

# Modern Slavery Statement

## Franklin Templeton Global Investors Limited (“FTGIL”) and Franklin Templeton Investment Management Limited (“FTIML”)

### The Modern Slavery Act 2015 – Statement Financial Year Ending 30 September 2020

This statement is made on behalf of the UK companies, Franklin Templeton Global Investors Limited (“FTGIL”) and Franklin Templeton Investment Management Limited (“FTIML”) to address section 54 (1) of the Modern Slavery Act 2015. The statement describes the steps taken to mitigate the risk of slavery and human trafficking taking place in the supply chains of FTGIL and FTIML and in any part of their business.

### Organisation Structure and Business

FTGIL is a UK private limited company which provides support and administration services to Franklin Resources, Inc. and its subsidiaries operating as Franklin Templeton Investments (“FTI”). FTI is a global investment management organisation providing investment management and related services to retail, institutional and high net worth clients.

Services provided by FTGIL to its parent and associated companies include legal, compliance, human resources, accounting, fund administration and IT support.

FTGIL has a number of subsidiaries including the UK Company, FTIML, a UK private limited company which provides investment management and advisory services to various FTI sponsored products and on a discretionary basis to institutional clients.

### Supply Chains

FTGIL and FTIML contract with a number of direct and indirect suppliers of goods and services including suppliers of IT, office equipment, cleaning services and professional services from lawyers, accountants and other advisers and consultants. Due to the nature of the good and services supplied the majority of suppliers in our supply chain are not located in countries or sectors that are considered to be at high risk of exposure to human trafficking or slavery.

## **Policies in Relation to Slavery and Human Trafficking**

FTGIL and FTIML are committed to ensuring that no member of staff and no vendor has any involvement in human trafficking and modern slavery. This commitment reflects our core values to put clients first, build relationships, achieve quality results and work with integrity.

This approach is supported by our Anti-Bribery Policy which outlines the principles that FTI follows to achieve zero-tolerance against bribery and corruption and our Code of Ethics which require staff to uphold the highest level of ethical conduct in their day to day business.

## **Due Diligence**

### **Employees**

Recruitment at Franklin Templeton is conducted through an online application system either direct by the candidate or via a third-party supplier such as a Franklin Templeton contracted recruitment business. Applications for all roles (permanent, temporary and contract) are reviewed and appropriately experienced candidates are invited for interview. Reference and background checks are carried out on all prospective employees, using a third party specialist company, and proof of the right to work is mandatory before an offer will be made.

Franklin Templeton base salary levels and benefit provision are set with reference to appropriate market benchmarking data (third party industry surveys), which are reviewed regularly. We also take into account any mandated minimum pay levels, fair pay and any other relevant legislation. All salary payments are made directly to each employee's personal bank account.

### **Vendors**

All direct vendors that Franklin Templeton uses are considered to be at a low risk of exposure to human trafficking or slavery. Franklin Templeton ensures that all contracts have appropriate modern slavery act terms to ensure vendor compliance. All key staff involved in recruitment and vendor sourcing are made aware of our policy.

William Jackson, Director

Franklin Templeton Global Investors Limited (“FTGIL”) and Franklin Templeton Investment Management Limited (“FTIML”)

Board Approval Date: 17 December 2020

## **Legg Mason Investments (Europe) Limited**

### **Organisation’s Structure and Business**

Legg Mason became a member of the Franklin Templeton group of companies on the 31st July 2020, combining years of expertise and know-how within the asset management industry. Franklin Templeton is now one of the largest asset management firms in the world with over \$1.4 trillion in assets under management and offices in 34 countries.

Today, Franklin Templeton is a globally diversified group of more than 1,300 widely recognized investment professionals committed to long term performance and outstanding client service who provide clients with deep expertise across asset classes, investment styles, and geographies.

Franklin Resources Inc. is headquartered in San Mateo, California in the USA and operates in the UK via a number of subsidiaries, one of which is Legg Mason Investments (Europe) Limited (the “Company”), a private company limited by shares incorporated in England and Wales. The Company falls within the scope of S54(2) of the Modern Slavery Act 2015 (the “Act”).

The Company acknowledges their responsibilities to the Act and the prevention of slavery and human trafficking. In addition, the Company takes steps to seek to ensure transparency within the organisation and with suppliers of goods and services with whom it contracts in relation to the prevention of modern slavery and human trafficking.

### **Our Supply Chain**

The Company’s supply chain includes the following suppliers: