

## MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

(Updated June 20, 2024)

At Sanders Capital, LLC, a US-based independent investment management firm, we uphold a steadfast commitment to ethical conduct and social responsibility. We believe our recent actions underscore our dedication to identifying and mitigating the risks of modern slavery and human trafficking within our operations and at our key supply chain partners.

Modern slavery encompasses various forms of exploitation, including forced labor, bonded or child labor, and unlawful recruitment or facilitating trafficking of individuals, according to the US Department of State. We believe that such abhorrent practices have no place in our business operations or those of our partners.

Our internal assessment has affirmed that the risks of modern slavery and human trafficking within our operations are minimal. This conclusion is grounded in our lack of exposure to highrisk geographies and products/services prone to such exploitation. Additionally, we are an equal opportunity employer and do not discriminate against employees or applicants for employment on any legally recognized basis including, but not limited to race; color; religion; genetic information; national origin; sex; sexual orientation, pregnancy, childbirth, or related medical conditions; age; disability; citizenship status; uniform servicemember status; or any other protected class under federal state, or local law. Finally, all employees are required to adhere to the firm's Compliance Manual as well as the Code of Ethics. All employees have access to the manual and are required to certify their adherence to the code every year.

A recent survey of our key supply chain partners on their operations for any modern slavery and human trafficking risks suggests that such risks in our supply chain are also low. In general, our supply chain partners include regulated professional advisors, regulated financial services firms, leading services businesses specializing in information technology (IT) and other services required by asset managers, and a building landlord.

All activities related to identifying, assessing, and addressing modern slavery and human trafficking risks in our own operations and in our supply chain are led by our Chief Financial Officer and a member of our Board of Managers (the "Board").

To the extent consistent with client mandates and our fiduciary duties to our clients, we seek to integrate Environmental, Social, and Governance (ESG) considerations, including human rights issues, across our investment portfolios. Leveraging both third-party assessments and internal

research, we strive to make informed decisions that align with our values and principles. ESG integration is led by our Director of Research/Co-CIO and a member of the Board.

Governance of modern slavery and human trafficking issues rests squarely with our Board, ensuring that any unresolved concerns receive proper attention and escalation. Through these concerted actions, we remain steadfast in our commitment to ethical investing and upholding human dignity in all aspects of our operations.