

## **Modern Slavery Act Statement**

**We believe we have a responsibility to ensure that our business is conducted in an ethical way and we actively address social issues.**

**This statement sets out the approach taken by Nomura Asset Management U.K. Limited during the financial year ending 31 March 2022 towards identifying and preventing modern slavery and human trafficking in its business and supply chains, as required under the UK Modern Slavery Act 2015 (the “Act”).**

### **Organisational structure**

Nomura Asset Management Co., Ltd (‘NAM’) is a leading global investment manager for some of the world’s largest institutional investors, and has its headquarters in Tokyo, with overseas subsidiaries in London, Singapore, Kuala Lumpur, Hong Kong, New York, Frankfurt, Shanghai and Taipei. NAM is 100% owned by Nomura Holdings Inc., which is the ultimate holding company of the Nomura Group.

Nomura Asset Management U.K. Limited (‘NAM UK’) is one of the NAM subsidiaries, based in London. NAM UK manages assets for corporate and state pension schemes, sovereign wealth funds and financial institutions including insurance companies, mutual funds and private banks. We provide a wide range of innovative strategies including single country, regional and global equity products, fundamental index solutions and global fixed income strategies.

### **Business and supply chains**

NAM believes in the regional management of investment portfolios, which results in numerous cross border delegation arrangements whereby the local office delegates the management of non-regional mandates to the relevant regional entity.

NAM UK is responsible for the management of global equity and fixed income mandates for clients based in both the EMEA region and beyond. This includes a large proportion of Japanese domiciled funds for which we have been appointed as the sub investment adviser. In reverse, clients with Japanese equity mandates, for example, have the management of their portfolios delegated to the NAM investment team in Tokyo, with Pacific Basin equities managed by the offices in Singapore / Hong Kong. In each case, a sub advisory agreement with the relevant NAM office is entered into.

Other suppliers may include parties with whom NAM UK has entered into a distribution or similar agreement, to distribute our products and services, business outsourcing contracts for investment administration and IT services, and other ancillary services such as disaster recovery and business continuity, data provision and maintenance, as well as other IT and general service providers.

We share our office in London with Nomura International plc (‘Nlp’), although NAM UK is an entirely separate entity. Nlp is responsible for procurement of shared services and amenities such as premises, Human Resources and the staff restaurant, and is part of the wider Nomura Europe Holdings plc group which produces its own Modern Slavery Act statement.

### **Risk assessment and due diligence**

NAM UK business and supply chain contractual arrangements are subject to a thorough due diligence process, both before the business relationship commences and on an ongoing basis. This includes a risk assessment which takes account of the type of service to be provided, the jurisdiction of the counterparty and its regulatory status if appropriate, and any conflicts of interest which may arise. We may also use input from global resources and bodies such as the Financial Action Task Force, Transparency

International and third party screening services with links to global sanctions and watchlists, Politically Exposed Persons databases and adverse media screening facilities.

### **Our response to the Modern Slavery Act**

Our analysis suggests that the nature of NAM UK's service offering and that of its contractual counterparties means the risk of involvement in modern slavery and human trafficking is low, and we believe we do not currently have any third party relationships which raise any issues or concerns in this area. Nevertheless, we have a process to assess any potential modern slavery risks presented by new suppliers, and have taken steps to strengthen our third party service provider framework by creating a full inventory of our outsourced and service provider companies, a company policy and oversight committee.

Our Modern Slavery Act statement is available on our website and also the UK Government's Modern Slavery Registry (<https://modern-slavery-statement-registry.service.gov.uk>) and TISCREport (<https://tiscreport.org>), enabling our practices to be made known to the wider public.

The Board of NAM UK will regularly review the procedures we have in place to ensure NAM UK's continued compliance with the requirements of the Act.

### **Staff awareness training**

During the last 12 months, staff received 'in person' awareness training from a leading UK law firm, on the Modern Slavery Act 2015 and the processes and controls NAM UK has in place to comply with it.

NAM UK has a whistleblowing policy through which staff may report any concerns of malpractice without fear of recrimination. An independent reporting service is also available to staff wishing to make an anonymous report.

**The statement has been approved by the Board of Directors of Nomura Asset Management U.K. Limited on 28 September 2022.**

**Dr Constant Eduard Maria Beckers  
Chairman of the Board of Directors  
Nomura Asset Management U.K. Limited**