

# Anti-slavery and human trafficking statement

At IFM Investors, we are committed to preventing acts of modern slavery and human trafficking from occurring within our business and supply chain, and impose the same high standards on our suppliers.

December 2019

We are focused on investment returns over the long term, but making sure that we achieve these returns in a way that is socially responsible and ethical.

Our approach to responsible investment is closely aligned with the United Nations Global Compact, which enjoys global consensus and supports a set of core principles in human rights – including to ensuring companies are not complicit in human rights abuses, or deprivation of liberty.<sup>1</sup> The Compact focuses on labour standards, and demands an end to child labour and the elimination of all forms of forced and compulsory labour.

We believe only a strong and inclusive society can provide future investment growth, and we focus on what upholds human rights and gives workers a safe place to work.

When we invest in an asset, or make a significant investment in a company, our due diligence process includes an assessment against the GRI Human Rights Performance Indicators.

IFM Investors further conducts its own business activities in accordance with the beliefs and approach set out above, running periodic reviews against the OECD Guidelines for Multinational Enterprises as it relates to human rights.

## 1.1 Statement for financial year 2018/19

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 (UK) and sets out the steps that IFM Investors has undertaken to ensure that modern slavery and human trafficking is not taking place within our business or supply chain. IFM Investors Pty Ltd has an annual turnover in excess

of £36m and this statement is published on behalf of IFM Investors Pty Ltd and its wholly owned subsidiaries that are within the scope of the Act including IFM Investors (UK) Ltd.

## 1.2 About IFM Investors

IFM Investors is an Australian headquartered, investor-owned, global investment manager with over A\$140 billion (£77.5bn, converted at 0.5534 rate) of funds under management as at 30 June 2019. Established over 20 years ago and owned by 27 Australian superannuation funds, we have investment teams based in Melbourne, Sydney, London and New York that manage institutional strategies across infrastructure, debt investments, listed equities and private equity.

Further information about the nature of our business, can be found on our website at [www.ifminvestors.com](http://www.ifminvestors.com).

## 1.3 Policies

As part of our commitment to combating modern slavery, we have reviewed the following policies and procedures in-year and updated these, where appropriate, to include references to and consideration of the Modern Slavery Act 2015 (UK):

- IFM Group Corporate Environmental Social & Governance Policy (updated 15 March 2019);
- IFM Group Policy for the Engagement of External Advisors (updated 2 August 2018);

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<sup>1</sup> Universal Declaration on Human Rights, on which the UN Global Compact is based, states as Article 3: "Everyone has the right to life, liberty and security of person."

” Additionally, the following policies are maintained and ensure that appropriate due diligence and consideration of Modern Slavery risks is undertaken in engaging with third parties:

- IFM Group Outsourcing Policy (updated 8 May 2018);
- The following policies and procedures also remain relevant to ensure we have mechanisms in place to identify and remain compliant with the requirements of the Modern Slavery Act 2015 (UK):
- IFM Group Whistle-blower Policy; and
- IFM Group Recruitment and Retention Policy.

## 1.4 Our Suppliers

IFM Investors' primary business is investment management on behalf of like-minded institutional investors and we work with a range of suppliers who provide us with financial and professional services, technology and premises. Given the nature of our business, we consider the risk of modern slavery to be low.

We undertake or have undertaken the following actions to ensure that we manage this risk exposure and deem these appropriate to the level of risk:

- As part of IFM Investors' supplier selection process, factors such as a supplier's resources, feedback from parties with prior dealings with them (if available) and reputation are considered prior to engaging a supplier. Additionally, our main outsourced service providers are reviewed periodically and other suppliers' conduct monitored on an ongoing basis;
- As part of our efforts to reduce the risk of slavery and human trafficking occurring within our supply chains, we make sure our suppliers are aware of our position and adhere to the same high standards when it comes to preventing acts of modern slavery and human trafficking;
- We have evaluated the nature and extent of our exposure to the risk of modern slavery occurring in our supply chain and have reviewed our suppliers to determine alignment with our standards. Where we find evidence of a failure to adhere to the same standards, we will take appropriate action by seeking to terminate our relationship with the relevant supplier, or working with the relevant supplier to uplift their standards and processes to minimise or eliminate all known modern slavery risks;

- We have reviewed updated guidance on our reporting obligations as set out in section 54 of the Act as released by the UK Government to ensure we meet the requirements; and we have news and media alert services in place such that we can monitor and track any developments to our key suppliers that may indicate modern slavery and human trafficking risks.

Specifically, during 2018/19 we performed a desktop review of our material suppliers by value and industry of operation to determine if there were any known issues or controversies arising in respect of modern slavery in the period. No issues were identified from this review.

## 1.5 Training

Employees are encouraged through our whistle-blowing policy to identify and report any concerns that could affect the wellbeing and best interests of IFM Investors and its stakeholders including employees and investors. This would include any concerns about modern slavery and human trafficking by our suppliers.

This statement was approved by the Board of Directors on 20 November 2019.



**Greg Combet**  
Chair, IFM Group Board  
12 December 2019



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