

## PineBridge Investments LLC Modern Slavery Statement - 2021

### Introduction

PineBridge Investments LLC (ABN 83 262 385 409) (“PBI LLC”) makes this statement in respect of the financial year ended 31 December 2021 in accordance with section 13 of the Modern Slavery Act 2018 (Commonwealth of Australia) (the “Act”). PBI LLC is the reporting entity under the Act. In this statement, “PBI LLC,” “PineBridge,” “we” and “our” refer to PBI LLC and the entities it owns and controls.

Modern slavery refers to forced or bonded labour, deprivation of personal freedom and human trafficking, as well as forced marriage, child labour, servitude and deceptive recruitment for labour or services. PBI LLC is strongly opposed to all aspects of modern slavery. This statement outlines the steps taken by PBI LLC to address risks of modern slavery in our operations and supply chain, as well as our investment approach.

### Our Organisational Structure and Business

PBI LLC is a limited liability company organized in the State of Delaware, United States of America. PBI LLC operates primarily in the United States. It is registered as an investment adviser with the U.S. Securities and Exchange Commission, and manages investment funds and separate accounts for clients in a wide range of asset types including equity, multi-asset, fixed income, direct lending, and alternative investments. PBI LLC also has a presence in Australia, where it provides services to Australian wholesale clients in reliance on the relief available to regulated U.S. financial services providers under the Australian Securities and Investments Commission Class Order [03/1100].

In connection with the pooled vehicles that it manages, PBI LLC owns and controls subsidiaries formed as special purpose holding entities or general partner or manager entities.

### Risks of Modern Slavery in Our Operations and Supply Chain and Actions Taken

As a regulated financial services organization with a professional workforce, we consider the risk of modern slavery within PBI LLC’s direct business operations to be low.

PBI LLC’s workforce is located predominantly in the United States and consists primarily of professionally qualified and skilled employees. As an employer we have robust recruitment and employment practices and comply with all applicable labour laws. We are committed to promoting diversity and equal opportunity, and our employment policies prohibit all forms of harassment and discrimination against employees.

We maintain a whistleblower program which provides a channel for staff to report concerns about illegal, unethical or unsafe activities occurring in the workplace confidentially and without fear of retaliation.

All of our employees must comply with the firm’s Code of Ethics, which sets out our expectations of the highest standards of ethics and integrity in our staff. Employees are required to certify they have read the Code of Ethics at the time they begin employment and annually thereafter. We provide training to our employees on an annual basis on financial crime, whistleblowing, anti-bribery, and money laundering, among other topics.

We have in place policies and procedures reasonably designed to comply with global economic sanctions and prevent PBI LLC from engaging in prohibited transactions with sanctioned parties. There is a broad degree of overlap between the countries that are identified as having a high prevalence of modern slavery (for example, in the Global Slavery Index 2018), and those countries that are subject to economic sanctions. Our policies require that the investments we make must be screened to ensure they are not subject to sanctions. At the same time, third parties with whom we have dealings including clients, business partners, counterparties, financial institutions and vendors are also required to be screened on a risk-assessed basis to ensure we do not transact with sanctioned or high-risk parties.

PBI LLC’s suppliers and vendors are mainly professional firms that provide us with services and products to support our business of providing pooled and segregated investment management services to clients. Key vendors include providers of financial software, enterprise applications and analytics; market data vendors; rating companies; fund administrators and custodians; law firms; auditors and tax advisors. Our third-party vendors also include providers of other services such as payroll administration, office facilities and cleaning services, either sourced directly from third

parties or through our group affiliates. Our direct third-party vendors are predominantly located in the United States and other jurisdictions that are not associated with high modern slavery risks.

Due to their geographic location and the fact that services are typically provided by a highly skilled professional workforce, we consider that our key third party suppliers have a low risk of modern slavery. It is possible however that there may be risk exposure where the services are subcontracted to be provided from higher risk locations, or from using vendors for non-professional services such as cleaning and purchase of office stationery, where it can be more common to employ base skill workers and whose supply chains may extend to higher risk countries.

