Modern Slavery and Human Trafficking Statement 2023
Introduction

UBS Group AG and its subsidiaries and affiliates (collectively, "UBS") are committed to maximizing positive effects and to minimizing negative impact that we have on society and the environment. As part of this commitment, we strive to improve our practices to combat slavery and human trafficking.

The United Nations Sustainable Development Goals ("SDGs") bring together the enormous societal and environmental challenges the world faces. We recognize that it is important to understand these challenges, as well as the opportunities arising from them, to consider their relevance to UBS and to identify potential actions our firm may need to take. Our approach to sustainability is set out in the UBS Sustainability Report 2022.

We are committed to respecting human rights and recognize that human rights are essential to achieving sustainable development globally. Our commitment is set out in the UBS Human Rights Statement.

This Modern Slavery and Human Trafficking Statement ("Statement") is made pursuant to section 54, Part 6 of the UK Modern Slavery Act 2015, for the following entities jointly following a process of consultation between each reporting entity, for the financial year ending 2022:
- UBS AG, London Branch
- UBS Asset Management (UK) Ltd
- UBS Business Solutions AG UK Branch
- UBS Optimus Foundation UK
- UBS UK Donor-Advised Foundation

This Statement is also made pursuant to the Australian Modern Slavery Act 2018 (Cth) for the following entities jointly following a process of consultation between each reporting entity, for the financial year ending 2022:
- UBS AG, Australia Branch
- UBS Securities Australia Limited
- UBS Holdings Pty Limited
- UBS Asset Management (Australia) Ltd.

The process of consultation to prepare and draft this statement was coordinated globally and involved a collaborative multi-jurisdictional and cross-functional approach involving stakeholders from various relevant group functions. Throughout the reporting period the reporting entities were tasked to routinely consider any emerging risks or events which have materialized during the period which may impact this modern slavery statement.

This Statement has been approved by the principal governing body of each of the respective entities listed above. Each of the principal governing bodies was given an opportunity to consider and provide feedback on the Statement prior to publication.

Business, operations and structure

UBS provides financial advice and solutions to private, institutional and corporate clients worldwide, as well as retail clients in Switzerland. Headquartered in Zurich, Switzerland, UBS is present in all major financial centres, with the firm's employees working in 48 countries worldwide. The operational structure of UBS is comprised of four business divisions (Global Wealth Management, Personal & Corporate Banking, Asset Management and the Investment Bank) and Group Functions. More information can be found in our Annual Report 2022.

In the UK, UBS's core businesses are investment banking, including sales and trading, asset management and wealth management. In Australia, UBS's core businesses are investment banking, including sales and trading, and asset management.

Governance

Our approach to human rights is overseen by the Board of Directors (the BoD) of UBS Group AG, notably by the Corporate Culture and Responsibility Committee (the CCRC) (as embedded in the charter of the Committee). The CCRC oversees our Group-wide sustainability and impact strategy and key activities across environmental and social topics, including climate, nature and human rights. Annually, it considers and approves our firm’s sustainability and impact objectives. All BoD committees have specific responsibilities pertaining to environmental, social and governance (ESG) matters. For example, the Compensation Committee is responsible for ESG-related compensation topics, the Risk Committee supervises the integration of ESG in risk management, the Governance and Nominating Committee supports the Board in establishing best practices in corporate governance and the Audit Committee has oversight of the control framework underpinning ESG metrics.

Our Group Executive Board (the GEB) has overall responsibility for establishing and implementing risk management and control in our firm. The responsibility for setting the sustainability and impact strategy and developing Group-wide sustainability and impact objectives, in agreement with fellow GEB members, has been delegated to the GEB Lead for Sustainability and Impact by the Group Chief Executive Officer (Group CEO). The GEB drives our efforts pertaining to human rights. Other management bodies, including in particular our Risk, Compliance, HR and Corporate Services functions, ensure the implementation of our approach to human rights across the firm.
Workforce

As of 31 December 2022, we had 72,597 employees as full-time equivalents (FTEs). In addition, a total of 15,469 external staff members for core business services were active at the end of 2022, primarily in technology and operations roles. This included 1,841 FTEs employed through third parties on short-term contracts to fill positions on an interim basis. Additionally, a total of 13,628 external staff members for non-core business services were active at the end of 2022. Fair and consistent pay practices are designed to ensure that employees are appropriately rewarded for their contribution. We pay for performance, and we take pay equity seriously. We have embedded clear commitments in our global compensation policies and practices, and we regularly conduct internal reviews and external audits as quality checks. If we find any gaps not explained by business or by appropriate employee factors such as role, responsibility, experience, performance or location, we look at the root causes and address them.

