

Quilter Human Rights Policy

Policy Owner

Executive Director and Head of Responsible Investment, Quilter Cheviot

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¹ This Policy replaces Quilter's previous Human Rights Standard.



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1 Introduction

Human rights are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more. Everyone is entitled to these rights, without discrimination. (Source: United Nations)

While governments have the primary duty to protect human rights, the UN Guiding Principles on Business and Human Rights (“UNGPs”) establish that businesses have a responsibility to respect human rights, avoid infringing on the rights of others, and address any adverse impacts where they are involved.

Quilter plc (“Quilter”) recognises this responsibility and is committed to embedding respect for human rights throughout our operations, supply chain, and investment activities.

1.1 Purpose

This Policy sets out Quilter’s approach to respecting human rights in line with:

- The International Bill of Human Rights;
- The UN Guiding Principles on Business and Human Rights;
- The International Labour Organization (“ILO”) Declaration on Fundamental Principles and Rights at Work; and
- The UN Global Compact (“UNGC”) Principles 1–6.

As a UN Global Compact signatory Quilter is committed to:

- Supporting and respecting internationally proclaimed human rights;
- Ensuring we are not complicit in human rights abuses; and
- Upholding fundamental labour rights, including freedom of association, and the elimination of forced labour, child labour, and discrimination.

1.2 Scope

This Policy applies to all employees and subsidiary entities within Quilter plc, and informs our expectations of suppliers, business partners, and investee companies.

2 Our commitment

Quilter plc respects the rights and freedoms of our colleagues and those in our supply chain and has zero tolerance for any form of modern slavery. We strive to uphold internationally recognised human rights across our operations, supply chain, and investment activities, and conduct our business in a way that seeks to avoid causing or contributing to adverse human rights impacts.

Through our investment stewardship processes we commit to engage with companies and funds to better understand or improve performance on issues such as decent work and pay, human rights in the supply chain, and health and safety as well as inclusion and diversity. More specifically, where we have appropriate agency through our responsible investment processes, we commit to monitoring and respecting human rights included in the International Bill of Human Rights and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work, and the eight core conventions.

Should we identify that we have caused or contributed to harm, we will provide for or corporate in appropriate remediation, in line with the UNGPs.



3 Our business areas

3.1 Colleagues

We are committed to respecting the human rights of all colleagues, including employees, agency workers, contractors and other workers engaged across the Group. Our approach is aligned with internationally recognised labour standards, including the ILO Fundamental Principles and Rights at Work, and reflects the UN Global Compact labour principles.

To uphold our commitment to colleagues' rights, we will continue to:

- **Provide colleagues with a safe working environment and fair working arrangements** in line with internationally recognised labour standards and applicable health and safety regulations. This commitment is governed by the Quilter Group Security and Property Policy, and the Quilter Human Resources Policy supported by internal standards that promote workplace safety and wellbeing, including our Safeguarding Policy and Overtime Policy. All employees are provided with an employment contract that clearly sets out agreed working hours, patterns, and remuneration, all of which can be considered for amendment under our Flexible Working Policy.
- **Ensure fair and lawful pay practices across our workforce**, including our continued commitment that 100% of Quilter employees are paid at least the applicable national real living wage, supported by a proactive annual review process. We also respect colleagues' rights to freedom of association and collective bargaining, and colleagues are free to join a union of their choice in accordance with local law.
- **Provide colleagues with adequate escalation mechanisms and feedback channels** to ensure instances of human rights abuses are identified, reported and rectified immediately. We also aim to equip colleagues with the guidance they need to recognise potential vulnerabilities and use our reporting routes, including the Code of Conduct, Whistleblowing Policy and the Quilter employee forum.
- **Build an inclusive culture**, in which everyone has a chance to succeed and does not face discrimination, regardless of age, gender, ethnicity, disability, religion, sexual orientation, or education, social, or cultural background. Quilter's three-year Inclusion & Diversity Action Plan sets out the targets, actions and key performance indicators ("KPIs") we use to track progress and drive accountability.
- **Maintain policies and procedures that prevent and address any form of bullying or harassment** in the workplace and ensure that complaints are handled promptly, fairly, sensitively and confidentially, with appropriate support for those impacted.
- **Identify and prevent exploitative or unlawful employment practices** that may constitute modern slavery, such as child or forced labour by requiring 'right to work' checks and appropriate background screening.

As outlined in the Quilter Code of Conduct, all colleagues are expected to demonstrate the highest standards of personal and business integrity at all times, and to adhere to the Code and all applicable laws and regulations. The Code also sets out colleagues' responsibility to report concerns about misconduct, wrongdoing, or behaviour that conflicts with the law or Quilter's policies or values.

3.2 Supply Chain

Quilter's supply chain provides a wide range of products and services to the Group. These range from professional



advice, technology, and business services to more operational services such as cleaning, catering, and facilities support.

