

# MFS Modern Slavery Statement

Reporting period: 1 January 2025 to 31 December 2025

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# 1. Reporting Entities

This modern slavery statement (**Statement**) is made on behalf of MFS International Holdings Pty Limited (ACN 601 210 575) (**MFS Holdings**) and all entities it owns and controls pursuant to section 14 of the *Modern Slavery Act 2018 (Cth)* (**the Act**) and constitutes our Statement for the reporting period 1 January 2025 to 31 December 2025 (**Reporting Period**). MFS Holdings and its subsidiary MFS International Australia Pty Limited (**MFS Australia**) (AFSL 485343, ABN 68 607 579 537) are reporting entities for the purposes of the Act.

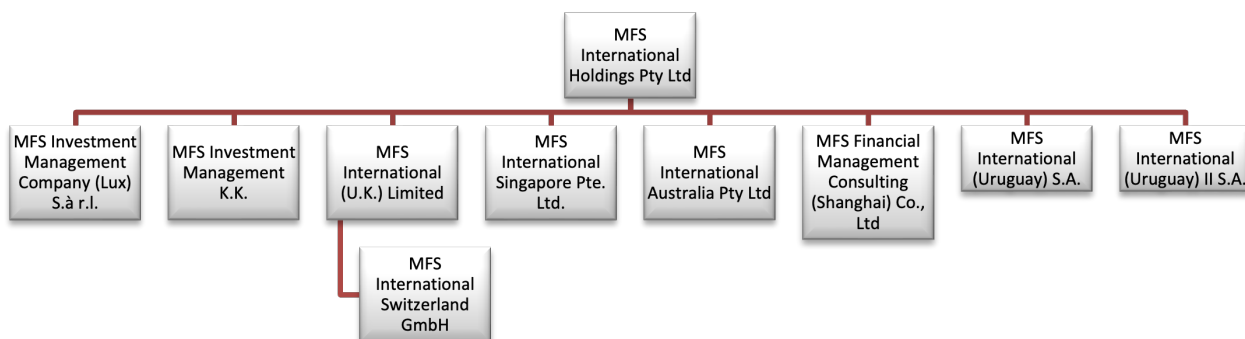
The MFS Group (referred to throughout this Statement as **MFS** or **we** or **our** or **us**) is committed to tackling risks of modern slavery on a company-wide basis to capture all MFS affiliates including MFS Holdings, MFS Australia and the MFS Holdings Subsidiaries.

The Act defines modern slavery as trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour. The worst forms of child labour can mean situations where children are subjected to slavery or similar practices or engaged in hazardous work.

Modern slavery and forced labour remain a rampant problem in today’s world. MFS recognises the damaging effect of these practices 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, MFS is conscious of the growing reputational and regulatory risks related to modern slavery as regulators and investors come to expect best practice in environmental, social and governance (ESG) research. From an investment perspective, we acknowledge that these factors could result in financially material 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 supply chains.

## (a) Structure

MFS Holdings is a proprietary limited company incorporated in Australia. MFS Holdings is one of several of the Massachusetts Financial Services Company (d.b.a. MFS Investment Management) group of companies (**MFS Group**). Established in 1924, the MFS Group is an active, global asset manager with investment offices in Boston, Hong Kong, London, São Paulo, Singapore, Sydney, Tokyo and Toronto. The MFS Group is a member of the Sun Life Financial group of companies. Per the diagram below, MFS Holdings owns and controls a number of MFS Group entities (**MFS Holdings Subsidiaries**):



MFS Australia is a proprietary limited company incorporated in Australia. MFS Australia is an Australian- based investment manager and is a member of the MFS Group. MFS Australia does not own or control any other entities.

## (b) Operations and Supply Chain

MFS Holdings is a holding company for a number of other MFS entities which generate income globally. It does not have employees. Although MFS Holdings is an Australian incorporated corporation, it is managed and maintained by MFS International (U.K.) Limited in the United Kingdom.

The primary operations and activities of MFS Australia and the other MFS Holdings Subsidiaries relates to financial investments, including internally and externally managing investment portfolios and assets. The MFS Group provides a range of investment products and services to its clients across several asset classes, including equities and fixed income.

MFS Australia employs approximately 26 employees. MFS Australia has two offices in Australia:

- Sydney (registered office): Level 15, 20 Martin Place, Sydney, NSW 2000
- Melbourne: Level 27, 101 Collins Street, Melbourne, VIC 3000

MFS has a global network of suppliers and vendors, including those engaged at a group level as well as local suppliers. These suppliers and vendors are located primarily in global office locations where MFS is based, such as in the United States of America, Europe and the Asia Pacific region (see [www.mfs.com](http://www.mfs.com) for further detail on these office locations). The main supplier relationships have remained the same in this Reporting Period and include those with:

- Professional services providers (including external legal firms, accountants, insurance and tax advisers);
- IT and applications service providers (including suppliers of IT and office equipment);
- Facilities management, cleaning and maintenance services providers; and
- Providers of services related to the leasing of office space.

