

Responsible business

# Compliant and transparent

**100%**

Of our top 50% of suppliers  
(by spend) have net zero  
targets (2024: 95%)

**99%**

Completion rate of  
mandatory compliance  
learning by colleagues  
(2024: 99%)

**AA**

MSCI ESG rating  
(2024: AA)

This section outlines the frameworks, policies and compliance principles that support our approach to being a responsible business, and summarises progress for the year ended 31 December 2025. These form an important part of our Responsible Business pillar, which also encompasses how we deliver sustainable solutions for our customers and clients and broader responsible practices across our organisation. This section should read in conjunction with our Sustainability Report 2025, which provides a fuller overview of our Responsible Business strategy.

[Click here for our  
Sustainability Report 2025](#)

## Responsible business continued

# Human rights

### Why it matters

Through our work as global investors, employers, and service providers, we are connected to a wide range of human rights considerations. We are alert to these issues across our business and have policies and actions in place to help mitigate risk and deliver positive outcomes. We have a critical role to play and work to tackle industry issues and promote best practice.

### Salient human rights issues

#### Overview of our areas of focus

We look at a range of potential human rights impacts resulting from activities we are involved in and prioritise those likely to be the most severe, were they to occur. This is based on the level of impact to the rights holder, how widespread the issue could be, and the complexity of remediating the issue. We view our salient human rights issues through the eyes of the rights holder, drawing on internal expertise and conversations with external bodies. This page identifies the rights holders and salient human rights issues we believe are most relevant to them. An overview of the relevant Group and Business policies in place can be found in our [ESG data book](#) and [Human Rights Statement](#).

### Rights holder – Clients

#### Data privacy

We maintain records of processing activities and regularly monitor compliance with our policies to evidence compliance with applicable laws. Privacy notices are published/provided to inform data subjects what personal data is processed by Aberdeen and how to exercise their rights under laws. Find out more [here](#).

#### Protection from discrimination; vulnerable customers

We listen to the needs of all of our clients and consider their diverse requirements within our products.

### Rights holder – Colleagues

#### Protection from discrimination, bullying and harassment

We treat everyone fairly and with respect. We do not tolerate unfair treatment, discrimination or harassment of any kind, with our principles upheld in every country we operate in, complying with local legislation and regulations.

#### Safe and secure work

We currently operate Blended Working, where colleagues can split their time between in-office and home working. We continue to support safe working in the office and at home, requiring the majority of colleagues to work from their local office at least three days per week.

### Fair wages

We commit to paying all our employees fairly, and our working hours are not excessive. We have been an accredited UK Living Wage employer since 2014 and are a founding member of the UK Living Hours initiative. Find out more [here](#).

### Inclusion

We are committed to building a business that attracts brilliant talent; a business where all people can thrive and belong, learn and develop and do their best work. Find out more [here](#).

### Listening to colleagues

Each year our annual engagement survey provides colleagues with the opportunity to have their voices heard. Find out more [here](#).

### Rights holder – Supply chain

We are committed to upholding internationally recognised labour and human rights standards across our value chain, including addressing modern slavery risks. Our approach is guided by the UN Guiding Principles on Business and Human Rights, the International Labour Organization (ILO) Core Conventions, and the International Bill of Rights. These principles are included in our supplier expectations:

- Treat all workers with dignity and respect.
- Provide safe, fair, and inclusive working conditions.

- Prohibit discrimination, harassment, forced labour and child labour.
- Ensure transparency in employment practices and supply chain operations.

We integrate labour and human rights checks into risk assessment, due diligence, and continuous monitoring, and encourage suppliers to proactively address potential risks.

No instances of modern slavery or forced labour were identified or reported in 2025. However, we acknowledge that absence of detection does not guarantee absence of occurrence. We remain committed to collaborating with suppliers and stakeholders to identify and mitigate risks and take corrective action where necessary. Additional information is provided in our [Modern Slavery Statement](#).

### Rights holder – Communities

#### Inequality

Action through the Aberdeen Group Charitable Trust (previously the Aberdeen Group Charitable Foundation). Find out more [here](#).

### Impacts linked to investments

Dependent on country and sector – human rights considerations are integrated into our investments approach. Find out more in our [approach document](#).

