

HUMAN RIGHTS STATEMENT

SCOPE AND STATEMENT OF PURPOSE

Northern Trust Corporation and its consolidated subsidiaries (collectively “Northern Trust”) recognize our responsibility to respect internationally recognized human rights, as outlined in the UN Guiding Principles of Business and Human Rights.

Modern slavery is a serious contravention of human rights. It includes: slavery, servitude, forced labor, debt bondage, forced marriage, human trafficking and the worst forms of child labor. A number of countries have introduced legislative reporting requirements relating to modern slavery risks and the measures in place to assess and address those risks. Our commitment to respect human rights includes the recognition of each individual’s right not to be subject to modern slavery.

STATEMENT

This Human Rights Statement reflects our commitment to respect the rights, dignity and equality of all people. Our focus is upon three key stakeholder groups (employees, clients and suppliers) as well as the communities impacted by our actions.

- **Employees:** We commit to upholding the human rights of our officers and employees.

We require all persons to be treated without bias, discrimination or harassment. We are committed to a culture that embraces diversity, encourages equity and promotes inclusivity.

It is our firm belief that all work should be done voluntarily without any slavery, servitude, forced labor or human trafficking. We are committed to providing fair and equal wages for equal work to all employees, and offering competitive compensation and benefits to our workforce.

We foster maintenance of a workplace that is safe and healthy for ourselves, our suppliers and our clients, and that is free of violence and of any substance that is illegal or unsafe. Employees worldwide may exercise freedom of association regarding collective bargaining and trade agreements as permitted by applicable regional laws. We protect personal employee information by following all applicable privacy and data protection laws wherever we do business.

Training our staff in relation to human rights is a key element of our commitment, alongside the provision of mechanisms to enable employees and other stakeholders to raise concerns and the prohibition of unlawful retaliation against reporters.

- **Clients:** We commit to implementing policies designed to ensure compliance with legal requirements and which seek to prevent our products and services from being used for improper purposes.

Our Know Your Customer (KYC) and Anti-Money Laundering (AML) screens are applied to all clients and transactions. These screens include an assessment of the risk of modern slavery and other human rights impacts, bribery and corruption, contravention of economic and trade sanctions and other serious crimes. We offer a range of Environmental, Social, and Governance (ESG) investing products for clients electing to invest with this purpose.

- **Suppliers:** We commit to seeking to engage contractors and suppliers who share our commitment to respect human rights.

Our Supplier Code of Conduct requires our suppliers to respect human rights and to have in place adequate procedures to identify, prevent, mitigate and account for modern slavery and other human rights impacts in their operations and supply chains. This includes provision of a safe workplace, compliance with labor laws, maintenance of the right to collectively bargain and prohibition of discrimination. Compliance with our Supplier Code is a material consideration for us in assessing every aspect of our supplier relationships.

RAISING CONCERNS

Our culture supports open communication at all levels. In addition to internal reporting avenues, employees, clients, suppliers and other third parties have access to our Business Abuse and Employee Relations Hotline (maintained by a third party) through which they can raise any concerns or possible violations of a law, regulation or policy. The Hotline is available on our [website](#), and is referenced in our Code of Business Conduct and Ethics, Employee Handbook and our Supplier Code of Conduct. Concerns may be reported anonymously to the extent permitted by applicable laws.

If you have any questions about this Statement, please contact corporate_sustainability@ntrs.com.