

Winton Transparency Statement on Modern Slavery

31 December 2023

Introduction and purpose of this statement

This statement is made by Winton Group Limited (“WGL”), Winton Capital Management Limited (“WCM”) and other relevant group companies (together, “Winton”) and is published pursuant to applicable modern slavery legislation (the “Rules”). All entities owned or controlled by WGL are governed by policies and procedures set at group level, including the Modern Slavery Procedure. All relevant companies owned or controlled by WGL were consulted and considered in the development of this statement.

Winton is a research-led investment management company that uses statistical and mathematical inference in financial markets. The Winton group parent company, WGL, is a limited liability company incorporated in England and Wales. WCM performs investment management functions. WCM is a limited liability company incorporated in England and Wales and is wholly-owned by WGL. WCM is authorised and regulated in the United Kingdom by the Financial Conduct Authority.

This statement outlines the steps that Winton has taken to detect and prevent modern slavery during the financial year ended 31 December 2023 and the following period prior to publication of this statement. This statement will be reviewed and, where required, updated annually. This statement applies to relevant entities in the Winton group.

The Winton approach to slavery and human trafficking

It is Winton’s policy not to tolerate modern slavery, servitude, forced labour or human trafficking as contemplated by the Act (“Modern Slavery”) within its business activities, employment arrangements or supply chains.

Winton’s supply chain

Due to the nature of its business, Winton has a limited supply chain. Accordingly, the risk of Modern Slavery in Winton’s business is relatively low when compared to businesses which produce or sell physical goods.

Winton’s direct supply chain is limited and includes, for example, financial data providers. Winton uses a number of third-party suppliers in its indirect supply chain in relation to non-core functions such as cleaning and security.

Supply chain audit and due diligence

Winton has applied a risk-based approach in its supply chain audit and has considered the results of previous supply chain audits. As part of those audits, it reviewed the supply arrangements that are considered to pose the highest risk of Modern Slavery, taking into account qualitative factors including particular industry or sector risk, business partner risk and geographical risk. As part of this risk assessment, Winton also conducted research in order to determine which suppliers are directly bound by UK Rules and, where relevant, requested other evidence of compliance such as copies of relevant certifications and policies.

Steps taken

Any relevant supplier within scope is sent a letter informing it of Winton’s zero tolerance policy towards Modern Slavery. Winton’s approach is to consider terminating or not renewing any contract with any high-risk supplier that is unable to make a declaration of compliance or which provides unsatisfactory evidence of compliance.

Winton’s supplier onboarding process includes requests for information about measures taken by suppliers to address the risk of Modern Slavery. Where appropriate, this includes reviewing modern slavery statements

made by suppliers and asking relevant new suppliers to confirm that they take steps to prevent and address Modern Slavery in their business and supply chains. Arrangements with suppliers and service providers are subject to ongoing review.

Working for Winton

Winton has over 190 employees and a number of independent contractors and consultants who perform business and non-core functions. The majority of staff employed or engaged by Winton carry out highly-skilled activities and therefore the risk of these workers being subject to Modern Slavery is relatively low.

Furthermore, Winton promotes high standards of health and safety at work and does not tolerate Modern Slavery in its recruitment or employment arrangements. Winton's staff are protected by relevant laws and regulations, which are fully reflected in Winton's policies and procedures. Winton's standard terms with recruitment firms include contractual protections to address the risk of Modern Slavery.

Existing policies

Winton maintains the following policies which it believes are relevant in the detection and prevention of Modern Slavery:

- Vendor Management Policy and Procedures;
- Corporate Social Responsibility Policy;
- Code of Ethics;
- Anti-Bribery and Sanctions Policies;
- Internal Escalation and Whistleblowing Policy; and
- Anti-Money Laundering and Terrorist Financing Policy.

Assessment of effectiveness in preventing Modern Slavery

The risk of Modern Slavery is expected to fluctuate over time. Winton will use the following key performance indicators to assess effectiveness of its anti-modern slavery processes and procedures on an ongoing basis:

- The onboarding procedures, information requests and contractual terms aimed at ensuring the detection and mitigation of Modern Slavery; and
- Any remedial action taken in response to a report or suspected case of Modern Slavery.

Approval

This statement was approved by the Board of Directors of WGL on 25 September 2024. It has been signed by Brigid Rentoul in her capacity as a member of the WGL board of directors.



Brigid Rentoul
Director
Winton Group Limited