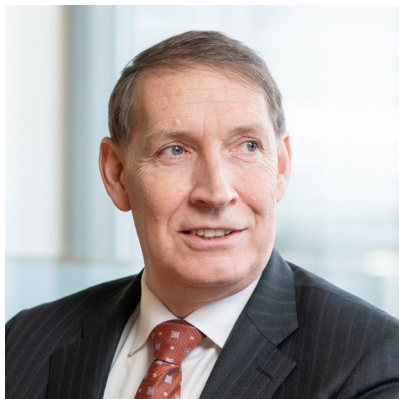




► Communication On Progress



ANDREW CROFT
Chief Executive Officer

I am pleased to confirm that St. James's Place reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption.

In this annual Communication on Progress, we describe our actions to continually improve the integration of the Global Compact and its principles into our business strategy, culture and operations.

We commit to sharing this information publicly on our corporate website for our stakeholders.



LIZ KELLY
Chief Corporate Affairs Officer

Our vision is to become a leading Responsible Business in the United Kingdom. Our business purpose and approach seeks to ensure our clients, employees, Partners and the wider community have the confidence to create the future they want.

We aim to work in partnership to plan, grow and protect clients' financial futures. We do this by creating a connected and sustainable business that puts creating healthy communities and a healthy environment at the centre of our strategy, both for our clients and wider society.

“ We commit to sharing this information publicly on our corporate website for our stakeholders. ”

► Introduction

In 2020, St. James's Place became a Participant of the United Nations Global Compact, with the ambition to further embed the Ten Principles of Human Rights, Labour, Environment and Anti-Corruption, and the United Nations Sustainable Development Goals, into our strategy.

Acting responsibly is key to achieving positive outcomes for all stakeholders. We have a defined approach and strategy to support us in becoming a leading responsible business and we are striving for excellence in all that we do.

The following pages detail how we align our business to the Ten Principles with measurement of outcomes throughout.

<https://www.unglobalcompact.org/what-is-gc/mission/principles>



► Human Rights

Being a responsible business starts with a company's value system and a principles-based approach to doing business. This means operating in ways that, at a minimum, meet fundamental responsibilities in the areas of human rights.

We are committed to managing our business in an ethical manner and recognise that responsible management is important to all of our stakeholders, to our shareholders, our clients, the Partnership, our employees, our suppliers and the communities in which we operate.

We will not tolerate or condone abuse of human rights, including modern slavery, in any part of our business, and we are committed to minimising the risk of slavery or human trafficking in all parts of our supply chain.



What do we do to support and respect the protection of internationally proclaimed human rights and ensure we are not complicit in human rights abuses?

- Upon joining, all employees receive a copy of our Code of Ethics and our Equal Opportunities policy, which make clear that we oppose all forms of unfair discrimination or victimisation.
- Our Bullying and Harassment policy sets out our approach in relation to allegations of harassment and/or bullying. Harassment, for us, is defined as unwanted conduct affecting the dignity of people in the workplace. It may be related to age, sex, race, disability, religion, nationality or any personal characteristic of the individual and may be persistent or an isolated incident.
- We make public commitments to respect human rights, carry out human rights due diligence, and provide a remedy if things go wrong. We identify appropriate measures to mitigate risks and track the effectiveness of our efforts.
- We ensure our employees are provided with safe, suitable and sanitary working conditions in all our offices across the United Kingdom and Asia. Please find our Slavery and Human Trafficking Statement here: <https://www.sjp.co.uk/~media/Files/S/SJP-Corp/careers/slavery-human-trafficking-2021.pdf>
- Our onboarding process requires all new suppliers to confirm their compliance to applicable legislation, including but not limited to; diversity and inclusion, modern slavery, employee payments and contract terms and gender pay gap reporting. We recognise the benefits of building strong, mutually beneficial relationships with both new and existing suppliers and we are sharing our aspirations and objectives in order to encourage our suppliers to adopt similar principles.

► Labour

Our people are our greatest asset and integral to our continued success. Supporting our people and their families in times of need continues to be an important part of our culture and became even more important this year due to COVID-19.

We uphold the freedom of association and the effective right to collective bargaining power.



What do we do to uphold the freedom of association and the effective right to collective bargaining power, to eliminate all forms of forced or compulsory labour, to abolish child labour and eliminate discrimination in respect of employment and occupation?

