



Modern Slavery and Human Trafficking Statement 2022

Introduction

This statement is made by Quoniam Asset Management GmbH ("Quoniam" or "we") according to section 54 of the Modern Slavery Act 2015 acting through its UK branch and constitutes our Slavery and Human Trafficking Statement for the financial year ended 31 December 2021.

Quoniam is committed to taking steps to ensure that human rights abuses in any way are recognised and eradicated in our business and supply chains.

Our Business

Quoniam is a leading active quantitative asset manager providing customer-oriented investment solutions for institutional clients by leveraging science and modern technology. Our product range covers equities, fixed income and multi-asset strategies. We service our clients from offices in Frankfurt and London. We manage around EUR 25 billion for investors in Germany and abroad.

Quoniam is an independently operating asset manager with the freedom to devise creative solutions. As a member of Union Investment Group, our entrepreneurial freedom rests on a solid foundation. With over 130 experienced professionals, we are focused on providing our clients with successful investment solutions.

We promote sustainable investments and are committed to the Principles of Responsible Investment (PRI). Quoniam is a signatory of the United Nations' PRI initiative since 2012. We have achieved an A score in all the asset classes we reported on in the latest PRI Transparency Report, and in the Strategy & Governance chapter, Quoniam even achieved the highest possible score of A+.

Quoniam is registered in Germany as an investment firm with the German Federal Financial Supervisory Authority (Bundesanstalt für Finanzdienstleistungsaufsicht - BaFin) under section 15 of the German Securities Institutions Act (Wertpapierinstitutsgesetz, WpIG).

Concerning our London branch, we are subject to limited regulation by the Financial Conduct Authority (FCA) – FRN 582571.

In the UK, we run a branch offering dedicated sales and client services to international institutional clients.

Risk Assessment

We believe that the risk of modern slavery within our business and supply chains is relatively low as we are operating in the financial service sector, employ predominantly high-skilled people and engage suppliers mainly for data delivery, software and hardware products and office supplies. Despite the perceived low risk we have implemented several measures to manage the remaining risks carefully.

Policies and Commitment

We are aware of our responsibility towards society, our clients and all employees. We believe that good ethics and integrity are fundamental requirements of the investment profession. For this reason, we have documented our core values in our purpose statement: We exist to add value for our multiple current and future stakeholders – clients, employees, shareholders, wider society, and the planet– as these are all interconnected. While we recognise that our primary duty is to our clients, we firmly believe that their interests are best served by having a sustainable system as a whole. We want Quoniam to be a great diverse place to work where all employees feel included, are passionate and engaged.

We live and respect these values in our dealing with investors, clients, business partners and society at large; and do not tolerate any act of discrimination, harassment or victimisation.

Quoniam has established procedural controls for its conduct of business and developed a formalized set of policies and procedures that describe the appropriate methodology for operations in all lines of business. Such policies and procedures ensure compliance with the full range of applicable laws, regulations and industry standards. We are reviewing our policies to include, where appropriate, commitments addressing slavery and human trafficking considerations in our business activities, supply chains and investment decisions.

Quoniam has an established whistleblowing policy and fosters an open compliance culture. We encourage our employees, clients and business partners to report any concerns.

Investment Process

We strongly believe that environmental, social and governance (ESG) considerations should be part of every investment process. Our approach to sustainable action in the investment process is set out in our Responsible Investment Policy (RIP), which complements other conventions that we apply, i.e. the BVI Rules of Conduct, the German Corporate Governance Code, OECD Guidelines for Multinational Enterprises, UN Guiding Principles for Business and Human Rights. Our GRIs affect all portfolios that we manage ourselves. Once appointed with a mandate having specific requests, we work towards ensuring that the principles of our RIP are included into that management.

We are convinced that the most credible way to analyse the sustainability of an investment is through a transparent and objective process that considers a breadth of high-quality data that has withstood our research process. Therefore, we use and integrate a wide range of various data sources on sustainability which we can process in our quantitative investment platform.

Please refer to our Responsible Investment Policy for further information.

Supplier Due Diligence

We expect our suppliers to uphold the same ethical values as we do. Therefore, we perform supplier due diligence and collect information regarding compliance with sustainability standards (e.g., duty to pay the statutory minimum wage). In addition, we have a dedicated Money Laundering and Reporting Officer and Compliance Office. Both remain alert to the risk of Financial Crime and the risk of Modern Slavery.

In case we become aware of non-compliance, we will take appropriate measures, including rejection or termination of any contract with such supplier.

Training and Awareness:

Quoniam will use its internal communication vehicles to raise awareness of modern slavery and human trafficking risks.

Approval Procedures

This statement has been approved by Quoniam's Management Board in July 2022.

A handwritten signature in blue ink, appearing to read 'Nigel Cresswell'.

Nigel Cresswell

CEO

A handwritten signature in blue ink, appearing to read 'Silke Weiser-Walther'.

Silke Weiser-Walther

CCO & CFO