

MODERN SLAVERY STATEMENT 2021

1. INTRODUCTION

This Modern Slavery Statement (Statement) is made pursuant to section 54(1) of the U.K. Modern Slavery Act 2015 (Modern Slavery Act) and constitutes the “slavery and human trafficking statement” for the financial year ended December 31, 2021 (Reporting Period) for the following Northern Trust entities (together, the Reporting Entities):

- The Northern Trust Company (the Bank)
- Northern Trust Global Services Societas Europaea (NTGS SE)
- Northern Trust Management Services Limited (NTMSL)
- Northern Trust Global Investments Limited (NTGIL)

NTGS SE, NTMSL and NTGIL are indirect subsidiaries of the Bank, which itself is a subsidiary of Northern Trust Corporation (the Corporation). Except where the context requires otherwise, references to “the Bank”, “we”, “us”, “our” or similar terms means the Bank and its subsidiaries, including NTGS SE, NTMSL and NTGIL. References to “Northern Trust” in this Statement means the Corporation and all of its subsidiaries, including the Reporting Entities.

Wherever we operate, the Bank and all of its affiliates are committed to the highest standards of integrity, ethics and honesty. We firmly believe that all work should be performed voluntarily, without the use of slavery, servitude, forced or compulsory labor, or human trafficking, as defined in the Modern Slavery Act.

We take the risk of modern slavery occurring within our business or supply chain seriously, and view relationships with vendors as an opportunity to encourage behavior and practices that are consistent with our own ethical practices. Compliance with the Modern Slavery Act comprises part of our commitment to ethics and corporate social responsibility.

2. OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

A. OUR STRUCTURE

The Corporation is a leading provider of wealth management, asset servicing, asset management and banking solutions to corporations, institutions, families and individuals. The Corporation is a financial holding company conducting business through various U.S. and non-U.S. subsidiaries, including the Bank. At December 31, 2021, the Corporation had consolidated total assets of US\$183.9 billion and stockholders' equity of US\$12.0 billion.

The Bank is an Illinois banking corporation headquartered in Chicago and is the Corporation's principal subsidiary. Founded in 1889, the Bank conducts its business through its U.S. operations and its various U.S. and non-U.S. branches and subsidiaries, including the Bank's London Branch. At December 31, 2021, the Bank had consolidated total assets of US\$183.7 billion and common bank equity capital of US\$11.1 billion.

Northern Trust has a global presence with offices in 23 U.S. states and Washington, D.C., and across 23 locations in Canada, Europe, the Middle East, and the Asia-Pacific region. At December 31, 2021, Northern Trust had over 21,000 employees globally. Figure 1. shows our global locations.

CHART 1: NORTHERN TRUST LOCATIONS AS OF DECEMBER 31, 2021



* In the U.S., Northern Trust has offices in 23 states and Washington D.C. Its headquarters is located in Chicago, Illinois.

A large proportion of Northern Trust's employees around the world work in our business units to deliver our products and services – see the "Operations" section below. Our other employees provide support and expertise to the Bank in areas including risk management, compliance, technology, legal, finance, and human resources. The large majority of our employees are full-time, permanent employees in professional and desk-based roles.

B. OPERATIONS

Business Overview

Northern Trust focuses on managing and servicing client assets through two client-focused segments: Corporate & Institutional Services (C&IS) and Wealth Management. Asset management and related services are provided to C&IS and Wealth Management clients primarily by the Asset Management business.

C&IS is a leading global provider of asset servicing and related services to corporate and public retirement funds, foundations, endowments, fund managers, insurance companies, sovereign wealth funds, and other institutional investors around the globe. Asset servicing and related services encompass a full range of capabilities including but not limited to: custody; fund administration; investment operations outsourcing; investment management; investment risk and analytical services; employee benefit services; securities lending; foreign exchange; treasury management; brokerage services; transition management services; banking; and cash management. Client relationships are managed through the Bank and the Bank's and the Corporation's other subsidiaries, including support from locations in North America, Europe, the Middle East, and the Asia-Pacific region. At December 31, 2021, total C&IS assets under custody/administration, assets under custody, and assets under management were US\$15.18 trillion, US\$11.55 trillion, and US\$1.19 trillion, respectively.

Wealth Management focuses on high-net-worth individuals and families, business owners, executives professionals, retirees, and established privately-held businesses in its target markets. In supporting these targeted segments, Wealth Management provides trust, investment management, custody, and philanthropic services; financial consulting; guardianship and estate administration; family business consulting; family financial education; brokerage services; and private and business banking.

