

# Modern Slavery and Human Trafficking Statement 2024

## 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 2023.

Quoniam is committed to respecting the human rights of its employees through our internal employment policies and procedures and to respecting local laws and regulations dealing with human rights.

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

## Branch structure, business, and supply chains

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 20 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 120 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, Quoniam is authorised for specific activities and product types by the Financial Conduct Authority (FCA) – FRN 966627.

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

Quoniam is committed to holding itself and its suppliers to high standards of business conduct, integrity and to be free from any slavery and human trafficking. Due to the nature of our business and operations in the UK, the Firm is at low risk of exposure to these issues and our supply chain is not complex.

## 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 services 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.

Our major suppliers and contractual arrangements with them are reviewed to ensure they continue to have sufficient procedures in place against slavery and human trafficking in their business or supply chain.

We strive to maintain practices and policies that fulfil the Firm's commitment to protecting against modern slavery and human trafficking. We understand that this must be a continuing effort, with ongoing work to reassess our practices in place and our overall approach in light of any changing global circumstances. As part of our process to report on our efforts, we assess our policies and practices related to modern slavery and human rights and are committed to engaging with stakeholders on these important topics.

### **Training**

Where relevant to their line of business and function, employees receive training on policies and procedures that pertain to products and services we provide to our clients. This includes training on the ethical principles in our Code of Conduct as well as the firm's Anti-Bribery and Corruption, AML and KYC policies and practices. All newly hired employees will undergo training and current employees are assigned training on an ongoing basis.

The Branch employees received its annual compliance training in November 2023, where Modern Slavery and Human Trafficking was included.

### **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 formalised 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. All employees of the UK Branch are required to read these policies and attest annually that they understand them and will act in line with the core values and ethics of the business.

Quoniam has an established whistleblowing policy and fosters an open compliance culture. We encourage our employees, clients, and business partners to report any concerns. If we become aware of any allegations of modern slavery or human trafficking activities against any of our suppliers, we will take appropriate action depending on the nature of the incident. This may include engaging with the supplier to ensure they investigate the issue, accessing victim support to protect any modern slavery victims and reporting it to the authorities where appropriate.

### **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, for example, 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.



nigel.cresswell@quoniam.com, Oct 14, 2024 12:14:34 PM UTC

**Nigel Cresswell**  
CEO

### **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* (for example, duty to pay the statutory minimum wage). In addition, we have a dedicated Money Laundering and Reporting Officer and Compliance Officer. 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.

### **Approval Procedures**

This statement has been approved by Quoniam's Management in October 2024.



Silke.Weiser-Walther@quoniam.com, Oct 14, 2024 09:16:20 AM UTC

**Silke Weiser-Walther**  
CCO & CFO