## Responsible business continued

### Supply chain

#### Why it matters

Our supplier relationships are significant and have the potential to impact people and the environment. Our objective is to mitigate these impacts where they emerge.

#### Our third parties

We rely on third parties to deliver a diverse range of goods and services that underpin our operations and enable us to serve clients effectively. Our global supplier network spans multiple regions, industries and organisational sizes.

#### Sustainable procurement approach

Our Global Third Party Code of Conduct outlines principles and compliance requirements we expect from our third parties. This includes environmental transition, social impacts and responsible business expectations, such as emissions reduction, fair and ethical work and inclusive growth.

The principles contained within our Global Third Party Code of Conduct form the basis of our sustainable procurement strategy. This strategy outlines our plan for achieving long term aspirations such as:

- 75% of suppliers to have established emission reduction targets by 2030.

- Continuous monitoring and disclosure of third-party labour and human rights risks, mitigation and remedy.
- Increased opportunities for small- and medium-sized enterprises and diverse businesses.

To implement this strategy we have in place a sustainable procurement framework which embeds sustainability into the processes outlined in our third-party risk management framework and across all associated third party life-cycle stages.

#### Third-party sustainability risk

We continuously assess sustainability risks associated with our third parties. In 2025, overall risk remained low, reflecting the generally low-risk nature of financial services supply chains.

Since 2023, our partnership with EcoVadis – a leading supplier sustainability rating platform – has strengthened oversight and improved transparency. Through its IQ platform, we have enhanced risk awareness and gained better access to supplier sustainability information.

Building on this foundation, we continue to expand our data capabilities to support long-term actions, targets, and governance processes. In 2025, these efforts enabled us to extend sustainability risk screening of active suppliers, resulting

#### 2025 Achievements

100% of top 50% suppliers by spend set emission reduction targets
100% of procurement team members completed bespoke modern slavery awareness training
99% of suppliers screened for inherent sustainability risk
Increased opportunities for minority-owned businesses and charity partners
Fair Payment Code Gold Award

in the assessment of 99% of our third-party relationships.

Aberdeen applies a risk-based due diligence process to assess environmental, social, labour and operational risks in our supply chain. Each engagement is assigned an Inherent Risk Rating, which determines the level of pre-contract checks and ongoing monitoring required. We complete structured Due Diligence Assessments, independently reviewed by our Risk Domain Owners, with medium- and high-risk findings recorded and tracked in our governance system until resolved.

To identify risks beyond supplier declarations, we use targeted sustainability, labour and human-rights questions aligned with recognised responsible-business expectations, reviewed by sustainability specialists. Regular review cycles (set by risk level) ensure continued oversight throughout the supplier relationship.

#### Identifying issues

If an issue arises, we work collaboratively with the affected third-party to implement mitigation and remediation measures.

Where appropriate, we will also support engagement with impacted individuals if the event was directly caused by third parties while providing goods or services to Aberdeen.

We encourage suppliers to be open and transparent. Where issues are identified, suppliers are expected to notify their Aberdeen business contact promptly. If an individual or third-party feels unable to raise concerns directly (due to fear of reprisal), we provide access to our confidential Speak Up service. Details of this service are outlined in our Global Third-Party Code of Conduct.

#### Treating suppliers fairly

Aberdeen is committed to fair and transparent supplier relationships, with prompt payment at the core. By adopting the UK Government's Fair Payment Code and strengthening our invoice processes, we consistently meet high standards – earning Gold status in 2025 for paying 95% of invoices within 30 days, reporting transparently, and continually improving our practices.

## Responsible business continued

# Clients and Colleagues

## Ethical conduct

### Why it matters

We all have personal responsibility to follow the principles of ethical conduct and to take accountability for our own actions. We follow the basic principle of doing the right thing by customers, clients, colleagues, shareholders and communities, with the goal to make a positive difference.

### Core principles for ethical conduct

Acknowledging that laws, regulations, policies, and procedures may vary by country, we expect that all colleagues should always:

- 1 Act with integrity.
- 2 Act with due skill, care and diligence.
- 3 Be open and cooperative with our regulators.
- 4 Pay due regard to the interests of customers and clients and treat them fairly.
- 5 Observe proper standards of market conduct.
- 6 Act to deliver good outcomes for retail customers.

