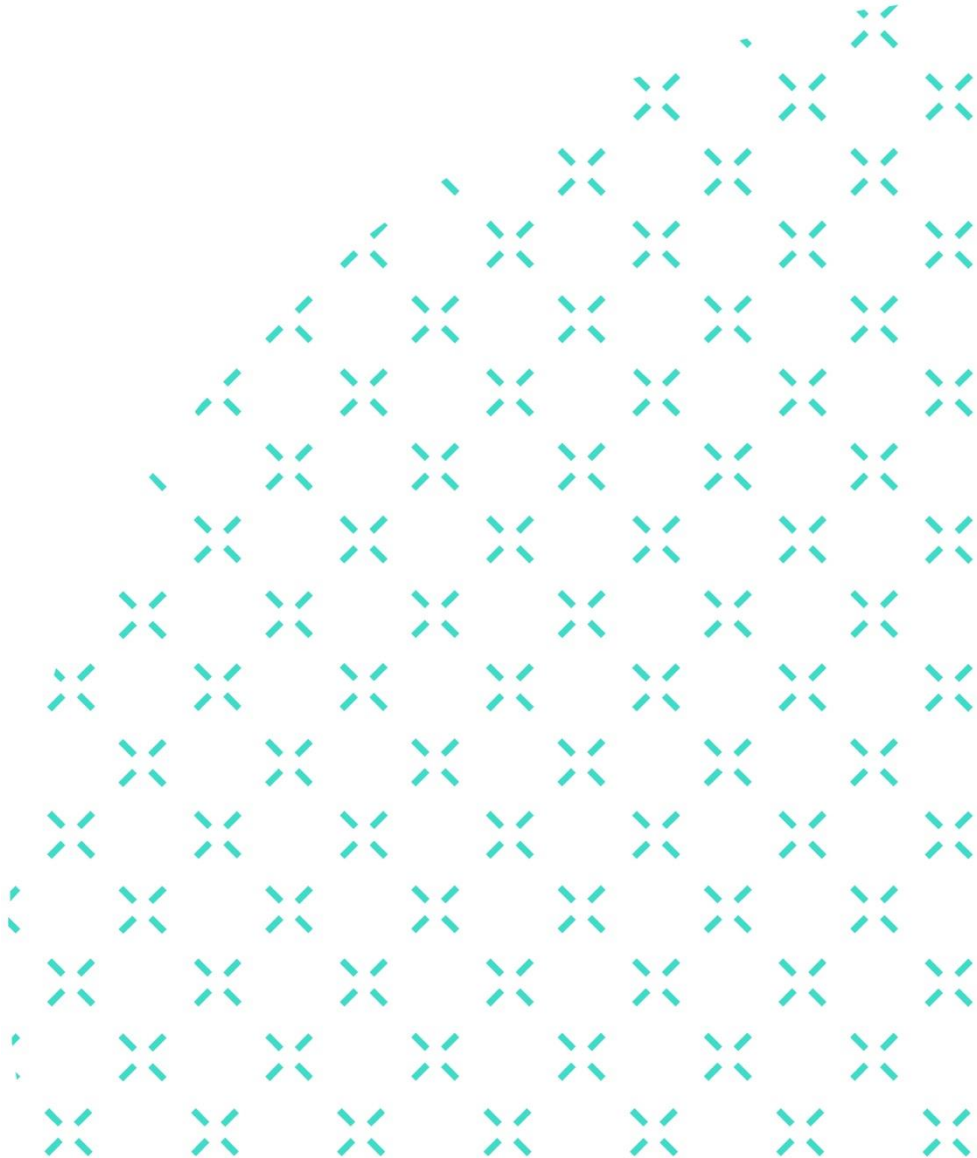


Group Human Rights Policy



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Introduction

Objective and rationale for the policy

This policy helps to express the commitment of St. James's Place plc (SJP) as the parent of the Group and all subsidiaries in the Group, to meet its responsibility to respect internationally recognised human rights standards. This includes the rights set out in The Universal Declaration of Human Rights, The International Covenant on Civil and Political Rights, and The International Covenant on Economic, Social and Cultural Rights, or more commonly referred to collectively as the International Bill of Human Rights, and the principles concerning fundamental rights set out in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

