

Modern Slavery Act 2015 Statement - for financial year ending 31 December 2025, and in respect of Thames River Capital LLP only for financial year ending 31 March 2026

This statement is made by Columbia Threadneedle Investments on behalf of relevant subsidiaries that are subject to the requirements of Section 54 of the UK Modern Slavery Act 2015 (the “Act”) in respect of the financial year ending 31 December 2025, and in respect of Thames River Capital LLP only for financial year ending 31 March 2026.

Modern slavery includes forced or compulsory labour, servitude and human trafficking, and are severe violations of fundamental human rights and freedoms. We are committed to respecting human rights, ensuring we do not infringe the rights of others, and to addressing the risk or instance of modern slavery within our operations and supply chains.

The Act

The Act requires those organisations which supply goods or services, carry on a business (in whole or part) in the UK and have a turnover of £36 million or more to publish a Modern Slavery Statement each financial year detailing steps they have taken to ensure there is no modern slavery or human trafficking in their business and supply chains. We recognise our responsibility to respect and uphold human rights, and we take this responsibility seriously.

Our organisation

We are a leading global asset manager operating under the brand name of ‘Columbia Threadneedle Investments’ (“**Columbia Threadneedle**”). Columbia Threadneedle is the global asset management group of Ameriprise Financial, Inc (NYSE:AMP) (“**Ameriprise**”), a leading US-based financial services provider. Columbia Threadneedle manages US\$678 billion¹ of assets under management for institutional and retail clients globally and has over 30 office locations in 18 countries² globally, and approximately 2,300 employees.^{3/4} For more information on our business, please see our website:

<http://www.columbiathreadneedle.com/>

Columbia Threadneedle is committed to high standards of ethical behaviour. We are continuing to evolve practices to combat modern slavery and human trafficking and endeavour to build on our efforts year on year.

Modern slavery risks in our operations and supply chains

To the best of our knowledge, we do not support any business involved in modern slavery and have taken the steps set out in this statement to continue to monitor and prevent this.

Due to the nature of the services, we provide within the financial services industry and our employee base, we consider that the risk of modern slavery and human trafficking to our direct employees is low. Columbia Threadneedle operates robust recruitment processes that prohibit the primary indicators of modern slavery-like practices such as withholding of worker identity or immigration documents; the use of child labour; and engaging with recruiters or labour brokers who do not comply with the local labour laws.

However, there remains a risk that our operations may be indirectly linked to modern slavery because of our business activities, including via our investments and customer activities, and the supply chains we rely on to

¹ As of 12-31-2025

² Australia, Austria, Denmark, France, Germany, Hong Kong, Italy, Japan, Luxembourg, Netherlands, Singapore, South Korea, Spain, Sweden, Switzerland, UK, United Arab Emirates, US.

³ As at 30 Sept 2025.

⁴ Employees in our India locations are part of the Ameriprise India organization and hence are not included in this number. More than 500 – as at 31 Dec 2025 - of those employees directly support the global asset management business of Ameriprise (Columbia Threadneedle Investments).

support these activities.

The entities that make up Columbia Threadneedle engage with a broad range of suppliers who provide products and services, including those relating to business activities that Columbia Threadneedle outsources as part of its own service delivery and product offerings to customers.

Services from third party suppliers which we consider to be medium risk include personnel recruitment, advertising and marketing, information technology, business operations, travel, hospitality, call centre and real estate services.

Columbia Threadneedle also engages with suppliers who present a higher risk because they employ workers who provide cleaning and catering services.

Policies that reduce the risk of modern slavery and human trafficking

Columbia Threadneedle, as part of Ameriprise, complies with the following policies and procedures, which are reviewed and assessed for effectiveness and updated annually, unless stated otherwise. These examples do not refer to modern slavery or human trafficking explicitly but contain requirements and guidance that show the steps we take in practice to reduce the risk of modern slavery and human trafficking in our business dealings and relationships.

Monitoring, controls, and respective reporting to senior management are in place for all policies. Non-adherence can lead to disciplinary consequences.

Global Code of Conduct

We operate under the Ameriprise Global Code of Conduct, which applies to everyone working for one of our business areas or affiliates. It requires each person to comply with the Code, act with integrity, follow applicable laws, rules and regulations and report ethical concerns promptly.

We currently don't have a dedicated Supplier Code of Conduct, but our current procurement process ensures that all contracts with third parties require them to abide by applicable laws and regulations, including sub-contractors. Any contractors performing work on-site/via Ameriprise controlled laptops must also complete annual compliance training and adhere to the Global Code of Conduct.

Third Party Risk Management Policy

The Ameriprise Third Party Risk Management Policy aims to establish effective and sustainable third-party risk governance. It applies to third parties engaged across Ameriprise, its affiliates and subsidiaries (note that some engagements by funds managed by Columbia Threadneedle are out of scope of this policy). It includes acknowledgement of personnel risk (including employment practices) and sub-contracting risk.

