Together
we invest for a better future

Standard Life Aberdeen
Modern Slavery Statement 2019/20
Our latest statement, published in accordance with the UK Modern Slavery Act 2015, sets out the steps Standard Life Aberdeen (Standard Life Aberdeen plc and each of its UK subsidiary commercial organisations) has taken during the year ending 31 December 2019 to help prevent modern slavery in our operations and supply chain.

All forms of modern slavery - from human trafficking and forced labour, to bonded labour and child slavery - have no place in our society. As a global investment company we want to do all that we can to help tackle these issues. We are committed to operating ethically, raising awareness of modern slavery issues, and encouraging good practices among our suppliers and the companies we invest in.

Mike Tumilty,
Global Chief Operating Officer and executive sponsor

Our purpose
Together we invest for a better future. We do it to make a difference to the lives of our clients and customers, our employees, society and our shareholders.

Our business
We meet the evolving needs of investors and savers. We do this by building lasting relationships and developing innovative products and services. We offer:
- Active asset management to institutional, wholesale and strategic insurance clients
- Wealth management, financial planning and advice services, either directly to customers or through financial advisers.

We also have significant holdings in associate and joint venture businesses: Phoenix in the UK, HDIFC Life and HDIFC Asset Management in India and Heng An Standard Life in China.

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What we’ve done this year at a glance

- Launched a new modern slavery standalone training module and assessment for our people
- Joined the “Find it, Fix it, Prevent it” investor collaboration
- Engaged with investee companies on modern slavery issues and reported transparently on our discussions
- Performed a regular risk assessment of our highest risk suppliers with a third party

Investment approach
A key way we can drive change is through how we invest. We incorporate environmental, social and governance (ESG) considerations into our investment approach across all asset classes. We take our responsibilities as an investor seriously and seek to encourage the adoption of best-practice ESG standards. We expect that the companies in which we invest meet internationally recognised modern slavery standards and industry best practices.

We also expect companies to report to shareholders regarding policies, practices and the performance of all the steps taken to address modern slavery issues. Where we believe a company is exposed to modern slavery risk and not taking action to mitigate this, we will incorporate this into our investment view and engage with the company to drive positive change.

Engagement case study Barratt Developments
The UK’s largest house builder, Barratt Developments, is a company we hold in the UK Equity Impact – Employment Opportunities Fund. This fund aims to use capital as a source for strong financial returns and force for social good through supporting creation of quality jobs across the UK.

We prioritise our engagements based on risk and materiality. As the construction industry is in one of the high risk sectors for modern slavery, we spoke to the company to find out how it is managing this risk in its supply chain.

We learned that the company has taken a number of positive steps. It is the first national house builder to sign up to the Gangmasters and Labour Abuse Authority’s Construction Protocol; it has included modern slavery requirements in the contractual relationships with its suppliers; it has installed a confidential helpline for reporting suspicious incidents; it has put up anti-modern slavery posters on sites to help workers spot signs of slave labour; and it carries out audits on suppliers assessed as high risk.

The company has confirmed to us that it has found no incident of modern slavery in its own operations or supply chain. However, given the prevalence of this issue in the construction industry, we encouraged Barratt Developments to keep up its scrutiny of suppliers further down the chain.

Policies
We have a number of policies and statements, collectively demonstrating our approach to identifying and mitigating modern slavery risks:

- Global code of conduct
- Supplier code of conduct
- Other policies (third party management, outsourcing, corporate transactions, and people)

These policies form part of our enterprise risk management framework and support our commitment to tackling modern slavery through our interactions with our suppliers, our people, and new business partners. Each policy owner is required to complete and sign-off a quarterly certification confirming the business area’s adherence to the policy, and where necessary, develop action plans to resolve any issues of non-compliance with policy standards. Regular updates on policy compliance are reported to our Board-level Risk and Capital Committee.
Speak up hotline
If our employees identify any issues relating to modern slavery we encourage them to report this to their manager. If they feel uncomfortable raising their concern using their normal reporting line, or wish to do so anonymously, an independently managed confidential speak up hotline is available. All concerns raised are taken seriously and anyone raising a concern will not be at risk of losing their job or suffering any form of reprisal as a result, even if the concern is proved to be unfounded. This hotline is also advertised to our suppliers who can use it in the same way. All reports received are investigated and appropriate action taken. In 2019 we received no calls related to modern slavery.

Training
To raise awareness amongst our employees of both modern slavery and the speak up arrangements available to them, this year we provided a new standalone modern slavery learning module for all our people to complete. This online training provides details on how to identify modern slavery, relevant requirements of legislation across the globe, and what action to take. 92% of our people have completed the 2019 training and the accompanying assessment to test their understanding. We provide modern slavery training to all our people on at least an annual basis.

Due diligence and risk assessment of suppliers
We want to reduce the risk of modern slavery in our operations and supply chain. Heightened modern slavery and human trafficking risk exists in relation to certain territories, and in relation to the production of certain goods and supplies.

During 2019 we continued to work with a third party who performed an independent risk assessment of the suppliers we work with that we have identified as presenting the greatest risk of modern slavery. The initial output from this activity is that none of the suppliers assessed by the third party are deemed high risk. We will continue to review our suppliers in this way and will take appropriate action if any are identified as being high risk.

In 2020 we are evolving our risk assessment of suppliers to further inform our responsible sourcing decisions, and develop and enhance our compliance with our regulatory obligations.

Measurement
Our progress against our key performance indicators established in 2018 is as follows:

1. We raise awareness amongst our employees of modern slavery issues and how to respond
   92% of our people have completed our 2019 modern slavery online training.

2. We complete modern slavery risk assessments of our Suppliers
   In 2019 we continued using the third party service to assess a subset of our suppliers operating in specific sectors and countries – none were deemed to be high risk. In 2020 we will continue to evolve and strengthen our risk assessment of suppliers and use this to inform our sourcing decisions and supplier management approach.

3. Modern slavery considerations are integrated into our investment process
   See section ‘Investment approach’ which details our Integration and provides an engagement example.

This Statement was approved by the Board of Directors of Standard Life Aberdeen plc, and is signed by:

Keith Skeoch
Chief Executive
March 2020