As we do not have direct involvement in our suppliers' operations, we consider the risk of modern slavery and human trafficking to be more significant within those operations than in our own. Therefore, the contract between us and the supplier, as well as the due diligence we undertake are important mitigating factors in our approach to minimising the risk. We are committed to operating in an ethical manner and we expect the same of our suppliers.

To uphold these expectations and manage human rights risks within our supply chain, we will continue to:

- **Embed human rights expectations** in our Supplier Code of Conduct and communicate these to suppliers prior to engagement. This includes expectations around compliance with all applicable employment laws, paying the real living wage, preventing discrimination, eliminating modern slavery, and maintain high health and safety standards. Suppliers are required to ensure they can demonstrate their adherence to the Code and if required, Quilter may audit suppliers, to ensure compliance.
- **Maintain a risk-based approach to supplier due diligence** that is proportionate to the nature of the service being provided and the supplier's risk profile whilst monitoring key suppliers through our centralised third-party risk management process on an ongoing basis.
- **Require our on-site service providers to meet our living wage expectations** by ensuring that suppliers whose staff work on our UK premises for two or more hours per week for eight or more consecutive weeks in a year pay at least the applicable real living wage rate, updated annually, consistent with Quilter's status as an accredited Living Wage employer.
- **Ensure all parties are able to report suspected human rights breaches in our supply chain** anonymously and confidentially. Details of our independent supplier whistleblowing procedure is outlined in our Supplier Code of Conduct.

3.3 Customers

For our customers, Quilter has a responsibility to:

- i. Support the rights of our customers through the identification of vulnerabilities, delivering good customer outcomes, and protecting our customers privacy.
- ii. Ensure that our products and services do not facilitate human rights abuses through money laundering and financial crime.

The Quilter Customer Policy sets out the framework to ensure our clients are treated fairly, and our products and services avoid causing foreseeable harm. The policy is supported by a dedicated Customer Inclusion Working Group, a pan-Quilter group of vulnerable customer champions and business representatives, established to support good outcomes for customers in vulnerable circumstances.

The right to privacy is a recognised human right in Article 12 of the Universal Declaration of Human Rights and Quilter has an obligation to protect our customers data privacy in line with the General Data Protection Regulation ("GDPR") and the UK Data Protection Act 2018 ("DPA"). The Quilter Personal Data Privacy Policy sets out the minimum requirements for safeguarding the personal data of customers, staff and others who interact with Quilter.

Financial crimes, such as money laundering, corruption, and fraud, can facilitate and support human rights abuses, including human trafficking, forced labour, and child exploitation. As a wealth manager, we recognise that without effective controls, our products and services may be exploited for the purposes of money



laundering or terrorist financing. To address this, Quilter maintains a robust financial crime framework with targeted controls to identify and manage these risks. The mitigations include customer risk assessments, identification and due diligence processes, customer-related party and third party screening, transaction monitoring, as well as mandatory training for colleagues. Our approach is set out in our Anti-Money Laundering and Terrorist Financing Policy and our Anti-Bribery and Corruption Policy. If colleagues suspect any acts or attempts of financial crime, they are required to report this immediately in line with local reporting procedures or the Ethics Hotline.

3.4 Investments

Quilter recognises that our investment activities have the potential to be directly linked to human rights impacts through the companies and funds in which we invest. As a responsible investor we have a role to play in engaging with those investments and promoting the respect for human rights. Quilter respects the human rights of our stakeholders and those working in our supply chain, and we expect the same of the companies and funds that we invest in.

Our two business segments, Affluent and High Net Worth, maintain distinct approaches to responsible investment, tailored to their respective investment styles. At the Group level, human rights is one of our three thematic responsible investment priorities, informing the integration of environmental, social and governance (“ESG”) factors and stewardship activities across the business.

To uphold our responsibilities, our Responsible Investment teams will continue to:

- **Incorporate human rights into ESG integration processes** by including these considerations into our qualitative and quantitative assessments of the companies and funds we invest in.
- **Collaborate with industry initiatives and peers**, where appropriate, to address systemic human rights risks and support policy change.
- **Monitor for human rights related controversies** and engage reactively to encourage appropriate remediation and the implementation of measures to prevent recurrence. Within Affluent, this is primarily conducted through engagement with third-party managers, while in High Net Worth, engagement also takes place directly with investee companies.
- **Escalate concerns through voting**, including voting against management where issues are not adequately addressed and supporting shareholder resolutions that seek to improve human rights practices and overseeing the voting activity of sub-advisers.
- **Exclude direct investment in controversial weapons** specifically cluster munitions and anti-personnel landmines, in line with the applicable international conventions and national laws.

Affluent invests predominantly via third party funds and therefore undertakes stewardship through engagement with sub-advisers and the fund managers in which it invests. In contrast, the High Net Worth segment combines fund investing with direct equity investments and engages directly with the companies in which it invests.

