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# 2020 Modern slavery statement

**This joint statement discloses the actions taken by AMP<sup>1</sup> to address risks of modern slavery, forced labour and human trafficking in our business and value chain for the 2020 calendar year. This statement is prepared to comply with the requirements of the United Kingdom Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018.**



1 AMP refers to AMP Limited and its subsidiaries including the reporting entities listed on [page 10](#) collectively known as 'us', 'we' and 'AMP'.

## Overview and structure

AMP has a long history of helping our customers manage their finances and achieve their goals. This deep commitment to helping clients continues and is articulated in our purpose statement today – Realise human ambitions. AMP and its subsidiaries have over 5,907 employees globally, predominantly based in Australia and New Zealand and is headquartered in Sydney, Australia.

### Superannuation Trustee

The Superannuation Trustee is responsible for the governance of AMP superannuation funds for members. It outsources a range of services to AMP entities and external service providers, such as administration and investment management services.

The actions and policies of the Superannuation Trustee with respect to modern slavery are captured in this statement.

### AMP Life and mature

AMP sold its life insurance and mature business to Resolution Life. The transaction was completed on 30 June 2020. Resolution Life publishes a separate statement on its actions relating to modern slavery.

### AMP Australia

AMP Australia provides retail and workplace superannuation products and self-managed superannuation funds (SMSF) services, as well as retirement income solutions and investments for individuals. Through our employed and aligned advice network, we support 1,573 advisers in Australia to provide quality financial advice to clients, including Charter and Hillross licences.

AMP Bank provides clients with home loans, deposit and transaction accounts. It provides limited advice practice lending and does not provide business or corporate banking services to industries.

SuperConcepts offers clients a suite of SMSF administration services and has operations in Australia and India.

### AMP Capital

AMP Capital is a global investment manager, which services institutional and direct clients, including AMP. We have offices and operations globally, including in the United Kingdom, Europe, the United States and Asia Pacific.

In real assets, we manage \$28.6 billion in real estate assets including office buildings, retail shopping centres and industrial assets, predominantly based in Australia. We also manage \$25.8 billion of infrastructure assets including airports, trains and pipelines on behalf of funds and clients.

In public markets, we manage \$135.2 billion in equities, fixed income, diversified, multi-manager and multi-asset funds on behalf of clients around the world.

### AMP New Zealand wealth management

In New Zealand, we provide clients with super, retirement, financial advice and insurance, directly and through one of the largest networks of financial advisers in the country.

### Strategic partnerships

AMP group and business units hold several strategic partnerships including:

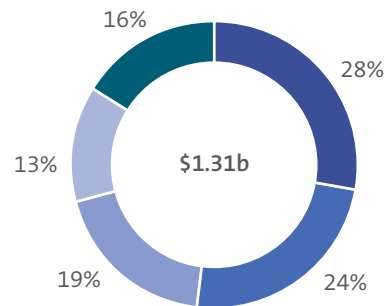
- 19.13% equity interest in Resolution Life Australasia
- 19.99% of China Life Pension Company (CLPC)
- 15.0% of China Life AMP (CLAMP)
- 24.9% of US real estate investment manager, PCCP.

As these are minority stakes, they are not included as part of this statement.

**AMP is a wealth management company offering clients financial advice and superannuation, retirement income, banking and investment products across our portfolio of businesses.**

## Supply chain profile

### AMP total external payments



- IT infrastructure and services
- Professional services
- Investment and banking services
- Human resources
- Other

In 2020, AMP spent approximately \$1.31 billion on external goods and services. About 28% of this spend is in IT infrastructure and services, 24% in professional services, which includes legal and consulting services, and 19% on investment and banking services. The remainder is a combination of human resources, property, travel, utilities and compliance-related spend. The nature of these services means that our spend is highly concentrated, with the top 126 suppliers representing approximately 80% of total spend and these relationships are typically stable and longer term. The majority of these suppliers are based in Australia, the United States or the United Kingdom with some service providers located in India, China, Vietnam and the Philippines.