We also have additional responsibilities and expectations for managers, with the objective being to set standards, develop teams, and lead our business. Our Global Code of Conduct is a public document, available on our website.

### Speaking up Importance of speaking up

We are committed to operating in an honest and transparent way across Aberdeen Group plc and this extends to speaking up should there be an issue relating to any aspect of our conduct. We have a duty to raise any concerns related to our regulatory responsibilities and conduct. This principle helps to protect our clients, customers, colleagues, and our business, as we act with integrity and take accountability for our actions.

### Reporting channels

If colleagues have a concern, we encourage them to report this to their manager. This is our suggested first point of contact, and is often the best way to resolve any challenges. Our objective is to create a safe environment, where all colleagues feel empowered to express concerns. We also have formal grievance procedures in place should there be a need to follow a different process. All concerns raised are taken seriously and any victimisation, harassment, discrimination or bullying of anyone is not tolerated and may be considered a disciplinary matter.

### 12 Speak Up reports

2024: 4  
In 2025, we received 12 reports via the service, compared with 4 reports in 2024.

### Confidential Speak Up service

Recognising the importance of multiple reporting channels and the ability to raise concerns anonymously, an independent Speak Up service is available globally to clients, colleagues, third-parties and anyone who may wish to raise a concern. The service is managed independently by Safecall and is available 24 hours a day, seven days a week, in multiple languages, with a dedicated website [www.safecall.co.uk/report](http://www.safecall.co.uk/report). All reports are monitored, and we carry out investigations based on the nature of report. Any concern raised is taken seriously and investigated. The anonymous nature of the service is important, but it can limit our ability to provide feedback to any concerned parties. Our Audit and Risk Committee maintains oversight over the Speak Up arrangement, with a specific report on related matters provided annually.

## Responsible business continued

# Clients and Colleagues

## Compliance training

### Why it matters

In addition to our learning and development strategy, we provide colleagues with mandatory training to ensure a clear understanding of critical regulatory and legal obligations. Our objective is to ensure our colleagues are supported to deliver on our business obligations.

### Topics covered by mandatory training

- 1 Anti Money Laundering
- 2 Client assets
- 3 Competition law
- 4 Conduct
- 5 Fraud prevention
- 6 Health and safety
- 7 Privacy, Data Protection, Information Security and Cyber Risk
- 8 Resilience
- 9 Preventing discrimination and harassment
- 10 Risk and control fundamentals

# 99%

2024: 99%

### Mandatory training completion

Aggregated percentage of mandatory training completed.

### Monitoring compliance and completion

Colleagues are expected to complete mandatory training in a timely manner, with some exceptions for cases where individuals may be out of the business for extended periods. Actions linked to non-compliance may lead to disciplinary action, with potential consequences up to and including dismissal.

### Ensuring training remains relevant

Our suite of mandatory compliance training remains under review to ensure changes to regulations and business requirements are reflected. We have training relevant for specific regions and teams, and endeavour to ensure that colleagues benefit from the learning provided and that their time spent on training is effective.

### Bespoke training

In addition to mandatory training for all colleagues, some roles are required to complete training to develop competencies for specific aspects of their responsibilities.

### Looking ahead

Ensuring that our colleagues are equipped to deliver on our obligations and regulatory requirements will continue to be a critical focus, with training appropriately updated to reflect this.

## Health and safety

### Why it matters

The health, safety, and wellbeing of the people who work with us is of paramount importance. We ensure that appropriate processes are in place to protect those we work with.

### Monitoring and systems

All colleagues work in comparable office environments. The highest volume of our people are based in the UK (approximately 82%), which is therefore our highest risk. We employ an external consultancy to visit all our UK offices on an annual basis to review our health and safety approach and fire safety compliance. Identified risks are logged as actions and addressed based on the noted severity by our third-party workplace team. We also conduct risk assessments for our work activities. Our goal is zero reportable workplace accidents and 95% of risks to be controlled

at the point of audit. All accidents and incidents are investigated.