Wealth Management also includes Global Family Office, which provides customized services, including but not limited to investment consulting; global custody; fiduciary; and private banking to meet the complex financial needs of ultra-high-net-worth individuals and family offices across the globe. Wealth Management is one of the largest providers of advisory services in the U.S., with assets under custody/administration, assets under custody, and assets under management of US\$1.07 trillion, US\$1.06 trillion, and US\$416.1 billion respectively at December 31, 2021. Wealth Management services are delivered by multidisciplinary teams through a network of offices in 19 U.S. states and Washington, D.C., as well as offices in London, Guernsey, and Abu Dhabi.

Asset Management, through the Corporation's various subsidiaries, supports the C&IS and Wealth Management reporting segments by providing a broad range of asset management and related services and other products to clients around the world. Investment solutions are delivered through separately managed accounts, bank common and collective funds, registered investment companies, exchange traded funds, non-U.S. collective investment funds, and unregistered private investment funds. Asset Management's capabilities include active and passive equity; active and passive fixed income; cash management; multi-asset and alternative asset classes (such as private equity and hedge funds of funds); and multi-manager advisory services and products. Asset Management's activities also include overlay services and other risk management services. Asset Management operates internationally through subsidiaries and distribution arrangements and its revenue and expense are fully allocated to C&IS and Wealth Management.

Other Activities

Corporate Philanthropy is an important element of our business. Northern Trust undertook significant philanthropic works during 2021. Northern Trust is committed to creating more equitable opportunities to achieve long-term financial success for those who too often face unfair hurdles because of their race, ethnicity, gender, geography or socio-economic conditions. Deploying a long-term community investment strategy designed to drive individual advancement and broader wealth creation, we are focusing Northern Trust's resources, capabilities, and business expertise on four key areas of fundamental impact, namely food, housing, healthcare and education. These areas, when strengthened from the start, enrich our communities and the lives of everyone in them. In 2021, Northern Trust supported nearly 1,000 registered charities and non-governmental organizations across the globe with approximately US\$18.0 million to broaden opportunities. In the past decade, Northern Trust has donated over US\$160.0 million and provided over 1 million hours of volunteer time globally.

C. SUPPLY CHAIN

During the Reporting Period, Northern Trust engaged over 4,800 suppliers.¹ Its procurement spend totaled US\$2.5 billion. As the principal subsidiary of Northern Trust, the Bank's suppliers comprise the following broad categories:

- Professional service providers such as business and strategy consultants, recruitment agencies, legal counsel, and training and insurance providers;
- Suppliers supporting the Bank's client servicing requirements, including sub-custodians, brokers and distributors; and
- Other support service providers including information technology (IT), market data, communications equipment, software, utilities, catering, cleaning, security and office equipment suppliers.

Our suppliers range in size and include publicly traded organizations and privately owned firms. Our suppliers also have extensive global supply chains. A centralized procurement function manages procurement globally. Each of the Bank's branches and subsidiaries around the world engage a combination of local suppliers, domiciled in the jurisdictions where they operate, and global suppliers who often supply Northern Trust globally. Suppliers are on a combination of long term, short term and one-off contracts.

During the Reporting Period, the Bank licensed an automated supplier due diligence tool, *360 Third-Party Risk Management Platform* (Platform) from third party vendor, ethiXbase, to assess modern slavery risk in its suppliers. The Platform relies upon a modern slavery questionnaire (Modern Slavery Questionnaire), focused on five risk factors:

1. Jurisdiction
2. Industry
3. Product
4. Workforce characteristics
5. Risk-mitigating measures implemented by the supplier.

¹Where goods or services were provided by multiple subsidiaries within the same corporate group, the company at group level was counted once.

The analytics applied to the information gathered result in each supplier being assigned a modern slavery risk rating. For our 2021 pilot, we used the Platform to issue a Modern Slavery Questionnaire to suppliers of our Australian and U.K. offices (including local and global suppliers to these offices).

The broad geographic footprint of suppliers to the Bank's Australian or U.K. business is shown in Figures 2 and 3 below. The maps shown are based on the responses of those suppliers that completed the Modern Slavery Questionnaire. When suppliers of all of our locations are considered, the significant majority of our suppliers are based in the U.S.

