Modern Slavery Statement

Wellington Management Australia Pty Ltd ABN 19 167 091 090

Financial Year Reporting Period: 1 January 2025 to 31 December 2025

WELLINGTON MANAGEMENT

INTRODUCTION

This document is a Modern Slavery Statement (Statement) issued by Wellington Management Australia Pty Ltd (WMA) in accordance with the Modern Slavery Act 2018 (Cth) (Act) and has been approved by the Board of WMA as its principal governing body.

Modern Slavery has been defined by the Act to include eight types of serious exploitation: trafficking in persons; slavery; servitude; forced labour; forced marriage; debt bondage; the worst forms of child labour; and deceptive recruiting for labour services.

This Statement outlines our commitment and steps taken in identifying and addressing Modern Slavery risks within our business and supply chain.

STRUCTURE, OPERATIONS AND SUPPLY CHAIN OF THE REPORTING ENTITY

STRUCTURE

WMA, a proprietary limited company organised in Australia (ABN 19 167 091 090), is an investment manager, and holds an Australian Financial Services Licence (no. 462912). WMA does not own or control other entities.

Sydney, Australia (26 employees)	Address
Wellington Management Australia Pty Ltd	Level 30 180 George Street Sydney NSW 2000 Australia Telephone: +612-8233-6400

All employee data is as of 31 December 2025

WMA is 100% owned by Wellington Management Global Holdings, Ltd., a Bermuda-domiciled holding company. The ultimate parent company of the Wellington Management organisation is Wellington Management Group LLP, a Massachusetts private limited liability partnership owned by 184 partners, all fully active in the business of the firm and which has operations in North America, Europe and Asia Pacific regions. Over 800 investment professionals are employed across the Wellington Management Group (Wellington Management).

OPERATIONS AND SUPPLY CHAIN

WMA is engaged exclusively in investment management and serves as a trusted adviser and strategic partner to professional investors and wholesale clients.

As an investment manager, we have a relatively simple supply chain built around supporting our investment management practice. The external vendors we procure goods and services from primarily fall into four broad categories:

- **Professional and employee related services:** such as legal, tax, audit/accountancy advice; external investment research providers; external training and recruiting providers; employee insurance and benefit providers.
- **Workplace services:** services which support the running of our day-to-day business (such as cleaning, catering, office equipment maintenance services and property management).
- **Technology and data services:** systems, software and hardware purchased to provide the technology infrastructure required to undertake our business; market data services.
- **Travel services:** as a global organisation serving clients in many different countries, our staff undertake global travel; as such, we engage with a number of travel service providers.

RISKS OF MODERN SLAVERY PRACTICES IN OPERATIONS AND SUPPLY CHAIN

As a professional financial services organisation, WMA considers the risk of Modern Slavery within our Australian business operations to be low, given the nature of the business undertaken. However, we recognise that there may also be Modern Slavery risks through our supply chain and investment management activity.

SUPPLY CHAIN RISK

The nature of our business, along with the high standards we have for ourselves and our suppliers, has helped ensure that the risk of slavery and human trafficking in our supply chain is low. Regardless, Wellington takes a risk-based, case-by-case approach to supplier evaluations. Each evaluation takes into account the supplier's geographic location(s) and the sector(s) in which it operates, with particularly careful consideration when a supplier operates in a region and/or industry that has been determined to be more susceptible to slavery and human trafficking.

INVESTMENT MANAGEMENT RISK

In order to assess a company's risks of Modern Slavery practices, we believe there are multiple factors of relevance.

- **Sector/industry exposure risk:** Certain sectors and industries may have higher Modern Slavery risks because of their characteristics, products and processes. Indicators of this type of risk include the use of unskilled, temporary or seasonal labour, use of short-term contracts and outsourcing, use of foreign workers or temporary or unskilled labour to carry out functions which are not immediately visible (i.e., at night), security and cleaning. We recognise that higher risk sectors and industries can play a role in mitigating investment risks.
- **Geographic risk:** Certain countries may have a higher risk of Modern Slavery, including due to poor governance, weak rule of law, conflict, migration flows and socio-economic factors.
- **Entity risks:** Certain entities may have exposure to Modern Slavery risks because of poor governance structures, lack of transparency, a record of treating workers poorly or a track record of human rights violations.