### Reporting and transparency

Though our colleagues work in low-risk environments, accidents can and do happen, and we believe in the principle of reporting relevant information publicly.

### Workplace fatalities

# 0

2024: 0

### Workplace accidents

# 0

reportable workplace accidents

2024: 0

### Workplace absence

# 1.6%

2024: 1.9%

The coverage is 71% of colleagues (2024: 72%) (excludes ii employees)

## Responsible business continued

### Clients and Colleagues

#### Client outcomes

##### Why it matters

Our purpose is to enable our clients and customers to be better investors; we do this through products and services that meet their needs and provide the outcomes they might reasonably expect. Core to this is the recognition that we must treat clients and customers fairly and ensure that the voice of the customer is brought into every conversation.

##### Aberdeen conduct outcomes

Our conduct outcomes provide a common language to support our conduct framework and deliver good outcomes.

#### Our key commitments

##### Colleague culture



All stakeholders can be confident that they are dealing with a firm where the fair treatment and the needs of customers and clients are central to the corporate culture.

##### Client and customer understanding



Consumers understand the products and services they are buying. Information provided is appropriate, balanced and suitable to their needs and circumstances and enables them to make an informed decision.

##### Price and value



Ensure that consumers receive fair value. Customers and clients are provided with services that are of a standard in line with expectations set.

##### Proposition design & governance



Products and services are fit for purpose and meet the needs of consumers. Propositions are designed to promote and build valuable relationships with customers and clients, paying due regard to their interests and meeting their needs, and are sold appropriately.

##### Proposition delivery & support



Customers receive appropriate support after purchasing a product or service. They do not face unreasonable barriers to change product, switch provider, submit a claim, access services or make a complaint or expression of dissatisfaction.

## Responsible business continued

### Clients and colleagues

#### Data privacy

##### Why it matters

It is important we process personal data in line with privacy and data protection laws and is critical that our customers and clients trust us to take appropriate measures to ensure its security.

##### Guiding principles

Our Data Protection Officer sets the framework including an internal policy and standards to support the effective processing of personal information in line with obligations under applicable laws globally:

- We document personal data processing activities (with clear lawful bases) in a Personal Data Inventory (Record of Processing Activities); this is reviewed and updated at least annually to reflect any changes.
- We will only process the minimum personal data necessary for the agreed purposes and will delete personal data in line with business retention schedules when we no longer have a lawful basis, e.g. seven years after the end of our relationship with the data subject.
- Appropriate processes and controls are implemented to ensure personal data is processed fairly and lawfully; regular

monitoring is in place to ensure these remain effective.

- We will consider potential privacy risks upfront ('privacy by design') when implementing any new or changes to existing processing activities. Data privacy impact assessments are undertaken for high-risk activities which require prior approval from the Data Protection Officer.
- Privacy notices, used to inform data subjects why and how we process their personal data, are published and are easily accessible. These are reviewed at least annually to reflect changes in processing activities.
- We have implemented controls to ensure access to personal data is restricted to only those employees who require this information to do their role. We review these regularly to ensure they remain effective to prevent unauthorised access to personal data.
- We undertake regular due diligence and have up to date contractual agreements in place, including relevant data protection and security provisions, with our affiliates and any external third-parties, and their sub-processors.
- We have implemented processes and controls to prevent breaches, but where these occur, we act promptly to identify the root cause, to take the required actions to minimise any harm to data subjects and prevent recurrence. We

have processes to notify regulators and data subjects where required in line with laws.

##### Monitoring and systems

Personal information is protected by processes and controls designed to minimise loss or damage through accident, negligence or deliberate actions. We apply appropriate measures to ensure the security and integrity of personal information. Processing activities and the nature and volume of personal data will vary across the business, but each area documents these within a Personal Data Inventory (Record of Processing Activities). This is then assessed by the Data Protection team to identify any compliance gaps requiring remediation. We believe our privacy management framework supports efficiencies in how we assess data privacy risks and associated business processes, and enables effective monitoring and reporting. We review our privacy management framework at least annually.