FIGURE 2: RESPONDING SUPPLIERS (SUPPLIERS TO THE BANK'S AUSTRALIAN OR U.K. BUSINESSES) TO PILOT MODERN SLAVERY QUESTIONNAIRE
By country of registration (headquarters)

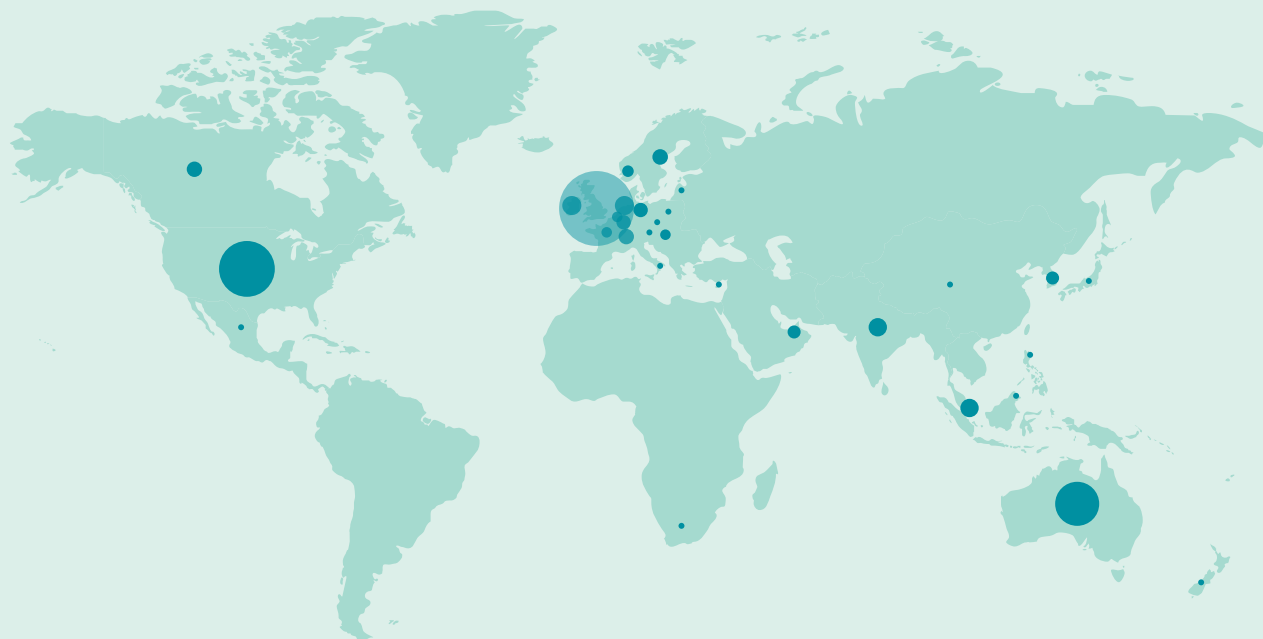
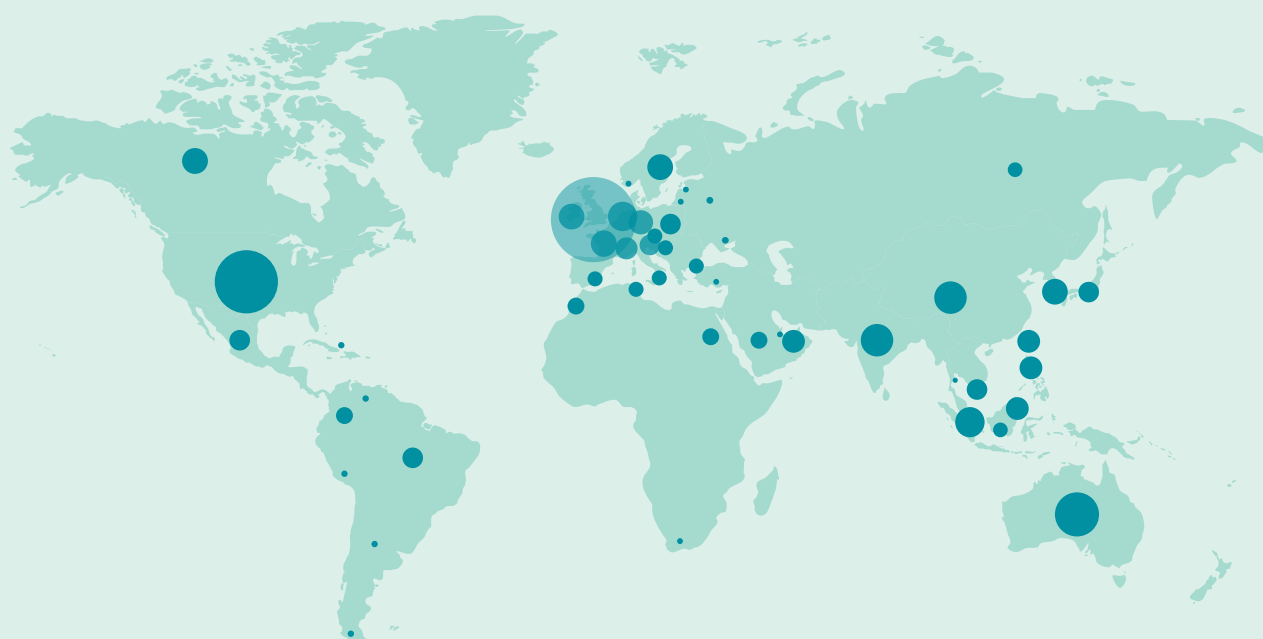


