleague safety.

In early 2022, we refreshed our approach to colleague engagement surveys, which enables these to be more frequent, tailored, and allows for enhanced data analysis and comparison, including peer comparison.



# Our supply chain

## Our supply chain

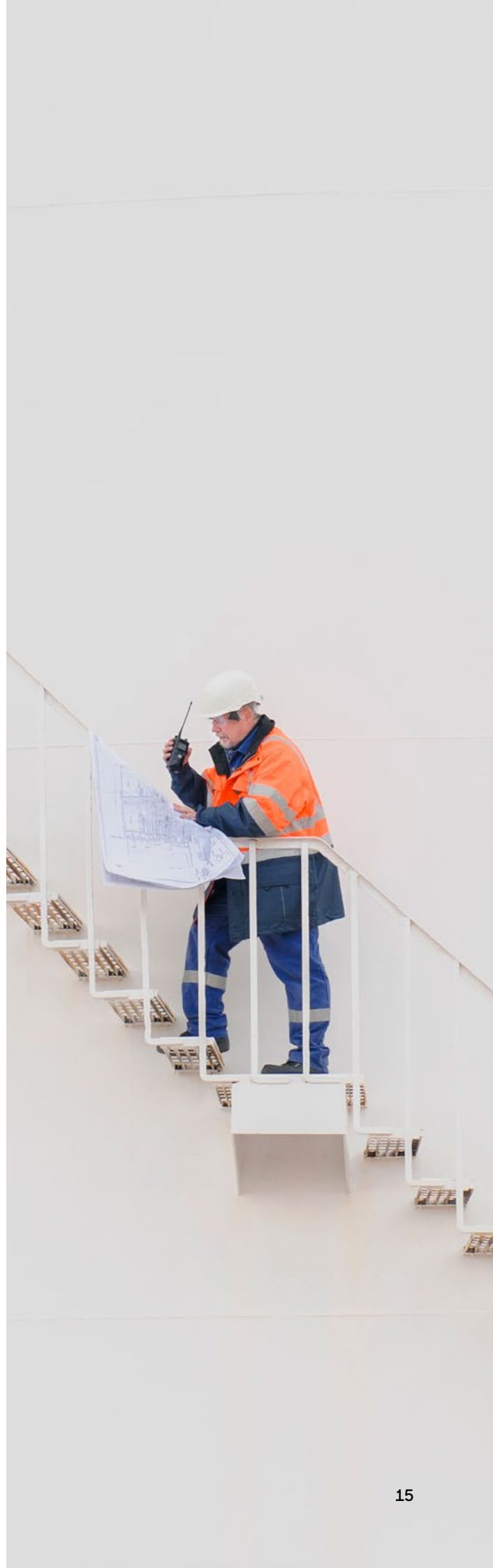
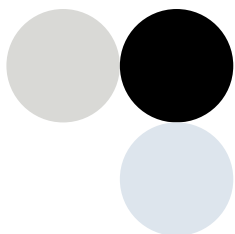
Our **Global Third Party Code of Conduct** sets out what we expect from suppliers and reflects the values and principles within our Global Code of Conduct. It focuses on human rights issues, labour standards, diversity and inclusion, and health and safety. It also provides details of our independent whistleblowing hotline to anonymously report any issues.

Where relevant, suppliers' performance and approach to their human rights responsibilities are also reviewed at various stages – during our sourcing process, as part of our annual due diligence and during our ongoing relationship management discussions.

In 2021, we undertook extensive work to enhance our supplier oversight through the implementation of the Procurement, Outsourcing and Third Party Management Policy. This included enhanced standards of supplier due diligence and ongoing risk assessment in line with updated EBA (European Banking Authority) Standards.

### Identified salient human rights issues

Our human rights oversight group identified fair wages and modern slavery as our current salient human rights from the perspective our suppliers. Modern slavery was chosen because, although unlikely, the impact on the rights holder is severe. Fair wages is a global inequality issue, and an area in which we want to influence positively through our supply chain.