- We ensure that St. James's Place does not participate in any form of forced or bonded labour, through our operations and value chain.
- We provide market-competitive rewards and benefits that are regularly benchmarked and monitored, including for gender pay equality. We have maintained our Living Wage employer status, being a member of the Living Wage Foundation, for all our employees in the UK and in equivalent initiatives overseas. We also encourage our suppliers to adopt the same approach.
- We experienced a rapid increase in demand for support around mental health during 2020, and our approach to the commitment to supporting our employees' health and wellbeing was consolidated through the appointment of a Head of Wellbeing and an increased emphasis on a range of services to address the breadth of challenges our people and their families have had to face. We doubled the number of Mental Health First Aiders to 115 and extended available counselling services from once to eight times a month.
- Throughout the year we have continued to progress towards our public commitments for increased diversity in the business, with an aim to: increase female representation on our plc Board to at least 33%; increase female representation in senior roles to at least 30% by 2023; and increase the representation of Black, Asian and minority ethnic employees to at least 10% by 2023. We also participate in the 30% Club Mentoring Scheme which is a cross-company mentoring programme to help individuals perform at their best.
- Providing greater flexibility for part-time work, job-sharing, remote working and flexibility on hours has resulted in an increase in our existing employee satisfaction around achieving a better work/home-life balance.
- We are signatories of the Prompt Payment Code, which demonstrates our commitment to good payment practices between ourselves and our suppliers.

► Environment

As a business focused on giving our community the confidence to create the futures they want, it is important that we operate in a way that considers the need to take a responsible, focused and long-term mindset towards our environmental impact. **We recognise we can play a central role in promoting the importance of sustainability.**

Over the past year we have made significant progress with both our environmental strategy and responsible investing, which now underpins the whole of our investment approach and is an integral part of how we at St. James's Place add long-term value for the clients we serve.



What do we do to support environmental challenges, promote greater environmental responsibility and encourage the development of environmentally friendly technologies?

- In 2021 we hired a Head of Environmental Strategy to create and implement a Group wide environmental strategy and review and update the governance around climate.
- We set a net zero target of 2050, which is a leading approach for asset managers. We recognise businesses worldwide have the power to raise ambition and accelerate change, so we will look to be climate positive in our operations by 2025, net zero throughout our Partnership and supply chain by 2035 and net zero in our investments by 2050. We will develop, validate and disclose science-based targets in each respective area. To mark these commitments, we will become members of Business Ambition for 1.5C and Race to Zero.
- We doubled electric charging points through a partnership with a new supplier, and now 50% of our company vehicles are electric or hybrid.
- Initiated condition surveys across the estate to identify inefficiencies such as older chillers and boilers to inform a longer-term replacement schedule which will be proposed to the business.
- Our implementation of Docusign for digital signatures saving 16,503kg carbon and 1,143kg paper across the group. We also looked to encourage clients to go paperless by donating on their behalf to the Woodland Trust. In 2020, we donated £121,146 and now have 165,129 who are paperless.
- Like many businesses during 2020 we saw a dramatic decrease in our travel and use of accommodation. We are working hard to capture the benefits of this long term and are reviewing our policies on travel and face to face meetings, and empowering employees to make the low carbon choice as the norm.
- We have also maintained our 100% purchasing of electricity from renewable sources and our carbon neutrality through offsetting; we reduced our carbon emissions by 30% in 2020. As a result we maintained our Carbon Disclosure Project 'Grade B Management' score.
- 100% of our Fund Managers have signed up to the United Nations Principle of Responsible Investing (UNPRI), and we have received an A+ rating from the UNPRI.



► Anti-Corruption

St. James's Place has a zero-tolerance approach to bribery and corruption. The Board has responsibility for oversight of the Group's anti-bribery and corruption policy and procedures and annually carries out a review of their adequacy.

Conducting our business in an honest and ethical manner is imperative to our success. We uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate, and our policies apply to all individuals working for, or on behalf of, our business at all levels and grades, whether permanent, fixed-term or temporary.



What do we do to work against corruption in all its forms, including extortion and bribery?

- Employees and advisers are provided with annual training with regards to money laundering, financial crime, fraud, bribery and corruption via online training programmes, the completion of which is compulsory.
- The anti-bribery and corruption policy, which contains additional information, is available on our website, www.sjp.co.uk/about-us/corporate-governance.
- As a Group we assess the risk of corruption throughout our operations, and anti-corruption and anti-bribery is mentioned in our contracts with business partners.
- We also ensure that internal procedures and processes in the company support the Group's anti-corruption commitments.