FIGURE 3: RESPONDING SUPPLIERS (SUPPLIERS TO THE BANK'S AUSTRALIAN OR U.K. BUSINESSES) TO PILOT MODERN SLAVERY QUESTIONNAIRE
Locations of global operations



3. MODERN SLAVERY RISKS IN OUR OPERATIONS AND SUPPLY CHAINS

A. RISKS IN OUR OPERATIONS

In terms of our own employees, we consider the risk of modern slavery occurring in our workforce to be low, given that the majority of our employees perform professional, desk-based roles. Further, in every jurisdiction in which the Bank has offices, the Bank complies with applicable laws, including regarding the right to work. This is prescribed and enforced through the policies detailed in the section below (*Actions to Assess and Address Modern Slavery Risks*). Except for a very small number of paid school interns, the Bank does not hire individuals under the age of 18 in any offices across the globe. This practice reduces the Bank's potential risks associated with child labor. Each employee must demonstrate they are entitled to work in the jurisdiction in which they are employed. A review of our Business Abuse and Employee Relations Hotline (Hotline) reports did not reveal any concerns regarding modern slavery.

As a large financial institution, the Bank, on behalf of clients, invests in portfolio companies, and provides financial, advisory and investment management services in multiple asset classes including infrastructure, private equity and real estate. Though modern slavery may occur in all sectors, we recognize the risks may be higher in asset classes such as infrastructure, manufacturing, mining and agriculture and food processing and in jurisdictions with a greater prevalence of modern slavery.

Northern Trust invests a portion of its balance sheet in short term deposits with Central Banks and other highly rated financial institutions globally. Northern Trust also invests in fixed income securities issued by governmental and other highly rated entities (typically A, AA and AAA rated). These investments do not represent equity ownership. However, as a fixed income investor, Northern Trust can still be linked to modern slavery risks through these investments. The vast majority of Northern Trust investments held on its consolidated balance sheets are in sectors that are considered to have a lower risk of modern slavery such as large Central Banks, U.S. Government and Agency, Non-U.S. Sovereign and sub-Sovereign, U.S. Municipalities, Supranational organizations, and private organizations in finance, insurance and real estate. From time to time, Northern Trust also seeds new investment vehicles to assist with the launching of new products.

As regards our clients, like all financial institutions, the Bank needs to guard against the risks of dealing in funds which may derive from criminal offenses including modern slavery. We meet this responsibility through implementing our Anti-Money Laundering (AML) and Know Your Client (KYC) policies.

In regards to the above descriptions of risks and the mitigating measures in place (described in further detail in section 4), we consider that the Bank has a low risk of causing or contributing to modern slavery through our operations. However, there may be some risk of being linked to modern slavery through the actions of third parties via investments and clients.

B. RISKS IN OUR SUPPLY CHAIN

Across our global supplier base, we consider the risk of modern slavery to be lower among our suppliers engaged in professional services, financial and insurance services, information media and communications, and computer system design and related services.

We recognize that the risks are inherently higher in relation to suppliers with operations in countries with an increased prevalence of modern slavery. This includes local suppliers in the higher risk jurisdictions in which the Bank operates, either via a branch or its subsidiaries. There is also a higher risk of modern slavery in suppliers operating in sectors which rely on a lower-skilled workforce, and where there may be a higher proportion of migrant workers. This includes the following sectors:

- In relation to services: cleaning and security vendors, couriers, construction and catering; and
- In relation to products: IT, telecommunications, office equipment, branded products and merchandise, and consumables.

