

## **The UK Modern Slavery Act 2015 – Russell Investments**

**This statement sets out the steps taken by Russell Investments during the financial year ended 31 December 2016 to seek to identify and prevent modern slavery and human trafficking in its business and supply chains.**

The Modern Slavery Act 2015 (the “Act”) constitutes the offences of “slavery, servitude and forced and compulsory labour” and “human trafficking”. The Act seeks to increase transparency to the public on the actions organisations are taking to address risks of slavery and human trafficking in their businesses and supply chains.

### **Organisation, Structure and Business**

Russell Investments is a global organisation with subsidiaries established in a number of jurisdictions. Russell Investments Limited (“RIL”), Russell Investments Implementation Services Limited (“RIISL”) and Russell Investments Systems Limited are among those group entities incorporated in England and Wales that fall within scope of S.54(2) of the Act.

Russell Investments provides a range of financial services and investment products to an institutional client base which includes pension funds, insurance companies and private banks. Cross-border delegation arrangements are commonly used both within the group and external to the group to facilitate provision of these services.

Therefore, the group’s supply chains include the following third-party suppliers: distribution companies and platforms that enter into arrangements to distribute investment funds managed by the group, investment managers, investment advisors, consultants and brokers, commercial real estate/cleaning/office suppliers and services needed to support staff in offices, pay-roll providers, pension fund providers and private health-care providers among other associated service providers.

### **Due Diligence**

Russell Investments implements due diligence processes prior to commencing any business relationships with a third party investment manager; such an investment manager is subject to ongoing, risk-management checks on a periodic basis which take into account compliance with laws including conflicts of interest and regulatory requirements. Russell Investments further seeks to ensure such investment managers contractually agree to comply with regulatory requirements and applicable laws.

Both RIL and RIISL are authorised and regulated by the Financial Conduct Authority in the United Kingdom and as such must comply with a number of regulatory requirements concerning conduct of business, governance, systems and controls and prudential measures, all of which seek to support well-managed and supervised firms.

### **Addressing the Act**

Given the nature of Russell Investment's business, we consider the risk of modern slavery and human trafficking is low; and are currently not aware of any third party relationship raising modern slavery or human trafficking issues. However, Russell Investments will seek to include contractual provisions in future agreements with higher risk service providers to comply with the Act. Policies and procedures will also be updated to address the Act and ensure associates are made aware of Russell Investments' commitment to seeking to ensure no slavery or human trafficking occurs in its businesses or supply chains.

### **Training**

Training relating to risks associated with human trafficking and modern slavery will be provided to relevant associates within Russell Investments, to raise their awareness around issues associated with these risks. Affected boards of directors within Russell Investments have also been made aware of the requirements of the Act.

**This statement has been approved by the relevant boards of directors of Russell Investments on 6 March 2017.**



**Jim Beveridge**  
**Director**  
**Russell Investments Limited**  
**Russell Investments Implementation Services Limited**  
**Russell Investments Systems Limited**