## 2. Risks of Modern Slavery Practices in MFS' Operations and Supply Chains

During the review and preparation of this Statement, MFS' internal stakeholder teams assessed and identified areas where MFS' operations and supply chains may cause, contribute to or be directly linked to modern slavery risks during the Reporting Period (see Section 6 for further details regarding the involvement of various internal teams).

Following this assessment, MFS incorporated any results of its review to continually address modern slavery risk in its operations and supply chains, specifically by reviewing and improving any policies and procedures where necessary (see Section 3(a) for further details regarding these policies and procedures).

Due to the absence of any material changes to MFS' operations, to the structure of the MFS Group or to MFS' global business model during the Reporting Period, MFS considers the modern slavery risk factors that have been identified in MFS' previous modern slavery statements to continue to exist in this Reporting Period. In particular, this includes risks which exist within MFS' workforce, investment, and supplier/vendor functions (described below). This was also confirmed each relevant internal stakeholder team.

MFS recognises that, through its supply chain and investment arrangements, it can be indirectly linked to organisations that benefit from or are involved (even if unintentionally) in modern slavery.

### (a) Employment and Workforce Risk

MFS uses a number of factors to assess the potential risk of modern slavery in its workforce operations and supply chains, including the geographic risks related to where its employees and contractors may be located, its sector specific factors relevant to a highly regulated financial services organization and the professional nature of MFS' workforce.

### (b) Investment Risk

As discussed in MFS' previous statements, there is some risk of modern slavery in MFS' investments as a result of MFS' broad global investment portfolio. In this Reporting Period, MFS continued to consider the following areas of risk in its investment process:

- **Sector and industry risk:** certain sectors and industries may have high modern slavery risks because of their characteristics, products, processes and supply chains. Indicators of this type of risk include the use of unskilled, temporary or seasonal labour, use of short term contracts and outsourcing, use of recruitment agencies for supply chain labour, use of foreign workers or temporary or unskilled labour to carry out functions which are not immediately visible (*i.e.* at night time) for example, security and cleaning and the reliance on long and complex supply chains. Areas of such risk include but are not limited to industries such as agriculture and fishing, apparel, and electronics.
- **Geographic risk:** some countries may have higher risk of modern slavery, including due to poor governance, weak rule of law, conflict, migration flows and socio-economic factors. While we have identified some examples of these risks in developed markets (*e.g.* in relation to matters like underpayment of wages), geographic risk related to modern slavery has proven to be most pronounced in emerging and frontier markets, where public access to information is less robust. For example, the cocoa supply chain in West Africa has long experienced allegations related to the use of child and forced labour.
- **Entity risk:** an entity may have particular modern slavery risks because of their reliance on long and/or complex supply chains, insufficient oversight or governance structures, or historical controversies in the area of human rights. While MFS believes the risk of modern slavery in

the direct operations of the companies MFS owns is generally low, it is very difficult to assess this risk in the long, complex and often opaque supply chains of many investee companies. MFS has sought to understand modern slavery risk at an entity level through direct discussions with management teams and third-party organisations that evaluate these issues.

### **(c) Supplier and Vendor Risk**

Many of MFS' suppliers and vendors are professional and financial services providers in countries with strong labour protections (including the United States of America, Europe and Australia) which lowers the likelihood of modern slavery risk.

MFS continues to recognise that higher risks of modern slavery practices may be associated with its suppliers of workforce supporting services including suppliers of facilities related services such as cleaning, maintenance and building management services of MFS' global offices, as there may be a heightened risk of forced labour or trafficking within their supply chains. During this Reporting Period (and as in the last Reporting Period), MFS continued to use its vendor management tool for vendor oversight monitoring and reporting. The tool enables MFS to centrally track and document vendor due diligence activities, including reviews of information sources such as Dun & Bradstreet (a business data and insight provider) and negative news, within a central system to support consistent monitoring of vendor risks, including modern slavery.

## **3. Actions Taken by MFS to Assess and Address Risks**

In this Reporting Period, MFS continued to take action by applying and upholding its existing policies and procedures in accordance with usual practice, designed to assess and address the risks of modern slavery practices occurring in its operations and supply chains.