Through our aligned advice network, AMP supports 1,573 advisers in Australia. Larger and network-wide outsourcing activities are managed centrally by AMP, however individual practices are responsible for office-related procurement activities. Advisers who wish to engage offshore services are expected to submit evidence of due diligence to AMP.

AMP Capital's real estate division separately administers procurement and supply chain activities in its managed assets, including commercial, logistics and shopping centres. The managed services represent operating expenses of approximately \$104 million per year with over 700 suppliers. About 36% and 15% are with cleaning and security services respectively, while the remaining spend is with a range of building services and related maintenance contractors. These suppliers are primarily Australian based.

	2020
<b>AMP total external payments<sup>2</sup></b>	<b>\$1.31b</b>
<b>Suppliers by type</b>	
IT infrastructure and services	28%
Professional services	24%
Investment and banking services	19%
Human resources	13%
Other	16%

<sup>2</sup> Represents total external payments. Excludes corporate credit card and AMP Capital fund activities.

	2020
<b>AMP Capital asset operations<sup>3</sup></b>	<b>\$104m</b>
Cleaning	36%
Security	15%
Other (including mechanical services, landscaping, lift maintenance)	49%

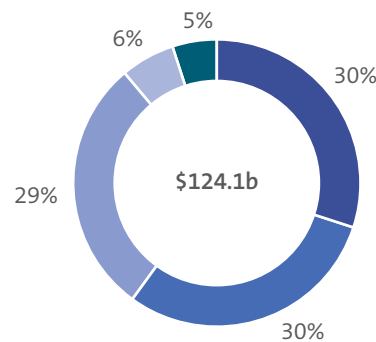
<sup>3</sup> These figures do not include development or capital works projects.

## Investment asset profile

In 2020, AMP managed a total of \$255 billion in AUM, comprising \$190 billion of AMP Capital managed funds and \$65 billion in non-AMPC managed funds, comprising externally managed funds on platforms and funds under administration in SuperConcepts.

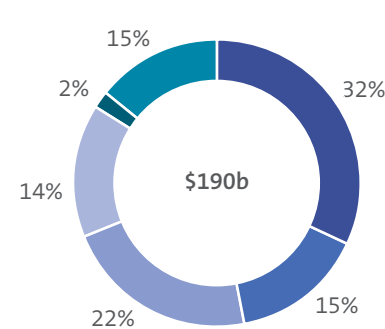
Of the total AMP Australia AUM of \$124.1 billion, 77% is ultimately externally managed, while 23% is internally managed. AMP Capital manages 62% of Australian wealth management AUM – of this, 29% is managed internally by AMP Capital's in-house investment capabilities and 71% is outsourced to external fund managers.

Australian wealth management total AUM



- Cash and fixed interest
- Australian equities
- International equities
- Property
- Other

AMP Capital total AUM



- Fixed interest
- Australian equities
- International equities
- Real estate
- Alternative assets and direct investments
- Infrastructure

	2020
<b>Australian wealth management (total AUM)</b>	\$124.1b
Cash and fixed interest	30%
Australian equities	30%
International equities	29%
Property	6%
Other	5%

<b>AMP Capital (total AUM)</b>	\$190b
Fixed interest	32%
International equities	22%
Australian equities	15%
Real estate <sup>4</sup>	15%
Infrastructure	14%
Alternative assets and direct investments <sup>5</sup>	2%

<sup>4</sup> Real estate AUM comprises Australian (\$24.0b), NZ (\$2.8b) and Global (\$1.8b) managed assets. Australian real estate AUM is invested in office (50%), retail (42%), industrial (5%) and other (3%).

<sup>5</sup> Alternative assets refers to a range of investments that fall outside the traditional asset classes and includes investments in commodities and absolute return funds. Direct investments refers to private equity.

## Our position and commitment

**AMP is committed to conducting our business in an ethical and professional manner. We consider the broader impacts to society of our own business operations, purchasing and investment decisions.**

We acknowledge the [United Nations Guiding Principles on Business and Human Rights](#) and understand the role we can play in the financial sector to address risks of modern slavery across our value chain.