##### Reporting data incidents

Data incidents are logged when identified and reported to management and relevant risk and control meetings regularly. This process ensures visibility of the incidents and provides assurance that appropriate actions have been taken to address risks and to help prevent a recurrence. All reported data incidents are assessed either by local risk and

compliance teams or with advice from the Data Protection Officer, where required. The Data Protection Officer will assess the materiality of risk to determine if it should be reported to the relevant regulator(s).

##### Reportable data breaches

There was 1 data privacy breach reported to the UK privacy regulator (the ICO) during 2025 (2024: 1). It was assessed as low risk internally, but was reported on a prudent and precautionary basis, with the ICO closing the matter with no further action required to be taken by Aberdeen.

##### Looking ahead

There are no planned changes to how we approach compliance. It remains a priority for Aberdeen to continue to demonstrate that the processing of personal data is in line with statutory obligations and meets regulator and data subjects' expectations.

## Responsible business continued

### Clients and colleagues Cyber Security

#### Why it matters

The misuse of confidential information, whether accidental or deliberate, can result in significant harm to people and society, and we must continually ensure its protection.

#### Our information security framework

Our Information Security Framework is developed using industry standards, including ISO27001, ISF SoGP and the NIST Cybersecurity Framework. Our objectives are to:

- Protect our assets: people, physical and financial.
- Protect client and customer interests.
- Comply with related legislation and regulatory requirements.

Specialist teams help drive the implementation of the framework and supports the development of our risk-aware culture for the business. Areas of focus include:

- Analysing cyber risks and the threat intelligence.
- Operation of our incident and crisis management framework.
- Colleague training and awareness.
- Policy development and efficacy.

These teams support the wider business to implement key policies and embed controls, where applicable.

#### Certification

Aberdeen Group plc holds ISO22301 Business Continuity certification. This certification requires that the organisation undergoes a formal external assessment of our Business Continuity management systems and demonstrates to internal and external stakeholders that Aberdeen is adhering to good practices in business continuity management. This certification is audited and validated annually and re-certified every three years.

#### Independent monitoring

We thoroughly test our controls using independent procedures, both internally and externally, to ascertain the effectiveness of our control environment. Consequently, we can identify potential enhancements, which may help prioritise items for investment in our annual cyber change programme.

#### Training and education

As a minimum, all colleagues must complete training on Data Privacy, Information Security and Resilience at least once a year. This covers a range of regularly updated related topics such as password security, social engineering and information protection. The Information Security Governance & Assurance Team

also delivers ad-hoc training focused on threat trends and/or individual requirements, and provides resources for colleagues through our internal communications platforms and intranet. The team deliver training and engage with colleagues through a range of formats to enhance the Group's security conscious culture. Education on phishing and social engineering continues to be a key focus, as it remains one of the primary risks facing organisations.

#### Third-party due diligence

Prior to procuring goods and services across Aberdeen, we complete a service risk assessment questionnaire, which informs the questions we ask during due diligence. Information security and resilience standards are embedded in this process, and identified risks are challenged by internal subject matter experts to determine proportionate mitigation efforts and decision-making.

#### Reporting and transparency

The business monitors and internally reports a range of metrics to track the effectiveness of relevant policies, procedures and controls. These include outcomes from phishing training and exercises, but also comprehensive maturity, vulnerability and business continuity testing. We aim to increase the resilience of our business to security breaches, and to ensure our colleagues are

equipped to manage risks. We disclose related voluntary metrics in support of transparency.

#### Looking ahead

Cyber Security and Information Security remain critical priorities for Aberdeen, and we are making appropriate investment to ensure that we continue to improve our maturity. Our existing processes are designed to protect our assets, ensure operational resilience, and comply with industry standards and regulations. By continuously evolving our security measures against the most likely threats, we aim to provide our clients and notable stakeholders with the confidence that their data and investments are secure.

## 0

#### Information security breaches

Confirmed breaches of information security during the reporting period (2024: 0)

## Responsible business continued

### Public affairs

#### Why it matters

We want to share our knowledge, insights, and ideas to help shape policy and contribute to better outcomes for our clients, shareholders, people, and society.