Our workforce in a nutshell

<table>
<thead>
<tr>
<th>Gender</th>
<th>Employees</th>
<th>%</th>
<th>Age Group</th>
</tr>
</thead>
<tbody>
<tr>
<td>Men</td>
<td>43,971</td>
<td>59%</td>
<td>&lt;30</td>
</tr>
<tr>
<td>Women</td>
<td>30,051</td>
<td>41%</td>
<td>30-50</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>&gt;50</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Region</th>
<th>%</th>
<th>Countries</th>
<th>Nationalities</th>
<th>Languages</th>
<th>Years of Service, on average</th>
</tr>
</thead>
<tbody>
<tr>
<td>Switzerland</td>
<td>28%</td>
<td>48</td>
<td>150</td>
<td>151</td>
<td>8</td>
</tr>
<tr>
<td>Americas</td>
<td>30%</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Asia Pacific</td>
<td>22%</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>EMEA</td>
<td>20%</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

1 Calculated as of 31 December 2022 on a headcount basis of 74,022 internal employees only (72,597 FTE).
Our policies and principles

We have a number of important policies, principles and tools relevant to the prevention of modern slavery and human trafficking. Our policies and principles are reviewed on a regular basis and updated in line with our commitment to meeting the obligations that a responsible company is expected to comply with.

Code of Conduct and Ethics of UBS

The Code of Conduct and Ethics of UBS (the "Code") defines the way UBS does business. The principles and standards set out in the Code apply to all aspects of our business and the way we engage with our stakeholders. The Code aims to support a culture where ethical and responsible behaviour is ingrained in our workforce. It includes an ongoing commitment to acting with the long term in mind and creating value for clients, employees and shareholders. As set out in the Code, UBS aims to only develop products, offer advice, and conduct business in a way that reflects the firm’s high standards in order to avoid any negative impact on our world and the society.

The Code is also the basis for all our human resource (HR) policies, guidelines and procedures, and it includes a commitment to protect the health and safety of employees and external staff. The Code is complemented by global and country-specific HR policies designed to ensure effective management practices, a strong culture and a safe and respectful working environment. The Code is reviewed on an annual basis.

Human Rights Statement

The UBS Human Rights Statement shows UBS’s commitment to respecting internationally recognized human rights across our firm globally. It shows the structures (governance, policies) and mechanisms (procedures, processes) UBS has in place to support its commitment. Our Human Rights Statement demonstrates our desire to maximize positive impacts on society and reduce as far as possible potentially negative impacts. This is in line with key pledges of our firm, notably to the UN Global Compact. The Statement also reflects the elements of the UN Guiding Principles on Business and Human Rights. In our Human Rights Statement we outline what we do and what we avoid in order to ensure respect for human rights.

Whistleblowing Policy

UBS is committed to conducting its business lawfully and ethically. We have a Whistleblowing Policy and established procedures in every region to help us resolve employee grievances and to deal with concerns staff may have about any suspected breaches of laws, regulations, rules or other legal requirements, ethical breaches, sexual misconduct or harassment, or any infringement of our Code, policies or procedures. In addition to our whistleblowing policies and procedures, all staff have easy access to anonymized, internal or external mechanisms (including an internal website with guidance and links to an online form, whistleblowing and sexual misconduct hotlines and other resources), for submitting whistleblowing reports. All concerns raised are taken seriously and investigated fully and promptly. UBS prohibits retaliation against any employee who reports a concern that they reasonably believe is a breach or violation.

Group Sustainability and Impact governance

The scope, principles, responsibilities and structure of Group Sustainability and Impact, our sustainability organization, are set out in more detail within our Group Sustainability and Impact governance and framework. It provides an overview of the governance and key Group-wide policies, guidelines, and commitments applying to sustainability and impact at UBS.

Risk principles and risk culture

We focus on maintaining a strong risk culture. Our risk appetite framework combines all the important elements of our risk culture, expressed in our Pillars, Principles and Behaviours, our risk management and control principles, the Code, our SCR Policy Framework (see below) and our Total Reward Principles. Together, these aim to align the decisions we make with UBS’s strategy, principles and risk appetite. They help provide a solid foundation for promoting risk awareness, leading to appropriate risk-taking and the establishment of robust risk management and control processes, including in relation to modern slavery and human trafficking. These principles are supported by a range of initiatives covering employees at all levels.