As set out in the UN Guiding Principles on Business and Human Rights, all companies have a responsibility to respect human rights, which means avoiding infringing on the human rights of others and to address any impacts if they occur. When SJP became a signatory to the United Nations Global Compact (UNGC) in 2020, we committed to integrate the Ten Principles of UNGC into our business strategy, culture, and daily operations. These are:

- Human Rights Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and
- Human Rights Principle 2: make sure that they are not complicit in human rights abuses.
- Labour Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- Labour Principle 4: the elimination of all forms of forced and compulsory labour;
- Labour Principle 5: the effective abolition of child labour; and
- Labour Principle 6: the elimination of discrimination in respect of employment and occupation.
- Environment Principle 7: Businesses should support a precautionary approach to environmental challenges;
- Environment Principle 8: undertake initiatives to promote greater environmental responsibility; and
- Environment Principle 9: encourage the development and diffusion of environmentally friendly technologies.
- Anti-Corruption Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

This also includes contributing to United Nations goals, particularly the Sustainable Development Goals. We actively participate in the UNGC and our commitment to embedding the above principles is confirmed by our CEO annually.

Scope

This human rights policy is applicable to all SJP's own workforce and workers in our subsidiaries. It is also provided, as a measure of our expectations, to our value chain - through our network of advisers and their support staff, suppliers and outsourcers, third-party contractors, product providers and fund managers.

Policy Statement

Our Commitment

We commit to respect all internationally recognised human rights standards, in particular the rights set out in the [International Bill of Human Rights](#) and the principles concerning fundamental rights set out in the [International Labour Organisation's Declaration on Fundamental Principles and Rights at Work](#).

SJP's Human Rights Priority Areas

While SJP respects all internationally recognised human rights, based on SJP's business model we have identified aspects to be more salient than others. Salient human rights issues are defined by the UN Guiding Principles on Business and Human Rights (UNGPs) as 'the human rights that are at risk of the most severe negative impacts through a company's activities or business relationships.' SJP's main potential negative impacts relate to equal treatment and opportunities for all, and working conditions such as work-life balance.

We recognise the role that everyone in our organisation plays in preventing human rights abuses and work to increase awareness, educate and empower our people to play their part. We will keep all human rights under regular review, and we acknowledge that SJP's salient human rights impacts may change as initiatives are delivered and the company evolves over time.

Our Expectations

Our Business Operations

SJP expects our employees and those in our value chain to respect human rights. As a minimum we expect all workers to be provided with wages, benefits and working conditions that are fair and in accordance with internationally recognised labour standards and the laws of the countries in which we operate.

SJP's business operations have an international footprint with offices across the United Kingdom alongside Singapore, Dubai, Hong Kong, and the Republic of Ireland. The UN Guiding Principles on Business and Human Rights sets out that the corporate responsibility to respect human rights exists independently of States' human rights duties. This means that businesses have the responsibility to respect international human rights standards regardless of where they are operating and the local practices e.g. some jurisdictions may have State imposed forced labour.

SJP recognises that our responsibility to respect human rights is applicable to all our offices and we apply the same approach to human rights in all jurisdictions in which we operate. Should conflicts arise between international human rights principles and applicable host-government legal requirements we will look to engage and influence on the topic of human rights.

Our Suppliers, Outsourcers and Product Providers

Human rights are considered as part of our due diligence process. Where a third party does not meet our expectations and is considered not to be within SJP's risk appetite¹, if suitable mitigations cannot be agreed upon, it may result in termination of the engagement with the third party. More information on our approach can be found in our [Modern Slavery Statement](#).

Our Fund Managers²

We expect the managers of our funds to consider financially material environmental, social and governance (ESG) factors in their investment and engagement processes where possible. Human rights considerations are included in our annual assessment of fund managers. Where we identify room for improvement, we engage with the fund manager and set specific milestones and timeframes for change.