### **(a) Policies and Procedures**

MFS has an established framework of policies and procedures that continues to govern our operations and assists it in managing potential modern slavery risks with regard to its employees, supply chain and business operations. This framework, which addresses modern slavery risk in the organisation, includes:

- A code of business conduct;
- Employee manuals;
- Equal employment opportunity policies;
- Responsible investing policies;
- Vendor oversight monitoring program and vendor management policy;
- Whistleblower program; and
- Statement of Human Rights.

During this Reporting Period, MFS continued to implement and review its policies and procedures (as referred to above) to ensure they appropriately address relevant modern slavery risks. The relevant MFS policies and procedures relating to modern slavery risk continue to be reviewed on a regular (normally annual) basis.

Throughout the Reporting Period, MFS did not identify or receive any reports of breaches or incidents in relation to modern slavery risks under MFS' internal policies, procedures or the Statement on Human Rights through the ombudsman/whistleblower program or otherwise.

### **(b) Suppliers and Vendors**

MFS takes a risk-based approach to supplier and vendor management. MFS continued to maintain its internal controls to mitigate risks of modern slavery during the Reporting Period. MFS continues to seek to engage with suppliers that adopt the same strict standards that we ourselves adhere to.

The policies and procedures that MFS implements as part of its modern slavery risk controls in respect of suppliers and vendors include MFS' supplier code of conduct, MFS' vendor oversight monitoring program and vendor management policy.

In this Reporting Period, MFS has:

- Continued to assess and engage with vendors on the supplier code of conduct (inclusive of human rights policies) during vendor onboarding as well as ongoing due diligence;
- Continued to implement vendor engagement protocols to further understand code of conduct practices (inclusive of human rights);
- Continued to monitor and periodically review vendors for negative news events (inclusive of modern slavery risks) during vendor onboarding and ongoing due diligence monitoring processes;
- Continued to consider mechanisms for conducting deeper screening and detailed analysis of parts of our global supply chain; and
- Continued to utilise a vendor management tool that enhances oversight capabilities by leveraging technology to further mitigate risk.

### **(c) Investment Management and Responsible Investing**

MFS has sought to understand modern slavery risk at a company level through direct discussions with management teams and third-party organisations that evaluate these issues.

During this Reporting Period, MFS engaged with a bank in the Middle East regarding modern slavery in the context of their supplier selection and lending practices. From a vendor perspective, MFS learned that the bank includes modern slavery-related questions in their risk assessment, and in 2025, the bank introduced site visits for additional due diligence. From a lending perspective, the identification of modern slavery risks is integrated in the bank's annual ESG risk assessments for counterparties. Those with elevated risks will undergo enhanced due diligence and, if necessary, be required to demonstrate mitigation plans. Furthermore, there is an additional layer of scrutiny for project financing. The MFS fixed income team came away from this interaction satisfied with the level of research involved in the bank's due diligence processes to address modern slavery risks .

### **(d) Employees**

MFS Holdings does not have any employees.

As detailed in previous statements, MFS Australia and the other MFS Holdings Subsidiaries have robust employment policies and procedural controls. These policies and procedural controls cover modern slavery risk and continue to be reviewed annually (including during the Reporting Period) to ensure the MFS Holdings Subsidiaries have the requisite processes in place to minimise the risk of modern slavery in its operations. During the Reporting Period, MFS implemented more enhanced background checks for temporary contractors that perform work for MFS and incorporated these requirements into the relevant agency contracts (including verifying education, past employment, police checks and bankruptcy checks where permissible).

During the Reporting Period, MFS ensured that modern slavery refresher training was provided to all employees globally within the MFS Group on the relevant modern slavery risks in the MFS Group's operations and supply chain, in order to continuously improve awareness of and responsiveness to modern slavery risk in its operations and supply chains. MFS provides training on modern slavery risks for new employees hired in Australia.

## 4. How MFS Assesses the Effectiveness of These Actions

During the Reporting Period, MFS has sought to evaluate the effectiveness of its approach to addressing modern slavery risks within its supply chain and operations through the measures set out in the table below:

