

Man Group Global Banned Weapons Policy

December 2020

Introduction

This statement sets out Man Group’s approach to Global Banned Weapons¹ investments, specifically in regard to anti-personnel landmines, cluster munitions producers, biological and chemical weapons. (see table below)

Controversial weapons

Controversial weapons can be those that are either banned – as their production and use is prohibited by international legal instruments (where these have been ratified by a particular State) – or considered controversial because of their indiscriminate effects and the disproportionate harm they may cause. Biological and chemical weapons, Anti -personnel mines and cluster munitions (cluster bombs) are examples of such weapons.



1. Man Group’s Banned Weapons include: biological, chemical, blinding laser weapons; cluster munitions and anti-personnel mines; and non-detectable fragments lists (“Banned Weapons”. 2. No known development or production.

The Conventions:

Convention on Cluster Munitions

The Convention on Cluster Munitions was agreed in Dublin on 30 May 2008. It entered into force on 1 August 2010. The convention has been ratified by several nations in which Man and its clients are domiciled and is an international treaty that aims to prevent the use, development, production and transfer of cluster munitions. A number of countries, including the United Kingdom, have taken steps to apply the provisions of the Convention in law. In the United Kingdom, for example, the Cluster Munitions (Prohibitions) Act 2010 makes it an offence to, among other activities, assist, encourage or induce any other person to engage in conduct relating to cluster munitions, including the production, development and transfer of cluster munitions.

Anti-Personnel Landmines Convention

The 1997 Anti-personnel Landmines Convention (Convention on the Prohibition of the Use, Stockpiling, Production and Transfer of Anti-Personnel Mines and on Their Destruction) was concluded in Oslo on 18 September 1997. This Convention entered into force on 1st March 1999, six months after it was ratified by 40 States. The Convention has been ratified by several nations in which Man and its clients are domiciled. The Convention aims at eliminating anti-personnel landmines around the world. A number of countries, including the United Kingdom, have taken steps to apply the provisions of the Convention in law. In the United Kingdom, the Landmines Act 1998, makes it an offence to, among other activities, assist, encourage or induce any other person to engage in conduct relating to anti-personnel mines, including the production, development and transfer of anti-personnel mines.

Biological, Chemical, Blinding Laser Weapons and Non-Detectable Fragments

In addition, there are a number of conventions that aim to prevent the development, production or stockpiling of biological and chemical weapons, and of blinding laser weapons and non-detectable fragments, some of which are listed below. These conventions have also been ratified by several nations in which Man and its clients are domiciled.

- Convention on the Prohibition of the Development, Production and Stockpiling of Bacteriological (Biological) and Toxin Weapons and on their Destruction;
- The Convention on the Prohibition of the Development, Production, Stockpiling and Use of Chemical Weapons and on their Destruction;
- Convention on Prohibitions or Restrictions on the Use of Certain Conventional Weapons which may be Deemed to be Excessively Injurious or to have Indiscriminate Effects, Protocol on Blinding Laser Weapons, Protocol IV; and
- Convention on Prohibitions or Restrictions on the Use of Certain Conventional Weapons which may be Deemed to be Excessively Injurious or to have Indiscriminate Effects, Protocol on Non-Detectable Fragments, Protocol I.

As with cluster munitions and anti-personnel mines, a number of countries, including the United Kingdom, have taken steps to apply certain of the provisions of these Conventions in law by which it is prohibited, among other things, to assist in the production, development or transfer of such items.

Global Banned Weapons Screening

Man Group is committed to complying with these Conventions and relevant laws, and has developed internal systems and controls to assist the Firm in complying with the restrictions set out above. This includes utilizing ISS ESG's Controversial Weapons Research service¹ to monitor and identify companies involved in activity contrary to these conventions, including the manufacture, supply and distribution of cluster munitions and other Banned Weapons. Man Group utilises this research, along with other information, to make decisions regarding investing in, or setting restrictions or outright prohibitions on, companies with a confirmed direct or indirect involvement in prohibited activities such as those linked to Banned Weapons, including cluster munitions and anti-personnel mines. Man Group may also, following appropriate review and consideration, supplement the ISS list with names received from other sources.

Procedures and Banned Weapons List

In line with the Conventions and laws set out above, Man Group has implemented internal procedures to either prohibit or restrict Man Group investing in companies that, among a range of other activities, are involved in activities prohibited by these Conventions and laws.

For more information, please contact **Financial Crime Compliance**.

1. <https://www.issgovernance.com/esg/screening/>

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