MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement provides an update on the commitment that Fidelity International has made to combat slavery and human trafficking. This statement, approved by the Boards of FIL Holdings (UK) Limited on 4 June 2026 and FIL Life Insurance Limited on 24 June, is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the "Act") and constitutes our slavery and human trafficking statement in respect of the financial year ended 31 December 2025.

This statement is published on the Fidelity International UK website and is also published, with historic statements, on the UK government online registry.

Mandatory criteria	Section
1. Identify the organisation's structure, its business and its supply chains.	**Section 1** - Our corporate structure; **Section 2** - Assessing and addressing our supply chain risks
2. Describe the reporting entity's policies in relation to slavery and human trafficking.	**Section 3** - Assessing and addressing our operations risks
3. Describe the due diligence processes in relation to slavery and human trafficking in the reporting entity's business and supply chains.	**Section 2** - Assessing and addressing our supply chain risks; **Section 3** - Assessing and addressing our operations risks
4. Describe the parts of the reporting entity's business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk.	**Section 2** - Assessing and addressing our supply chain risks
5. Describe the reporting entity's effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate	**Section 4** - Monitoring and assessing our effectiveness
6. Describe the reporting entity's training about slavery and human trafficking available to its staff.	**Section 3** - Assessing and addressing our operations risks

1. Our corporate structure

FIL Holdings (UK) Limited is a private limited company registered in England and Wales (registered number 06737476) and is the parent company for a number of companies, including entities authorised and regulated by the Financial Conduct Authority. FIL Life Insurance Limited is a private limited company registered in England and Wales (registered number 03406905) authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority. All such companies and their subsidiaries are members of the Fidelity International group of companies and are registered in England and Wales with their registered address being either 4 Cannon Street, London EC4M 5AB or Beech Gate, Millfield Lane, Lower Kingswood, Tadworth, Surrey, KT20 6RP.

We undertake the following key activities:

- asset management;
- portfolio management, investment strategy and advisory services;
- wholesale and institutional sales;
- marketing of our products;
- legal and compliance activities;
- corporate communications and sponsorship;
- management and administration of our UK office locations;
- procurement of goods and services to support our financial services activities;
- human resources; and
- IT support.

We also collaborate with other entities within the Fidelity International group of companies, where relevant, to the investment and asset management in other regions.

2. Assessing and addressing our supply chain risks

As an investment fund manager, our supply chain consists of our investments and investee supply chains. Fidelity International is committed to respecting and promoting human rights across our investment activities, seeking to align our approach with the core standards of the International Labour Organization, the UN Global Compact, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. More information on our approach to social capital, including human rights and modern slavery, can be found in our Sustainable Investing Principles.

Fidelity's commitment to and action on modern slavery:

Prior to 2020

- **Joined CCLA's "Find it, Fix it, Prevent it"**
- **Founding member of Investors Against Slavery and Trafficking (IAST) APAC**
- Led investor consortium calling for urgent action regarding **stranded seafarers during COVID**
- Focused engagement with **apparel retail sector in Asia**

2021

- Introduced **proprietary ESG ratings** and incorporated focus on worker treatment and supplier management
- Engagement was **expanded to European companies**, with particular focus on their supply chains
- **Collaborative letters with IAST APAC to leading Australian listed companies** setting out investor expectations

2022

- **Undertook risk-based analysis of section of portfolios** with an external consultant
- Collaborated with IAST APAC with a **submission to the Australian Modern Slavery Act Review**
- Expanded engagement universe **beyond retail sector to construction companies**

2023

- Established Modern Slavery & Supply Chain Resilience as **a core thematic engagement topic**
- Developed **modern slavery-specific milestones and expectations** for best practice
- Field trip into the apparel supply chain in Vietnam and Bangladesh

2024

- Established **portfolio-wide risk assessment approach** to improve engagement prioritisation
- Developed modern slavery specific **company engagement plans with time-bound asks**
- **Client and investment professionals training** on modern slavery
- Hosted RISFD event and monitoring development

2025

- Joined the **Investors Alliance for Human Rights** and the **PRI Reference Group on Human Rights and Social Issues**
- Engaged with **social auditors** to better understand processes and challenges
- Continued **policy engagement** on risk-based human rights due diligence, including EU Omnibus

Our approach to managing modern slavery risk operates through three lenses: (a) a general assessment of ESG issues (proactive and reactive); (b) portfolio risk assessments and thematic engagements; and (c) system-level stewardship under our Influence Framework (see our [Sustainable Investing Principles] for more details).

a. Modern slavery as part of Fidelity International's general assessment of ESG issues in investments

Proactive risk management

We integrate modern slavery considerations proactively in several ways:

- **Proprietary tools and fundamental issuer research**
We assess over 2,000 companies using our proprietary ESG ratings. Where material, analysts use publicly available information and company dialogue to understand a company's approach to respecting human rights in its workforce and supply chains. The resulting ESG rating forms a key part of our due diligence process and is one of the factors portfolio managers consider when making investment decisions.