Our clients are invested in a variety of investment strategies, including both commingled funds and separate accounts, with broad global and regional supply chains. As such, the underlying companies in which we invest span many sectors/industries, countries and entities, some of which have increased exposure to Modern Slavery risks. We acknowledge that the risks of Modern Slavery may be heightened in some of our investee companies' supply chains and operations as a result of the geographical location of some suppliers and areas of operation.

ACTIONS TAKEN BY THE REPORTING ENTITY TO ASSESS AND ADDRESS RISKS, INCLUDING DUE DILIGENCE AND REMEDIATION PROCESSES

POLICIES AND PROCEDURES

We are committed to incorporating socially and environmentally sustainable behaviour into sound governance and engagement with our employees, our community, and our environment. We utilise our procurement procedures and employment policies to raise awareness of the Act with employees and suppliers as relevant to help mitigate the risks of Modern Slavery and human trafficking in our business. These global policies and procedures include:

- Code of Ethics
- Safe Work Environment Policy
- Equal Employment Opportunity, Discrimination & Harassment Policy
- Global Escalation of Concerns Policy and associated hotline
- Reference Checking
- Harassment and Discrimination
- Supplier Code of Conduct

Our Global Escalation of Concerns Policy is intended to ensure that every Wellington Management employee knows about and has access to effective avenues to voice any concerns regarding wrongdoing or misconduct at the firm. This policy is supported by our third-party "Concerns Hotline", which enables employees to raise concerns on an anonymous or attributed basis via phone, internet, email, or mail. In addition to reinforcing the importance of voicing concerns, the policy also makes clear that the firm will not tolerate any form of retaliation against an employee who acts to voice concerns. Employees are also encouraged, and in some cases our policies require, that they share any concerns they may have regarding misconduct or wrongdoing with their immediate line manager, or an appropriate representative from our Employee Relations/Human Resources department. In addition, we provide mandatory training on anti-money laundering and anti-bribery and corruption to all new employees, and annual training to all employees across WMA.

SUPPLY CHAIN

The nature of our business activities and the high standards that we expect from both our suppliers and ourselves is reflected in our overall assessment that the risk of modern slavery in our supply chain is low.

We have a centralized sourcing function for Wellington's vendor contract processes. The contract managers collaborate with our Third-Party Risk Management (TPRM) Team, which initiates due diligence for new suppliers and conducts periodic reviews for certain existing suppliers. To identify and mitigate modern slavery and human trafficking risk, we have taken a risk-based approach to our evaluation. Where applicable, we may incorporate modern slavery-related provisions into our contractual agreements. We may also ask a supplier to provide information about its necessary actions to prevent or remediate modern slavery in its business or its supply chain. We identify and review third-party service providers for potential modern slavery risks during onboarding, based on risk factors such as the party's industry and country of operation. If evidence of modern slavery is identified within a supplier's operations or supply chain, we will engage with the supplier to seek appropriate remediation and, where necessary, consider termination of the relationship.

Over this reporting period, we continued to make progress in implementing actions to assist in addressing the Modern Slavery risks associated with our supply chain, this includes instituting a global supplier code of conduct in 2025. **Please refer to Wellington's Supplier Code of Conduct for details about our supply chain risk-management approach.**

INVESTMENT MANAGEMENT

Wellington Management continues to take a multi-layered approach to tracking and managing the risk of Modern Slavery in client portfolios. First, we seek to provide training to investment teams (including portfolio managers and research teams) and product management operating in high-risk sectors and regions to increase their understanding of Modern Slavery, how incidents and risks may show up in securities, and key questions to consider when meeting with company and country leadership. Second, we work closely with data providers to ensure we understand their latest screening tools and to appropriately incorporate data into Wellington Management research. In order to assess a company, investors may incorporate certain factors into their research and investment process as applicable to their investment philosophy & processes ("P&P"), such as:

