

# Modern Slavery & Human Trafficking Statement

2023



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# 1. Introduction



# 1. Introduction

This Modern Slavery Statement (Statement) is made pursuant to the Australian Modern Slavery Act 2018 (Cth), the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act (the Canadian Act) and the United Kingdom (U.K.) Modern Slavery Act 2015 for the financial year ended December 31, 2023 in respect of the following Northern Trust entities which together are known as the Reporting Entities listed below:

- The Northern Trust Company (the Bank), which operates in Australia, Canada and the U.K. via its Melbourne, Canada and London branches, respectively (the Bank is therefore a Reporting Entity with respect to Australia, Canada and the U.K.)
- Northern Trust Global Services SE, U.K. Branch (U.K. Reporting Entity)
- Northern Trust Global Investments Limited (U.K. Reporting Entity)
- Northern Trust Securities LLP (U.K. Reporting Entity)
- Northern Trust Investor Services Limited (U.K. Reporting Entity)
- Northern Trust Management Services Limited (U.K. Reporting Entity)

The Reporting Entities are limited to those entities with an obligation to prepare a Modern Slavery (or similar) Statement.



This Statement, however, describes the Modern Slavery risks and program of all direct and indirect subsidiaries of Northern Trust Corporation (Corporation), including the Reporting Entities. Except where the context requires otherwise, references to “Northern Trust”, “we”, “us”, “our” or similar terms means the Corporation and its subsidiaries, including but not limited to the Reporting Entities and the entities listed in Annexure A,<sup>1</sup> on a consolidated basis.

In accordance with Section 11(a) of the Canadian Act, Northern Trust uses diligence tools including third party vendor Modern Slavery questionnaires to evaluate the risk of forced labor and child labor in its suppliers, to ascribe risk ratings to suppliers and to maintain and implement policies and procedures related to forced labor and child labor in its supply chains.

**This Statement defines Modern Slavery as including slavery, servitude, forced labor, forced marriage, debt bondage, child labor,<sup>2</sup> and human trafficking. Northern Trust:**

- recognizes that Modern Slavery is a violation of fundamental human rights and freedoms;
- is committed to respecting human rights and endeavors to uphold the rights of others;
- will seek to assess and, as appropriate, mitigate, remediate or cooperate in the provision of remediation where we identify that we have caused or contributed to Modern Slavery in accordance with the United Nations Guiding Principles on Business and Human Rights (UNGPs);
- fully supports the principles of the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work; and is committed to acting in alignment with the guidance of the UNGPs.



## 2. Our Structure, Operations and Supply Chains



## 2. Our Structure, Operations and Supply Chains

### A. OUR STRUCTURE

The Corporation is a leading provider of wealth management, asset servicing, asset management and banking solutions to corporations, institutions, families and individuals. The Corporation is a financial holding company conducting business through various U.S. and non-U.S. subsidiaries, including the Bank.

The Bank is an Illinois banking corporation headquartered in Chicago and the Corporation's principal subsidiary. Founded in 1889, the Bank conducts its business through its U.S. operations and its various U.S. and non-U.S. branches and subsidiaries, including the Australian, Canadian, and U.K. branches as outlined in Annexure A.

At December 31, 2023, the Bank had consolidated assets of US\$150.3 billion and common bank equity capital of US\$11.6 billion.

The Corporation was formed as a holding company for the Bank in 1971. The Corporation has a global presence with offices in 24 U.S. states and Washington, D.C., and across 22 locations in Canada, Europe, the Middle East and the Asia-Pacific region.



**As of December 31, 2023, the Corporation had consolidated total assets of US\$150.8 billion and stockholders' equity of US\$11.9 billion.**

**Figure 1: Northern Trust Locations as of December 31, 2023**



\*In the U.S., Northern Trust has offices in 24 states and Washington D.C. Its headquarters is located in Chicago, Illinois.

At December 31, 2023, Northern Trust employed approximately 23,100 full-time equivalent employees. The regional breakout of our employee base is 42% Asia-Pacific, 41% North America and 17% Europe, Middle East and Africa. Specifically, in Australia we had 311 employees, in Canada we had 109 employees, and in the U.K. we had 1,489 employees.

The large majority of our employees are full-time, permanent employees in professional or administrative desk-based roles.

An overview of the types of positions within the Bank is set out below:

Fund Services	Corporate and Business Program Resources	Business/Data Analytics
Risk and Compliance	Investment Management	Legal
Sales and Service	Audit	Administrative Support
Information Technology	Business Management and Strategy	Business Unit/Executive Management
Finance and Accounting	Human Resources	Investment Operations



## B. OPERATIONS

### BUSINESS OVERVIEW

Northern Trust focuses on managing and servicing client assets through its two client-focused reporting segments: Asset Servicing and Wealth Management. Asset management and related services are provided to Asset Servicing and Wealth Management clients primarily by the Asset Management business.

**Asset Servicing** is a leading global provider of asset servicing and related services to corporate and public retirement funds, foundations, endowments, fund managers, insurance companies, sovereign wealth funds, and other institutional investors around the globe. Asset servicing and related services encompass a full range of capabilities including but not limited to: custody; fund administration; investment operations outsourcing; investment management; investment risk and analytical services; employee benefit services; securities lending; foreign exchange; treasury management; brokerage services; transition management services; banking; and cash management. Client relationships are managed through the Bank and the Bank's and the Corporation's other subsidiaries, including support from locations in North America, Europe, the Middle East, and the Asia-Pacific region. At December 31, 2023, total Asset Servicing assets under custody/administration (AUC/A), assets under custody, and assets under management were US\$14.36 trillion, US\$10.88 trillion, and US\$1.03 trillion, respectively.

**Wealth Management** focuses on high-net-worth individuals and families, business owners, executives, professionals, retirees, and established privately-held businesses in its target markets. In supporting these targeted segments, Wealth Management provides trust, investment management, custody, and philanthropic services; financial consulting; guardianship and estate administration; family business consulting; family financial education; brokerage services; and private and business banking. Wealth Management also includes Global Family Office, which provides customized services, including but not limited to: investment consulting; global custody; fiduciary; and private banking; family office consulting, and technology solutions, to meet the complex financial and reporting needs of ultra-high-net-worth individuals and family offices across the globe.

Wealth Management is one of the largest providers of advisory services in the United States, with AUC/A, assets under custody, and assets under management of US\$1.04 trillion, US\$1.03 trillion, and US\$402.5 billion, respectively, at December 31, 2023. Wealth Management services are delivered by multidisciplinary teams through a network of offices in 19 U.S. states and Washington, D.C., as well as offices in London, Guernsey, and Abu Dhabi.

**Asset Management**, through the Corporation's various subsidiaries, supports the Asset Servicing and Wealth Management reporting segments by providing a broad range of asset management and related services and other products to clients around the world. Investment solutions are delivered through separately managed accounts, bank common and collective funds, registered investment companies, exchange traded funds, non-U.S. collective investment funds, and unregistered private investment funds. Asset Management's capabilities include active and passive equity; active and passive fixed income; cash management; multi-asset and alternative asset classes (such as private equity and hedge funds of funds); and multi-manager advisory services and products. Asset Management's activities also include overlay services and other risk management services. Asset Management operates internationally through subsidiaries and distribution arrangements and its revenue and expense are fully allocated to Asset Servicing and Wealth Management. As discussed above, Northern Trust managed US\$1.43 trillion in assets as of December 31, 2023, including US\$1.03 trillion for Asset Servicing clients and US\$402.5 billion for Wealth Management clients.

**OTHER ACTIVITIES: Corporate Philanthropy** is an important element of our business. Our 2023 Philanthropic Impact Report<sup>3</sup> describes our significant philanthropic works during the year.

Northern Trust is committed to broadening opportunities to achieve long-term financial success for those who have been marginalized. Deploying a long-term community investment strategy designed to drive individual advancement and broader wealth creation, Northern Trust is focusing its resources, capabilities, and business expertise on four key areas of fundamental impact, namely food, housing, healthcare and education. These areas, when strengthened from the start, enrich our communities and the lives of everyone in them.