Additional information is available in the relevant Responsible Investment Policy:

- [Quilter Responsible Investment Policy \(Affluent\)](#)
- [Quilter Cheviot Responsible Investment Policy \(High Net Worth\)](#)



4 Speaking up

At Quilter we promote a culture of 'Speaking Up' whereby colleagues are encouraged to raise any concerns they may have about misconduct, malpractice, or wrongdoing, and feel confident in doing so. If colleagues see behaviour that they believe conflicts with the law, our values, or our Code of Conduct, they have a responsibility to speak up and share concerns without fear of repercussion.

Evidence is not required in order to raise concerns, and we ask that any concerns are reported. Colleagues are able to raise concerns with line managers or other senior managers, if appropriate. However, where colleagues are not comfortable with this, or it is not possible or appropriate, Quilter operates an independent Hotline and Secure Web Portal, which are available 24 hours a day, 365 days of the year, to allow concerns to be reported anonymously.

Information given via the independent channels will be passed on anonymously to Quilter senior executives, who will act on it whilst protecting the person who has raised the concern. Colleagues also have the option to report concerns directly to the Financial Conduct Authority ("FCA"), or the Prudential Regulation Authority ("PRA") via their websites, without the need to report internally first.

All of this information, including the relevant contact details, is included in the Quilter Code of Conduct, which is reviewed at least annually and publicly available.

Colleagues are also able to raise concerns or complaints regarding their work, working environment, pay and benefits, working hours, or any other issue affecting their employment directly via our grievance procedure.

5 Transparency and reporting

We expect our suppliers and the companies in which we invest to be transparent and accountable for all sustainability related matters and must therefore hold ourselves to the same standard. Providing clear and consistent disclosures holds Quilter to account and allows our stakeholders to understand our approach, activities, and progress on key issues.

To support this commitment, we publish the following disclosures:

- [**Quilter plc Annual Report**](#), which includes our non-financial and sustainability disclosures, as well as information about our colleagues, diversity, and community engagement.
- [**Modern Slavery Statement**](#), setting out the steps we take each year to prevent modern slavery and human trafficking across our operations and value chain in line with the Modern Slavery Act 2015.
- [**Stewardship Policy and Context disclosure**](#), outlining our overarching approach to stewardship and key priorities.
- [**Stewardship Activities and Outcomes Report**](#), which is published annually, providing detailed examples of engagement and voting activity throughout the year.
- [**Quilter Cheviot Annual and Quarterly Responsible Investment Reports**](#), which provides a regular update on the High Net Worth segment's responsible investment approach, priorities, and activities.

In addition to the above, as a signatory to the UNGC, Quilter submits an annual Communication on Progress, which is publicly available on the UNGC website.



6 Governance

The Quilter plc Board (the “Board”) is the ultimate decision-making body for matters of Group-wide strategic, financial, risk, regulatory, or reputational significance. It is responsible to shareholders for creating and delivering sustainable shareholder value through the management of the Group’s business areas whilst having regard to the interests of our key stakeholders, being our advisers, colleagues, communities in which we operate, customers, investors, and regulators. It determines the strategic objectives and policies of the Group to deliver long-term value, providing overall strategic direction within a framework of effective risk management and control.

The Board has delegated authority to a number of Board Committees, which assist the Board in delivering its responsibilities and ensuring that there is appropriate, independent oversight of internal control and risk management. Decisions on certain matters are specifically reserved for the Board, including the approval of the Group’s strategy and financial budgets, risk appetite, financial statements, dividends, material corporate transactions, and Board appointments. The schedule of Matters Reserved to the Board and the Terms of Reference for the Board Committees are published on the Quilter website at plc.quilter.com.

The Board has also delegated authority for the operational management of the Group’s business areas to the Group Chief Executive Officer within certain limits for execution to support the effective day-to-day running and management of the Group. The Group Chief Executive Officer has delegated responsibility to certain senior executives (principally other members of the Quilter Group Executive Committee) within prescribed limits. The Group Chief Executive Officer and his Executive Committee are supported by several management committees which operate under his delegated authority. The authority of these management committees is documented within their respective Terms of Reference.

The Quilter Cheviot Chief Executive Officer is the Executive Sponsor for Corporate Sustainability across the Group and delegates day to day management and oversight to the Executive Director and Head of Responsible Investment for Quilter Cheviot.

This policy is reviewed at least annually by the Policy Owner.

Appendix A: Supporting Documents

The Human Rights Policy is supported by the following internal and publicly available policies and standards:

Internal policies	Publicly available policies
• Quilter Responsible Business Policy • Quilter Human Rights Standard • Quilter Human Resources Policy • Quilter Group Security and Property Policy • Quilter Safeguarding Policy • Quilter Overtime Policy • Quilter Flexible Working Policy • Quilter Third Party Risk Management Framework • Quilter Customer Policy • Quilter Personal Data Privacy Policy • Quilter Anti-Bribery & Corruption Policy • Quilter Anti-Money Laundering & Counter Terrorist Financing Policy • Quilter Whistleblowing Policy	• Quilter plc Code of Conduct • Quilter plc Supplier Code of Conduct • Quilter Cheviot Responsible Investment Policy • Quilter (Affluent) Responsible Investment Policy