- **Industry:** Products and services linked to the use of low-skilled labour or where the use of migrant labour is common in the production and/or delivery the products and services are at highest risk of Modern Slavery. These low-skilled workforces typically have less power in the workplace and workers are more easily substituted if they complain about working conditions and worker rights. As a result, Modern Slavery is most commonly found in specific industries. Recognizing the industries where this risk is highest is an important part of the work of our Environmental, Social and Governance (ESG) Analysts.
- **Country:** Governments play a critical role in developing and implementing the laws, policies, and programs needed to prevent and respond to Modern Slavery risk. As a measure of this, the Global Slavery Index is produced by a globally recognized NGO with a long track record of assessing Modern Slavery risk and generating in-depth research at a country and product level. The Global Slavery Index has created a Government Response Index which includes an assessment of the actions governments are taking to respond to Modern Slavery. The framework was developed in consultation with an independent Expert Working Group and is based on findings from NGO research and scholars in fields related to Modern Slavery, such as harmful traditional practices, health, social welfare and migration.
- **MSCI Controversy Score:** MSCI ESG controversy scores allow institutional investors to analyse a company's significant social, environmental, and governance impacts by identifying company involvement in major ESG controversies, adherence to international norms and principles, and company performance with respect to these norms and principles. Given that we seek to reduce risk of forced or child labour practices in company business operations and supply chains, especially since these risks can erode profitability and weaken financial positions, controversy scores can help inform our investors' views.
- **Company Survey:** We have developed a proprietary survey that investment teams may leverage to better understand and assess a company's policies and procedures for managing modern slavery risk across its business operations and supply chains, and – where relevant to the investor's philosophy and process – to help identify companies that may benefit from enhanced engagement on the subject, specifically for the purpose of protecting value.

Ongoing interactions between ESG Analysts and investment teams related to company engagement, proxy voting, and portfolio reviews are all opportunities to educate investment teams on ESG issues and trends where these may be relevant to their investment P&P. Investment teams take part in our ongoing dialogue with companies, and we share engagement information using a central collaboration platform. Investment teams regularly discuss issuers, write investment notes and make comments in our daily morning investment meeting. This collaboration is a form of ongoing training within our firm.

In addition, Wellington Management maintains multiple internal e-mail distribution lists related to ESG and sustainable investing in order to facilitate information sharing across multiple functions of the firm. Content shared in this forum could include trends or common questions among clients of a certain channel and recent academic studies regarding ESG.

We are aware of the pernicious nature of Modern Slavery, particularly the potential for supply chains – and those not directly controlled by companies marketing goods to end users – to be at greater risk for human trafficking and other human rights abuses. Wellington Management regularly reviews the ways in which we can improve our due diligence and engagement efforts on this issue.

HOW THE REPORTING ENTITY ASSESSES THE EFFECTIVENESS OF ACTIONS TO ASSESS AND ADDRESS RISKS

Wellington Management recognises that addressing the risk of Modern Slavery requires ongoing commitment. Managing the Modern Slavery risk within investment portfolios begins with investment team awareness of the risk and where these risks are likely to be elevated. In 2025, we continued to strengthen this awareness through targeted communications and training for teams, with the goal of supporting more informed and actionable decision-making on high-risk holdings.

In 2025, we continued our supply chain and labor research with the goal of driving investment returns through better risk assessment and promoting the adoption of modern slavery risk-management guardrails at particular investee companies. When companies lack labor-rights transparency or oversight in their operations or supply chains, adverse effects such as reputational damage, legal fines, and supply disruptions may occur. These factors can collectively erode profitability and weaken the company's financial position.

Our work in this area focuses on supporting investment led risk assessment and constructive dialogue with issuers on labor and supply chain practices that may be financially material. We draw on internal research, issuer disclosures, and targeted engagement tools to improve our understanding of how companies approach labor related risks within their operations and supply chains. These insights help our ESG analysts and portfolio managers – as relevant to their investment P&P – identify companies where governance, policies, or controls may warrant closer attention. Internal insights also help inform engagement priorities, with the objective of encouraging practices that support operational resilience and long term value creation. We expect our approach to labor related and human-rights-related risk assessments to evolve as data availability, disclosure standards, and internal frameworks mature.

In order to ensure the effectiveness of our actions as it relates to Modern Slavery risk in WMA's supply chain, the centralized sourcing and TPRM team periodically reviews our risk assessment and procurement processes to ensure they remain up to date and appropriate (leveraging a risk-based approach). As an additional measure, we reviewed a subset of the suppliers paid by WMA in 2025. Based on these reviews, there were no concerns identified related to Modern Slavery risks within the vendors.

Please refer to Wellington's Supplier Code of Conduct for details about our supply chain risk-management approach.

CONSULTATION PROCESS

As there are no subsidiaries or entities owned or controlled by WMA, this requirement is not applicable.

OTHER RELEVANT INFORMATION

There is no other relevant information for this reporting period.

APPROVAL

This Statement was approved by the Board of Directors of Wellington Management Australia Pty Ltd on 23 June 2026.

Signed by:

Name: Caitlin K. Hollebone
Title: Director