Based on an assessment of responses to the Modern Slavery Questionnaire issued to suppliers of our U.K. and Australian businesses (as outlined above), we observed that:

1. The risk profile of our suppliers is generally low, which reflects the high proportion of suppliers providing professional services from lower risk jurisdictions.
2. Almost half of our suppliers are themselves required to report pursuant to modern slavery laws in the U.K. or other countries which generally correlates with the proportion of suppliers that have conducted human rights risk assessments in their own operations and supply chains.
3. Suppliers with operations in jurisdictions with an increased prevalence of modern slavery and/or with workers that may be considered to be in vulnerable categories (e.g. migrant workers, disabled workers and young workers) are typically businesses providing professional services which have policies and procedures, including training, in place to mitigate risks.
4. The risks of modern slavery may exist deeper within our supply chain in respect of the products that we procure from our direct suppliers.
5. In regards to points 1 to 3 above, the Bank has a low risk of causing or contributing to modern slavery in respect of our direct suppliers. However, there may be some risk of being linked to modern slavery deeper within our supply chain (for example, in the supply chain of our IT hardware suppliers).

We consider the above observations to broadly reflect the risks of modern slavery in the supply chains of each of the Bank's branches and owned or controlled entities, given that they operate in the same industry and comply with our group policies and procedures to mitigate risks. Where they operate in jurisdictions with a higher prevalence of modern slavery, this will increase the inherent risk of suppliers domiciled or operating from those jurisdictions.

We consider there to be a lower risk of modern slavery occurring among our U.K.-based suppliers, recognizing that the U.K. is ranked by the Global Slavery Index as one of the jurisdictions where slavery is less prevalent (132nd of 167 countries). However, the risks of modern slavery still exist in the supply chains of companies domiciled in lower risk countries such as the U.K., given the globalized nature of many supply chains.

4. ACTIONS TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

A. ACTIONS WITH RESPECT TO OUR OPERATIONS

Northern Trust's guiding principles are "Integrity", "Service" and "Expertise". How Northern Trust does business is as important as what we do. We have a long-standing culture of doing what is right. Our Code of Business Ethics and Conduct (Code of Business Conduct) promotes honest, ethical conduct and compliance with applicable law.

Our Standards of Conduct Policy, which expands upon the themes expressed in our Code of Business Conduct, affirms Northern Trust's commitment to compliance with all applicable labor laws, and the active championing of human rights. It also expresses our firm belief that all work should be done voluntarily without slavery, servitude, forced or compulsory labor or the involvement of human trafficking.

Northern Trust's compensation programs for employees are designed to be competitive. We regularly review pay levels to ensure compliance with minimum wage laws. We also evaluate information regarding competitive practices and emerging trends gathered from a range of publicly available and commissioned resources. This information is used to inform our decisions about compensation programs. In addition, Northern Trust held virtual focus groups to ascertain employee sentiment, on an anonymous basis, regarding wellbeing and, indirectly, workload. The participant demographic data allowed us to identify trends by certain cohorts.

Northern Trust's culture supports open communication at all levels. In addition to internal reporting avenues, employees, as well as third parties, have access to our Hotline (maintained by a third party) through which they can raise any concerns or possible violations of a law, regulation or policy. Concerns may be reported anonymously to the extent permitted by applicable laws. When concerns are raised with respect to potential misconduct, Northern Trust conducts investigations thoroughly, fairly, with discretion and in a timely manner. Violations of the Code of Business Conduct or Standards of Conduct, laws, rules, regulations, policies or procedures may result in disciplinary action up to and including termination of employment.

We prohibit retaliatory action against anyone who raises concerns regarding ethics, discrimination or harassment; reports suspected violations of applicable laws, regulations, or policies; or participates in a subsequent investigation of such concerns. As part of any investigation, we respect the rights of all parties related to the matter afforded under applicable laws and regulations.

Northern Trust recognizes that educating employees is fundamental to ensuring potential human rights and modern slavery risks are identified and managed. Employees are required to complete training on the Standards of Conduct Policy on an annual basis. Such training emphasizes the importance of complying with applicable laws and maintaining the highest ethical standards. Employees are encouraged to take a stand to correct or prevent any improper activity. The training also includes examples of 'warning signs' indicative of modern slavery. During the Reporting Period, Northern Trust expanded the modern slavery-specific content in our mandatory Standards of Conduct Policy training to ensure that our employees are ably equipped to identify and respond to modern slavery risks. This enhanced training was rolled out during 2021.