  For more information on our ESG ratings, please see our Sustainable Investing Principles.

- **Company engagements**
Engagement with companies is key to identifying, mitigating, and remediating ESG risks. In 2025, we conducted 167 company engagements on social capital topics, including modern slavery and human rights. We use our corporate access, research capabilities, and investment scale to encourage investee companies to address modern slavery and supply chain resilience through company meetings, shareholder resolutions, proxy voting, and public policy engagement. We engage both directly and through collaborative engagement initiatives to address material sustainability across sectors and regions.

- **System-wide engagement to drive structural change**
We take a system-wide approach by collaborating with policymakers and data providers to advance social capital objectives and influence broader systemic change.

Reactive risk management

Reactive management involves several strategies to promptly address issues as they arise; these include:

- **Issuer level engagement on controversies**
Upon public disclosure of a controversy, a sector analyst will engage with the issuer. The sustainable investing team supports these engagements, providing additional context to assess the extent of the controversy and determine how well the company is addressing it.

- **Quarterly fund reviews with portfolio managers**
We conduct Quarterly Sustainability Reviews ("QSR") in the UK on funds where our sustainable investing team flags significant controversies to portfolio managers. The QSR provides a regular and structured forum to discuss key sustainability aspects of portfolio holdings, including a review of human rights controversies data.

- **Updates on severe human rights controversies**
The sustainable investing team provides updates on severe human rights controversies to the investment team, ensuring a systematic process for flagging such matters to portfolio managers and investment analysts.

By combining proactive and reactive management, we seek to deliver positive real-world outcomes and uphold human rights across our investments.

b. Modern slavery portfolio risk assessments and thematic engagements

Beyond our general ESG assessment, we adopt a whole-of-portfolio approach to understanding modern slavery risk exposure. Each year, we conduct a dual-faceted review- combining top-down risk exposure evaluation with bottom-up risk management analysis, to inform our engagement methodology.

Many of our investees may not directly control the sites where modern slavery risks arise, as these often occur deep within supply chains — including in holdings based in low-risk geographies. We take a risk-based approach, prioritising engagement with investees in known high-risk geographies and factoring this into our ESG assessments. Where relevant, we also engage investees on their supply-chain governance.

Issuer modern slavery risk exposure

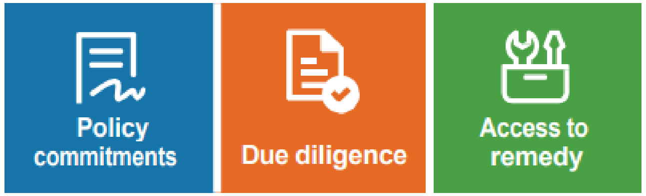
Industry: The risk exposure assessment begins with a mapping of high-risk products and services to the corresponding Global Industry Classification Standard (GICS) sector categories. We analyse our portfolio against a list of high-risk sectors, informed by our proprietary ESG ratings, global research, and emerging regulatory frameworks, conducting a binary assessment (high-risk or low-risk). For each sector, we also determine whether the modern slavery risk lies in operations or supply chains to further refine our analysis.

Geography: We use Walk Free's Global Slavery Index list of high-risk countries to assess potential material risks within operations or supply chains. Each country's risk exposure is mapped to company revenue exposure.

Materiality is assessed by evaluating our level of influence in engaging with issuers and excluding those with minimal exposure or relative holdings.

Issuer modern slavery risk management approach

Following the identification of issuers with potential high-risk exposure, we evaluate each company's commitment and actions by assessing disclosures and practices across three measures: policy commitments, due diligence processes, and access to remedy.



Using a third-party ESG data provider, we assess issuer risk management across these three areas and categorise companies as Low, Medium, or High risk based on their preparedness. We cross-reference this analysis with historical controversies to determine whether incidents have been appropriately addressed. This shapes our engagement methodology — directing resources to high-risk areas, maximising leverage, and identifying opportunities for collaboration to drive broader systemic change in combating modern slavery across our investment portfolios.