Sustainability and Climate Risk (SCR) Policy Framework

Products, services and activities deemed to have significant sustainability or climate risk potential are subject to procedures and tools for the identification, assessment, and monitoring of such risks in client onboarding, transaction due diligence, supply chain management, operational activities and investment decisions.

Our key tool in this regard is our SCR Policy Framework which governs client and supplier relationships, applies firm-wide, meets the highest industry standards and is integrated in management practices and control principles. We apply the framework to identify and manage potential adverse impacts on the environment and human rights, as well as the associated sustainability and climate risks to which our clients’ and our own assets are exposed.

UBS’s risk and compliance processes are designed to identify clients, transactions and suppliers which do not comply with UBS’s SCR standards. SCR data categories integrated into our compliance tool include forced labour, child labour, and human trafficking, along with other human rights abuses and corporate complicity.

As set out in our SCR policy framework, UBS annually performs a sustainability and climate risk materiality assessment of its products, services and supply chain (in accordance with the ISO 14001 standard and UBS’s Risk Control Self-Assessment). Products, services and activities deemed as having high risk are subject to a framework that includes: (i) risk identification and measurement; (ii) risk monitoring and appetite setting; (iii) risk management and control; and (iv) risk reporting.

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1 Refer to ubs.com/global/en/our-firm/our-culture/code-of-conduct
Policies and Procedures to Combat Financial Crime
We are committed to combating money laundering, corruption and terrorist financing and have implemented policies, procedures and internal controls that are designed to comply with such laws and regulations. We have developed policies intended to prevent, detect and report money laundering, corruption and terrorist financing. These policies seek to protect the firm and its reputation from those who may be intending to use UBS to legitimize illicit assets. As proceeds stemming from the offences referenced in the Modern Slavery Acts of Australia and the United Kingdom would be the proceeds of crime, instances of slavery or human trafficking would also come within the scope of UBS’s money laundering reporting procedures.

Application of relevant international standards
Our commitment to respecting human rights, as highlighted in the UBS Human Rights Statement, refers to internationally recognized human rights – understood, at a minimum, as those expressed in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work (Guiding Principles on Business and Human Rights – Implementing the United Nations “Protect, Respect and Remedy” Framework).

UBS has been globally certified to ISO 14001, the international environmental management system standard, since 1999. In accordance with this standard, UBS annually analyses its portfolio of products and services, own operations and supply chain to assess the significance of environmental and social (including human rights) risks.

The UBS Sustainability Report 2022 has been reviewed by Ernst & Young Ltd (EY). The Report’s content has been prepared in accordance with the Global Reporting Initiative (GRI) Standards. We use the GRI as the basis for this report and apply a careful process weighing up the materiality and relevance of the information reported and the expectations of our stakeholders. The Report covers topics such as labour practices, significant actual or potential human rights impacts in the supply chain, and procedures for assessing and screening environmental and social risks in business lines.
Our Clients

Investment approach
We provide our clients with innovative investment solutions in themes related to human rights, such as health, education, gender and/or equality, in addition to taking human rights risks into account in solutions that address a broader range of sustainability issues. We identify and manage actual and potential adverse impacts to human rights that our clients’ assets and our own assets are exposed to. We aim to identify, prevent and mitigate actual and potential contributions to human rights abuses.

UBS Asset Management (AM) is a signatory to the Principles for Responsible Investment (PRI) and applies a responsible investment approach, which guides processes in integrating environmental, social (including human rights) and governance factors in investment decisions and contains an exclusion process, based on the United Nations Global Compact (UNGC) principles. It also regards stewardship, in the form of proxy voting and engagement, as an integral part of its fiduciary duty. We execute our shareholder rights by generally supporting resolutions promoting human rights and we have set expectations on management of investee companies regarding human capital management and human rights which guide our stewardship activities.

We engage with investee companies as part of our ESG integration process, where we identify company-specific risks and opportunities, and as part of our social thematic and collaboration programs. Through our Human Rights program, we engage with companies identified as presenting a high risk of negative human rights impacts and encourage them to demonstrate their respect for human rights across their operations and value chain. Our Good Work program covers the relationship between companies and their employees and suppliers, including four sub-themes: (1) diversity, equity and inclusion, (2) education, (3) fair pay, and (4) health and safety. Through this program, we encourage companies to enhance policies, practices and disclosure to evidence provision and promotion of good work. We also engage with leading sustainability index providers and industry initiatives to promote human rights.

