



LOMBARD ODIER
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Lombard Odier (Europe) S.A. UK Branch

Slavery and Human Trafficking Statement for the purposes of Section 54(1) of the Modern Slavery Act 2015

Introduction

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015. It sets out the steps that Lombard Odier (Europe) S.A. UK Branch has taken to ensure that modern slavery and human trafficking do not occur in its business.

Who are we?

Lombard Odier (Europe) S.A. UK Branch (“**LOESA UK**”) is the UK authorized branch of Lombard Odier (Europe) S.A. which in turn is a Luxembourg bank part of the wider Lombard Odier group (“Lombard Odier”), a global private banking, asset management and banking technology infrastructure group headquartered in Geneva, Switzerland. LOESA UK is authorised and regulated by the Commission de Surveillance du Secteur Financier (“CSSF”) in Luxembourg and authorised in the UK by the Prudential Regulation Authority (“PRA”), subject to regulation by the Financial Conduct Authority (“FCA”) and limited regulation by the PRA. The principal business activities of LOESA UK are asset management services, providing discretionary and advisory investment solutions.

Policies in relation to the prevention of modern slavery and human trafficking in our bank include:

Supplier Code of Conduct

LOESA UK is subject to the Lombard Odier Group Supplier Code of Conduct and is committed to managing its commercial, social and environmental impact in a sustainable manner. Lombard Odier recognizes that it is part of a broader social and environmental ecosystem, and believes that its interests as a business and those of the society in which it operates must be aligned.

Lombard Odier is a signatory/member of several sustainability frameworks and certifications, such as the UN Global Compact and the UN Principles for Responsible Banking, which help us to further define our sustainability roadmap as we integrate their values in our sustainability strategy. Lombard Odier is also B Corp certified, a certification granted to companies with the highest corporate sustainability standards and integration. Lombard Odier aligns itself with those who encourage the transition to a more sustainable economic model, and our commitment to these frameworks, and related reporting requirements, helps

us to further integrate sustainability in a transparent manner in our businesses and operations. Lombard Odier therefore recognises the importance of a sustainable supply chain and aims to engage with third party companies and individuals supplying products or services to Lombard Odier (“Suppliers”) that have adopted strong policies and programs in terms of social and environmental responsibility as well as corporate governance principles.

This Supplier Code of Conduct (the “Code”) aims to ensure the alignment of our Suppliers with Lombard Odier’s sustainability values and commitments and outlines the standards with which Lombard Odier expects its Suppliers to comply. This Code applies to all Suppliers of Lombard Odier and their subsidiaries. While Lombard Odier recognises that supply chain sustainability is a work in progress at many Suppliers, the Suppliers are expected to ensure that all their own suppliers, subcontractors, employees and agents adhere to the principles outlined in this Code. In addition to this Code, all Suppliers must comply with all applicable laws and regulations.

The Supplier is required to

- Respect human rights as defined in the United Nations’ Universal Declaration of Human Rights and its subsequent human rights treaties, and not be complicit in human rights violations within its sphere of influence;
- Strive to put in place adequate remedial mechanisms in case of any human rights violations;
- Respect the International Labour Organization’s fundamental standards on child labour: ILO Convention 138 (Minimum Age Convention) and ILO Convention 182 (Worst Forms of Child Labour Convention);
- Seek to recognize employees’ right to organize and bargain collectively;
- Endeavour not to discriminate against any employee and to treat all employees fairly and respectfully; and
- Use its best efforts to provide a safe working environment.
- In addition, if the Supplier is a UK company subject to the UK Modern Slavery Act 2015, it must provide Lombard Odier with a copy or link to its Modern Slavery Statement

Given that LOESA UK is mainly dealing with private clients, regulated financial services firms and leading business services providers linked to the Banking industry we consider the risk of slavery and human trafficking in our supply chains to be low.

Lombard Odier and its people

Our people are key to our present success and future growth. Employees with initiative, talent, good judgement and creativity form our greatest asset. As service to our clients is integral to our product delivery, our business success depends on the quality of our employees. Lombard Odier businesses worldwide operate under the same principles in their approach to managing employees. This approach is to provide the climate and resources that will enable all employees to advance on merit as far as their talents and skills will take them, without regard to gender, sexual orientation, trans-sexuality, race, nationality, ethnic or national origin, colour, religion, belief, disability, marital or civil partnership status or age. We reward our employees with pay and benefits that reflect their contribution and encourage retention and we ensure that ideas, concerns and problems are identified and two-way communication is effectively maintained. We create an environment that identifies, encourages and rewards excellence, innovation and quality customer service and we remember that respect for human dignity is fundamental to our success.

The LOESA UK's **Employee Handbook and Policies** reinforce our commitment to creating a workplace that respects employee's personal dignity and is free from harassment. Lombard Odier will not condone harassment. Harassment is a disciplinary offence (Ref. LOESA Directive on the protection from harassment, bullying and discrimination in the workplace).

No member of staff should suffer as a result of raising a concern in accordance with the internal policies and procedures. Appropriate disciplinary action will be taken against individuals who victimise staff in this way and no disciplinary action will be taken against an individual who makes a disclosure in good faith.

All employees are expected to act in accordance with these policies and values.

Training

LOESA UK is a regulated business and conducts mandatory training in a wide field of areas connected with its business. LOESA UK's training and in-house learning sessions highlight the importance of ESG factors in its business.

Background screening

LOESA UK's employment onboarding process ensures that all new employees can confirm their identity, have the right to work in the UK, are remunerated above the minimum wage threshold, and are not subject to forced labour.

This statement was approved by the board of directors of Lombard Odier (Europe) S.A. on 20 October 2022.

For and on behalf of Lombard Odier (Europe) S.A. UK Branch



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