WELLINGTON MANAGEMENT®

SLAVERY & HUMAN TRAFFICKING STATEMENT 2025

INTRODUCTION

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 ("the Act") and constitutes Wellington Management International Ltd's ("WMIL") Slavery and Human Trafficking Statement ("Statement") for the financial year 1 January 2025 to 31 December 2025 ("financial year 2025"). Under the Act, commercial organisations that supply goods or services, carry on business in the UK and meet the annual turnover threshold of at least £36m from the provision of goods and services must publish an annual slavery and human trafficking statement.

The Act prompts us to review our business and supply chains to identify where the highest risk of encountering modern slavery exists. Our review for the financial year 2025, found that no changes to policy nor approach are required to ensure that WMIL continues to meet its obligations under the Act.

OUR BUSINESS AND STRUCTURE

Wellington Management is engaged exclusively in investment management. We serve as a trusted adviser and strategic partner to investors in more than 60 countries worldwide. We offer capabilities that span nearly all segments of the global capital markets. Our investment solutions, which are tailored to the unique return and risk objectives of institutional clients, draw upon our robust body of proprietary research and collaborative culture. We encourage independent thought and healthy debate. As a private partnership, we believe our ownership structure fosters a long-term view that aligns our perspectives with those of our clients. WMIL is a subsidiary of Wellington Management Group LLP.

OUR APPROACH TO THE ACT

Our corporate sustainability approach (WellSustain) guides our responsible operations across our facilities, supply chain, and workforce to support our clients, our firm, and our people. We take seriously our obligations to prevent modern slavery and human trafficking and are committed to taking appropriate steps to ensure the requirements of the Act are met within our business and supply chain.

RISKS OF MODERN SLAVERY PRACTICES IN OPERATIONS AND SUPPLY CHAIN

As a professional financial services organisation, WMIL considers the risk of modern slavery within our United Kingdom 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 & PROCUREMENT PROCESS

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.

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 & 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 & 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 a number of travel service providers.

SUPPLIER ADHERENCE TO OUR CODE OF CONDUCT

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.

OUR BUSINESS POLICIES AND PRACTICES

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
- Statement of Policy on the Prevention of Corrupt Practices (UK)
- Health & Safety Policy (UK)
- 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 WMIL.

INVESTMENT MANAGEMENT

ESG is a broad term that refers to one or multiple Environmental, Social and/or Governance issue(s). At Wellington Management, we consider ESG as one set of factors among many that should be weighed appropriately to inform investment decision making. ESG research at Wellington Management is centralised and available to all portfolio managers and investment teams. Investment teams globally may incorporate ESG research into decision making as appropriate and consistent with their investment approach. 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 philosophy and process (“P&P”).

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 labour 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 labour 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 labour related and human-rights-related risk assessments to continue to evolve as data availability, disclosure standards, and internal frameworks mature.

This statement was approved by the Board of Wellington Management International Ltd on 23 June 2026.

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Signed: Molly Shannon

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Name: Molly Shannon

Title: Director