We regularly report on our activities to clients. UBS AM’s approach to stewardship is described in the annual UBS AM Stewardship Report.

UBS Optimus Foundation
The UBS Optimus Foundation (“Optimus”) network works with UBS and private philanthropists to support organizations working to address child trafficking and slavery. It partners with organizations that have long term strategies aimed at reducing the prevalence of trafficking in communities, businesses and residential care institutions, and building the evidence of what is impactful. Optimus focuses on countries where there is a high trafficking burden, including USA, UK, Uganda, Nepal, Malaysia, Vietnam, Cambodia, Bangladesh, India, Middle East and North Africa and Latin American regions, and supports philanthropists working to tackle the issue in their own communities. As of end of 2022 it has 11 partners from the not-for-profit sector on the issue.

Managing Sustainability and Climate Risks
We have set sustainability and climate risk (SCR) standards for product development, investments, financing and supply chain management decisions. As part of our due diligence process, we engage with clients and vendors to better understand their processes and policies and to explore how any sustainability and climate risks may be mitigated.

Our SCR standards, as outlined in the “UBS SCR Standards table below, include the stipulation of controversial activities (left column) and other areas of concern (right column) we will not engage in, or we will only engage in under stringent criteria. These standards are reviewed on a regular basis.

<table>
<thead>
<tr>
<th>UBS SCR Standards</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>We will not knowingly provide financial or advisory services to clients whose primary business activity, or where the proposed transaction, is associated with severe environmental or social damage to or through use of:</strong></td>
</tr>
<tr>
<td><strong>We will only do business under stringent criteria in the following areas:</strong></td>
</tr>
<tr>
<td>- UNESCO world heritage sites</td>
</tr>
<tr>
<td>- Wetlands on the Ramsar list</td>
</tr>
<tr>
<td>- Endangered species</td>
</tr>
<tr>
<td>- High conservation value forests, illegal logging and illegal fire</td>
</tr>
<tr>
<td>- Child labour, forced labour, indigenous peoples’ rights</td>
</tr>
</tbody>
</table>

Procedures and tools for identifying, assessing, reporting and monitoring sustainability and climate risks are applied and integrated into our standard risk, compliance and operations processes. These include client onboarding, transaction due diligence, product development and investment decision processes, own operations, supply chain management and portfolio reviews. The latter give us an accurate aggregated exposure profile and an enhanced insight into our transaction and client onboarding processes. Based on the outcome of these reviews, we can explore ways to improve the future portfolio profile along a range of risk parameters.

Our processes seek to identify and manage potential adverse impacts to the environment and to human rights, as well as the financial and reputational risks of being associated with them. Advanced data analytics on companies associated with such risks is integrated into our web-based compliance tool used by our staff before they enter into a client or supplier relationship, or a transaction. The systemic nature of this tool significantly enhances our ability to identify potential risks. In 2022, our SCR unit assessed 2,834 referrals, of which 93 were rejected or not pursued further, while 397 were approved with qualifications and 365 were pending at year-end 2022.

*United States of America, United Kingdom, Uganda, Nepal, Malaysia, Vietnam, Cambodia, Bangladesh, India, Middle East and North Africa and Latin American regions.*
## Sustainability and climate risk assessments