# Our supply chain

## Modern slavery

All forms of modern slavery – from human trafficking and forced labour, to bonded labour and child slavery – have no place in our society. Heightened risk exists in relation to certain territories, and in relation to the production of certain goods and supplies. Our Modern Slavery Statement sets out our approach and details our objectives to expand reporting and transparency across both our supply chains and investee companies.

Our suppliers have been assessed by a third party and none were deemed as being at high risk of modern slavery. We have committed to continuing to review our suppliers in this way and will take appropriate action if any are identified as being high risk.

In 2021, we implemented the new global Third Party Risk Management Framework which includes a strengthened service risk assessment, with more focus placed on Anti-Financial Crime and Environmental, Social and Governance (ESG) issues. We engaged subject matter expertise (SMEs) to inform what levels of proportionate due diligence activities may be required to be undertaken on the respective third party. These SMEs made recommendations in strengthening our due diligence questions (DDQ) and supplier risk assessment questionnaire (SRAQ) plus making recommendations around our DDQ and SRAQ process.





# Our community

## A lack of respect for human rights creates inequality, damaging society and the communities we operate in.

### Identified salient human rights issues

As a company, we have identified inequality as the most salient human right priority facing communities domestically and globally. The COVID-19 pandemic has exacerbated the already growing levels of inequality.

We factor human rights into our charitable giving strategy. We ensure our charity partners enhance

human rights by either protecting the planet or by reducing inequalities. We do not fund any organisation which discriminates in any way for the services they offer, and we seek opportunities to actively encourage greater equality.



### Case Study: Henry Street Settlement, New York City

The New York City (NYC) unemployment rate of 11.2% (March 2021) remains almost double the national average. An estimated 800,000 residents in NYC have no internet access in their homes.

Henry Street Settlement's mission is to open doors of opportunity for Lower East Side residents and other New Yorkers through social services, arts, and health care programs. We are supporting this mission via a three year partnership to set up a Technology Lending Library.

Staying connected, in an increasingly digital world, is more important than ever. The lending library will give people the opportunity to participate in online groups, complete training courses and apply for jobs. Individuals will be referred to the scheme by an Employment Coordinator who will regularly check-in with them. The aim of the partnership is to support up to 100 people per year to gain access to the technology they need in order to break down barriers to employment.

### Financial inclusion

abrdrn is a leading supporter of financial inclusion, as a founding member of Kickstart Money, which seeks to ensure every primary aged child receives a high-quality and effective financial education. So far, the initiative has funded the delivery of financial education to almost 20,000 primary school children and has commissioned research into the effectiveness of financial education.

Additionally, the abrdrn **Financial Fairness Trust** aims to contribute towards strategic change which improves financial wellbeing in the UK. The Trust, which is independent of abrdrn, funds research and undertakes campaigning and policy work to improve living standards and personal finances for people on low to middle incomes in the UK.

# Our Policies and Associated Documents

## Policies and Associated Documents

Our policies and associated documents, collectively demonstrate our approach to identifying and mitigating human rights impacts. We ensure all regions and markets have policies that are appropriate and relevant to the legislation they are governed by. Our policies are available on request, and our documents are available on our website.

### The following policies are UK specific:

#### Parent Leave Policy

Covers what our people need to know for maternity, paternity and adoption leave, including the right for partners of birth mothers/primary adopters to take up to 52 weeks' leave and 40 weeks' pay.

#### Special Leave Policy

Covers how we will support our UK employees if they need time off from work to manage commitments outside of work, deal with exceptional situations that arise, or take a career break to pursue personal interests.

### The following policies are global:

#### Global Diversity and Inclusion Policy

This policy covers our approach to inclusion and diversity. 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 define diversity in its broadest sense and support a culture that values fairness and transparency. We fully support the right of all people (whether colleagues, workers, or clients) to be treated with respect and dignity.

#### Global Code of Conduct

Our **code** describes the principles and standards that we hold ourselves to and we ask all our employees to consider in every decision and action that they take. Within the code, we specifically highlight our commitment to tackling modern slavery.