B. ACTIONS WITH RESPECT TO OUR SUPPLY CHAIN

i. Policies and Procedures that manage supply chain risk

All new and existing suppliers are expected to meet the standards and principles set out in our [Supplier/Vendor Code of Conduct](#) (supplier code). Reflecting our commitment to mitigate supply chain-related modern slavery risk, Northern Trust undertook a review of the Supplier Code during the Reporting Period, to ensure its alignment with evolving industry best practice. An updated Supplier Code was issued and published on our website during 2021. Among other things, the Supplier Code prescribes that our suppliers must:

- Respect human rights and refrain from engaging in any form of modern slavery;
- Have in place adequate procedures to identify, prevent, mitigate and account for modern slavery and other human rights impacts in their operations and supply chains;
- Adopt sound labor practices and treat workers fairly;
- Comply with applicable labor laws and regulations;
- Ensure that sub-contractors are made aware of the Supplier Code; and
- Promptly notify us if the supplier becomes aware of any acts of modern slavery by either the supplier or any of its subcontractors. Our Supplier Code provides the details of our Hotline for suppliers and their employees to report concerns.

In addition, we expect our suppliers to have a process through which their workers can raise workplace concerns without fear of retaliation.

The Supplier Code was included in the Modern Slavery Questionnaire, seeking confirmation from suppliers that they have read and agree to adhere to our Supplier Code when providing goods and services to us and agree to notify us without delay in the event of an actual or suspected breach. In response, 91% agreed and 8% noted that they were unable to comply with the requirements of the Supplier Code, mainly because they had their own supplier code of conduct with comparable requirements.

During the Reporting Period, we commenced the review of our master supplier agreement precedent, to ensure that it contains appropriate provisions requiring suppliers to comply with the anti-modern slavery requirements of the Supplier Code, and to ensure that we have appropriate contractual rights to take action in the event that a supplier breaches these expectations. We expect the specific modern slavery terms will become operational during the next reporting period with guidance provided to procurement team members on how to navigate negotiations with suppliers while adequately managing modern slavery risks.

Our Global Procurement Policy (Procurement Policy) governs supplier engagement. Under the Procurement Policy, the business units identify a need which initiates the procurement and due diligence processes prior to the engagement of any new supplier for all but the lowest-risk and lowest-spend purchases. Such due diligence includes a review of the supplier's compliance with applicable laws and regulations; adverse media screening using a well-known subscription database which covers risk areas including human trafficking, slavery or forced labor; and a country-based risk assessment incorporating the risk of human trafficking.

A subsequent risk-based assessment of the supplier determines the appropriate level of ongoing monitoring of that supplier. The degree of monitoring and the overall inherent risk rating for each new supplier engagement is determined by an independent review of subject matter experts from across the organization, including Compliance, Operational Risk and Procurement. During 2021, this policy was amended to provide that supplier adherence with the Supplier Code, including managing modern slavery risks, is essential. Failure to comply can result in termination of a supplier relationship.

Once a supplier is engaged, a Vendor Manager (appointed by the relevant Business Unit within the Bank) is responsible for managing the ongoing business relationship with the supplier. The Vendor Manager is responsible for performing supplier risk management duties and responsibilities pursuant to Northern Trust's third party management procedures. The responsibilities of the Vendor Manager include, but are not limited to:

- Monitoring the supplier against the terms of the contract and service level agreements; and
- Documenting, maintaining and reporting legal and other issues or incidents.