For the year ended 31.12.22

<table>
<thead>
<tr>
<th>Cases referred for assessment</th>
<th>31.12.22</th>
<th>31.12.21</th>
<th>31.12.20</th>
<th>% change from 31.12.21</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>by region</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Americas</td>
<td>1</td>
<td>2,834</td>
<td>2,919</td>
<td>(3)</td>
</tr>
<tr>
<td>Asia Pacific</td>
<td>548</td>
<td>496</td>
<td>373</td>
<td>10</td>
</tr>
<tr>
<td>Europe, Middle East and Africa (excluding Switzerland)</td>
<td>729</td>
<td>631</td>
<td>551</td>
<td>16</td>
</tr>
<tr>
<td>Switzerland</td>
<td>1,076</td>
<td>1,236</td>
<td>1,021</td>
<td>(13)</td>
</tr>
<tr>
<td><strong>by business division</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Global Wealth Management</td>
<td>151</td>
<td>278</td>
<td>170</td>
<td>(46)</td>
</tr>
<tr>
<td>Personal &amp; Corporate Banking</td>
<td>1,151</td>
<td>1,345</td>
<td>933</td>
<td>(14)</td>
</tr>
<tr>
<td>Asset Management</td>
<td>11</td>
<td>24</td>
<td>56</td>
<td>(54)</td>
</tr>
<tr>
<td>Investment Bank</td>
<td>1,443</td>
<td>1,162</td>
<td>977</td>
<td>24</td>
</tr>
<tr>
<td>Group Functions²</td>
<td>78</td>
<td>110</td>
<td>32</td>
<td>(29)</td>
</tr>
<tr>
<td><strong>by sector</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Agribusiness¹</td>
<td>466</td>
<td>536</td>
<td>406</td>
<td>(13)</td>
</tr>
<tr>
<td>Chemicals¹</td>
<td>134</td>
<td>133</td>
<td>97</td>
<td>1</td>
</tr>
<tr>
<td>Financial²</td>
<td>438</td>
<td>283</td>
<td>168</td>
<td>55</td>
</tr>
<tr>
<td>Infrastructure²</td>
<td>142</td>
<td>148</td>
<td>90</td>
<td>(4)</td>
</tr>
<tr>
<td>Metals and mining</td>
<td>481</td>
<td>615</td>
<td>492</td>
<td>(22)</td>
</tr>
<tr>
<td>Oil and gas</td>
<td>350</td>
<td>318</td>
<td>354</td>
<td>10</td>
</tr>
<tr>
<td>Technology³</td>
<td>144</td>
<td>190</td>
<td>141</td>
<td>(24)</td>
</tr>
<tr>
<td>Transport</td>
<td>85</td>
<td>80</td>
<td>60</td>
<td>6</td>
</tr>
<tr>
<td>Utilities</td>
<td>204</td>
<td>225</td>
<td>186</td>
<td>(9)</td>
</tr>
<tr>
<td>Other⁵</td>
<td>390</td>
<td>391</td>
<td>174</td>
<td>0</td>
</tr>
<tr>
<td><strong>by outcome</strong>¹⁰</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Approved¹¹</td>
<td>1,965</td>
<td>1,988</td>
<td>1,696</td>
<td>10</td>
</tr>
<tr>
<td>Approved with qualifications¹²</td>
<td>397</td>
<td>396</td>
<td>349</td>
<td>(11)</td>
</tr>
<tr>
<td>Rejected or not further pursued¹³</td>
<td>365</td>
<td>49</td>
<td>119</td>
<td>9</td>
</tr>
<tr>
<td>Pending¹⁴</td>
<td>14</td>
<td>390</td>
<td>0</td>
<td></td>
</tr>
</tbody>
</table>

1 Transactions and client onboarding requests referred to the SCR function.  
2 Relates to procurement / sourcing of products and services.  
3 Amendment in sector calculations: sectors calculated based on first assessed entity.  
4 Includes, e.g., companies producing or processing fish and seafood, forestry products, biofuels, food and beverage.  
5 Includes e.g. chemical and pharmaceutical companies.  
6 Includes, e.g., banks, commodity traders, investments and equity firms.  
7 Includes e.g., real estate and construction and engineering companies.  
8 Includes technology and telecom companies.  
9 Includes, e.g., aerospace and defence, general industrials, retail and wholesale.  
10 “By outcome” 2022 data is from 25 January 2023. Outcomes from 2021 and 2020 were also recalculated.  
11 Client / transaction / supplier transactions approved at SCR.  
12 Client / transaction / supplier subject to an SCR assessment and approved with qualifications. Qualifications may include ring-fencing of certain assets, conditions toward client / supplier or internal recommendations.  
13 Client / transaction / supplier subject to an SCR assessment and rejected or not further pursued.  
14 Decision pending. Except for few cases still in progress from 2021 and 2020, all 2019 pending cases have been closed and reallocated to the other outcome categories.  
15 Assessed companies related to portfolio reviews.
Our Supply Chain

We have embedded environmental and social, including human rights, standards into our sourcing and procurement activities. In order to run our business, we engage numerous suppliers, consultants, agents, contractors, temporary workers and other third-party individuals or firms that have direct contracts with UBS to provide various products and services. As our business partners, we view our vendors as an extension of UBS, and expect our vendors to demonstrate the highest standards of business conduct, integrity and adherence to the law. This expectation is embedded in our Supplier Code of Conduct, which details our ethical and professional standards, which our suppliers must follow when conducting business and engaging with us. We expect our suppliers to uphold high standards of ethics, carefully mitigate risks, and honour global and local labour laws, human rights and environmental responsibilities.