Please see the 'Suppliers' section below for further information on our third-party risk assessment process.

Policy training and updates are communicated to the entire population of third-party relationship owners at the time the policy is updated and are also communicated via an intranet article to the entire organization. The policy is additionally linked to the Acquisition of Goods and Services Policy owned by Enterprise Procurement and to applicable Operational Risk Management and Risk policies. The Vendor Risk Assessment (VRA) program is noted as well within the annual, group-wide Compliance training programme.

Whistleblowing Policy

Columbia Threadneedle has two whistleblowing policies that apply to different parts of the business, including the UK and Luxemburg. These policies acknowledge the risk to all organisations of control failures or of unknowingly harbouring illegal or unethical conduct. They encourage a culture of openness and accountability to prevent such situations occurring or to address them if they do occur. The policies' aims are to:

- encourage staff to report suspected reportable concerns as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected;
- reassure staff that they should raise reportable concerns without fear of reprisal, even if they turn out to be mistaken; and
- provide staff with guidance on how to raise reportable concerns.

Employee representatives play an important role in our organisation, as a key link between employees and leadership. They help ensure open, two-way communication and provide a meaningful platform for employees to express their views, including representing colleagues during formal consultations. Their work supports a positive, inclusive workplace culture and contributes to initiatives that enhance the overall employee experience.

All employees are required to undertake annual online mandatory compliance training which covers the topic of whistleblowing claims. This training is intended to highlight the existence of the policy, and the options employees have available to them to raise Whistleblowing concerns.

Global Anti-Bribery and Anti-Corruption Policy

The Ameriprise Global Anti-Bribery and Anti-Corruption Policy defines corruption as the abuse of entrusted power for private gain and sets out a no tolerance approach.

Background Checks & Screening Requirements Policy & Procedure

This policy details the standards for screening requirements and the procedures for carrying out background checks for new employees (temporary and permanent), intra-company transfers and current employees in the scope of the UK Senior Manager & Certification regime ("SMCR").

Global Anti-Money Laundering and Economic Sanctions Policy

This policy seeks to identify and verify customer information, monitor customer transactions for unusual activity, and report suspicious activity to the relevant authorities to assist in identifying criminal activities that may be linked to money laundering, terrorist financing, or financial or trade sanctions.

There were no material changes to the policies year-on-year in relation to modern slavery risk management.

Risk Assessment and Management

Employees

We aim to comply with all applicable employment standards and human rights legislation in all jurisdictions in which we operate, including in our hiring and recruitment procedures. We promote a respectful and inclusive workplace culture, supported by talent and engagement practices where employees can belong, grow, contribute and thrive.

Our organisational values, client focused, integrity always, excellence and respect are well established in the business with performance appraisals designed to measure goals (*what* has been achieved) as well as leadership behaviours (*how* it has been achieved). In case of suspected modern slavery risks, response protocols are in place, investigations may occur, and escalation procedures to senior management are established. Where required, external investigations, legal counsel or law

enforcement might be involved, and potential victims will receive appropriate support.

Training

Our compliance training program covers parts of the policies referenced above at various times, such as when an employee onboards and in annual trainings.

Where relevant to their line of business and function, employees receive mandatory annual compliance training (or when an employee onboards) on parts of the policies and procedures referenced above that pertain to products and services we offer clients.

This includes training on the ethical principles in our Global Code of Conduct as well as the firm's Anti-Bribery, Anti-Corruption and Anti-Money Laundering policies. All newly hired employees must complete Global Code of Conduct training and current employees must complete Global Code of Conduct training on an ongoing basis. Our employees annually attest that they have read and understood our Global Code of Conduct.

The objective of all training is to raise employee awareness and promote compliance with our policies and processes, as well as the obligation to comply with applicable laws. The desired outcome is an enhanced adherence to all policies.

Suppliers – corporate level

As part of our on-boarding process for key corporate level vendors and suppliers globally, we have a robust third-party risk assessment process. Key vendors and suppliers are those who we categorise as material or having the potential for inherent risk⁵. This process is aimed at monitoring existing and future third-party relationships.

We aim to oblige all our vendors and suppliers contractually to 'comply with laws and regulations', which includes the Act for our UK-based vendors and suppliers. Suppliers go through our Enterprise Procurement and/or the Vendor Risk Assessment process and are required to provide responses in a questionnaire related to the Act. We also seek to include requirements that they have policies and procedures in place to comply with the Act and to submit to an audit / produce reports at our request.

Responses are reviewed and any negative responses would be shared with the appropriate Compliance team. The Enterprise Third Party Risk Management team also utilizes Equifax for our OFAC/Sanctions processing. Any third parties noted with a potential risk/regulatory issue for Modern Slavery would receive an alert and referred to the appropriate Compliance team to review. Equifax is not limited to only those third parties required to go through Vendor Risk Assessment/Enterprise Procurement, but any third party in which we may make a payment through accounts payable.

