

## Modern Slavery Statement

### MODERN SLAVERY ACT TRANSPARENCY STATEMENT

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Modern Slavery Act transparency statement for Southeastern Asset Management, Inc. ("SAM").

### ORGANIZATIONAL STRUCTURE

SAM serves as an SEC registered investment advisor. The Company's primary customers are corporate and municipal pension plans, foundations, endowments, institutions and the Lingle family of 40-act mutual funds and Dublin-domiciled UCITS funds. The company is a Tennessee Corporation and has elected to be treated under Subchapter S of the Internal Revenue Code for federal income tax purposes. SAM is the 100% owner of Southeastern Asset Management International (UK) Limited (SAMI UK), Southeastern Asset Management International (Singapore) Pte. Limited (SAMI Singapore) and Lingle Management Company (Ireland) Limited.

### RISK ASSESSMENT

Because of the sector in which we operate and the locations of our operations, we believe that there is a relatively low risk of modern slavery and human trafficking. While we acknowledge that "increasingly complex and multi-tiered globalized supply chains, spanning multiple countries, now represent a potential site of risk for every multinational company"<sup>1</sup>, our suppliers are generally considered relatively low risk in terms of sector and location of operations. Many of our suppliers are professional services firms, including hosted and cloud-based technology solutions providers, banks, accountants and law firms. We also source services relating to, among others, leasing and office management, travel, catering, cleaning and printing.

### DUE DILIGENCE

We have sought and received confirmation from certain key existing suppliers - and we are in the process of working through this process with a number of other key suppliers - that neither they nor any company in their group has committed or been notified or placed under investigation for any offenses relating to modern slavery or human trafficking. We have further received confirmation, and are continuing this process with a number of other key suppliers, that none of these suppliers is aware of any circumstances within their supply chain that could

give rise to an investigation or a prosecution for any offenses relating to modern slavery or human trafficking.

We undertake due diligence prior to engaging any new supplier. We will ensure that each significant new supplier addresses the issue of modern slavery and human trafficking during our initial engagement process. We will also seek to ensure that relevant suppliers are obligated to inform us of any developments in respect of modern slavery or human trafficking either in their business or in their supply chain.

#### STAFF AWARENESS

We also provide relevant staff with training regarding the risks surrounding modern slavery and human trafficking in supply chains and the steps they should take to reduce those risks.

Ross Glotzbach

CEO, Southeastern Asset Management, Inc.

13 April 2021

<sup>1</sup> Forced Labour, Human Trafficking & the FTSE 100 – a Review of Company Disclosure and Recommendations for Investor Engagement