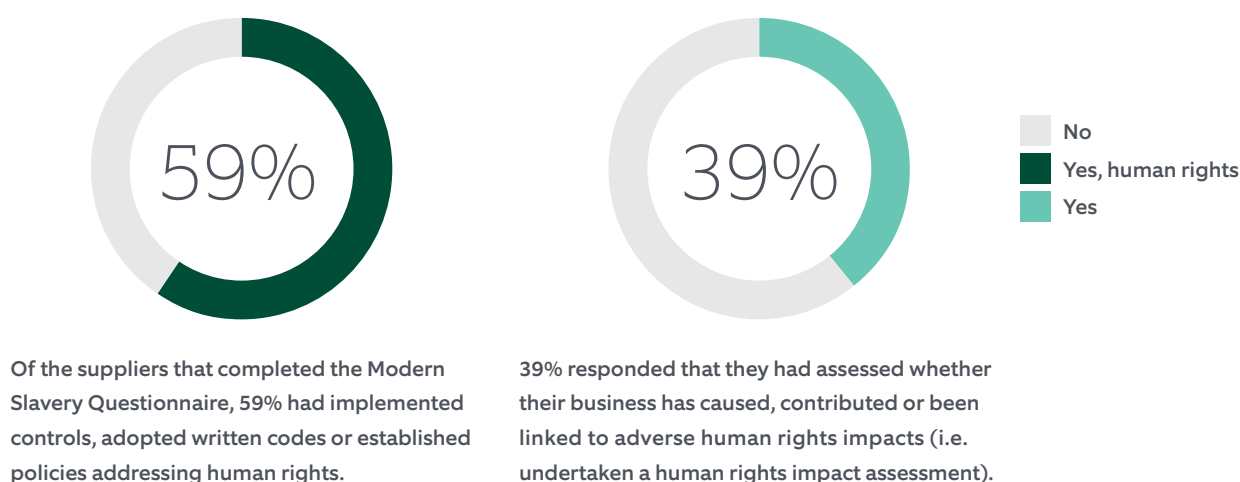
In 2022, we intend to amend these procedures to make it clear that the Vendor Manager also needs to assess whether the vendor is compliant with our Supplier Code (which includes modern slavery commitments as outlined above).

Further, where possible, Northern Trust's supplier contracts provide for audit rights to facilitate supplier monitoring, and such audit rights may be deployed to assess compliance with the Supplier Code, where required. Our template services agreement has audit rights allowing Northern Trust to perform an independent review.

ii. Supplier due diligence via the Modern Slavery Questionnaire

The Modern Slavery Questionnaire was issued to a pilot group of approximately 445 suppliers, comprising entities that supplied goods or services to our offices in the U.K. and Australia during the Reporting Period. Our intention is to roll the Modern Slavery Questionnaire out more broadly in future years. Suppliers identified as 'lowest-risk'/'lowest-spend' were excluded from this sample population. Separately, Northern Trust has a comprehensive Due Diligence Questionnaire (DDQ) used for sub-custody service providers that includes modern slavery questions, so the Modern Slavery Questionnaire was not issued to sub-custody service providers. As part of the next DDQ cycle, Northern Trust will include additional modern slavery questions in the DDQ so that it aligns with the Modern Slavery Questionnaire. The next cycle will commence in June 2022.

The Modern Slavery Questionnaire completion rate was approximately 30%, with an additional 10% of suppliers commencing but not completing the Modern Slavery Questionnaire, 10% providing alternative information such as their own modern slavery statements and 50% not starting the Modern Slavery Questionnaire. Just under 40% of responding suppliers (of the U.K. and Australian businesses) had reporting obligations pursuant to the Modern Slavery Act in Australia and/or the U.K., or The California Transparency in Supply Chains Act. On average, the suppliers assessed via the Modern Slavery Questionnaire returned a low risk rating.



Going forward, in addition to our reporting obligations, assessment and evaluation of a supplier's modern slavery risk will be undertaken as part of on-boarding or as part of supplier contract renewal. Further, a supplier's compliance with the Supplier Code will be used as part of the supplier evaluation, selection and contract management process.

We will continue to engage appropriately with our suppliers to make them aware of our approach to modern slavery and encourage them to adopt their own measures to minimize modern slavery risks in their own organizations and supply chain.

C. ACTIONS WITH RESPECT TO OUR CLIENTS AND INVESTMENTS

The Bank's Global AML Team is responsible for maintaining our KYC and AML procedures. Among other things, the KYC / AML due diligence process incorporates background checks and adverse media screening using well-known subscription databases to identify potential clients which may present a legal, compliance or reputational risk, including any persons or entities accused or convicted of human trafficking, slavery or forced labor. Human trafficking risk of customers, arising from the location of their operations, is also included in the AML process. Adverse media checks are regularly refreshed against the Bank's client population. In 2022, we plan to review our client and transaction screening processes to consider whether the sensitivity of our client screening processes may be enhanced to ensure modern slavery risks are appropriately captured and given due consideration.