Human rights controversy assessment

We conduct a modern slavery controversy screening across our investment holdings, assessing severe human rights-related controversies from the past five years. The sustainable investing team analyses each controversy to determine its timing, severity, and whether the company has taken remedial steps. A sustainable investment analyst then determines the most appropriate engagement approach. At the beginning of 2025, we identified 45 issuers with a severe controversy. Following review, engagement was required at eight issuers, which formed part of our thematic engagement target list.

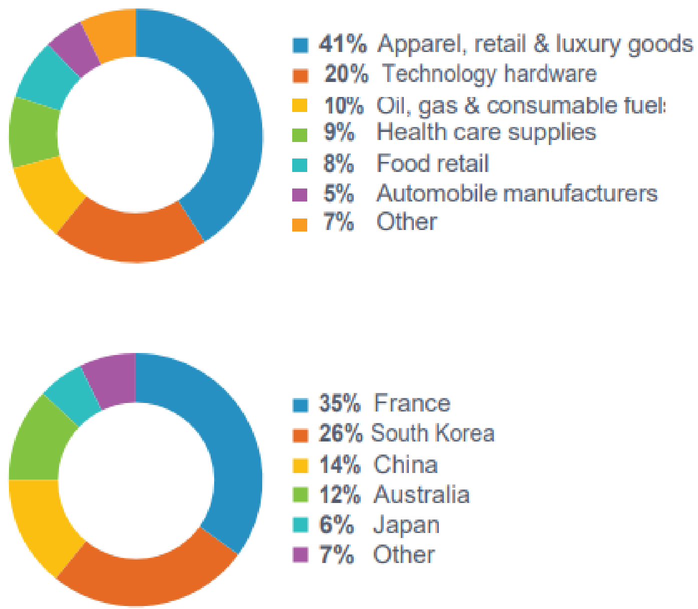
Limitations with our risk assessment approach

We acknowledge that our risk assessment approach has limitations due to data availability and portfolio coverage. Some companies do not provide sufficient disclosure for us to assess their risk management processes, and we are therefore unable to assign a risk category in all cases. As highlighted above, we are proactively engaging with regulators and data providers to improve company disclosures, which will in turn strengthen our risk assessment. We will seek to improve and iterate our approach annually as new data emerges.

Modern slavery thematic stewardship activity

Once issuers are assigned a risk category we determine an appropriate engagement strategy. The decision to engage is influenced by our holding size, level of influence, and the materiality of the issue. For high-risk issuers, the sustainable investing team conducts assessments to determine whether intensive engagement is appropriate, prioritising companies based on risk to people, our financial exposure, and our ability to influence positive change. At the beginning of 2025, we identified 24 companies for our thematic engagement programme. These engagements use our global stewardship progress tracker, which systematically tracks engagement objectives and milestones within our internal research platform. We report on engagement progress regularly to our clients.

Geographic and sector split across the 24 high-risk thematic issuers



Please see our annual [Sustainability & Stewardship Report]() for examples of modern slavery and human rights-related engagements in 2025.

c. Fidelity International’s influence framework: framing our modern slavery stewardship strategy

As part of our firm-wide Sustainable Investing Policies, we have identified four priority thematic engagement areas: climate change, nature loss, social capital, and effective governance. Supply chain resilience and modern slavery fall under our social capital theme.

This focus targets companies with higher exposure to significant human rights issues due to the sectors and regions in which they operate or the products and services they provide. The core objectives are:

- To understand key risks and their potential impact on our portfolios, ensuring issuers are actively working to mitigate modern slavery in their operations and supply chains, while managing associated operational and reputational risks.
- To invest in companies committed to eradicating supply chain risk, thereby enhancing the resilience and sustainability of their business models over the long term.

We recognise that modern slavery presents substantial legal and reputational risks to investee companies. Companies may also face operational risks if they depend on suppliers engaged in modern slavery whose operations are subject to investigation and closure. Conversely, companies that actively work to eliminate modern slavery are likely to maintain more resilient business models over the long term.

System-wide influence

Our system-wide stewardship efforts recognise that policymakers and regulators play a key role in delivering global sustainability objectives, such as those set out in the UN Guiding Principles on Business and Human Rights. To complement our bottom-up company-level engagement, we also engage at the system level on human rights issues both via associations and directly with policymakers and regulators.