#### Our guiding parameters

The following principles summarise the parameters we adhere to in order to ensure our apolitical status:

- We do not make political donations to parties, campaigns, any candidates, or their agents.
- We do not provide non-financial support that could compromise our apolitical status.
- We do not make public statements that could be seen to endorse an individual, party, or organisation.
- We do not permit any external consultants to engage with policymakers on our behalf.
- We work with industry bodies who engage with policymakers, but such bodies are non-partisan.

#### Engaging with trade associations

We work closely with industry bodies, as valuable mechanisms to connect with peers and to put forward perspectives on issues of importance to our stakeholders. This enables us to engage on positions such as the future of sustainable finance and responsible investment in the UK. Examples of our trade bodies and industry associations can be found in our ESG data book [here](#).

#### Responding to public consultations

Policymakers will often seek views from stakeholders, including companies like Aberdeen, on important policy and regulatory developments. We monitor opportunities to provide our perspective, and contribute both directly as Aberdeen, as well as through our trade associations.

#### Looking ahead

Engagement and dialogue with policymakers and regulators is likely to intensify in 2026, in line with further sustainable finance reforms. In particular, sustainability reporting and disclosure continues to be a significant focus for many governments, regulators, and other industry groups, and we are strong supporters of efforts to establish global standards. This supports our work as investors and represents long-term transformation for corporate disclosure. We will continue to monitor and, if necessary, engage on the implementation of the Sustainability Reporting Standards and corporate transition planning requirements in the UK.

## Responsible business continued

### Financial crime

#### Why it matters

We are committed to protecting our client and corporate assets, with a zero-tolerance approach to bribery and corruption, money laundering, sanctions and terrorist financing.

#### Internal control systems

We maintain proportionate, tailored controls to prevent financial crime across our three businesses. These controls are embedded within our Enterprise Risk Management Framework (ERMF), which supports effective management and monitoring. First line teams implement policy and procedure requirements, with oversight from our Anti-Financial Crime (AFC) team. All systems and processes are subject to regular assurance reviews and audits to assess effectiveness in countering financial crime.

#### Risk based approach

A cornerstone of our AFC Framework is the Risk Based Approach (RBA). This ensures that clients posing a higher Anti-Money Laundering and Counter Terrorist Financing risk are subject to enhanced due diligence and monitoring. Additional controls are allocated to higher-risk activities and operations. The RBA is underpinned by a detailed client risk assessment methodology, considering factors such as entity type, jurisdiction, product channel and sectoral risk.

#### Client due diligence

Before establishing any business relationship, we verify the identity in line with our risk-based approach to prevent money laundering and terrorist financing. Our due diligence process include screening against terrorist databases and identifying Politically Exposed Persons using specialised tools; applying enhanced scrutiny where heightened risk factors exist, including Money Laundering Reporting Officer (MLRO) and senior management approval; and gaining a thorough understanding of our client's business and investment objectives. We also conduct ongoing monitoring to detect suspicious activity. Colleagues must report any concerns to the designated MLRO, who determines whether onward reporting to the authorities is required.

#### Monitoring and oversight

The AFC team conducts assurance reviews to monitor financial crime risks in line with the Group's risk appetite and risk-based approach. These reviews include testing controls, identifying gaps, and reporting effectiveness to senior management.

#### Reporting and transparency

We operate a zero-tolerance approach to financial crime. Colleague conduct is critical to prevention and detection. We are committed to transparency and voluntarily disclose common measures of business ethics.

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# 0

#### Incidents identified of bribery or corruption

Confirmed instances of bribery or corruption by Aberdeen colleagues (2024: 0)

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# £0

#### Losses from legal proceedings

Losses from public legal proceedings relating to bribery or corruption by Aberdeen colleagues (2024: £0)