Acknowledging the complexity and global nature of modern slavery and human trafficking, we have adopted the following principles:

1. A risk-based approach to identifying and addressing modern slavery across our business activities
2. Prioritise actions where we believe we have the most impact to affect meaningful change for victims
3. Partner with industry and other organisations to systemically address modern slavery in higher risk sectors.

**Our approach is underpinned by several policies to address modern slavery across our business activities, including:**

Policy	Purpose
<a href="#">Code of Conduct</a>	AMP's Code of Conduct outlines how AMP seeks to conduct our business and how we expect our people to conduct themselves. The code is supported by our employee policies, which govern the way we operate to best serve our customers and business and meet our legal and regulatory obligations.
<a href="#">Supplier Code of Practice</a>	External suppliers play an important role in helping AMP achieve our business objectives and meet community expectations. Suppliers need to adhere to values that are consistent with AMP's own policies and standards. The purpose of this Supplier Code of Practice is to communicate AMP's policies and standards as they relate to our dealings with suppliers.
<a href="#">Whistleblowing Policy</a>	AMP's whistleblower program encourages, protects and supports responsible reporting of wrongdoing, including fraud, corrupt conduct, questionable accounting and inappropriate workplace behaviour. The Whistleblowing Policy applies to AMP suppliers and third parties providing services to AMP.
<a href="#">Outsource and Procurement Policy</a>	This policy ensures that all outsourcing arrangements are appropriately established and managed so that AMP maintains its reputation and financial performance, and continues to meet its obligations to regulators, customers and other stakeholders.
<a href="#">Environment and Social Policy</a>	This policy sets out AMP's obligations and commitments to environmental management and social responsibility, including human rights and modern slavery, for our clients, our people, and the community.
<a href="#">AMP Capital ESG and Responsible Investment Philosophy</a>	Outlines AMP Capital's ESG and responsible investment approach across assets classes, including the consideration for material social risks such as human rights and modern slavery.
<a href="#">AMP Capital Position on Modern Slavery</a>	This position statement presents an overview of relevant priorities, values and expectations in relation to modern slavery risks as they relate to our own business operations, supply chain relationships and through the investments we manage on behalf of our clients.

## Our actions

**In 2018, a dedicated project was established by our AMP Capital business to address legislative requirements and uplift our capacity to manage modern slavery risks. This work continued in 2020 with AMP Australia and AMP group functions including Procurement, Financial Crime Compliance and People and Culture in the lead-up to our requirements under the Australian legislation.**

In 2020, we have undertaken further activities to address modern slavery risks across our different business activities. We undertook a review with an external human rights consultancy to review existing processes and set a roadmap for future actions that are detailed in this statement.

### Governance

In 2020, we established a group-wide Modern Slavery Working Group, with key representatives from across our businesses including procurement, legal and regional teams. The purpose of this group is to oversee our roadmap of deliverables, share information, report on progress and facilitate production of the statement.

The working group acts as our primary consultative forum for the development of this statement. It reports into the Group Risk and Compliance Committee, which is comprised of the AMP executive management team. The statement is approved by this management body and ultimately approved by the AMP Limited Board.

The Superannuation Trustee and AMP Capital Responsible Entity Boards, comprising independent directors, were also consulted on the development of this statement.

### Incident reporting and remediation

We have established a group-wide incident and escalation procedure, led by our Financial Crime Compliance function. This process provides employees with instructions on how to respond to suspected instances of modern slavery in the business' supply chain or operations, including escalation, engagement with law enforcement and risk management. A key consideration of the framework is ensuring that any decisions or actions taken will not cause further impacts to possible victims of modern slavery.

AMP's Whistleblowing Program provides a secure channel for people to report concerns relating to AMP and provides assurance that concerns will be reviewed and/or investigated in an objective, independent and confidential manner, with appropriate corrective action taken where concerns are substantiated. This confidential service is available to suppliers, sub-contractors and employees in our supply chain that are connected to the provision of services to AMP.

AMP has not yet identified any confirmed cases of modern slavery. We expect this to change in future as awareness training continues to roll out to all employees and our risk assessment processes mature with industry collaborations.

### Operations and employees

As a predominantly Australian and New Zealand based financial services company, with a largely professional employee profile, we consider the risk of causing modern slavery among our own employees as low.