Corporate disclosures: We see disclosures on key social metrics as an important first step in assessing corporate risk. We engaged with the European Commission and the European Financial Reporting Advisory Group (EFRAG) on revisions to the Corporate Sustainability Reporting Directive (CSRD) to reiterate the importance of including material social metrics, including on human rights and forced labour, in the European Sustainability Reporting Standards (ESRS). Given the potential extra-territorial impact of the CSRD, this requirement has the potential to influence companies and supply chains outside Europe.

Due diligence requirements: Proportionate and risk-based due diligence requirements could help reduce modern slavery risks. We engaged with the European Commission on the Corporate Sustainability Due Diligence Directive, encouraging it to maintain proportionate and risk-based requirements.

We also responded to the United Kingdom's Joint Committee review on forced labour in the UK's supply chains. In this response, we noted we would like to see risk-based and proportionate due diligence into forced labour in supply chains, which could help companies identify forced labour risks, and that this should be tailored to a company's size, sector, and supply-chain risks.

We engage with ESG data providers and other stakeholders to encourage greater provision of human rights-related metrics. Modern slavery-related risk analysis is still in its early stages and significant data gaps and inconsistencies remain. We are part of the Investor Initiative on Human Rights Data, a collaborative initiative seeking to address the lack of consistent, decision-useful human rights data at scale and have been proactively engaging with data providers to help close this gap.

Industry, sectoral and thematic influence

We participate in a range of collaborative investor engagement initiatives as part of our thematic engagement on supply chain resilience and modern slavery.

- **Investors Against Slavery and Trafficking (IAST) APAC**

  In 2020, as a founding member and Steering Committee member, we launched the Investors Against Slavery and Trafficking (IAST) APAC initiative. IAST APAC is a coalition of leading investors, including First Sentier Investors, Aware Super, Australian Super, and Ausbil, with collective assets under management of approximately US$7.8 trillion. Members have embarked on a multi-year initiative to address complex human rights issues in the value chain through collaborative engagement with companies at risk across APAC.

- **Find it, Fix it, Prevent it (UK)**

  In 2020, we joined the 'Find it, Fix it, Prevent it' initiative led by UK asset manager CCLA. The objective of this initiative is to help companies develop and implement better processes for finding, fixing, and preventing modern slavery in companies' supply chains.

Individual influence

Individual influence is key to effecting change. The social and economic consequences of human rights failures are less well understood than other systemic risks, creating a need to establish a baseline understanding of key concepts across our organisation and for our clients, so that all relevant stakeholders can make better-informed decisions.

We host training sessions and webinars to address identified knowledge gaps, including tailored internal training sessions for our investment and distribution teams, and publish training manuals and primers.

We regularly engage with clients on modern slavery issues through training sessions and one-to-one meetings, explaining key concepts and our evolving human rights-related investment strategy. We have also developed client content and thought leadership on this topic.

We provide regular updated to our clients on our sustainability activities through our annual sustainable investing reports, including progress on key themes such as employee management and modern slavery, as well as outcomes of the engagements we have undertaken.

We continue to review our reporting capabilities and will seek to incorporate additional human rights-related information, including engagement and voting examples, to align with emerging standards and regulatory requirements such as ISSB and the EU's CSDDD.

Awareness and training

We have developed comprehensive guidance on labour management and modern slavery for our investment analyst team, covering modern slavery risks, example engagement questions, and best-practice case studies across a range of reporting and management areas.

3. Assessing and addressing our operations risks

Fidelity International does not tolerate modern slavery or human trafficking within its business operations and takes a risk-based approach to its supply chain. Given the professional and regulated nature of our business, and that our supply chain is primarily services-based with no material services located in high-risk countries, we consider our risk of modern slavery or human trafficking within our business operations and supply chain to be low.

Our procurement process includes a thorough risk assessment of each new supplier. Any supplier not classed as low risk is subject to enhanced due diligence screening, including financial crime, information security and data protection assessments, as well as adverse screening for modern slavery, human trafficking, other human rights abuses, and financial stability.

All new suppliers and any existing suppliers which are due for renewal are required to acknowledge our Supplier Code of Conduct which sets out minimum standards and behaviours we expect from our suppliers, including adherence to employment standards, non-discrimination and human rights legislation.

Our supplier management tool requires an initial attestation from all suppliers at onboarding of their acceptance of the key principles of the Supplier Code of Conduct. All non-low-risk suppliers are also subject to comprehensive monitoring of performance against contractual obligations.

Suppliers participating in a sourcing tender event are also required to respond to specific questions relating to the Supplier Code of Conduct.