## Responsible business continued

## Governance and policies

	Topic	Governance	Policy
Clients and Colleagues	<b>Ethical conduct</b>	Ethical conduct is everyone's responsibility, with our Board maintaining oversight through our ERMF. Our Chief Executive Officer has delegated authority for the development, delivery and management of Conduct Risk, with all colleagues required to attest to adherence with the principles of our Global Code of Conduct annually.	Global Code of Conduct
	<b>Compliance training</b>	Mandatory training completion rates are monitored as part of our assessment of Conduct Risk, which is subject to Board oversight and embedded in our ERMF. Information to enable oversight is provided on a recurring basis to the Audit and Risk Committee, by the Chief Risk Officer in a report that covers the principal risks and uncertainties faced by Aberdeen.	Global Code of Conduct
	<b>Health &amp; safety</b>	Our Board has overall responsibility for health, safety, and wellbeing throughout Aberdeen, with our Chief Executive Officer responsible for oversight on behalf of the Board. Operational responsibility is delegated to a member of our ELT. Our UK Health and Safety and Workplace team meets weekly and highlights any material health and safety matters, including the effectiveness of existing policies and practices. The Board maintains oversight on an annual basis through the review of a health and safety report, which includes a summary of significant activities, by region, for the reporting year. Related risks are also embedded within our ERMF.	Health and Safety Policy Global Third-Party Code of Conduct
	<b>Client outcomes</b>	Treating clients and customers fairly is embedded in our ERMF, which is subject to Board oversight. Our Chief Executive Officer has delegated authority for the development, delivery and management of Conduct Risk, including in relation to clients and customers. Our ELT implement our framework, which ensures our 'client-first' culture and that appropriate processes and procedures are in place to deliver our strategy. We have no appetite for unfair or poor customer outcomes and seek to offer fair value, as well as the provision of appropriate service and support across the firm. In cases where a proposition, procedure or process has been identified as not performing as intended, we commit to do the right thing for our customers and clients and rectify in a prompt manner.	Client and Customer Policy Conflicts of Interest Policy Global Code of Conduct
	<b>Data privacy</b>	Privacy and data protection risks are managed as part of our ERMF, which is subject to Board oversight. It is the responsibility of all colleagues to understand and adhere to privacy and data protection principles and to manage any privacy risks in line with the company's risk appetite and applicable laws. The role of our Data Protection Officer and Data Privacy Office is to provide the framework and guidance to support ongoing compliance with our policies and applicable data protection laws, and to report independently on compliance to the Board and relevant Control Forums. Information relating to the company's privacy and data compliance risks and key metrics is provided on a regular basis to the Audit and Risk Committee, by the Chief Risk Officer.	Privacy and Data Protection Policy Information and Cyber Security Policy Global Third-Party Code of Conduct
	<b>Cyber &amp; information security</b>	Information security is embedded within our ERMF, which is subject to Board oversight. Information security risks apply to several principal operational risks for the business, including those relating to technology, security, and resilience. Our governance structure reflects this, with the Chief Information Security Officer reporting to the Group Chief Operating Officer, who is a member of the ELT.  Our Information Security Governance and Assurance team provides oversight across the business and specialist expertise on matters such as cyber security. Information to support effective oversight is provided on a recurring basis to the Audit and Risk Committee by the Chief Risk Officer.	Technology Policy Information and Cyber Security Policy Global Third-Party Code of Conduct

## Responsible business continued

### Governance and policies

	Topic	Governance	Policy
Supply Chain	<b>Procurement</b>	Third-Party Risk Management is embedded within our ERMF and is noted as a key operational risk. Our Board acknowledges that accountabilities remain within the business, while recognising that third-party relationships are essential to the delivery of our strategy. Third-parties are managed depending on the inherent risk of the service they provide and sustainability issues are considered throughout our third-party life cycle.	Procurement, Outsourcing and Third-Party Management Policy  Responsible Sourcing Principle  Global Third-Party Code of Conduct

