



## **MFS International (U.K.) Limited Slavery and Human Trafficking Statement**

### **Introduction**

This statement is made on behalf of MFS International (UK) Limited ("MILUK") pursuant to section 54(1) of the Modern Slavery Act 2015 (the "Act") and constitutes our slavery and human trafficking statement for the financial year ending 31st December 2024. MILUK recognises the damaging effect of modern slavery on people and communities, and is committed to not knowingly participating in, causing, contributing to, or being directly linked to modern slavery practices in its operations and supply chains. Further, MIL(UK) is conscious of the growing reputational and regulatory risks related to modern slavery as regulators and investors come to expect best practice in Environmental and Social Governance (ESG) research. From an investment perspective, we acknowledge that these factors can result in supply chain disruptions, litigation, fines and/or lowered valuations for companies that cannot effectively address their modern slavery risk. We therefore continue to build on our efforts to mitigate risks of modern slavery within our organisation and our supply chains.

### **Business and Structure**

MIL UK is a private limited company registered in England and Wales (registered number 03062718) and is authorised and regulated by the Financial Conduct Authority (the "FCA"), FCA reference number 181136. MIL UK is a UK-based investment manager with a subsidiary office holding a representative license in Switzerland and a branch office holding a representative office license in the Dubai International Financial Centre (the "DIFC"). MIL UK is a wholly owned, indirect subsidiary of Massachusetts Financial Services Company ("MFS"), headquartered in Boston, USA. In light of the business undertaken by MIL UK, which is limited to investment management, and the jurisdictions in which the company operates, MIL UK deems the risk of modern slavery existing within our business to be low.

### **Our Supply chain**

We seek to engage with suppliers that adopt the same strict standards that we ourselves adhere to. External vendors used by MIL UK include providers of professional services (including external legal firms, accountants, insurance and tax advisers); services related to the leasing of office space and IT; facilities management, cleaning and maintenance services providers; and, providers of services related to the leasing of office space. Such vendors include both suppliers that are engaged by MFS on a global basis and additionally local suppliers.

The MFS Vendor Oversight Monitoring Programme provides a framework for MFS management to identify, measure, monitor and control the risks associated with suppliers, service providers and outsourced vendors. The tools and techniques used to select service providers and monitor services under the Programme are based upon a risk relationship equation. The MFS Vendor Management Policy provides a framework for

vendor selection and ongoing due diligence. Monitoring includes relationship management, establishment and monitoring of service levels, identification and assessment of fourth party subservice providers, periodic meetings, evaluation of an independent accountant's report on internal controls (where applicable), conducting periodic due diligence assessments and evaluating conformance with the terms of written agreements, site visits as deemed applicable and management reporting.

The risks of modern slavery in MIL UK's operations/supply chains have been reviewed during this reporting period by the relevant internal stakeholder teams from a workforce, investment, and vendor and supplier perspective. As a result of this review process and the fact that MFS' business globally remains largely the same as a financial services organisation with a professional workforce, MFS and the Board of MIL UK still considers the risk of modern slavery within its direct business operations to be low. Additionally, MFS globally operates in a highly regulated industry, so MIL UK's affiliates are required to be authorised and may be subject to regulatory supervision. However, MFS and the Board of MIL UK recognises that, through its supply chain and investment arrangements, it can be indirectly connected to organisations that benefit from or are involved (even if unintentionally) in modern slavery. We will seek to incorporate within our ongoing Vendor Oversight Programme confirmation from vendors that they have relevant policies and procedures in place to mitigate the risk of slavery and human trafficking.

#### Employment

We comply with all applicable employment legislation with respect to the activities conducted by our employees in our London office as well as in our representative, branch and subsidiary offices. Ongoing monitoring is undertaken to help ensure that we stay current with changes in applicable rules and regulations regarding employment practices. The MFS Global Employee Handbook and the MIL UK Employee Handbook, which governs the conduct of MIL UK in relation to its employees, and the conduct employees themselves, incorporates the internal policies and procedures of the company which are consistent with local legal and regulatory requirements regarding the treatment of employees and their rights.

Statement Effective: December 2024

This statement shall be reviewed at least annually and updated as required.