

Modern Slavery and Human Rights Policy

Sumitomo Mitsui DS Asset Management (UK) Limited

January 2026

Version Control

Date	Short Description	Modified By	Approved By
January 2026	Policy adopted to reflect stated commitments	John Cutler	Hiroaki Kato of behalf of the Board of Directors

1. Introduction

Sumitomo Mitsui DS Asset Management (UK) Limited (“**SMDAM UK**”) is committed to conducting its business in an ethical and responsible manner. As a UK Financial Conduct Authority regulated asset manager, we recognise our responsibility to prevent modern slavery and human trafficking within our operations and supply chains, and to uphold human rights in all our business activities.

2. Purpose

The purpose of this policy is to outline SMDAM UK’s commitment to identifying and addressing modern slavery and human rights risks, and to ensure compliance with relevant laws and regulations, including the Modern Slavery Act 2015.

3. Scope

This policy applies to all employees, contractors, consultants, and any other individuals or entities acting on behalf of SMDAM UK. It also extends to our expected engagements with suppliers, business partners, and third parties.

4. Definitions

- **Modern Slavery:** Includes slavery, servitude, forced and compulsory labor, and human trafficking, as defined by the Modern Slavery Act 2015.
- **Human Rights:** Basic rights and freedoms to which all individuals are entitled, including but not limited to the rights outlined in the Universal Declaration of Human Rights.

5. Policy Commitments

1. Ethical Business Conduct

- SMDAM UK is committed to conducting its business with integrity and transparency.
- We seek to ensure that our business operations do not contribute to modern slavery or human trafficking.

2. Supplier and Partner Engagement

- SMDAM UK will communicate our expectations regarding modern slavery and human rights to our suppliers and business partners.
- We will maintain a Suppliers Code of Conduct to communicate our standards and practices regarding modern slavery and human rights to our suppliers and business partners.

3. Training and Awareness

- SMDAM UK will provide training to its staff to raise awareness of modern slavery and human rights issues.
- We will ensure that our staff understand their role in identifying and reporting potential modern slavery and human rights violations.

4. Reporting and Whistleblowing

- We encourage employees, suppliers, and other stakeholders to report any concerns related to modern slavery and human rights.
- We will provide a confidential and accessible mechanism for reporting concerns through our Whistleblowing arrangements

5. Continuous Improvement

- We will monitor our progress in addressing modern slavery and human rights risks, and will take corrective actions as needed.

6. Governance

The design and implementation of appropriate modern slavery and human trafficking prevention arrangements is the responsibility of SMDAM UK the Board of Directors. They will ensure that adequate resources are allocated to effectively implement this policy and that it is integrated into our overall risk management framework.

7. Compliance

Failure to comply with this policy may result in disciplinary action, up to and including termination of employment or contractual agreements. We are committed to working with our suppliers and business partners to address any issues of non-compliance.

8. Review

The CEO is responsible for this Policy and with support of the Compliance team will review and update this Policy as and when necessary.