In 2023, Northern Trust supported more than 2,000 registered charities and non-governmental organizations across the globe with nearly US\$16 million donated to broaden opportunities. In the past decade, Northern Trust has donated over US\$170 million and provided over 1 million hours of volunteer time globally.



## C. SUPPLY CHAIN

In 2023, Northern Trust engaged over 3,100 direct suppliers.<sup>4</sup> Our procurement spend totaled US\$2.5 billion. As the principal subsidiary of Northern Trust, the Bank's suppliers comprise the following broad categories:

- Professional service providers such as business and strategy consultants, recruitment agencies, legal counsel, and training and insurance providers;
- Suppliers supporting the Bank's client-servicing requirements, including sub-custodians, brokers and distributors; and
- Other support service providers including information technology (IT), market data, communications equipment, software, utilities, catering, cleaning, security and office equipment suppliers.

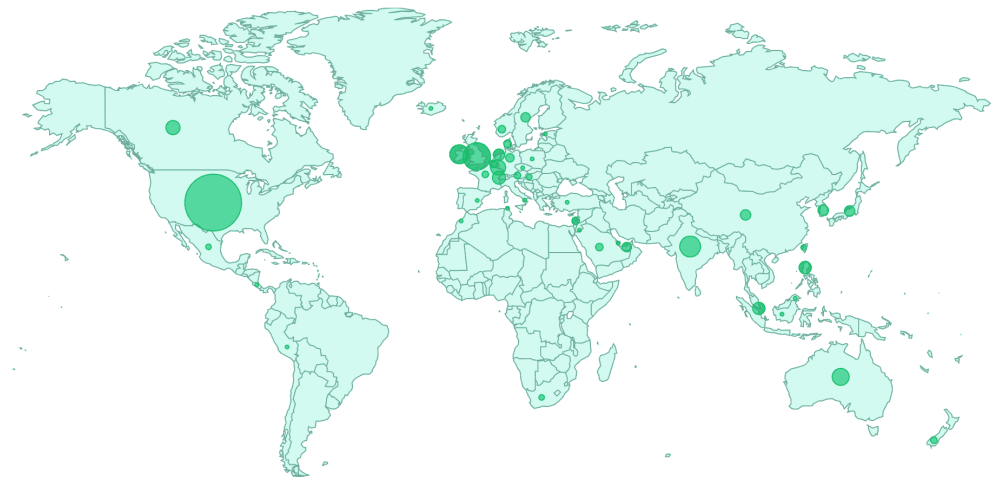
Northern Trust suppliers range in size and include publicly traded organizations and privately owned firms, which also have extensive global supply chains. A centralized procurement function manages procurement globally. Each of the Bank's branches and subsidiaries around the world engage a combination of local suppliers, domiciled in the jurisdictions where they operate, and global suppliers of Northern Trust. Suppliers are contracted on a combination of long-term, short-term and one-off bases.

During 2023, the Bank continued to use the automated supplier due diligence tool, 360 Third-Party Risk Management Platform (Platform) from third-party vendor, Ethixbase, to assess Modern Slavery risk in its suppliers.<sup>5</sup>

The Platform relies upon a Modern Slavery Questionnaire, focused on five risk factors: (a) jurisdiction; (b) industry; (c) product; (d) workforce characteristics; and (e) risk-mitigating measures implemented by the supplier. The analytics applied to the information gathered result in each supplier being assigned a Modern Slavery risk rating.

The geographic footprint of these suppliers is shown in Figure 2 below. The map is based on the responses of those suppliers that have completed the Modern Slavery Questionnaire to date. When suppliers of all of our locations are considered, the significant majority of our suppliers are headquartered, and have operations, in the United States.

**Figure 2: Geographic Footprint of our Suppliers as of December 31, 2023**





### 3. Modern Slavery Risks in our Operations and Supply Chains

# 3. Modern Slavery Risks in our Operations and Supply Chains

Risk is often described in terms of the potential adverse impacts upon a business or its people. In our Modern Slavery program, our focus is on the adverse human rights impacts that Northern Trust may have on people within our operations and supply chains, rather than the risks to us. This approach to assessing the risks of Modern Slavery in operations and supply chains is informed by the UNGPs, which has framed how we consider the appropriate responses and actions moving forward.

## A. MODERN SLAVERY RISKS IN OUR OPERATIONS

As a global financial services firm, Northern Trust has a broad base of professional desk-based employees who work across various lines of business, regions and functions to deliver products and services to our clients, as well as employees with expertise in risk management, technology, legal, policy and regulation, finance, accounting, controls, human resources and many more areas. Given this, Northern Trust considers the risk of Modern Slavery occurring in our workforce to be low.

Northern Trust is committed to respecting the human rights of our employees through our internal employment policies and practices and by respecting local laws and regulations related to human rights. Prior to the first day of service, we complete background assessments on all new employees and new contractors. Assessments include visa checks for rights to work.

Except for a very small number of paid school interns, we do not hire individuals under the age of 18 in any offices across the globe. We consider there to be low risk of child labor stemming from any internship given the type of work and short duration of the work experience.



Fostering inclusion is a cornerstone of our corporate culture and we strive to ensure that employees are able to work in a safe, professional work environment. We continue to reinforce our culture of respect and inclusion and anti-harassment efforts across our organization through engagement activities, internal communications and training.

As a global financial institution, the Bank, on behalf of clients, invests in portfolio companies, and provides financial, advisory and investment management services in multiple asset classes including infrastructure, private equity and real estate. Though Modern Slavery may occur in any sector, we recognize the risks may be higher in asset classes such as infrastructure, manufacturing, mining and agriculture and food processing and in jurisdictions with a greater prevalence of Modern Slavery.

Northern Trust invests a portion of its balance sheet in short-term deposits with central banks and other highly rated financial institutions globally. Northern Trust also invests in fixed income securities issued by governmental and other highly rated entities (typically A, AA and AAA rated). These investments do not represent equity ownership. However, as a fixed income investor, we recognize that in certain circumstances, Northern Trust may potentially still be linked to Modern Slavery risks through these investments. The vast majority of Northern Trust investments held on its consolidated balance sheets are in sectors that are considered to have a lower risk of Modern Slavery such as large central banks, U.S. government and agency, non-U.S. sovereign and sub-sovereign, U.S. municipalities, supranational organizations, and private organizations in finance, insurance and real estate.



There is a small amount of exposure to highly rated (typically A and AA) and highly liquid 'blue-chip' corporate bonds that is approximately 1 percent of total notional value, and this is down from approximately 2 percent in the prior year.

As part of Northern Trust's effort to integrate respect for human rights into the business activities of our organization, we have various policies and procedures designed to prevent our products and services from being used for improper purposes. These include policies and procedures pertaining to Anti-Bribery and Corruption, Anti-Money Laundering (AML) and Know Your Customer (KYC) due diligence. The sectors and jurisdictions which present the greatest risk mirror those described above in relation to investment risk.

In regards to the above descriptions of risks and the mitigating measures in place (described in further detail in section 4), we consider that Northern Trust has a low risk of causing or contributing to Modern Slavery through our operations. However, there may be some risk of being linked to Modern Slavery through the actions of third parties via investments and clients.



## B. MODERN SLAVERY RISKS IN OUR SUPPLY CHAINS

Across our global supplier base, we consider the risk of Modern Slavery to be lower among our suppliers engaged in professional services, financial and insurance services, information, media and communications, and computer system design and related services.

The risks are inherently higher in relation to suppliers with operations in countries with an increased prevalence of Modern Slavery. This includes local suppliers in the higher risk jurisdictions in which the Bank or its owned or controlled entities operate.

There is also a higher risk of Modern Slavery where suppliers are operating in sectors, irrespective of jurisdiction, which rely on a lower-skilled workforce, and where there may be a higher proportion of migrant workers. This includes the following sectors:

- In relation to services: cleaning and security vendors, couriers and transport, construction and catering and hospitality; and
- In relation to products: IT, utilities, telecommunications, office equipment, branded products and merchandise, manufacturing, and consumables.