	Topic	Governance	Policy
Corporate Integrity	<b>Financial crime</b>	Financial crime risks are embedded within Aberdeen's ERMF, with the Board maintaining oversight of all relevant systems and controls.	Anti-Financial Crime Policy
		The Chief Executive of each of the Group's three businesses is accountable for implementing operational processes and controls to manage financial crime. They are supported by the Global Head of Anti-Financial Crime and the Second Line Anti-Financial Crime team, who set policies and standards, provide advice, and oversee the Group's financial crime framework. Where required by regulation, legal entities appoint a Money Laundering Reporting Officer with specific responsibilities, including ensuring that policies and standards comply with local laws and regulations.	Anti-Money Laundering Policy  Anti-Bribery and Corruption Policy
		All colleagues must comply with applicable policies, standards, operating procedures, and guidance relevant to their business area. These risks are managed by first line business teams through comprehensive risk assessments and robust due diligence on clients and customers.	Gifts and Hospitality Policy  Sanctions Policy  Global Code of Conduct
	<b>Tax</b>	Our tax risk policy, which sets out how we manage and operate tax risk across our business, is approved by our Board and reviewed annually, and sets the operational standards by which we manage tax risk across the business. The tax risk policy is part of our ERMF, the basis upon which we manage risk.	Tax Risk Policy
	<b>Public affairs</b>	Our Public Affairs team supports the implementation of our strategy through engagement with policymakers, regulators, and trade associations. The team work closely with the ELT and subject matter experts on public policy issues which affect our stakeholders. This may take the form of responding to public policy consultations, as well as managing relationships with connected industry bodies. The Public Affairs team are embedded within our Legal function, with oversight from our Group General Counsel.	Political Engagement Policy

For further information on our policies please see our [ESG data book](#).

## Forward-looking statements

This document may contain certain 'forward-looking statements' with respect to the financial condition, performance, results, strategies, targets (including sustainability targets), objectives, plans, goals and expectations of the Company and its affiliates. These forward-looking statements can be identified by the fact that they do not relate only to historical or current facts.

Forward-looking statements are prospective in nature and are not based on historical or current facts, but rather on current expectations, assumptions and projections of management of the Aberdeen Group about future events, and are therefore subject to known and unknown risks and uncertainties which could cause actual results to differ materially from the future results expressed or implied by the forward-looking statements.

For example but without limitation, statements containing words such as 'may', 'will', 'should', 'could', 'continues', 'aims', 'estimates', 'forecasts', 'projects', 'believes', 'intends', 'expects', 'hopes', 'plans', 'pursues', 'ensure', 'seeks', 'targets' and 'anticipates', and words of similar meaning (including the negative of these terms), may be forward-looking. These statements are based on assumptions and assessments made by the Company in light of its experience and its perception of historical trends, current conditions, future developments and other factors it believes appropriate. By their nature, all forward-looking statements involve risk and uncertainty because they are based on information available at the time they are made, including current expectations and assumptions, and relate to future events and/or depend on circumstances which may be or are beyond the Group's control, including, among other things: UK domestic and global political, economic and business conditions; the impact of conflicts and geopolitical tensions (including the Russia-Ukraine conflict, and conflict involving Iran and in the Middle East) on global macroeconomic conditions, political stability and financial markets; market related risks such as fluctuations in interest rates, exchange rates and commodity prices, and the performance of financial markets generally; the impact of inflation and deflation; the impact of competition; the impact of tariffs, both imposed and threatened, and changes to underlying policies governing global trade; the timing, impact and other uncertainties associated with future acquisitions, disposals or combinations undertaken by the Company or its affiliates and/or within relevant industries; risks affecting defined benefit pension schemes; experience in particular with regard to mortality and morbidity trends, lapse rates and policy renewal rates; the value of and earnings from the Group's strategic investments and ongoing commercial relationships; default by counterparties; information technology or data security breaches (including the Group being subject to cyberattacks); operational information technology risks, including the Group's operations being highly dependent on its information technology systems (both internal and outsourced) and the continued development and enhancement of said technology systems (including the utilisation of artificial intelligence (AI)); natural or man-made catastrophic events; the impact of pandemics; exposure to third-party risks including as a result of outsourcing; the failure to attract or retain necessary key personnel; the policies and actions of regulatory authorities and the impact of changes in capital, solvency or accounting standards, sustainability disclosure and reporting requirements, and tax and other legislation and regulations (including changes to the regulatory capital requirements) that the Group is subject to in the jurisdictions in which the Company and its affiliates operate.

Metrics, projections, forecasts and other forward-looking statements relating to sustainability should be treated with particular caution given their complex nature, their dependence on models and methodologies which are nascent, and challenges with data quality, consistency and comparability. Risks and potential impacts arising due to climate change cannot be evaluated in the same way as more conventional financial risk due to their long-term nature and the way in which they interact with non-climate-related risks.

As a result, the Group's actual future financial condition, performance and results may differ materially from the plans, goals, objectives and expectations set forth in the forward-looking statements.

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