In 2022, we spent USD 6.39 billion on a broad range of products and services. A large portion of this expenditure consisted of real estate, outsourcing and IT costs, as well as consultancy and legal fees. Our sourcing and procurement services are provided by an external company, Chain IQ, which applies our responsible supply chain management (RSCM) framework and processes. The experienced procurement and sourcing specialists at Chain IQ perform vendor due diligence and establish remediation measures, supported by a centralized team of experts within UBS.

To ensure that our social and environmental values are being followed throughout the supply chain, we have in place a firm-wide RSCM guideline which provides systematic assistance on identifying, assessing and monitoring vendor practices in the areas of human and labour rights, environmental protection and anti-corruption. A central component of this guideline are the UBS Responsible Supply Chain Standards, to which our direct vendors are normally bound by contract. We expect our vendors to apply these same standards to relationships with their vendors. The standards define our expectations toward vendors and their subcontractors regarding legal compliance, environmental protection, avoidance of child and forced labour, non-discrimination, remuneration, hours of work, freedom of association, humane treatment, health and safety and anti-corruption issues. In respect of modern slavery, the standard explicitly defines our requirement as “Suppliers shall not use any form of forced, imprisoned, indentured, bonded, or involuntary labour”. As part of our contractual agreements, suppliers are also obligated to report to UBS any violations of applicable laws or regulations or UBS’s Supplier Code of Conduct. We have zero tolerance to slavery and human trafficking.

The main modern slavery-related risks pertain to working condition risks in real estate, outsourcing and IT. We address these risks through the application of our RSCM approach and framework. The RSCM framework includes an impact assessment of newly sourced goods and services, which takes into account actual and potential negative environmental and social impacts along the lifecycle of a product or a service, and all purchased goods and services are categorized accordingly.

We identify high-impact vendors when establishing new contracts or renewals based on the vendors’ provision of goods and services that have either a substantial environmental and social impact or are sourced in markets with potentially high social risks. Such high-impact vendors are requested to fulfill further requirements towards product and service provision and are assessed against UBS’s Responsible Supply Chain Standards. If this assessment reveals any non-compliance with our standards, UBS defines and agrees, together with the vendor, specific improvement measures, which we monitor. Lack of improvement may lead to the termination of the vendor relationship. We also regularly screen active vendors as part of our environmental and social risk control processes.

Vendors of potentially high-impact goods or services are requested to provide disclosures about their management practices and corresponding evidence, which is evaluated by a specialized team. Actual and potential negative impacts that are considered in the impact assessment of purchased goods and services include, among other areas, unfair employment practices, such as low wages, excessive overtime, absence of occupational health and safety measures.

In 2022, 124 high-impact newly sourced vendor contracts / renewals were classified as vendors that provide UBS with goods or services with potentially high impacts. In addition, 22 vendors were classified as ongoing engagements, which are reassessed after 24 months to ensure that even in long-term contracts UBS’s expectations regarding environmental and social aspects are met and supervised continuously. Of all the vendors assessed, 42% were considered as in need of improving their management practices to meet the standards required by UBS. Specific remediation actions were agreed upon and implementation progress is closely monitored. The remediation actions for this period included the establishment of policy documents with mandatory commitments and implementation procedures in the area of environment, human and labour rights such as setting up vendors’ own supply chain code of conduct, environmental policy, human and labour rights policy.

In 2022, no UBS vendor relationship was terminated as a result of RSCM assessments. This results partly from the fact that we assess each vendor’s potential risks before entering into a contract with them.
Ongoing Reviews

In the spirit of continuous improvement, our approach to human rights, including modern slavery risks, is subject to a regular review process. As part of the process, we consider pertinent developments and challenges. This includes UBS Sustainability and Climate Risk conducting ongoing reviews of our business relationships and portfolio-underlying assets to assess whether they might lead to or be exposed to potential negative impacts. We periodically assess the effectiveness of our policies, standards and practices in place to mitigate modern slavery and human rights related risks. Fundamental changes are endorsed by the Board of Directors of UBS Group AG, notably by the Corporate Culture and Responsibility Committee (as embedded in the charter of the Committee).

Training

UBS regularly provides training and works to raise awareness among employees about the Code along with our firm’s sustainability goals and actions. All employees are required to confirm annually that they have read UBS’s key documents and policies, including the Code. We actively engage in education and awareness raising for employees, staff, clients and our local communities on corporate responsibility and sustainability topics and issues.

Through employee onboarding, education and broader awareness-raising activities, we ensure that our employees understand their responsibilities in complying with our policies and the importance of our societal commitments. Better understanding of our firm’s sustainability goals and actions is promoted through a wide range of training and awareness-raising activities, as well as in our performance management process. For example, in 2022, a specialist training program on environmental and human rights topics (including sustainable finance) was provided to over 34,000 employees in front-office and support functions who deal directly with related aspects in every-day business processes.

All employees and external staff subject to mandatory learning requirements are required to complete financial crime training, which covers AML, sanctions, fraud and anticorruption. The training is mandatory and must be completed at least on an annual basis. For dynamic topics like sanctions, targeted communication and guidance is provided to relevant staff and employees may also access internal webpages containing up to date information. UBS refers to sanctions as “any measure or restriction (including those often referred to as “embargoes”) that is generally related to national/international security issues (such as terrorism or narcotics trafficking), human rights violations, or are economic or trade based.” Furthermore, we have included human trafficking as a topic in our Group-wide Financial Crime Prevention training module to raise awareness of the issue.
Pertinent Societal Commitments

We are a founding member of the Wolfsberg Group, an association of global banks that aims to develop financial services industry standards for policies on preventing financial crime such as money laundering, fraud, corruption and terrorist financing, as well as developing industry standards for know-your-client (KYC) due diligence and ongoing transaction monitoring. The Wolfsberg Group brings together banks from around the world at its annual forum and regional reach-out meetings focused on financial crime topics, and delivers an annual academy to support the development of junior Financial Crime Prevention (FCP) officers. It also works on guidance papers in related key areas of financial crime. UBS is actively involved with this group. For example, during 2022 we co-chaired the Wolfsberg Working Group to update and re-issue its Anti-Bribery & Corruption Programme guidance.

Together with the other members of the Wolfsberg Group, we work closely with the Financial Action Task Force (FATF), an intergovernmental body that helps develop national and international policies on preventing money laundering and terrorist financing through consultation with the private sector.

We are a member of a number of public private partnerships operating globally that have been set up to foster closer working relationships between financial institutions and law enforcement, most notably the Joint Money Laundering Task Force Operations Group in the UK, which has worked on a number of human trafficking and modern slavery cases.

We are co-chair of the Thun Group of Banks – an informal group of bank representatives that work together with the primary purpose of (i) furthering understanding of the UN Guiding Principles on Business and Human Rights (UNGPs) within the context of banking, and (ii) considering how they may be applied across the range of different banking activities. Since its first meeting in 2011, the Thun Group’s focus has been on sharing expertise and experience to support the integration of the UNGPs into the policies and practices of banking institutions.

Further Information

For more information about our approach to corporate sustainability (including our approach to modern slavery and human trafficking) and for any questions pertaining to this Statement, contact cr@ubs.com.

Our Supply Chain Standards and Supplier Code of Conduct can also be found on ubs.com/suppliers.
Execution Page:

For **UBS AG, London Branch**

[Signature]

Beatriz Martin  
UK Chief Executive  
for UBS AG London Branch

23 June 2023

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For **UBS Asset Management (UK) Ltd**

[Signature]

Ruth Beechey  
Director

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For **UBS Business Solutions AG UK Branch**

[Signature]

Zoe Evans  
Chairperson of the Management Committee

23 June 2023

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For **UBS Optimus Foundation UK**

[Signature]

Eva Lindholm  
Chair, Foundation Board UK

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For **UBS UK Donor-Advised Foundation**

[Signature]

Richard Hardie  
Chair, UBS UK Donor-Advised Foundation

23 June 2023
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Joint Country Head, Australia

Anthony Sweetman  
Joint-Country Head, Australia

23 June 2023

For **UBS Securities Australia Limited** (ABN: 62 008 586 481; AFSL: 23109)

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Conor Foley  
Director

23 June 2023

For **UBS Holdings Pty Limited** (ABN: 50 050 101 249)

Nick Hughes  
Director

Jo Avellano  
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23 June 2023

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23 June 2023