We take a risk-based approach in relation to modern slavery risks in our supply chain. We have in place a vendor management policy which requires due diligence to be conducted on all material vendors. We have enhanced the due diligence questionnaire on material vendors to include considerations of modern slavery in the vendors' operations and their supply chains.

We have notified our material third party vendors of our Minimum Standard for Suppliers on modern slavery, and our expectation that they will comply with our Standards. Further, we have directed our material third party vendors to provide notification upon discovery of any breach of applicable human rights legislation or any actual or suspected modern slavery in their supply chains.

### **Approach to Modern Slavery Risks in Our Investment Process**

Responsible investment is of great importance to us. We recognise that environmental, social, and governance ("ESG") issues can create both opportunities and risks for our clients, and that ESG factors may provide essential insights into the expected value and risk profile of an investment.

PineBridge is a signatory to the Principles for Responsible Investment (PRI), which provides a framework through which to assess and report ESG factors. PineBridge believes that business models and asset classes that improve upon their sustainability create value for investors as well as society and as active managers, we are able to hasten ESG improvement because companies will respond more to asset owners than other conscientious objectors. We also believe that the most effective applications of PRI and ESG investing can differ materially across our diverse range of asset classes, geographies, sectors, and specific investments. As a result, each PineBridge investment team is responsible for integrating responsible investment and ESG factors into their investment process in the manner deemed most appropriate for their activities and specific investment opportunities, with oversight by PineBridge's robust responsible investing governance structure.

PineBridge's CEO and other members of the Senior Leadership Team lead the Corporate Responsibility Steering Committee to drive progress as we strengthen and evolve our approach to corporate responsibility. The Steering Committee reports directly into the firm's Governance Committee, and oversees the firmwide Diversity & Inclusion, Company Responsibility, ESG Investment, and Stewardship committees, each of which have global cross-functional employee membership and participation. The ESG Investment Committee establishes the firm's ESG investing policy and best practices and oversees their application (as applicable) in investment decision-making processes and operations. The Stewardship Committee establishes and maintains the processes for engaging with investee companies and implementing proxy voting policies in the best interest of our clients.

Elements of modern slavery are important factors of the social aspect of responsible investing, which in conjunction with other ESG factors, and depending on the asset class, are integrated into the fundamental analysis conducted by PineBridge's investment teams to varying degrees.

### **Assessing the effectiveness of our actions**

We understand that managing risks associated with modern slavery requires an ongoing commitment and regular review of actions taken. We aim to continuously improve our approach to the mitigation of modern slavery risks in our business and will take appropriate actions to address any concerns that may arise.

Progress that we made in the financial year ended 31 December 2021 includes the enhancement of our employee training program by introducing modern slavery into the annual training curriculum for Corporate Responsibility delivered to all staff, as well as the introduction of the PineBridge ESG Investment Forum hosted by our ESG Investment Committee to increase staff awareness of PineBridge's ESG Philosophy for investment and stewardship.

Going forward, we will seek to improve upon our current approach by taking steps in the following areas:

- **Supply chains.** Continue to assess vendors through our on-boarding, due diligence and monitoring process. Many of our vendors are based in the U.S. and other locations which unlike in Australia and the United Kingdom do not have national non-industry specific legislation on modern slavery, and therefore may have varying degrees of awareness of supply chain modern slavery risk issues. As a result, we expect our engagement with vendors on this topic to be an iterative process.
- **Investments.** Continue to assess human rights and modern slavery risks as part of our responsible investing policies and framework in our asset class specific approach. As part of this process, we will continue to seek new and improved sources of data to help us track and assess country, sector, and corporate performance.
- **Training.** Periodically evaluate our employee training program for enhancement opportunities in terms of raising modern slavery awareness.
- **Policies.** Periodically evaluate our existing policies for potential enhancements, as well as develop new policies as may be required to provide guidance to our employees on how to address modern slavery risks in our operations and supply chains.

## Other

The Board of Directors of PBI LLC approved this statement on 27 June 2022.

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*Michael J. Karpik*

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Michael Karpik  
Director

27 June 2022