AMP complies with relevant employment legislation across our offices and ensures employees are not subject to any form of modern slavery. We have a range of internal policies that set out business standards for fair pay, appropriate use of labour, contract management, working conditions and promotion of non-discrimination.

In 2020, we launched a mandatory awareness training module for all employees on Modern Slavery as part of our Preventing Financial Crime program, with 2,030 employees completing the training. The updated online training was launched 1 July 2020, so we expect more employees will complete the module in 2021. This training outlines what modern slavery is, its significance as a global problem, and how to identify potential cases and report them appropriately.

## Our actions

### Supply chain

We have identified some broader supply chain activities that might be at higher risk of being directly linked to modern slavery in service delivery to AMP. When assessing risk, we consider risk to people based on sector and geographic indicators from sources such as the Global Slavery Index.

AMP Limited's third-party supply chain in Australia and internationally is largely managed through our group procurement function, Strategic Sourcing, which supports our businesses to manage these relationships. Higher risk sourcing activities include IT, property management, stationery and merchandise.

We also have extensive supply chains in our AMP Capital business that manages higher risk sectors including real estate, construction and infrastructure.

Some of our businesses and regions also manage some procurement activities locally, including international office locations, aligned advice practices, and SuperConcepts.

In 2020, we conducted a group-wide assessment of these activities and found these areas of our business to be of lower risk of modern slavery with a lower ability to influence through these activities. Therefore, the focus of our supply chain actions is initially focused on higher risk, high spend activities. It is expected as our approach matures, we can address other areas over time.

Throughout 2019 and 2020, we have strengthened our group supplier management framework to identify and address risks of modern slavery by:

- introducing an updated [Supplier Code of Practice](#) to better communicate our policies and expectations
- updating precedent contract documents to include modern slavery clauses across all of our AMP contract terms for contract renewals from 2019 onwards
- negotiating variations to existing higher risk service agreements

- introducing a new contract management system in our group procurement function to integrate risk assessment processes, document management, and obligation management
- updating due diligence processes, which includes consideration of sector and industry risks, as well as geographic risks in the supply chain, drawing on the Global Slavery Index.

In 2020, our risk-based approach has identified seven suppliers across 12 service arrangements who operate in both sectors and geographies that are of higher risk. The due diligence work conducted on these suppliers subsequently led to most of these being reclassified as low residual risk. For suppliers that could not provide additional evidence, AMP continues to work with these providers to enhance their own modern slavery processes.

### Case study

#### Real assets – real estate

In 2019, AMP Capital entered into a partnership with the Property Council of Australia and corporate social responsibility technology platform, Informed 365, to help the property industry and its members take a proactive approach to engaging their suppliers around modern slavery risks.

This collaboration allows leading Property Council of Australia members to assess and report on their supply chain networks through a single online platform which collects, compares and shares data on all suppliers. The assessment covers subjects including: General Understanding, Governance, Education and Training, Partnerships and Current Modern Slavery Approach. This initiative aims to create consistency across the industry,

streamline the reporting process for businesses involved, reduce the reporting burden and make it easier for suppliers to share information with leading property organisations.

In 2020, AMP Capital distributed the Informed 365 Modern Slavery Risk Assessment Survey to 926 suppliers, with 164 completed and 120 in progress as of December 2020. We plan to continue and expand distribution of these surveys to select suppliers in 2021.

## Our actions

### Investment management

As a global investment company, AMP may be at risk of being directly linked to modern slavery through our investment activities and relationships with external fund managers. AMP Capital is the appointed asset manager for the majority of client funds in the group. Clients also have access to a range of investment options through

external fund managers and AMP is working to assess the relevant risks of being directly linked to modern slavery through these relationships.

AMP Capital is committed to integrating ESG considerations into our investment decisions to protect and create long-

term value for investors. Modern slavery is considered a human rights issue and is managed across asset classes through the [AMP Capital ESG Investment Philosophy](#) and [AMP Capital's Position on Modern Slavery](#). The nature of modern slavery risks differs across asset classes and our actions for 2020 are detailed below.