**Based on an assessment of completed responses to the Modern Slavery Questionnaire issued to our suppliers, we observed that:**

- The risk profile of our suppliers is generally low, which reflects the high proportion of suppliers providing professional services from lower-risk jurisdictions.
- Approximately 17 percent of responding suppliers are themselves required to report pursuant to Modern Slavery laws in Australia, Canada and the U.K. or other countries, which generally correlates with the proportion of suppliers that have conducted human rights risk assessments in their own operations and supply chains.
- Our suppliers with a presence in more than one country, where one of those countries has an increased prevalence of Modern Slavery and/or the supplier employs workers that may be considered to be in vulnerable categories (e.g., migrant workers, disabled workers and young workers), are typically businesses providing professional or financial services which have policies and procedures, including training, in place to mitigate risks.
- Of the small cohort of suppliers without adequate policies or controls in place to mitigate against Modern Slavery risk, just over a quarter operate in a higher-risk jurisdiction and those suppliers have been the subject of due diligence via the Modern Slavery Questionnaire.
- The risks of Modern Slavery may exist deeper within our supply chain with respect to the products that we procure from our direct suppliers. The sourcing countries in the second tier of some of our U.S. and Australian headquartered manufacturing and wholesaling suppliers include China, India, Indonesia, Malaysia, Thailand and Vietnam, which are jurisdictions where Modern Slavery risks may be higher.
- 46 percent of responding suppliers had trained their workforce on human rights related topics such as anti-discrimination and anti-slavery. This compares to approximately 62 percent of responding suppliers that trained their workforce on anti-corruption or safety topics. The gap between the two figures is narrowing, year-on-year, suggesting that training on human rights related topics are increasingly featured in the training programs of our suppliers.
- Northern Trust has a low risk of causing or contributing to Modern Slavery in respect of our direct suppliers. However, there may be some risk of being linked to Modern Slavery deeper within our supply chain (for example, in the supply chain of our IT hardware suppliers).

We consider the above observations to broadly reflect the risks of Modern Slavery in the supply chains across each of the Bank's branches and owned or controlled entities, given that they operate in the same industry and comply with our group policies and procedures to mitigate risks. Where suppliers operate in jurisdictions with a higher prevalence of Modern Slavery, this will increase the inherent risk of those domiciled or operating from those jurisdictions.

**On average, the responding suppliers assessed via the Modern Slavery Questionnaire in 2023 remained low, consistent with the average from 2022. Based on the results from 2023, we identified suppliers requiring further due diligence during 2024.**



## 4. Actions to Assess and Address Modern Slavery Risks



# 4. Actions to Assess and Address Modern Slavery Risks

## A. ACTIONS WITH RESPECT TO OUR OPERATIONS

### i. Policies and Procedures

We recognize that robust risk policies and business standards are crucial to help us uphold human rights and prevent Modern Slavery. We are guided by internationally recognized human rights standards. We regularly assess our policies and standards to ensure their effectiveness, working with internal subject matter experts as well as with external partners.

Our Code of Business Conduct and Ethics,<sup>6</sup> available on our global website, is a statement of basic principles promoting honest, ethical conduct and compliance with applicable law from directors, officers and employees. Among other things, it specifically states that no Northern Trust director, officer or employee should take unfair advantage of anyone, including through forced labor.

Northern Trust's guiding principles are "Service," "Expertise" and "Integrity." How Northern Trust does business is as important as what we do. We have a long-standing culture of doing what is right.



Our Standards of Conduct Policy expands upon the themes expressed in our Code of Business Conduct and Ethics and provides further detail concerning business ethics and standards. It affirms our commitment to compliance with all applicable labor laws, and the active championing of human rights. It also expresses our firm belief that all work should be done voluntarily without slavery, servitude, forced or compulsory labor or the involvement of human trafficking.

Our Human Rights Statement,<sup>7</sup> available on our global website, sets out our firm belief that all work should be done voluntarily without any slavery, servitude, forced labor or human trafficking and reflects our commitment to respect the rights, dignity and equality of people. It focuses on three key stakeholder groups: employees, clients and suppliers, as well as the communities that may be impacted by our business activities.

Employees worldwide may exercise freedom of association regarding collective bargaining and trade agreements as permitted by applicable legislation. Our Employee Handbook was reviewed during 2023 to reflect our ongoing commitment to respecting human rights.

Senior management in multiple business units and corporate groups, globally including Human Resources; Corporate Sustainability, Inclusion and Social Impact; and Risk and Compliance, continued to have responsibility for the implementation of the human rights and workforce principles set out in our global policies.

**Additionally, in 2023, we became signatories to the UN Global Compact to affirm our commitment to its Ten Principles, including respect for human rights, as well as the elimination of forced or compulsory labor and child labor.**



## ii. Ability to Raise Concerns and Seeking Feedback from Employees

Northern Trust's culture continues to support open communication at all levels. Northern Trust's whistleblowing policies and reporting procedures were maintained and operational during 2023.

These policies encourage employees to report suspected wrongdoing as soon as possible in the knowledge that their concerns will be taken seriously and investigated appropriately and confidentially.

In addition to internal reporting avenues, employees, suppliers and other third parties may raise concerns regarding unethical conduct, including Modern Slavery, via our Business Abuse and Employee Relations Hotline (Hotline) maintained by Navex Global, an independent third party. The Hotline is a confidential and secure service allowing concerns to be raised 24/7.

All reports received via the Hotline are triaged and investigated thoroughly, fairly and with discretion in a timely manner. Concerns may be reported anonymously to the extent permitted by applicable laws. A review of our Hotline reports during 2023 did not reveal any concerns raised regarding Modern Slavery.

Northern Trust prohibits retaliatory action against anyone who raises concerns regarding ethics, discrimination or harassment; reports suspected violations of applicable laws, regulations, or policies; or participates in a subsequent investigation of such concerns. As part of any investigation, we respect the rights of all parties related to the matter afforded under applicable laws and regulations.

Each year we conduct an employee engagement survey to solicit employee sentiments on topics such as communication, accountability, and company culture.



### iii. Compensation

Northern Trust remains committed to providing competitive and equitable compensation for our employees, as well as benefits that support our employees' needs, including health insurance, retirement benefits, and other programs to bolster work-life balance.

We continue to evaluate information regarding competitive practices and emerging trends gathered from a range of publicly available and commissioned resources. This information is used to inform our decisions about compensation programs.

During 2023, we completed a global review of salaries utilizing benchmark information from the Fair Wage Network. Starting in 2024, an analysis of Living Wages will be conducted globally at least annually to monitor and evaluate the changes in Living Wage pay rates to ensure Northern Trust pays its employees commensurate with the Living Wage in each location.



## iv. Training

Training is an effective way to raise awareness of the various forms of Modern Slavery and to support the detection of Modern Slavery red flags by our employees. We remain committed to providing training and opportunities to raise awareness of Modern Slavery within our workforce.

Annually, employees are required to complete mandatory training on the Standards of Conduct Policy. Such training emphasizes the importance of complying with applicable laws and maintaining the highest ethical standards. The training includes content focused on ensuring that our employees are ably equipped to identify, respond and report on Modern Slavery risks. In 2023, more than 99 percent of the firm completed the annual training. Additionally, Northern Trust requires all employees to complete mandatory training on related matters such as diversity, anti-money laundering and anti-bribery and corruption.

In 2023, we launched our new Sustainability Learning Hub within the Northern Trust University that curates training materials supporting employees in their understanding of various sustainability related matters, including human rights and the risk of Modern Slavery. In 2024, we also plan to extend the training opportunities for employees by leveraging the training available within the UN Global Compact's Academy to deliver more bespoke training to specific segments of the employee base.