SUBJECT	ASSESSMENT MECHANISM	DETAILS
Vendors	Tracking vendors engaged through MFS's vendor management program that have completed onboarding and acknowledge the Supplier Code of Conduct, with the completion of monitoring through the vendor oversight process.	During the reporting period, MFS onboarded 132 new vendors through the vendor management program. As part of this process, vendors are provided the MFS Supplier Code of Conduct, which outlines expectations relating to modern slavery risks. The Code is also referenced in procurement and purchase processes, supporting broader supplier awareness and MFS's standards. ., On the basis of the responses received during the onboarding process from each vendor, no modern slavery risks were identified .
Investment Engagement	Tracking MFS' engagement on ESG topics, which includes modern slavery (details set out above at Section 3) as part of MFS' responsible investing framework.	MFS has used its engagement tracking database and a survey of its sustainable investment team to identify companies with which MFS has engaged on modern slavery in the Reporting Period. Our conversations with corporations generally display a pattern of sincere concern regarding the issue and desire to be part of the solution. However, these issues are complex and generally involve supply chains that are generic to all players in an industry, which has led many companies to invest time and effort in industry partnerships. We have also been happy to see more companies in the consumer discretionary industry reporting on frequency of labor misconduct in their supply chains, which allows them to more effectively manage the risk.
Training	Tracking the number of existing employees globally who have received modern slavery training.	Employees globally were offered modern slavery refresher training. In addition, all new employees hired in Australia were provided with modern slavery training during their onboarding process.
Employee Screening	Ensuring that employees and fixed term contractors in Australia are effectively screened in terms of identifying potential modern slavery risks (including their background and work eligibility) prior to employment at MFS.	Third party agency contractors were screened through police and work eligibility checks prior to employment. Any potential risks or issues in relation to employees are reviewed by human resources, legal, compliance and hiring managers and resolved with individual candidates prior to any employment.  Based on these screening processes, there were no material issues relating to modern slavery risks for any employees or contractors during the Reporting Period.
Whistleblower Reports	Tracking the number of whistleblower reports that concern modern slavery matters.	There were no whistleblower reports made concerning modern slavery matters during the Reporting Period.
Breaches or Incidents	Tracking the number of breaches or incidents relating to modern slavery risk in relation to MFS' internal policies or procedures.	There were no reported or identified breaches or incidents relating to modern slavery risk under MFS' internal policies or procedures identified in MFS' compliance monitoring program during the Reporting Period.

## 5. MFS' Action Plan for the Next Reporting Period

MFS will continue to implement its policy and procedural framework around modern slavery risks in the next reporting period.

MFS will also implement some or all of the following actions in future reporting periods:

- Considering reviewing and enhancing existing processes to factor in gender-differentiated risks and impacts when relevant (e.g. enhancing vendor questionnaires, engaging with company management teams on this issue as needed). This is because MFS recognizes that gender inequality influences modern slavery risk, where women and girls are more vulnerable to modern slavery;
- Continuing to regularly review and update all relevant existing policies and procedures to ensure that modern slavery risks are appropriately addressed within our operations and supply chain;
- Providing refresher training to all employees globally within the MFS Group when necessary, as well as training on modern slavery risks for new employees hired in Australia;
- Considering whether more detailed background checks on third party agency temporary contractors hired in relevant jurisdictions should be conducted by the relevant hiring agency that has been engaged;
- Building on insights from a recent review of its vendor life cycle conducted with an external consultant, MFS is developing a multi-year implementation plan to further strengthen its approach to identifying and mitigating vendor risk, inclusive of modern slavery, across the supply chain through enhanced vendor engagement and ongoing assessment mechanisms;
- Continuing to develop and deepen our global approach at MFS towards sustainability including via MFS' internal Corporate Sustainability Committee; and
- From an investment perspective, continuing to refine existing frameworks and engage with company management teams as needed to assess our investments that are most at risk of being impacted by modern slavery.

## 6. Consultation

MFS is committed to tackling the risks of modern slavery as a group, through developing and enforcing group-wide policies and processes, and through ongoing consultation between MFS Holdings and the MFS Holdings Subsidiaries, including MFS Australia. MFS implements a group-wide modern slavery risk assessment across MFS entities to capture the MFS entities referred to in this Statement.

In this Reporting Period, the process of consultation involved:

- The engagement of relevant global business teams that cover the MFS Holdings Subsidiaries (e.g. enterprise risk management, legal, compliance, investment, and human resources) to consider modern slavery risks in different sectors of the business, consider compliance against the reporting requirements under the Act, assess the relevant risks during the Reporting Period and report on progress on previous action items. These relevant global business teams were asked to review and provide feedback on the Statement;
- A review and approval process conducted by MFS' Corporate Sustainability Committee (which comprises stakeholder members from relevant global teams); and
- Following this internal review process, the board of MFS Holdings and MFS Australia were given an opportunity to consider and review this Statement prior to approval and submission.

## 7. Board Approval

This Statement was approved by the MFS Holdings Board of Directors, being its principal governing body, on behalf of itself and the MFS Holdings Subsidiaries. This Statement was also approved by the MFS Australia Board of Directors, being its principal governing body.

*Richard Drage*

[Richard Drage \(Apr 1, 2026 10:50:16 GMT+1\)](#)

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**Richard Drage**

Director, MFS International Holdings Pty Limited  
March 2026

*Josh Barton*

[Josh Barton \(Mar 27, 2026 00:00:00 GMT+11\)](#)

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**Joshua Barton**

Director, MFS International Australia Pty Limited  
March 2026

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