



Sanne Group plc

Modern Anti-Slavery and Human Trafficking Statement 2017

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Sanne Group plc (“the Group”) was founded in 1988 as a Jersey-based private client focused fiduciary business. It has evolved into a leading global provider of outsourced corporate, fund and private client administration, reporting and fiduciary services with a strong presence in 15 established, well-regulated international financial centres and a growing global network of offices across the Americas, EMEA and Asia-Pacific. SANNE is listed on the London Stock Exchange and is a constituent of the FTSE 250 index.

The following statement has been published on behalf of the group pursuant to section 54 of the United Kingdom’s Modern Slavery Act 2015.

Introduction

The Group is committed to respecting human rights and operating with integrity in regards to all aspects of its business. This Statement sets out the steps the Group has taken to understand the risks posed by modern slavery and ensure such activity does not occur as a result of its business ventures. This statement refers to actions and activities under taken during the financial year 31 December 2015 to 31 December 2016.

Organisational Structure and Business Model

The Group is organised around asset and market focused business divisions which offer a complete range of services to clients, delivered across a multi-jurisdictional platform. These business divisions are each led by a board of senior managers and directors with specific asset and market expertise, and are supported by dedicated teams providing bespoke service solutions. The divisional businesses focus on the following asset classes or markets: Private Debt & Capital Markets; Real Estate; Private Equity; Hedge; Corporate & Institutional; Executive Incentives; Private Client; and Treasury. These operations broadly span across our international footprint with Jersey being the location of the Group’s headquarters.

The Group has the following offices through which it provides regulated services:

- > Jersey – regulated by the Jersey Financial Services Commission
- > Guernsey – regulated by the Guernsey Financial Services Commission
- > Luxembourg – regulated by the Commission de Surveillance du Secteur Financier
- > London – regulated by the Financial Conduct Authority
- > Malta – regulated by the Malta Financial Services Authority
- > South Africa – regulated by the Financial Services Board
- > Mauritius – regulated by the Mauritius Financial Services Commission

The Group has the following licensed offices delivering administration services:

- > Dublin – authorised by the Department of Justice and Equality
- > Hong Kong – licensed to conduct business
- > Shanghai – licensed by the State Administration of Industry and Commerce
- > Singapore – licensed to conduct business
- > New York – licensed to conduct business
- > The Netherlands – licensed to Dutch Central Bank (DNB)
- > Dubai – authorised by the Dubai International Finance Centre Authority

The demand for its services is driven by macro-economic and regulatory trends as asset managers, corporates and financial institutions are increasingly required to meet complex current and future regulatory changes.

Legislation such as the alternative Fund Managers Directive (AIFMD) and the Foreign Account Tax Compliant Act (FATCA), is a contributory factor behind the increasing shift towards the outsourcing of administration services. These regulatory drivers of outsourcing have been enhanced by globalisation and an increasing demand for international structures for the facilitation of global capital and investment flows.

Supply chain

The Group's business model is to provide third party outsourced fund administration services directly to our clients. It does not have a supply chain as traditionally defined. Most definitions of supply chain make reference to "supply of raw materials", "distribution channels" and "manufacturing processes" and a "network between suppliers, the company and its customers".

Our clients are in the financial services sector which is not generally regarded as a sector where slavery and human trafficking is a significant problem. Financial institutions are still likely to employ lower-paid workers around the world in support services such as security, cleaning, catering and call centres. These types of jobs are traditionally considered higher risk, not least because the roles are often filled by migrant workers.

Relevant Policies

The Group does not have a dedicated anti-slavery and human trafficking policy although the employee staff handbooks makes it abundantly clear that employees are expected to behave ethically and operate with integrity at all times.

Due Diligence

The Group performs extensive due diligence on its clients based on jurisdictional requirements in line with The Financial Action Task Force ("FATF") recommendations.

Client Due Diligence

FATF is an inter-governmental body established in 1989 by the Ministers of its Member jurisdictions. Its objectives are to set standards and promote effective implementation of legal, regulatory and operational measures for combating money laundering, terrorist financing and other related threats to the integrity of the international financial system. FATF has 37 members; 35 jurisdictions and 2 regional organisations (the Gulf Cooperation Council and the European Commission). There are 31 international and regional organisations which are Associate Members or Observers of the FATF and participate in its work. Jersey is not a FATF Member but is a Crown Dependency of the United Kingdom (which is an FATF Member). In October 2012 the Crown Dependencies became subject to assessment by MONEYVAL, and subject to its follow-up and other procedures and processes. MONEYVAL, “the Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism” is the Council of Europe’s chief supervision instrument in the fight against money laundering.

FATF has developed 40 recommendations on money laundering and nine special recommendations regarding terrorist financing. FATF assesses each member country against these recommendations in published reports. FATF keeps a list of countries that have deficient Anti-Money Laundering (AML) systems or are uncooperative with AML efforts; those countries are called Non-Cooperative Countries and Territories (“NCCTs”). FATF published its most recent lists in October 2016. The Democratic People’s Republic of Korea is subject to a FATF call on its members and other jurisdictions to apply counter-measures to protect the international financial system from the on-going and substantial money laundering and terrorist financing risks it poses. Iran is subject to a call made by FATF on its members and other jurisdictions to apply enhanced due diligence measures proportionate to the risks arising from it. A review of the client on-boarding process took place in the first half of 2016. Sanne Fiduciary Services Limited Jersey board decided to start the process of establishing a centralised client on-boarding team which will operate against up-to-date and best of breed policy, procedures and processes on 23 June 2016.

Ongoing Effectiveness

Due to the nature of our business and our approach to governance, the Group has assessed that there is very low risk of slavery and human trafficking in our business and supply chains. However, the group aims to periodically review the effectiveness of the relevant policies and procedures it has in place. It does not have key performance indicators in relation to slavery or human trafficking as any instance would be expected to be a breach of law or its supplier standards.