## B. ACTIONS WITH RESPECT TO OUR SUPPLY CHAIN

### i. Policies and Procedures that Manage Supply Chain Risk

During 2023, Northern Trust continued to expect new and existing suppliers to comply with our Global Third Party (Supplier) Code of Conduct (Supplier Code). Among other things, the Supplier Code prescribes that our suppliers are expected to:

- Respect human rights and refrain from engaging in any form of Modern Slavery;
- Have in place adequate procedures to identify, prevent, mitigate and account for Modern Slavery and other human rights impacts in their operations and supply chains;
- Adopt sound labor practices and treat workers fairly;
- Comply with applicable labor laws and regulations;
- Ensure that sub-contractors are made aware of the Supplier Code; and
- Promptly notify us if the supplier becomes aware of any acts of Modern Slavery by either the supplier or any of its subcontractors. Our Supplier Code provides the details of our Hotline for suppliers and their employees to report concerns.

In addition, we expect our suppliers to have a process through which their workers can raise workplace concerns without fear of retaliation.

During 2023, the Modern Slavery Questionnaire sought confirmation from suppliers that they have read and agreed to adhere to our Supplier Code when providing goods and services to us and agree to notify us in the event of an actual or suspected breach. Of those that responded to the Modern Slavery Questionnaire 91 percent agreed to comply with our Supplier Code and the remaining 9 percent of respondents noted that they were unable to confirm compliance with our Supplier Code, although they were able to confirm compliance with their own supplier code of conduct that included comparable standards and expectations. During 2023, we did not receive any notifications from suppliers in relation to actual or suspected breaches of the Supplier Code.

Our Master Supplier Agreement contains provisions requiring suppliers to agree to comply with the Supplier Code including with respect to Modern Slavery and sets out the corrective and consequential measures available to the parties in the event of any breach. Modern Slavery terms were deployed in contracts during the reporting period and procurement team members were provided guidance on how to navigate negotiations with suppliers while adequately managing Modern Slavery risks.

Our Global Procurement Policy governs supplier engagement. Under our Global Procurement Policy, the business units identify a need which initiates the procurement and due diligence processes prior to the engagement of any new supplier for all but the lowest-risk and lowest-spend purchases. Such due diligence includes a review of the supplier's compliance with applicable laws and regulations; adverse media screening using a well-known subscription database which covers risk areas including human trafficking, slavery or forced labor; and a country-based risk assessment incorporating the risk of human trafficking. A subsequent risk-based assessment of the supplier determines the appropriate level of ongoing monitoring of that supplier. The degree of monitoring and the overall inherent risk rating for each new supplier engagement is determined by a review by subject matter experts from across the organization, including Compliance, Operational Risk and Procurement. The Global Procurement Policy provides that suppliers are encouraged to adhere to the Supplier Code, including managing Modern Slavery risks. As noted above, under the terms of our Master Supplier Agreement, non-compliance by the supplier with the terms of the Supplier Code may trigger the need for corrective action and may result in termination of the supplier relationship by Northern Trust.

Once a supplier is engaged, a vendor/manager (appointed by the relevant Business Unit within the Bank) is responsible for managing the ongoing business relationship with the supplier. The vendor manager is responsible for performing supplier risk management duties and responsibilities pursuant to Northern Trust's Third-Party Management Policy (TPM Policy) and procedures.



The responsibilities of the vendor manager include, but are not limited to:

- Monitoring the supplier against the terms of the contract and service level agreements; and
- Documenting, maintaining and reporting legal and other issues or incidents.

The TPM Policy also highlights that the vendor manager also needs to assess whether the vendor is compliant with our Supplier Code (which includes the Modern Slavery commitments as outlined above).

Further, where possible, Northern Trust's supplier contracts provide for audit rights to facilitate supplier monitoring, and such audit rights may be deployed to assess compliance with the Supplier Code, where required.

## ii. Supplier Due Diligence via the Modern Slavery Questionnaire

In 2023, we continued to assess Modern Slavery in a subset of our suppliers through a Modern Slavery questionnaire process. At the end of December 2023, over 1,700 suppliers were sent our Modern Slavery Questionnaire and the completion rate remained consistent with 2022. Also, a cohort of goods and service suppliers in Canada were issued with the Modern Slavery Questionnaire.

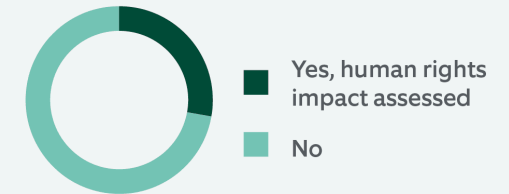
We also aligned the existing Due Diligence Questionnaire used for sub-custody service providers with the Modern Slavery Questionnaire to achieve consistency in our supplier due diligence assessment processes. In 2023, we issued the Modern Slavery Questionnaire to our sub-custody service providers and achieved a completion rate of over 90 percent within this population.

For the sub-custody service providers who did not complete the Modern Slavery Questionnaire in 2023 and those requiring further engagement, Sub-Custodian Network Management will review relevant publicly available information and liaise with the Modern Slavery Working Group and escalate any concerns, as appropriate.

For suppliers who did not complete the Modern Slavery Questionnaire but provided alternative information, our Third-Party Management Office (TPMO) reviewed the evidence and determined whether the information was adequate or required additional due diligence to remediate outstanding Modern Slavery risks.

A sizeable proportion of suppliers who did not complete the questionnaire were companies domiciled in countries without Modern Slavery reporting obligations or related legislation. Of the suppliers that completed the Modern Slavery Questionnaire, just under half had implemented controls, adopted written codes or established policies addressing human rights.

Approximately 28% responded that they had assessed whether their business has caused, contributed or been linked to adverse human rights impacts (i.e. undertaken a human rights impact assessment).



Assessment and evaluation of a supplier's Modern Slavery risk is undertaken as part of on-boarding or as part of supplier contract renewal. We are continuing to develop an assurance framework to monitor and verify a supplier's compliance with the Supplier Code as part of the supplier evaluation, selection and contract management process.

### iii. 2022 Recommended Actions Completed in 2023

Following the completion of our 2022 Modern Slavery Questionnaire process, we took a number of actions to assist us in managing Modern Slavery risks including:

1. Contacted suppliers that had reported that they did not have any controls, codes or policies in place to query their response and address where relevant.
2. Contacted suppliers that had reported that they were unable to comply with our Supplier Code to discuss their response and resolved any misunderstandings.
3. Notified those suppliers that had provided alternative forms of information instead of completing the Modern Slavery Questionnaire that they may be contacted at a later date to complete the survey if the supplied information provided proved to be inadequate.
4. Reviewed the contracts for those suppliers that had reported that they did not have a written contract with Northern Trust to ensure that the service arrangements had been appropriately formalized.
5. Included the sub-custodian vendor population in the 2023 Modern Slavery Questionnaire process.
6. Validated via our Third Party Management Office (TPMO) that corresponding Modern Slavery Risk ratings did not contain additional risks.
7. Presented our conclusions to the Modern Slavery Executive Steering Group.

We will continue to engage with our suppliers where appropriate to make them aware of our approach to Modern Slavery and encourage them to adopt their own measures to minimize Modern Slavery risks in their own organizations and supply chain.



### iv. In-house Catering

As set out in our last Statement as an objective for 2023, we transitioned to Fair Trade, Rainforest Alliance (or similar) tea and coffee products in all of our office locations reflecting our commitment to combatting Modern Slavery by supporting ethical and responsible business practices.

## C. ACTIONS WITH RESPECT TO OUR CLIENTS AND INVESTMENTS

The Bank's Global Anti-Money Laundering Team is responsible for maintaining our KYC and AML procedures. Among other things, the KYC and AML due diligence process incorporates adverse media screening using well-known subscription databases to identify potential clients which may present a legal, compliance or reputational risk, including any persons or entities accused or convicted of human

trafficking, slavery or forced labor. The risk that clients are engaged in human trafficking, arising from the location of their operations, is also included in the AML process.

Adverse media checks are regularly refreshed against Northern Trust's client population and alerts of potential matches are reviewed on a daily basis. Once a subject of adverse media is affirmatively deemed to be a

true match to a Northern Trust client or related party, the adverse media is appropriately evaluated and escalated to mitigate the risk to Northern Trust. In instances where there is significant adverse media detected, this is raised to Financial Crimes Compliance management, senior business leaders, the relevant Business Unit Risk Management teams and the Modern Slavery Working Group, who determine next

steps, which may include a relationship exit. Our Modern Slavery Executive Steering Group receives periodic reporting and acts as a point for escalation for contentious or potential reputational issues.

**During 2023, on three occasions, our screening processes identified Modern Slavery related concerns, which were escalated to the respective senior leaders, the Modern Slavery Executive Steering Group and the relevant Business Councils and, once confirmed, the relationships were terminated.**





The Global Anti-Money Laundering, Countering the Financing of Terrorism, and Countering Proliferation Financing Compliance Policy (AML/CFT/CPF Policy) provides examples of financial crimes that may generate criminal proceeds or create reputational risk, including Modern Slavery.

Specifically, the AML/CFT/CPF Policy includes the following statement to describe examples of significant adverse media identified during our screening processes:

**“Examples of financial crimes that may generate criminal proceeds or otherwise create reputational risk include, but are not limited to, tax evasion, fraud, insider trading, participation in an organized criminal group and racketeering, Modern Slavery, elder abuse, illicit trafficking in narcotics drugs, corruption and bribery, Ponzi schemes, extortion, and robbery or theft.”**

Northern Trust Asset Management (NTAM) has a publicly available Sustainable Investing Philosophy.<sup>8</sup> Sustainable Investing encompasses strategies and client assets managed in accordance with client specified responsible investing terms (historically referred to as “socially responsible”), as well as portfolios that leverage contemporary approaches and datasets, including Environmental, Social, and Governance (ESG) analytics and ESG thematic investing. Sustainable Investing includes portfolios designed by NTAM as well as those portfolios managed to client-defined methodologies or screens.

As risk-aware investors, we believe material ESG factors are indicators that can affect a company’s future financial viability and clients’ long-term investment returns. We recognize that failure of companies to appropriately manage human rights and Modern Slavery can have severe consequences for victims. Modern Slavery also carries risks for companies such as brand, reputation, litigation, supply chain interruptions, labor strikes and customer boycotts which in turn can all have significant short-and long-term financial implications for companies.



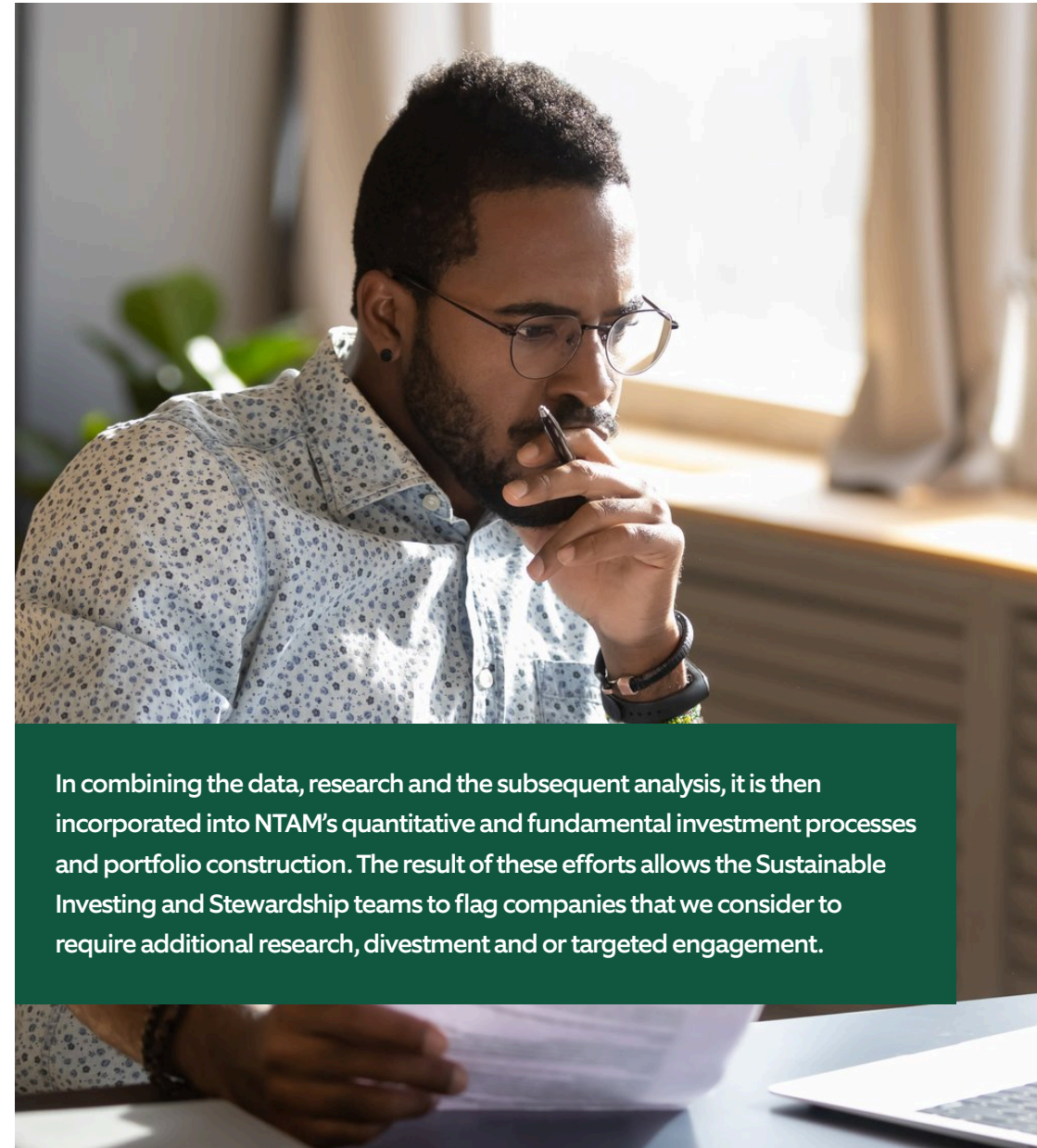
**As outlined in our Sustainable Investing Philosophy, NTAM employs a custom suite of screens that serve as the foundation within the ESG funds that we manage. Since inception, these screens have included factors that seek to identify and exclude companies that have been deemed to violate any of the Ten Principles of the UN Global Compact of which Principle Four<sup>9</sup> states that, “Businesses should uphold the elimination of all forms of forced and compulsory labor;” and Principle Five states that, “Business should uphold the effective abolition of child labor.”**



Through the use of various third-party research and screening tools, we seek to mitigate Modern Slavery risks in our ESG funds by identifying controversies and assessing the existence of social systemic issues which either constitute or may be linked to Modern Slavery, including forced labor, human trafficking, bonded labor, restrictions on freedom of association, poor/unsafe working conditions, and excessive work hours. These tools capture allegations linking companies from our portfolios as either engaging in or knowingly benefiting from such practices which are in turn flagged for further analysis. As part of the evaluation, we take into consideration various dimensions such as the severity of impact; insofar as the issue relates to a supplier, the company's links to that supplier; and the company's management of the issue and preparedness to prevent recurrences.

Further to company-level screening, our ESG methodology, as applied to our ESG product range includes human rights violations by State Owned Entities (SOEs) in fragile emerging markets. This methodology employs data sourced from Freedom House, a U.S.-based nonpartisan organization founded in 1941 to champion the advancement of freedom globally, to identify the countries in scope. The fragile countries are identified as those with weak civil liberties, political rights, religious freedoms, and freedom of press. Once the countries are identified, our investment process then excludes companies based on two criteria:

- Companies that are SOEs with 85 percent or more ownership by the state given the limited ability for direct engagement, and
- SOEs with either a severe or very severe human rights controversy score.



