

# Supplier Code of Conduct – Modern Slavery

December 2024



**ClearBridge Investments Limited (CIL)**

**ClearBridge Investments (North America) Pty Limited (CINA)**

(the above entities are referred to as “ClearBridge” for the purposes of this policy.

ClearBridge and ClearBridge Investments, LLC. are collectively referred to as

“ClearBridge Investments”.)

Document Owner: Head of Legal, Risk & Compliance

# Supplier Code of Conduct - Modern Slavery

## Purpose and Application

ClearBridge provides funds management services to a broad range of clients globally. Further to the ClearBridge voluntary Modern Slavery Statement issued annually, this Supplier Code of Conduct – Modern Slavery (**Code**) forms part of ClearBridge’s supply chain due diligence for its third-party contractual relationships.

ClearBridge is committed to reviewing its supply chain so as to identify and mitigate against acts of human trafficking and modern slavery. Such acts must not form part of ClearBridge’s business. We acknowledge our responsibility under the *Modern Slavery Act 2018* (Cth) (the **Act**) to take steps to provide transparency within our own organisation and with third-party suppliers of goods and services.

Suppliers are assumed to have similar standards and procedures in place such that they and their personnel, consultants, or contractors meet the minimum requirements set out in this Code, to the extent reasonably practicable. Where the supplier finds it difficult to undertake appropriate measures, we strongly encourage them to bring this to our attention for further discussion and assessment.

## Modern Slavery

Modern slavery describes situations where coercion, threats or deception is used to exploit individuals and undermine or deprive them of their freedom. The Act refers to eight types of serious exploitation:

- ❖ **slavery** – where one person (‘the offender’) exercises powers of ownership over another person (‘the victim’)
- ❖ **servitude** – where the victim is significantly deprived of personal freedom or where they are not free to cease work or leave their place of work
- ❖ **forced labour** – where the victim is either not free to cease work or leave their place of work
- ❖ **deceptive recruiting for labour or services** – where the recruiter deceives the victim about whether they will be exploited through a type of modern slavery
- ❖ **forced marriage** – where either party to a marriage (‘the victim’) has not freely or fully consented to the marriage due to the use of coercion, threat or deception or where the victim was incapable of understanding the nature and effect of the marriage ceremony (including due to age-related incapacity)
- ❖ **debt bondage** – where the personal services of a person (‘the victim’) are pledged as security for a debt and the debt is manifestly excessive, the reasonable value of the victim’s services are not applied to liquidate the debt, or the length and nature of the services are not limited and define
- ❖ **trafficking in persons** – the recruitment, transportation, or receipt of a person for the purposes of exploitation through modern slavery (including sexual exploitation, forced labour, slavery, slavery-like practices, or the removal of organs)
- ❖ **the worst forms of child labour** – situations where children are: exploited through slavery or slavery-like practices (including sexual exploitation), engaged in work which is likely to harm their health or safety, or used for illicit activities, particularly for the production or trafficking of drugs.

Modern slavery also describes circumstances where a person or entity:

- ❖ enters into a commercial transaction involving a slave or slave trading
- ❖ conducts a business involving servitude or forced labour.

A person or entity may be considered to do either if they exercise undue control, exert inappropriate direction over the transaction or business, or if they directly finance that transaction or business.

ClearBridge expects that its suppliers will comply with all modern slavery laws and regulations in the countries in which they operate and, where relevant, seek commitments from their own supply chain to also meet these requirements. More broadly, suppliers are expected to pursue ethical and responsible sourcing of all goods and services in their supply chain.

## Employment Practices and Human Rights

In line with our other supporting policies, we assume our suppliers will have appropriate policies and practices in place with respect to their employees and supply chains. Suppliers should not engage in or be complicit with human rights abuses, such as modern slavery and human trafficking.

Suppliers are expected to manage their employees in accordance with generally accepted good industry practice and adhere to all relevant laws, regulations, and standards. Suppliers must ensure that:

- ❖ there are no forced work or child labour practices
- ❖ no employee is required to provide money as a condition of their employment
- ❖ all employees maintain control of their identification documents
- ❖ all employees can freely associate with an organisation in accordance with local legislation and exercise their right to collective bargaining
- ❖ all employees are provided with fair remuneration, working hours and work conditions including in relation to workplace health and safety
- ❖ all whistleblowers are protected in accordance with applicable legislation.

## Risk Assessment and Relationship Management

ClearBridge will review those suppliers with Modern Slavery Statements as part of its third-party supplier due diligence. Where a supplier does not have a Modern Slavery Statement, ClearBridge may request that supplier to complete a self-assessment (via a Supplier Questionnaire) in regard to their business and supply chain practices. Answers to this Questionnaire will provide us with a greater understanding of the risk of modern slavery within the supplier's supply chains or operations and enable us to respond accordingly.

Should ClearBridge be advised of, or otherwise identify, modern slavery practices in a supplier's business or supply chain, it reserves the right to terminate the business relationship.

Supplier adherence and commitment to this Code forms an integral part of ClearBridge's third-party supplier relationship management and is used along with other relevant due diligence practices when selecting new suppliers or renewing current contractual relationships.

## Continuous Improvement

ClearBridge is committed to actively and progressively improving its understanding and oversight of all tiers of its supply chains. We will seek feedback from various stakeholders in regard to the success or otherwise of the actions taken by the business to reduce the risk of modern slavery.

## Contact Information

If you have a query or concern relating to any part of this Code, please contact the Head of Legal, Risk & Compliance at [aucpliance@clearbridge.com](mailto:aucpliance@clearbridge.com). All matters raised will be handled on a confidential basis and escalated as appropriate.

The following contact points are provided for informational purposes only and to ensure that this Code provides the standard information as contemplated by relevant guidelines.

### Contact Points

1. **Australian Border Force:** Modern Slavery Business Engagement Unit in the Australian Border Force - [slavery.consultations@abf.gov.au](mailto:slavery.consultations@abf.gov.au).
2. **Australian Federal Police:** by phone 131 237, by email [A OCC-Client-Liaison@afp.gov.au](mailto:A OCC-Client-Liaison@afp.gov.au), or via their [online form](#). Contact can be made anonymously.