### Public markets – engagement

AMP Capital's Sustainable Investment team believe that responsible investment extends beyond the investment decision itself and encompasses active ownership. Through considered voting and constructive engagement with companies the team strive for better long-term investment and societal outcomes. On behalf of several key funds, the team has engaged with companies to encourage them to:

- ensure they have the appropriate internal governance structure to deal with modern slavery risk management
- aim to consolidate their supply chain which will allow them more influence and oversight capabilities
- train employees to recognise modern slavery especially those in procurement and supply chain functions and build awareness throughout the organisation
- enhance their reporting of suppliers and ethical sourcing to board and management.

In 2020, the Sustainable Investment team engaged with 15 publicly listed Australian companies on human rights and 12 specifically on modern slavery. We plan to continue these actions in 2021.

### Real assets – infrastructure

While AMP Capital does not manage the day-to-day operations of the infrastructure assets that our funds and clients invest in, we have governance rights over many of these assets by nominating key employees and advisers to the asset company boards.

We use this board representation to influence asset companies to maximise value and mitigate risk, including risk of modern slavery within an asset's supply chain or operations. The infrastructure industry is a key focus area due to sector-specific risks and the influence we can have to improve practices.

Given the diversity of our infrastructure portfolios by size, sector and lifecycle, our focus is on equipping our nominee directors to drive influence across our infrastructure investments. To support this initiative, a standardised annual infrastructure due diligence process has been developed, to monitor the progress of modern slavery mitigation in our asset companies over time.

In 2020, our Infrastructure Equity team attended specialised training and awareness sessions focused on modern slavery legislation across relevant jurisdictions, the legal obligations of directors and due diligence processes. We plan to continue these actions in 2021.

### External fund managers

As part of developing investment strategies, our investment teams across our asset ownership, asset management and advice activities have important relationships with external fund managers. We have developed due diligence questionnaires and processes for onboarding new fund managers and assessing our existing relationships to understand how underlying managers are managing risks of modern slavery in their own business and investment strategies. These include:

- issuing due diligence questionnaires to AMP Capital's external fund managers
- issuing due diligence questionnaires for our platforms and approved investment options for Advice clients, including MyNorth.



## Our actions

### Capital flows and transactions

As a large financial services institution, AMP and its business activities are subject to anti-money laundering and counter terrorism financing laws and regulations.

We have a dedicated Financial Crime Compliance team who maintains the policies and standards and provides advice and oversight for ensuring compliance with these laws. The team also acts as the interface with law enforcement as modern slavery is a criminal offence in Australia and in many jurisdictions overseas and therefore may be a predicate offence to money laundering.

In 2020, our Financial Crime Compliance team engaged with industry working groups to establish effective interfaces with law enforcement and regulators in relation to suspected instances of modern slavery.

### Industry engagement and partnerships

Modern slavery is a broad, complex issue that spans industry sectors, and markets in which we invest around the world. AMP is engaged with a number of industry bodies, contributing to insights, developing best practices and sharing resources in order to have a meaningful impact on reducing risks of modern slavery within our sphere of influence. Our current industry collaborations include:

- Property Council of Australia (PCA)
- Cleaning and Accountability Framework (CAF)
- Financial Services Council (FSC)
- Responsible Investment Association of Australia (RIAA)
- Australian Banking Association (ABA).

### Responding to COVID-19

COVID-19 has presented global challenges to our business and AMP recognises that disruptions to services and supply chains can exacerbate risks of modern slavery. In 2020, AMP has worked with our service providers and partners to maintain critical services and deliver for clients. We have mobilised and enabled remote working with our major service providers, including offshore partners, to maintain services and people safety. This has supported employment in communities during these periods of economic disruption.

The disruption to our business has not significantly impacted our ability to deliver our planned actions for 2020. Training sessions have largely moved online and we continue to monitor and assess our execution and delivery risk within the Modern Slavery Working Group.

## Performance and metrics

Figures as at 31 December 2020 unless otherwise specified.