**In combining the data, research and the subsequent analysis, it is then incorporated into NTAM's quantitative and fundamental investment processes and portfolio construction. The result of these efforts allows the Sustainable Investing and Stewardship teams to flag companies that we consider to require additional research, divestment and or targeted engagement.**



We believe positive economic and societal change and financial performance are best achieved when Modern Slavery analysis is combined with active stewardship. Accordingly, NTAM's Stewardship team actively engages with various entities across all of our portfolios to promote human rights transparency and raise reporting standards with the companies in which we invest. Through comprehensive research and dialogue with companies on their global supply chain practices, we seek to mitigate Modern Slavery risks in our portfolios to drive better social and investment outcomes.

In 2023, NTAM's Stewardship team evolved its approach to identify investee companies with heightened risks associated with human rights and Modern Slavery. The changes implemented will allow more timely review of ongoing and emerging controversies. We developed a framework for identifying, evaluating and monitoring companies for engagement using a combination of MSCI and Sustainalytics data points focusing on supply chain labor standards, controversial sourcing, controversies related to forced labor, and global norms. The details of the factors underlying the framework are shared below:

### **Supply Chain Labor Standards**

We assessed the severity of controversies related to a firm's supply chain. Factors affecting this evaluation include, but are not limited to, a history of involvement in supply chain-related legal cases, widespread or egregious instances of abuses of supply chain employee labor rights, supply chain employee safety, resistance to improved practices, and criticism by NGOs and/or other third-party observers. The companies selected were found to have either severe or extremely severe controversies related to labor standards in the supply chain.

### **Exposure and Management of Supply Chain Labor Risk**

We examined to what extent a company's business is vulnerable to supply chain labor risk and how well they manage those risks and opportunities. Companies with high exposure and low management scores were targeted.

### **Exposure to Controversial Sourcing**

We examined the extent to which companies are at risk of incurring regulatory compliance costs, reputational damage, or supply chain disruptions resulting from reliance on raw materials that originate in areas associated with severe human rights and labor rights abuses. We targeted companies with high exposure and limited supplier engagement and found that all companies in this category were IT companies.

### **Controversies Related to Human Rights and Forced Labor in the Supply Chain**

We reviewed the number of incidents that have been reported involving human rights violations, including forced labor, in supply chains. The companies targeted were found to have reported incidents with either a moderate or severe impact on employees in the supply chain.

### **Global Norms**

We reviewed and will continue to monitor the companies' alignment to the United Nations Global Compact Principles.

From our initial review of the factors above, we selected 20 companies for continued monitoring and engagement. The Stewardship team will encourage companies through dialogue to commit to labor practices that reduce Modern Slavery risks. With this new process, the team has set up alerts to be notified as soon as there are any changes, positive or negative, to the factors above, including if any of the entities become implicated in additional controversies. Companies that are in the early stages of implementing a due diligence process will be encouraged to strengthen their stakeholder relationships through industry and trade associations, and build internal capacity in human rights management. It should be noted that our ability to engage is reliant on companies' reciprocation efforts to meet and have a dialogue. Out of the 20 companies we identified, we were able to successfully meet with seven.

When the Stewardship team initially contacts companies to raise concerns, they request a dialogue with representatives of management or the board of directors. NTAM's preference is to continue that dialogue to resolve raised concerns. However, if a company fails to make sufficient progress over time, the Stewardship team may recommend an escalation. An example of an escalation would be leveraging proxy voting options which may include supporting a shareholder proposal or opposing the re-election of one or more directors.



**All seven of the companies we engaged with in 2023 acknowledged the concerns we identified with respect to the supply chain risks of forced labor in the supply chain and are in various stages of remediation. The Stewardship team will continue its dialogue with the seven companies and will continue to pursue dialogue with the other 13 companies which we have identified as having heightened risks associated with human rights and modern slavery. In addition, we will continue to monitor the five factors through our third-party research providers for any positive or negative changes which may add or remove companies from our target list of investee companies to engage with.**

## Case Study: Ralph Lauren Corp (NYS:RL)

All of the companies with whom we engaged are actively working towards remediation. For example, we engaged with Ralph Lauren Corp. (NYS:RL), who, along with several other companies, has been accused of sourcing materials or products made using forced labor in Xinjiang, China and subject to an ongoing investigation by the Canadian Ombudsperson for Responsible Enterprise (CORE). On the basis of the information available, we found that Ralph Lauren has adopted strong policies to address human rights risks in the supply chain, including on-site social compliance assessments of suppliers and grievance mechanisms to enable workers to escalate concerns at a corporate level. Ralph Lauren states that it has a zero tolerance policy for forced labor and complies with all applicable laws and regulations wherever it operates. As with many other retailers, Ralph Lauren has invested and uses fiber-origin tracing technology to assess what region cotton may have been sourced from. In addition, Ralph Lauren reports that it undertakes third-party audits, has established traceability roadmaps for its supply chain, and conducts transparency mapping for all raw materials. It also participates in a variety of industry led initiatives to problem solve ways to tackle risk of forced labor not only in the supply of raw materials but also within manufacturing facilities. NTAM will continue to monitor the ongoing investigation by CORE and engage with Ralph Lauren to build a better understanding of the scope and depth of the company's work.

To ensure the program efficacy, our Proxy Committee, with input from our Sustainable Investment Council, reviews our proxy voting and engagement policies annually to identify issues and concerns about how we oversee implementation of our stewardship<sup>10</sup> objectives. Additionally, the risk, compliance and legal teams, along with leadership of the stewardship team, oversee the stewardship team's adherence to proxy voting and engagement policies. The work and progress of the Sustainable Investing and Stewardship programs is publicly communicated to clients and investee companies. We also report on other aspects of stewardship, such as engagements with company management, and provide full disclosure of voting records and quarterly reports of stewardship activities.

Our commitment to addressing Modern Slavery in our investments will continue in 2024 as we assess various opportunities to strengthen our resources and expertise through participation in industry initiatives dedicated to addressing human rights issues from an asset management perspective, including the PRI Advance<sup>11</sup> program which we joined in the second quarter of 2023. The PRI Advance is a collaborative initiative where institutional investors seek to advance human rights and positive outcomes for people through investor stewardship. We also have an ambition to expand the scope of our targeted engagements from 20 to 30 companies in 2024.

## D. OUR APPROACH TO REMEDIATION

When we identify Modern Slavery in our operations or supply chain, our response will be guided by what is in the best interests of the individuals at risk. For 2023, there is nothing to report with respect to measures taken during the reporting period to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labor or child labor in its activities and supply chains.

As mentioned in Part 3 above, our approach to identifying and addressing adverse human rights impacts, including Modern Slavery, is informed by the UNGPs. An overview of our approach to remediation is set out below.

	Cause	Contribute	Directly Linked
<b>Degree of Involvement</b>	An entity may cause Modern Slavery if its operations directly result in Modern Slavery practices.	An entity may contribute to Modern Slavery if, through its actions or omissions, it facilitates or incentivizes Modern Slavery practices.	An entity may be directly linked to Modern Slavery via a business relationship, where it does not cause or contribute to the Modern Slavery risk.
<b>Prevention &amp; Mitigation</b>	Cease or prevent the impact.	Cease or prevent contribution and use leverage to mitigate impact.	Seek to prevent and mitigate the impact. Appropriate steps may depend on leverage, availability of alternate vendors, significance of contractual relationship, severity and consequence of termination.
<b>Remediation Measures</b>	Provide for, or cooperate in, remediation.	Provide for, or cooperate in, remediation.	Take a role in remediation, including using leverage to encourage remediation by entities that caused or contributed to the impact.

As described in our Supplier Code, if a supplier is found to be engaging in Modern Slavery, or identifies Modern Slavery in its supply chain, we will engage with the supplier to encourage remediation of the situation. If the situation is not remediated (or not remediable) the Bank may terminate the relationship with the supplier and disqualify the supplier from participating in any future bidding processes.

As outlined above under the heading Actions to Assess and Address Modern Slavery Risks, Northern Trust provides its employees, suppliers and other stakeholders with numerous avenues to report Modern Slavery concerns. Anonymous reporting is permitted and we prohibit retaliatory action.



## 5. Assessing the Effectiveness of our Actions



## 5. Assessing the Effectiveness of our Actions

Northern Trust's Head of Corporate Sustainability, Inclusion and Social Impact is the executive responsible for the design and implementation of our Modern Slavery risk management program, with the support of the Modern Slavery Executive Steering Group, that was recast as the Societal and Human Rights Committee in December 2023.

The new committee will provide enhanced governance, oversight and strategic direction for human rights issues (including Modern Slavery) and social responsibility matters into our operations, policies and practices.

Our Modern Slavery Working Group comprising of representatives from Corporate Sustainability, Inclusion and Social Impact; Procurement; Human Resources; Legal; Compliance; and Risk continued to meet periodically during 2023. The Working Group develops and tracks the effectiveness of our actions to manage the risk of Modern Slavery in our operations and supply chains.

Where a concern arises within Northern Trust in relation to a Modern Slavery risk, it is referred to the Working Group for consideration. The Modern Slavery Working Group provides recommendations to senior management in relation to how the issue should be addressed and, if necessary, escalated to the Executive Steering Group or from 2024 to the Societal and Human Rights Committee. The Corporate Governance Committee of our board of directors is regularly briefed on the program and reviews our goals and progress.



In our 2022 Modern Slavery Statement, we set out the following goals that we planned to achieve during 2023, to demonstrate our progress in addressing Modern Slavery risks in our operations and supply chains:

	<b>Goals Set in 2023</b>	<b>Actions Taken in 2023</b>	<b>Status</b>
1.	Conduct a Living Wage project to assess our pay practices globally against living wage benchmarks provided by Fair Wage Network.	Assessment completed. Refer to Section 4.	Complete
2.	Our commitment to addressing Modern Slavery in our investments will continue in 2023 as we assess various opportunities to strengthen our resources and expertise through participation in industry initiatives dedicated to addressing human rights issues from an asset management perspective.  Participate in at least one collaboration in the metals, mining and renewables sector during 2023.	We continued to monitor the companies alignment to the United Nations Global Compact principles.  All seven of the companies we engaged with in 2023 acknowledged the concerns we identified with respect to the supply chain risks of forced labor in the supply chain and are now in various stages of remediation.	Ongoing
3.	Issue the Modern Slavery Questionnaire to more than 500 suppliers in 2023.	Complete. Refer to section 4B.	Complete
4.	Liaise with suppliers identified as high risk for Modern Slavery in 2022 or who were identified as requiring further review following the Modern Slavery Questionnaire.  Agree action plans with at least 50% of these high risk suppliers, including all cleaners/facilities management suppliers.	Complete. Refer to section 4B.	Complete
5.	Where available, will replace beverage supplies with Fair Trade, Rainforest Alliance or similar products in our office locations globally.  At least two-thirds of all Northern Trust office locations will have replaced existing beverage supplies with Fair Trade or similar products by the end of 2023.	Complete. Refer to section 4A.	Complete



In the coming financial year, we will seek to assess the effectiveness of our Modern Slavery program, including by tracking our performance against the following goals. We will internally report on progress to our new Societal and Human Rights Committee, the Disclosure Committee and the Corporate Governance Committee of our board of directors and externally within our next Modern Slavery Statement.

Goals Set for 2024	Actions Planned for 2024
1. Evaluate the findings from our 2023 Living Wage project and embed a review (at least annually) of our pay practices globally against living wage benchmarks as provided by Fair Wage	Findings to be reported to the Societal and Human Rights Committee, and if applicable, adjustments to pay to be implemented
2. Issue the Modern Slavery Questionnaire to a broader population of suppliers	Issue the Modern Slavery Questionnaire to more than 500 suppliers in 2024.
3. Liaise with suppliers identified as high risk for Modern Slavery in 2023 or who were identified as requiring further review following the Modern Slavery Questionnaire.	Agree action plans with at least 50% of these high-risk suppliers.
4. Our commitment to addressing Modern Slavery in our investments will continue in 2024 as we assess various opportunities to strengthen our resources and expertise through participation in industry initiatives dedicated to addressing human rights issues.	Participate in at least one collaboration under the PRI Advance initiative during 2024.
5. Continue to monitor investments identified as high risk for Modern Slavery and support shareholder requests for additional disclosures regarding Modern Slavery risk where appropriate.	Expand the list of companies NTAM engages with from 20 to 25 during 2024.
6. Participate in the 2024 UN Global Compact's Business & Human Rights Accelerator Program	Continue to build out Northern Trust's Modern Slavery program to identify salient human rights impacts, review our ongoing due diligence processes and develop an actionable plan.

## 6. Other Information



## 6. Other Information

In addition to the philanthropic activities described in Part 2 above, Northern Trust has focused philanthropic resources toward support for nonprofit organizations that deliver accessible healthcare, affordable housing, educational excellence and food security. For example, in October 2023, Northern Trust held its second Charity Trading Day, as part of Achieving Greater Together – our signature month of service – and a total of US\$700,000 (based on the day’s trading) was donated to the charities: Global Red Cross and Red Crescent Network, Ronald McDonald House Charities (RMHC), War Child and World Central Kitchen.



## 7. Consultation, Approval and Attestation



## 7. Consultation, Approval and Attestation

Working together with the Head of Corporate Sustainability, Inclusion and Social Impact, and the Modern Slavery Working Group, various business lines and functions within the Bank were consulted in the drafting of this Statement, including: Corporate Sustainability, Inclusion and Social Impact; Procurement; Human Resources; Legal; Compliance; Risk and applicable Business Units. These business lines and functions have global mandates, which include the entities to which this Statement applies (as Reporting Entities or because they are owned or controlled by Reporting Entities). Accordingly, the consulted internal stakeholders provided input in relation to the Reporting Entities globally and their owned or controlled entities.

This Statement was reviewed by the Societal and Human Rights Committee in accordance with its new chartered responsibilities and has been approved pursuant to section 11(4)(b)(ii) of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act by the principal governing body of the Bank as defined by the Modern Slavery Act 2018 (Cth), the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act and the Modern Slavery Act 2015 (U.K.) on February 20, 2024.

In accordance with the requirements of the Canadian Forced Labour and Child Labour in Supply Chains Act, in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the Bank. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act, for the reporting year listed above. I make this attestation for and on behalf of the Bank in my capacity as a director and Chief Executive Officer of The Northern Trust Company. I have the authority to bind, or direct or cause others to bind, each of the reporting entities pursuant to the Australian Modern Slavery Act 2018 (Cth), the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act (the Canadian Act) and the United Kingdom (U.K.) Modern Slavery Act 2015.