All new and existing vendors are monitored through third party tools for modern slavery risks. Any violations of the Act result in an alert for investigation to the Third-Party Risk Management team for review with appropriate Compliance teams. 100% of high-risk suppliers are being reviewed. In the reporting period we reviewed 689 vendors, and of these, 122 were identified as Tier 1 relationships, which are most critical to the operations of the organization.

Any third party with a noted risk or violation of any local laws or regulation will be managed through established escalation processes including the Chief Risk Officer, Legal, Employee Relations, and Enterprise Procurement.

Most of our suppliers are located in the countries in which the organization does business. There are countries from which suppliers are prohibited from performing work or subcontracting and require our consent or notice for subcontracting, depending on the contractual language the organization has

⁵ Our risk assessment in this context includes, but is not limited to, the risk of modern slavery.

agreed to. The majority of our third parties provide services from the United States, UK, Europe, the Middle East, India and a small volume from the APAC region.

Regarding supply chain mapping, we have mapped Tier 2 subcontractors (4th parties) data hosting locations and critical 4th parties to many of our higher risk relationships within the Enterprise. The supply chain mapping beyond that relationship is an evolving effort.

While there was no material change to the described process year-on-year, our programs, processes and policies continue to evolve and address emerging risk and utilize third-party tools for monitoring. As regulatory guidance changes, we look at the opportunities to improve our program.

Suppliers – fund level

Note that some engagements with funds managed by Columbia Threadneedle are out of scope of the third-party risk assessment process.

However, in respect of the real estate funds managed by Columbia Threadneedle, each of the UK-based property managers and project managers appointed on the real estate mandates have confirmed compliance with their obligations under the Act within the terms of their contract with us. We will continue to monitor this.

Please see the ‘Responsible Investment’ section below for further information on our approach to managing such risks in our fund portfolios.

Responsible Investment

Environmental, social and governance (“ESG”) factors, including human rights considerations, are integrated into our investment approach. These factors may be reflected in our investment research, corporate engagement, voting and reporting activities. Our engagement with companies includes discussion of social risks in their operations and supply chains, which can cover areas such as worker welfare, community relations, labour standards, and workplace safety.

Our approach to stewardship is outlined in our Responsible Investment Engagement Policy and Corporate Governance Guidelines – and their respective addendums - which relate to Columbia Threadneedle’s asset management function as stewards of our clients’ assets. In our dialogue with investee companies regarding ESG practices, we may reference international frameworks and standards, including the International Labour Organization (ILO) Core Conventions, OECD Guidelines for Multinational Enterprises, United Nations (UN) Guiding Principles on Business and Human Rights, and others.

Columbia Threadneedle is also a signatory of the Principles of Responsible Investment and is a signatory of the UK, Japan, Taiwan and South Korea Stewardship Codes, all of which prescribe disclosures covering how we approach ESG integration and investor engagement on ESG themes.

Customers

We undertake due diligence of our customers in accordance with the Global Anti-Money Laundering and Economic Sanctions Policy described above.

Commitment to continuous improvement

We have noted the updated “Transparency in Supply Chains” statutory guidance issued on 24 March 2025 and have carried out a gap analysis between our statement and the updated guidance. With our best efforts we have amended the statement, aiming at closing the identified gaps in disclosure.

The annual update of the statement, including a detailed review by our internal Legal team and subject matter experts (including policy owners of the policies listed above), as well as feedback gathered from external

stakeholders, aims at continuous knowledge sharing and ultimate improvement.

Process of consultation and approval

Various business lines and functions within Ameriprise have been consulted to update this statement on an annual basis, including Legal and Compliance, Third Party Risk Management, Procurement, Research, Responsible Investment and Human Resources. Representatives of these teams review and verify the information in this statement on an annual basis based on their knowledge, records and processes. Industry developments and information from external stakeholders, such as research and technology providers, industry initiatives, government agencies or regulators, as well as non-governmental organisations, are being monitored by the owners of this statement, and amendments considered, if suitable. Our practices and policies will continue to evolve in line with changing requirements and expectations across the globe.

This statement has been approved by the boards of the Columbia Threadneedle Investments subsidiaries which fall in scope of the Act:

- Columbia Threadneedle AM (Holdings) Limited
- Columbia Threadneedle Fund Management Limited
- Columbia Threadneedle Investment Business Limited
- Columbia Threadneedle Investments UK International Limited
- Columbia Threadneedle Management Limited
- Columbia Threadneedle Real Estate Partners LLP
- Columbia Threadneedle (Services) Limited
- Threadneedle Asset Management Limited
- Threadneedle Investment Services Limited
- Thames River Capital LLP

and signed by the Head of EMEA Columbia Threadneedle Investments.



David Logan
Head of EMEA & Global Business Operations,
Columbia Threadneedle Investments