

Modern Slavery and Human Trafficking Statement

This statement is made by MetLife Investment Management Limited (“MIML”).

About MetLife Investment Management Limited

MetLife Investment Management Limited is a company organised under the laws of England and Wales and is a FCA authorised investment manager. MIML is a subsidiary of MetLife, Inc. MIML provides investment management services to MetLife’s general account and unaffiliated third-party investors.

MIML is dedicated to ethical and lawful business conduct. We have a zero-tolerance approach to modern slavery and human trafficking in our organisation and our supply chain, additionally we oppose modern slavery and human trafficking in any form. This contributes to our general commitment to conduct our business ethically and lawfully. MetLife’s commitment to ethical practices is set out in MetLife’s Code of Business Ethics, located on the MetLife website.

Our Supply Chains

Our supply chains include third party suppliers of services that support MIML and enable us to carry out business activities. Please see below a non-exhaustive list of the services provided to us:

- Compliance support
- Trade analytics and reporting
- Middle/back-office support
- Fee billing hosting support
- Swap execution facilitation
- Execution of derivatives trading
- Client transaction reporting
- Generation of electronic wire transactions
- Maintenance services
- Consultancy services

Anti-Slavery and Human Trafficking

As stated above, we have a zero-tolerance approach to modern slavery and human trafficking in our organisation, including our supply chain, and we oppose modern slavery and human trafficking in any form. All our employees are required to act in accordance with the Code of Business Ethics and receive mandatory training on conduct expectations. An employee’s failure to comply with conduct requirements will lead to appropriate disciplinary action and may result in termination of their employment.

We continue to take steps with respect to our procurement processes and our supply chains to ensure that suppliers self-certify that they do not endorse, enable, or facilitate human trafficking or slavery within their business and work is on-going to build the self-certification requirement into our procurement process. Various procurement stakeholders work to ensure that due diligence processes are carried out on suppliers and vendors, this includes the completion of inherent risk questionnaires. Failure by a new supplier to provide positive affirmation as to compliance will disqualify them from becoming a supplier to us as a result of non-compliance with applicable law.

In addition, we have an established three lines of defence model which includes periodic Board meetings and updates such as monitoring, reviewing, and making recommendations as to the legal and regulatory compliance position of MIML i.e., compliance with English law, which includes modern slavery law.

We have an established and robust whistleblowing process through which employees can anonymously report concerns regarding any actual or potential misconduct, including any breach of modern slavery law.

Our Investment Process

For those clients whose investment objectives include specific sustainability focused outcomes, we offer several dedicated sustainability strategies. These strategies are designed to focus on long-term performance and sustainability outcomes.

Our public fixed income and private credit dedicated sustainability strategies, including SPECTRUM and Transition, perform an overall assessment of the ESG performance of the issuing entity and, for labelled Green, Social, and Sustainable (“GSS”) bonds, assess the proposed use of proceeds of securities eligible for investment. As part of this analysis, there is an evaluation of modern slavery risks with respect to geographic exposure, policy structure, evidence of such risks materialising in the past, and remediation undertaken by companies. Violations against international principles and norms, such as UN Global Compact and OECD Guidelines for Multinational Enterprises are also considered. Ongoing monitoring of these matters is also performed on portfolios offered in these strategies, along with other ESG risk factors.

When modern slavery risks are identified through our initial due diligence or monitoring processes, they are addressed through engagement with an issuer or company’s senior leadership, which is a fundamental part of our research process. Engagement provides our research analysts with an opportunity to better understand material, relevant risk factors, be clear about our expectations, and improve data transparency.

For public fixed income, when modern slavery risks are identified for an existing investment under these dedicated strategies, and if sufficient information cannot be gathered through engagement or research to determine that the risk of modern slavery is sufficiently mitigated, the issuer will be removed, resulting in the sale of the position. When an issuer has yet to be included within the investable universe, sustainability analysts are required to validate that modern slavery risks are appropriately mitigated. If the validation is not achieved through research or engagement, the issuer will not be permissible as an investment.

For private credit, when modern slavery risks are identified for an existing investment under these dedicated strategies, this will prompt the need for an engagement plan, enhanced monitoring, and attempts to seek remediation efforts, where required and/or practicable. The engagement plan and enhanced monitoring will be determined on a case-by-case basis to reflect the material risks factors related to the transaction. Given the less liquid nature of private debt investments, opportunities to reduce and/or exit the position will be considered where it is not detrimental to the interests of our clients.

Declaration

This statement constitutes MetLife Investment Management Limited’s modern slavery and human trafficking statement for the financial year ending 31 December 2023.

Signed on the Board’s behalf by



Paul Wilson
Chief Investment Officer, MetLife Investment Management Limited