Focus area	2020
<b>Training and awareness</b>	
Employees completed online awareness training	2,030
<b>Supply chain</b>	
Suppliers screened by group procurement team	514
Suppliers in higher-risk sectors and geographies	7
Questionnaires issued to suppliers in real estate activities	964
Completed questionnaires	164
Questionnaires in progress	120
<b>Investment activities</b>	
Companies engaged on human rights and modern slavery	15
External fund managers screened in AMP Capital	130
Number of infrastructure asset due diligence checks completed	46
<b>Grievance mechanisms and remediation</b>	
Number of confirmed instances of modern slavery reported	0

The AMP modern slavery statement has been approved by the AMP Limited Board.



**Francesco De Ferrari**

Chief Executive Officer and Managing Director, AMP Limited

## Future focus

Activity	Planned actions for 2021
<b>Operations and employees</b>	<ul style="list-style-type: none"> <li>– Continue to roll out online awareness training to all employees</li> </ul>
<b>Supply chain</b>	<ul style="list-style-type: none"> <li>– Continue to monitor and map modern slavery risks across our supply chains</li> <li>– Continue to roll out contract clauses to new suppliers and contract renewals for existing suppliers</li> <li>– Strengthen corrective and remediation processes based on risk profiles and developing industry guidance</li> <li>– Update outsource guidelines and information for our aligned advice network</li> </ul>
<b>Investments</b>	<ul style="list-style-type: none"> <li>– Engage external fund managers (EFMs) on modern slavery due diligence questions to both our onboarding process for new EFMs as well as conducting risk assessment through our well-established assurance process with our existing fund managers</li> <li>– Continue to engage at risk companies and advocate for action on human rights and modern slavery</li> </ul>
<b>Industry</b>	<ul style="list-style-type: none"> <li>– Take active leadership in industry forums to engage high-risk sectors to affect systems-level change</li> </ul>
<b>Reporting</b>	<ul style="list-style-type: none"> <li>– Strengthen performance metrics and KPIs to ensure measurable outcomes from our actions, in line with developing industry frameworks and guidelines</li> </ul>

## Appendix

### This statement has been prepared to comply with reporting requirements under the Australian and UK modern slavery acts.

#### Reporting entities

AMP Limited  
 AMP Financial Investment Group Holdings Limited  
 AMP Bank Limited  
 AMP Group Holdings Limited  
 AMP Group Services Limited  
 AMP Services Limited  
 AMP Holdings Limited  
 National Mutual Funds Management Ltd  
 AMP Wealth Management Holdings Pty Ltd  
 AMP Advice Holdings Pty Ltd  
 AMP Financial Planning Pty Ltd  
 Charter Financial Planning Limited  
 AWM Services Pty Ltd  
 NM Superannuation Pty Ltd (The Superannuation Trustee)  
 ipac Asset Management Limited  
 NMMT Limited  
 AMP Capital Holdings Limited  
 AMP Capital Investors Limited  
 AMP Capital Investors International Holdings  
 AMP Capital Investors (UK) Limited  
 AMP Capital Funds Management Limited

#### The table below outlines how this statement complies with the criteria of the Australian and UK legislation:

Modern Slavery Act reporting requirement (Aust)	Modern Slavery Act (UK)	2020 modern slavery statement
Identify the reporting entity	Detail the organisation's structure, business and supply chains	pages 1–2
Describe the reporting entity's structure, operations and supply chains	Detail the organisation's structure, business and supply chains	pages 1–3
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Describe the parts of its business and supply chain where there is a risk of slavery and human trafficking taking place and the steps taken to assess and manage that risk	pages 5–8
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	Provide information about: <ul style="list-style-type: none"> <li>– its policies in relation to slavery and human trafficking</li> <li>– its due diligence processes</li> <li>– the provision of training on modern slavery and trafficking to its staff.</li> </ul>	pages 5–8
Describe how the reporting entity assesses the effectiveness of these actions	Detail key performance indicators to measure effectiveness of steps being taken	page 9
Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	N/A	page 5 (Governance)
Provide any other relevant information	N/A	pages 5, 9–10

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AMP Limited ABN 49 079 354 519  
Unless otherwise specified, all amounts  
are in Australian dollars.