#### Global Immigration Support Policy

We will support the visa applications of anyone working on an international assignment or permanently relocating. We will also support new joiners who have been recruited internationally and their immediate dependants.

#### Global Health and Safety Policy

This policy sets out the standards that the business must adhere to in relation to managing abrdn's health and safety risks.

#### Global People Policy

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

# Our Policies and Associated Documents

**The following policies apply to all abrdn plc employees:**

## **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 fully support 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 and harassment.

## **Disciplinary Policy**

Explains the approach we take when we identify conduct, performance issues or matters affecting people's ability to perform their role. Having a clear framework to manage these issues helps us to maintain satisfactory standards of conduct and encourage improvement in performance where necessary.

## **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.

## **Holiday Policy**

Taking regular holidays is an important way of looking after wellbeing. We are committed to supporting our people to take time off to rest, relax and return to work refreshed.

## **Privacy and Data Protection Policy**

Sets out the principles and standards to be adhered to by abrdn when processing personal information.

## **Blended Working Policy**

Blended working combines the benefits of face to face collaboration, coaching and connecting in our offices with the flexibility of working from home and other locations. This benefits our clients, business, teams and colleague development and supports our aspiration of being a modern and empowering organisation.

## **Speak Up Policy**

Clarifies when and how abrdn employees, as well as our other stakeholders, can make a Speak Up (whistleblowing) report and reassures them that it is acceptable to do so, with confidence that their concern will be taken seriously and is anonymous.

## **Talent Acquisition Policy**

Covers the approach we take when recruiting. We are committed to creating a recruitment process that enables talent to move into and around the company. Aligning our aims to our diversity and inclusion priorities, we want to build a diverse workforce in the broadest sense, which reflects our clients, and the geographies in which we operate.

## **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. The purpose of vetting is to minimise the risk of financial crime on our business and ensure that we recruit the right people into our business.





# Our Policies and Associated Documents

## Our clients:

### Privacy Notices

Visitors to our **website** can access the most up to date privacy notice for that respective part of our operations. Privacy notices are accessible via a link at the foot of the website.

### Anti-Financial Crime and Anti-Bribery

Sets the standards the business must adhere to in relation to managing abrdn's key risks in relation to financial crime.

### Product and Services Policy

Sets out the minimum standards that the business must adhere to in assessing new and existing client propositions. It also supports abrdn's conduct risk appetite statement.

### Competition and Antitrust Policy

Sets the standards that the business must adhere to in relation to competition law compliance.

### Conduct Risk

Sets out the ways we make sure that wherever in the world we operate, we manage our conduct risk by ensuring that through our behaviours, strategies, decisions and actions, we do the right thing by placing clients at the heart of what we do and behave in a manner which pays due regard to treating them fairly.

### Global Investment Governance

We must ensure that client assets are being managed in line with expectations. This includes ensuring that mandates are being managed in line with relevant regulations and applicable house standards, as well as specific client requirements.

### Social Media Policy

This policy describes the approach taken by abrdn to ensure that all use of social media delivers value for our clients and that the risks are managed appropriately to ensure that the abrdn online community and all of its brands are protected.

## Our suppliers:

### Supplier Code of Conduct

**Our code** sets out the standards we expect from our suppliers. It specifically highlights the UK Modern Slavery Act 2015 as well as our wider interest and focus on ensuring that human rights and labour standards are respected.

### Modern Slavery Statement

**Our statement** sets out the steps abrdn (and each of its relevant UK subsidiary commercial organisations) has taken during the year ending 31 December to help prevent modern slavery in our operations and supply chain.

### Third Party Management

Sets out the standards that the business must adhere to in relation to both new and existing contractual arrangements.

## Our communities:

You can read more about our charity and sustainability approach in our **Annual Report** and **Sustainability Report**

## Our Investments:

**Human Rights** – our approach for investments

**Controversial Weapons** – our approach for investments

**Climate Change** – our approach for investments

**Fossil Fuels** – our approach for investments

**Our Sustainability Report details our support for a number of international codes and initiatives.**





