ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by the Morningstar Group Companies identified above during the year ending 31st December 2018 to prevent modern slavery and human trafficking in its business and supply chains.

ORGANISATION'S STRUCTURE

The above companies are Morningstar Inc.'s subsidiaries who are registered and located in the UK.

OUR BUSINESS

Morningstar, Inc., is a leading provider of independent investment research in North America, Europe, Australia and Asia. We offer an extensive line of products and services for individual investors, financial advisors, asset managers, and retirement plan providers and sponsors.

Morningstar provides data on nearly 540,000 investment offerings, including stocks, mutual funds, and similar vehicles, along with real-time global market data on approximately 18.5 million equities, indexes, futures, options, commodities, and precious metals, in addition to foreign exchange and Treasury markets. Morningstar also offers investment management services through its investment advisory subsidiaries. The company has operations in Australia, Brazil, Canada, Chile, China, Denmark, France, Germany, Hong Kong, India, Italy, Japan, Korea, Luxembourg, Mexico, Netherlands, New Zealand, Norway, Singapore, South Africa, Spain, Sweden, Switzerland, Taiwan, Thailand, United Arab Emirates, United Kingdom and United States.

OUR SUPPLY CHAINS

Our supply chains include suppliers of IT, data and communications, office cleaning, property grounds and other facilities management services, stock exchanges, legal counsel, insurers, health care providers, and recruitment agencies.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

We continue to adhere to our Anti-Slavery Policy which addresses how employees and other associated persons (agents, suppliers and other service providers) are required to act to minimise the risk of slavery and human trafficking occurring in the business and in its supply chains. The Anti-Slavery Policy is available at http://corporate1.morningstar.com/UK. This Policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

We continue to monitor Morningstar’s supply chains across multiple tiers and all our suppliers comply with our own zero tolerance approach to slavery and human trafficking by signing a Declaration of Compliance with the Modern Slavery Act 2015. Guidance is continuously offered to internal relationship owners and a template of the declaration is available to these employees.

SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking and continue to ensure all those in our supply chain and contractors comply with our values, new suppliers have to sign up a declaration of their compliance with the Modern Slavery Act 2015 or provide copies of their own policies.

We have a dedicated Chief Compliance Officer and EMEA Legal Department responsible for overseeing implementation of our Anti-Slavery Policy within our supply chain. In addition, relationship owners in the supply chain report to the Chief Compliance Officer and EMEA Legal Department when engaging with new suppliers. A declaration of compliance with the Modern Slavery Act is requested from all new suppliers and sent to the Compliance and Legal teams upon each new engagement.

GUIDANCE

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, a copy of the policy is available to all employees and continued detailed guidance to those who are responsible for supplier relationships. The Policy is available at our internal online platform and upon request. Supplier relationship owners are guided in a process designed to ensure declarations of compliance with the Modern Slavery Act are obtained from all relevant suppliers.

FURTHER STEPS

Following a review of the effectiveness of the steps we have taken in 2018 to attempt to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

- All new suppliers will continue to be asked to sign a Declaration of Compliance with the Modern Slavery Act 2015 or will provide copies of their own policies.

- Our policy will be reviewed annually and/or earlier in case of any amendments to current legislation.

- Upon each annual review, the existing policy or any relevant new amended policy will be signed off by management.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group’s slavery and human trafficking statement for the financial year ending 31st December 2018.

Paul Malone  Mark Rommens  Steve Croucher
Date: 28th June 2019