Our engagement partner, Robeco, supplements the activities of our fund managers, by engaging with companies in which our fund managers invest, on a range of key ESG issues, including social themes related to human rights. More information in our [Stewardship and Engagement Report](#).

Remediation and Escalation Process

If any human rights issues arise in our business or direct supply chain, the relevant subject matter experts will work actively with the relevant business area, and accountable persons within it, to address them. Where it is identified that SJP has caused or directly contributed to adverse human rights impacts, we will engage in appropriate remediation processed by ourselves or in cooperation with other stakeholders. We continue to build awareness and knowledge of employees and the wider SJP community on human rights, including labour rights, encouraging them to speak up without the fear of retaliation about concerns they may have.

If anyone has any concerns or believes that someone connected to SJP is violating an individual's human rights, this Human Rights Policy, or the law, they are asked to report it immediately. This can be done through one of the reporting channels outlined in the [Speak Up Policy](#) or by directly contacting us at whistleblowing@sjp.co.uk.

Reporting

SJP will hold itself to account for its responsibility to respect human rights through its annual reporting, including the United Nations Global Compact Communication on Progress, the Modern Slavery and Human Trafficking Statement and the Annual Report and Accounts which has a dedicated section focused on SJP's approach to Human Rights.

¹ Risk appetite is reviewed and approved annually by the SJP plc Board.

² Our expectations will differ slightly depending on the asset class.

Related Documents

This Human Rights Policy is supported by other company policies such as SJP's:

- [Modern Slavery and Human Trafficking Statement](#)
- [Investment Exclusions Policy](#)
- [Speak Up Policy \(Whistleblowing\)](#)
- [Stewardship Engagement & Shareholder Voting Policy](#)

Internal access only:

- Bullying and Harassment Policy
- Code of Ethics
- Equal Opportunities Policy
- Grievance Procedure Policy
- Health and Safety Policy
- Inclusion and Diversity Policy
- Leaver Policy
- Overtime Policy
- Recruitment Policy
- Supplier Code of Conduct
- Workplace Adjustments Policy

Glossary

Acronyms

- St. James's Place plc (SJP)
- United Nations Global Compact (UNGC)
- Environmental, social and governance (ESG)

Governance

Exceptions to the policy

No exceptions to this policy are anticipated.

Compliance with the policy

Non-compliance with this policy may result in disciplinary action, or termination of engagement.

Governance and Ownership

We understand that effective implementation of our approach to respecting human rights requires support and leadership from the highest levels of the business. Therefore, the Board of Directors of SJP plc approve our policy and the Executive Directors of each area of our business are responsible for its implementation.

- **Policy author** – Interim Head of Analysis and Reporting, Síle Veasey

- **Policy owner** – Chief Corporate Affairs Officer, Liz Kelly
- **Approval Committee(s)** – People Policy Change Board and Group Executive Committee (GEC).
- **Board Level Approval:** SJP plc Board
- Relevant subsidiary Boards will be asked to adopt the policy once approved by the SJP plc Board.

Due Diligence

This policy has been developed in consultation with a wide range of key internal stakeholders to ensure the content is up-to-date and accurate. This includes subject matter experts from the following teams: Company Secretariat, Group Expense Management, Internal Audit, Legal, Group Risk, Partner Services, Partnership Consultancy, People, Responsible Business, Responsible Investment and Third-Party Management Oversight. These teams have brought this policy to their respective Group Executive Committee member for oversight prior to approval.

Internal Audit

Internal Audit will review the implementation of this Policy when conducting relevant audits.

Document Control

Revision History

Version	Last Updated	By	Description
V1	November 2024	Responsible Business Team: Síle Veasey	New policy

Review / Distribution

Version	Date	Distribution	Feedback Noted
V1	19 November 2024	GEC Members	Not applicable

Sign-off / Approval

Version	Date	Distribution	Approval
V1	21 November 2024	SJP plc Board	Approved

Next Review Date

Version	Review Date	Approval Body
V2	November 2027	SJP plc Board