

# Modern Slavery Act Transparency Statement

This statement is made on behalf of WisdomTree UK Limited ("WisdomTree UK"). We are publishing this statement in accordance with the Modern Slavery Act 2015 and as a demonstration of our commitment to anti-slavery practices and as an affirmation of the values we hold across our businesses.

WisdomTree UK is committed to ensuring that the way we conduct our business and dealings with our service providers reflects our values and respect for human rights. We are committed to working with service providers that share these values and uphold the principles in this statement.

We will not tolerate slavery or human trafficking in our business or network. We are committed to continually improving our policies and practices to play our part in fighting against slavery and human trafficking and protecting human rights. We also have a strong commitment to diversity and inclusion and look after the wellbeing of our people, ensuring that they are safe and well and that we care for them appropriately.

# Our business and organisational structure

WisdomTree UK is an exchange traded product (ETP) and exchange traded fund (ETF) manufacturer and distributor, with product offerings covering equity, commodity, fixed income, leveraged and inverse, currency, cryptocurrency, and alternative strategies.

We are part of the WisdomTree group of companies, and our ultimate parent company is WisdomTree Investments Inc, headquartered in New York. WisdomTree currently has approximately \$78.7 billion<sup>1</sup> in assets under management.

#### Our supply chains

As an ETP and ETF manufacturer and distributor, WisdomTree UK does not have substantial supply chains. Service provider relationships are primarily limited to product management, legal and operation entities providing professional services.

As such, the risk of modern slavery existing within this supply chain has been assessed to be very low. Nonetheless, we remain vigilant and monitor the level of risk involved throughout any of our service providers, as we consider modern slavery to be a fundamental issue and will take appropriate measures if a higher risk of modern slavery is deemed to exist.

<sup>&</sup>lt;sup>1</sup> As at 22<sup>nd</sup> February 2022

We are committed to partnerships with service providers that share our dedication to conducting business in a legal, ethical, and socially responsible manner.

## Our policies

We have a zero-tolerance policy towards modern slavery, a crime and violation of fundamental human rights: This includes any form of slavery, servitude and forced or compulsory labour.

We have implemented policies relating to our commitment to ethical business practices. We expect all our contractors, suppliers and other business partners to uphold the same high standards as we do, by ensuring all employees and workers are treated with dignity and respect in a fair and ethical environment.

We maintain a Whistleblowing Policy and other sustainable business policies that ensure issues should not arise, but if they do, any concerns raised can be dealt with appropriately.

## Due diligence process

We expect all our service providers and other business partners to adopt the same high standard as we do to prevent modern slavery, by ensuring all employees and workers are treated with dignity and respect in a fair and ethical environment.

Our procurement process includes vetting of all potential service providers, with responses being evaluated on the basis of their policies and controls. We expect our service providers to adopt the same principles when contracting with their own suppliers and plan to make this a requirement.

For our key operational service providers, we also undertake annual due diligence visits (or calls) to ensure they are meeting regulatory and ethical standards.

#### Risk management

Due to the nature of our business, we consider the inherent risk of modern slavery and human trafficking occurring in our business to be low.

Our Human Resources and Compliance teams monitor any changes in the inherent risk levels within our business and across our service providers to the extent possible.

WisdomTree UK does not operate in jurisdictions noted for higher risks linked to modern slavery or human trafficking.

This statement is given on behalf of WisdomTree UK and sets out the steps taken to prevent modern slavery and human trafficking in our business and supply chain.

This statement was approved by the WisdomTree UK Limited Board of Directors on 24th February 2022 and has been signed by James Hartigan on behalf of the Board of Directors:

Docusigned by:

James Hartigan February 28, 2022

James Hartigan

**Director & Head of Compliance**