



Modern Slavery Act Statement

Capital Group UK Management Company Limited
Capital International Limited
Capital Research Company (UK Branch)

2024

Introduction

This statement is issued in accordance with section 54(1) of the Modern Slavery Act 2015 and serves as the modern slavery and human trafficking statement for Capital International Limited, Capital Research Company (UK Branch), and Capital Group UK Management Company Limited (collectively, the “**UK entities**”) for the financial year ending 30 June 2024. The UK entities and their affiliates collectively are referred to as “**Capital Group**.”

The UK entities have their registered offices at 1 Paddington Square, London, W2 1GL, and all three are regulated by the UK Financial Conduct Authority.

Capital Group is committed to preventing modern slavery and human trafficking within our operations and supply chains. We recognise our responsibility to remain vigilant to any risks, however small, in our business and the wider supply chain.

Structure and Supply Chain

Capital Group is an international investment research and management organisation serving institutional and private investors through our dedicated investment professionals and support staff. The UK entities are part of Capital Group and are indirect wholly owned subsidiaries of The Capital Group Companies, Inc., headquartered in the United States of America.

Supply Chain

To deliver services effectively, Capital Group partners with a diverse range of third-party suppliers, who may further subcontract certain services to other providers. Additionally, there are functions that are outsourced to ensure efficiency and focus on core competencies.

The financial services sector in the United Kingdom is generally considered low risk for modern slavery and human trafficking. Therefore, Capital Group believe that the investment services we provide, as well as the supply chains of our goods and services suppliers, are unlikely to be affected by these issues. However, we recognise the potential for indirect impacts from modern slavery or human trafficking.

As a signatory of the United Nations Global Compact, Capital Group is committed to aligning our operations with the universal principles of human rights, labour, the environment and anti-corruption and is taking actions to advance these societal goals. We maintain a strict policy of transparency and ethical conduct, expecting all our suppliers to adhere to these standards. We do not knowingly engage with any business involved in modern slavery or human trafficking.

Due Diligence

To identify and mitigate the risks associated with suppliers, we have established comprehensive due diligence processes. We conduct risk assessments in the following instances: when engaging new suppliers, when there is a change in the relationship with an existing supplier, when there are material changes with an existing supplier, or during periodic reviews. In these cases, we assess supplier risk across various domains, including operational, data security, qualitative, and financial perspectives.

We expect suppliers to support and respect internationally proclaimed human rights and to make sure they are not complicit in human rights abuses. In addition, we expect suppliers to maintain a workplace that is free from unlawful discrimination and harassment for all employees. This includes:

- Complying with regulations that pertain to working hours, benefits and wages (such as minimum legal wages).
- Ensuring that supplier employees are provided with appropriate health and safety training, such as safe work practices and emergency preparedness in compliance with all applicable laws and regulations of the countries we serve.
- Refraining from exploitation such as slave, forced, bonded, indentured or prison labour and involvement in any human trafficking. For UK contracts, we include a specific clause on compliance with the Modern Slavery Act.

Capital Group encourages suppliers to notify Capital Group of any of its personnel's material deviation from its policies and procedures and, if requested by Capital Group, to use best efforts to provide corrective actions that are being taken to address such deviations. We define a material deviation as conduct that deviates from suppliers' policies and procedures that are similar to Capital Group's Supplier Code of Conduct and that could affect the ability of the supplier to provide the products or services to Capital Group and lead to regulatory, legal or ethical violations and reputational risks of Capital Group.

Our Approach

Recruitment

Capital Group is committed to maintaining a high standard of fairness in our employment practices. We conduct thorough background checks on all prospective employees to ensure they meet our organisation's standards. We comply with all relevant legislation, including the Equality Act 2010, which mandates equal pay for men and women performing the same or equivalent work.

Policies

Capital Group have implemented several policies to mitigate the risk of modern slavery within our operations and supply chains, including:

- **Capital Group's Code of Ethics:** All employees are expected to comply with the Code of Ethics, which sets out basic principles designed to guide our employees, officers, and directors. This includes promoting ethical behaviour, ensuring compliance with all applicable laws and regulations, and fostering a culture of integrity and accountability throughout the organisation.
- **Supplier Code of Conduct:** We require all suppliers to adhere to our standards regarding labour practices, including the prohibition of forced labour and human trafficking. This Code ensures that our suppliers uphold human rights and maintain fair labour practices across all jurisdictions.
- **Open Line:** Our employees have a responsibility to speak up and immediately report any illegal or unethical behaviour, such as modern slavery. We provide a free and confidential Open Line for them to do so, ensuring that concerns can be raised safely and addressed promptly. This system is designed to protect whistleblowers and encourage transparency within the organisation.

Responsible Investing

To Capital Group, successful investing means generating superior long-term outcomes for our clients. It is fundamental to what Capital Group stands for that we do this with integrity and in a sustainable way that benefits all our stakeholders. Therefore, responsible investing is central to our philosophy, integrating environmental, social, and governance (ESG) considerations to manage risks and achieve long-term outcomes. Our ESG Policy Statement and UK Stewardship Report highlight our commitment to transparency and proactive engagement with companies on governance issues. Through our Engagement Policy, we address ESG issues, including human rights risks, ensuring our investments align with our values. These mechanisms help us identify and mitigate potential human rights issues, promoting ethical conduct and transparency.

Monitoring

To ensure the effectiveness of our policies and procedures, we have established robust monitoring and reporting mechanisms. We conduct regular audits and monitoring to ensure compliance with our policies and regulations. Feedback from these audits, assessments, and reports is regularly reviewed to continuously improve our practices and promptly address any identified issues.

Training

Capital Group recognise the importance of training. Therefore, all new hires receive a Code of Ethics overview during their HR orientation. Furthermore, associates based in the UK that are subject to the Senior Managers and Certification Regime, receive training on the FCA Code of Conduct rules.

Review

Capital Group is committed to acting ethically and with integrity in all our business dealings. We will continue to review and improve our policies and practices to ensure that modern slavery and human trafficking do not take place in our operations or supply chains.

This statement has been approved by the respective boards of the UK entities and will be reviewed and updated annually.



Mr. Aaron Espin
Director for Capital International Limited
Governance Committee Member and Compliance Officer for Capital Research Company
(UK Branch)
11/11/2024



Mr. Fabrice Remy
Director for Capital Group UK Management Company Limited
11/11/2024