In addition, our template supplier agreements require new material suppliers to comply with all applicable anti-slavery and human trafficking laws and to agree not to engage in any activity anywhere in the world that would be an offence under the Modern Slavery Act 2015 if the activity were undertaken in the UK.

All suppliers are requested to undergo assessment by our sustainability ratings provider, which evaluates ESG risk management across environment, labour and human rights, ethics, and sustainable procurement — including child labour, forced labour, and human trafficking. These assessments inform ongoing monitoring and corrective action planning. Over a third of all our suppliers have been rated, accounting for over 75% of our overall annual spend and 66% of our critical or important suppliers. We continue to work towards having all critical suppliers assessed and over 80% of our spend covered.

Policies

- **Supplier Code of Conduct:** documents our commitment to assessing and mitigating modern slavery and other human rights abuses in our corporate and supply chain relationships.

- **Financial Crime Prevention Policy:** outlines the steps our business takes to assess and mitigate modern slavery and human trafficking in our supply chain and in connection with any proposed acquisitions.

- **Global Procurement Standard:** underpinned by the principle of Sustainability which requires minimum controls to align with our Corporate Sustainability goals. Metrics are in place to monitor compliance against these goals and report progress to various senior management forums.

- **Whistleblowing Policy:** sets out how staff and suppliers can raise concerns about potential wrongdoing or illegal activities through an independent hotline. The policy highlights anonymity, confidentiality, and legal protection against retaliation. A standalone ‘Modern Slavery’ category was created in 2023 to capture potential incidents of modern slavery in our operations and supply chains.

Training

Compulsory training is provided to all staff on an annual basis in the financial crime prevention training package. The 2025 programme had a 100% completion rate for all staff. Additional compulsory training is provided to all staff in business functions involved in recruiting, sourcing, and managing a supply chain so that they are able to identify risk factors, understand the implications and assist us with the effective implementation of our policies.

4. Monitoring and assessing our effectiveness

Our General Counsel functions work with our Corporate Services, HR, and Procurement functions to manage concerns and ensure they are reported to the relevant Accountable Executives or Boards of Directors for remedial action.

The review and oversight of sustainable investing matters are vested in the Sustainable Investing Operating Committee (SIOC). Our Sustainable Investing Principles outline how accountability for sustainable investing sits across all levels of our governance structure.

We have included the following table of progress against stated commitments as a first step in monitoring our effectiveness. Going forward, we intend to develop clear metrics to assess the effectiveness of our actions through both our operational and supply chain risk exposure.

Commitment	Status
Governance	
Effectiveness metrics	
• Develop a framework for assessing progress of our engagement which we will report on a biannual basis to relevant governing body.	Completed
• Tracking of progress of Modern Slavery thematic engagement.	Ongoing
• Explore enhanced public reporting of the progress from the Modern Slavery engagement theme.	Ongoing
Policy	
• Enhance incorporation of modern slavery in all relevant policies.	Partially completed
International collaboration	
• Continue to collaborate with international and UK-based teams to share resources and engagement findings on modern slavery risk.	Ongoing
Awareness and training	
Internal training	
• Train our investment analyst teams in the definitions of modern slavery, relevance to the investment industry and Fidelity International's risk profile.	Completed and ongoing
• Develop appropriate resources for enhanced understanding and engagement for the investment team.	Ongoing
Collaboration and external engagement	
• Continue our involvement with collaborative engagement initiatives.	Ongoing
• Identify engagement opportunities with policy makers and regulators	Ongoing
Risk assessment, due diligence and remediation	
Operations risk screening	Completed
• Investigate opportunities to address risk in operations and from operational suppliers	
Investment risk screening	
• Review the methodology used to conduct a modern slavery risk assessment of portfolios and prioritise engagement targets.	Annual
Procurement risks	
• Monitor our exposure to procurement product and service risks and seek to enact appropriate due diligence where possible, including embedding screening processes via third party assessment monitoring.	In progress

Cara Hewitt
Director

For and on behalf of FIL Holdings (UK) Limited and its subsidiaries including:
FIL Investments International
Financial Administration Services Limited
FIL Investment Advisors (UK) Limited
FIL Investment Services (UK) Limited
FIL Pensions Management
FIL Investment Management Limited
FIL Platform Solutions (UK) Limited
FIL Wealth Management Limited

Date: 27-Jul-2026 | 15:54 BST

Marianne Jaekel
Director

For and on behalf of FIL Life Insurance Limited

Date: 27-Jul-2026 | 15:54 BST