Managing environmental, social and governance (ESG) risks is a key part of Asset Management's investment strategy for clients. Asset Management supports a substantial portion of Northern Trust's investment activities, including those of Wealth Management, where ESG risk mitigation is informed by our Sustainable Investing Philosophy and Engagement Policy. Asset Management's investment due diligence processes incorporate an ESG screening methodology, and the Asset Management business actively engages with portfolio companies and their boards to discuss material risks, ranging from business and operational risks to environmental and social risks. We have established a procedure to identify and monitor our portfolio companies for involvement in crimes against humanity or patterns of abuse of human rights and engage with them as appropriate. We expect to continue to enhance our monitoring of business practices and engage with companies where we believe that action is required. Wealth Management independently reviews ESG claims for ESG-designated products approved for use in managed accounts.

D. OUR APPROACH TO REMEDIATION

When we identify modern slavery in our operations or supply chain, our response will be guided by what is in the best interests of the individual, or individuals, who are at risk.

As described in our Supplier Code, if a supplier is found to be engaging in modern slavery, or identifies modern slavery in its supply chain, we will engage with the supplier to encourage remediation of the situation. If the situation is not remediated (or not remediable) the Bank may terminate the relationship with the supplier and disqualify the supplier from participating in any future bidding processes.

Anonymous reporting is permitted in our Standards of Conduct Policy via the Bank's Hotline. Details on how to use the Hotline are made available to our employees through various channels and to third parties, including employees of suppliers via our external website.

5. ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

A working group has been formed with representatives of Legal, Compliance, Risk, Procurement, Human Resources, and Sustainability, Inclusion and Social Impact. This group develops and tracks the effectiveness of our actions to manage the risk of modern slavery in our operations and supply chains. Starting in mid-2022, the modern slavery program will be overseen by the Head of Sustainability, Inclusion and Social Impact, with the continued support of the working group.

We will seek to assess the effectiveness of our modern slavery framework, including by tracking our performance against the following goals, in the coming financial year. We will report on progress internally to a steering group, our Board of Directors and the Boards of Directors and governing bodies of the Reporting Entities, and externally in our next Modern Slavery Statement:

1. We plan to roll-out the Modern Slavery Questionnaire to a broader supplier universe.
2. As we gather data on suppliers via the Modern Slavery Questionnaire, potential instances of non-compliance with the Supplier Code, or any protracted failure by suppliers to respond to Modern Slavery Questionnaires, will be identified for further review and engagement. Appropriate remediation steps will be taken or requested as appropriate, and the relevant information will be recorded.
3. We will amend our Third Party Management Practice Standard to make it clear that it is the responsibility of the Vendor Manager for each supplier to assess whether the vendor is compliant with our Supplier Code, as part of managing a supplier relationship.
4. The modern slavery questions in the sub-custodian Due Diligence Questionnaire will be expanded to align with the Modern Slavery Questionnaire and ensure consistency in our supplier due diligence assessment process.
5. We will review our client and transaction screening processes to consider whether the sensitivity of our processes may be enhanced to ensure modern slavery risks are appropriately captured and given due consideration.
6. As the enhanced modern slavery training is rolled out to our employee population, we will track training completion statistics.

6. OTHER INFORMATION

In addition to the philanthropic activities described in Part 2 above, Northern Trust has focused philanthropic resources toward support for nonprofit organizations that deliver healthcare, food and other humanitarian relief services around the globe in response to the global health pandemic. A US\$3.0 million commitment that began in April 2020 has helped support these organizations as COVID -19 persisted throughout 2021 triggering healthcare crises and disproportionately affecting underserved communities.

7. CONSULTATION AND APPROVAL

Various business lines and functions within the Bank were consulted in the drafting of this Statement, including: Legal, Procurement, Compliance, Human Resources, Sustainability, Inclusion and Social Impact and applicable Business Units. This included the creation of the modern slavery working group. These business lines and functions have global mandates, which includes the entities to which this Statement applies (as Reporting Entities or because they are owned or controlled by Reporting Entities). Accordingly, the consulted internal stakeholders provided input in relation to the Bank globally and its owned or controlled entities.

This Statement has been approved by the Board of Directors of each of the Reporting Entities.



Michael G O'Grady

Chairman, President and Chief Executive Officer
The Northern Trust Company

Approved by the boards of directors of the reporting entities as follows:

The Northern Trust Company:	25 April 2022
Northern Trust Global Services SE:	9 June 2022
Northern Trust Management Services Limited:	20 June 2022
Northern Trust Global Investments Limited:	23 June 2022