**Michael G. O'Grady**  
Chairman and Chief Executive Officer  
The Northern Trust Company

**Approved by the Boards of Directors of the Reporting Entities as follows:**

The Northern Trust Company	February 20, 2024
Northern Trust Investor Services Limited	March 12, 2024
Northern Trust Global Services SE	March 20, 2024
Northern Trust Global Investments Limited	March 21, 2024
Northern Trust Management Services Limited	March 22, 2024
Northern Trust Securities LLP	March 27, 2024



## End Notes

1. Australian, Canadian and U.K. operating entities are listed in Annexure A with a short description of each of their operations
2. As defined in the Canadian Act to include labor or services provided or offered to be provided by a person under the age of 18 years and that: (a) are provided or offered to be provided in Canada under circumstances that are contrary to the laws applicable in Canadian; (b) are provided or offered to be provided under circumstances that are mentally, physically, socially or morally dangerous to them; (c) interferes with the person's schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely or requiring them to attempt to combine school attendance with excessively long and heavy work; or (d) constitutes the worst forms of child labor as defined in article 3 of the Worst Forms of Child Labour Convention, 1999.
3. <https://www.northerntrust.com/united-states/about-us/corporate-social-responsibility/corporate-philanthropy/impact-report>
4. Where goods or services were provided by multiple subsidiaries within the same corporate group, the company at group level was counted once.
5. See heading "Supplier Due Diligence via the Modern Slavery Questionnaire" for a description of the suppliers that have received the Modern Slavery questionnaire and are represented in Figure 2.
6. <https://cdn.northerntrust.com/pws/nt/documents/governance/code-of-business-conduct-ethics.pdf?1010>
7. <https://www.northerntrust.com/content/dam/northerntrust/pws/nt/documents/about-us/policy/human-rights-statement.pdf>
8. <https://www.northerntrust.com/content/dam/northerntrust/pws/nt/documents/investment-management/sustainable-investing-philosophy.pdf>
9. <https://unglobalcompact.org/what-is-gc/mission/principles/principle-4>
10. <https://www.northerntrust.com/united-kingdom/what-we-do/investment-management/stewardship>
11. PRI | Advance (unpri.org)

ANNEXURE 1

# Operating Entities in Australia, Canada and the U.K.





## Australia

Entity	Operations
<b>The Northern Trust Company, Melbourne Branch (TNTCMB)</b>	The Bank operates in Australia as a foreign registered company ABN 62 126 279 918, is an Australian Prudential Regulation Authority authorized deposit-taking institution operating a banking business in Australia and is also the holder of an Australian Financial Service License issued by the Australian Securities and Investments Commission (ASIC).
<b>Northern Trust Securities Australia Pty Ltd (NTSA)</b>	Northern Trust Securities Australia Pty Ltd ACN 648 476 055 (NTSA) is a proprietary limited company incorporated in Australia, a subsidiary of the Bank and the holder of an Australian Financial Services Licence issued by ASIC. NTSA provides brokerage services to wholesale clients.
<b>Northern Trust Asset Management Australia Pty Ltd (NTAMA)</b>	Northern Trust Asset Management Australia Pty Ltd ACN 648 476 019 (NTAMA) is a proprietary limited company incorporated in Australia, a subsidiary of the Bank and the holder of an Australian Financial Services Licence issued by ASIC. NTAMA provides investment management services to wholesale clients.

## Canada

Entity	Operations
<b>The Northern Trust Company, Canada Branch (TNTC CB)</b>	The Bank operates in Canada as an authorized foreign bank (a Schedule III Bank) under the <i>Bank Act</i> (Canada). Under section 524 of the under the <i>Bank Act</i> (Canada) The Northern Trust Company is authorized to conduct its business in Canada under the name The Northern Trust Company, Canada Branch. TNTC CB was established in November 2006 with its principal office in Toronto, Ontario. TNTC CB's principal regulator is the Office of the Superintendent of Financial Institutions (OSFI).
<b>The Northern Trust Company, Canada (TNTCC)</b>	TNTCC was originally incorporated April 8, 1991 under the <i>Business Corporations Act</i> (Ontario) and is currently continued, authorized and regulated as a trust company under the <i>Trust and Loan Companies Act</i> (Canada) (Letters Patent of Continuance issued by Minister of Finance July 22, 1993, Order to Commence Business issued by OSFI (its principal regulator) January 4, 1994). TNTCC maintains trust licences in all ten Canadian provinces and three territories. TNTCC is a wholly owned subsidiary of The Northern Trust Company.
<b>NT Global Advisors, Inc. (NTGAI)</b>	NTGAI, which operates in the Province of Ontario under the registered business name Northern Trust Global Advisors, is incorporated under the <i>Business Corporation Act</i> (Ontario) and is a wholly owned subsidiary of The Northern Trust International Banking Corporation (TNTIBC). NTGAI is registered as a "dealer", in the category of "exempt market dealer", with the Ontario Securities Commission (OSC), is registered as an "adviser" in the category of "portfolio manager" pursuant to the applicable provincial securities legislation of all ten Canadian provinces and three territories. NTGAI is also registered as an "investment fund manager" pursuant to the applicable provincial securities legislation in Ontario and Quebec, and registered as "commodities trading manager" pursuant to the applicable provincial legislation in Ontario. The Ontario Securities Commission (OSC) is NTGAI's principal regulator.

## U.K.

Entity	Operations
<b>The Northern Trust Company, London Branch (TNTC LB)</b>	The Bank operates in the U.K. TNTC LB is established in the U.K. under U.K. establishment number BR001960 and is authorized and regulated by the Prudential Regulation Authority and regulated by the Financial Conduct Authority (Firm Registration Number: 122020).
<b>Northern Trust Global Services SE, U.K. Branch (NTGS U.K.)</b>	<p>Northern Trust Global Services SE, U.K. Branch (NTGS U.K.) is U.K. registered branch of Northern Trust Global Services SE, a Luxembourg based company. NTGS U.K. provides asset servicing solutions to clients.</p> <p>NTGS U.K. is a third country branch authorized and regulated by the Prudential Regulation Authority and regulated by the Financial Conduct Authority. Northern Trust Global Services SE is wholly owned by Northern Trust Holdings Limited (NTHL). NTHL is wholly owned by the Bank which is the principal banking subsidiary of Northern Trust Corporation.</p>
<b>Northern Trust Investor Services Limited (NTISL)</b>	Northern Trust Investor Services Limited (NTISL) is the legal entity established to operate Northern Trust's U.K. trustee and depositary business. NTISL also offers transition management services. NTISL is registered in England and Wales under number 12578024 and authorized and regulated by the Financial Conduct Authority. NTISL is a subsidiary of the Bank.

## U.K. (continued)

Entity	Operations
<b>Northern Trust Management Services Limited (NTMSL)</b>	Northern Trust Management Services Limited's (NTMSL) principal activity is the provision of management services. NTMSL also acts as a holding company for its subsidiary undertaking, Northern Trust Global Investments Limited and continues to support the growth and development of the core activities undertaken by the subsidiary. NTMSL is wholly owned by The Northern Trust International Banking Corporation (TNT IBC). TNTIBC is in turn wholly owned by the Bank which is the principal banking subsidiary of Northern Trust Corporation.
<b>Northern Trust Global Investments Limited (NTGIL)</b>	Northern Trust Global Investments Limited's (NTGIL) core activities comprise the distribution and provision of investment management solutions for global investors. NTGIL is authorized and regulated by the Financial Conduct Authority. NTGIL is wholly owned by Northern Trust Management Services Limited, which is wholly owned by The Northern Trust International Banking Corporation (TNTIBC). TNTIBC is in turn wholly owned by the Bank which is the principal banking subsidiary of Northern Trust Corporation.
<b>Northern Trust Securities LLP (NTS LLP)</b>	Northern Trust Securities LLP (NTS LLP) is an institutional equity broker trading as a limited liability partnership in the U.K. which offers institutional clients a suite of brokerage services including equity, fixed income and derivative trade execution, portfolio trading as well as pre- and post-trade analytics. NTS LLP is authorized and regulated by the Financial Conduct Authority as a limited licence firm. NTS LLP comprises two equity members with The Northern Trust International Banking Corporation (TNT IBC) holding a 99% equity interest. TNT IBC is in turn wholly owned by the Bank which is the principal banking subsidiary of Northern Trust Corporation.

## Statement Annexe

	<b>Mandatory Criteria</b>	<b>Section</b>	<b>Page</b>
1.	<u>Identify the reporting entity.</u>	1	1
2.	<u>Describe the reporting entity's structure, operations and supply chains.</u>	2	1
3.	<u>Describe the risks of Modern Slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.</u>	3	1
4.	<u>Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.</u>	4	1
5.	<u>Describe how the reporting entity assesses the effectiveness of these actions.</u>	5	1
6.	<u>Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).</u>	7	1
7.	<u>Any other information that the reporting entity, or the entity giving the statement, considers relevant.</u>	6	1

Thank you for reading

# Modern Slavery and Human Trafficking Statement 2023