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PineBridge® INVESTMENTS

Modern Slavery Statement

Introduction

At PineBridge Investments Europe Limited ("PBIEL"), we have a zero-tolerance approach to modern slavery and are committed to acting ethically to support the protection of human rights and to combat slavery and human trafficking violations related to our own operations, supply chain and services.

Modern slavery refers to forced or bonded labour, deprivation of personal freedom and facilitating the movement of people for exploitation. Whist, we believe there is a low risk of modern slavery or human trafficking within our operations or supply chain, ongoing due diligence and rigorous oversight of third party outsourced functions and internal processes are maintained.

Our Organisational Structure and Business

PBIEL is a private limited company incorporated in England and Wales. PBIEL operates primarily in the United Kingdom and is authorised and regulated by the Financial Conduct Authority in the United Kingdom in the conduct of its investment business. PBIEL is a London-based investment management firm and is part of the PineBridge group. It manages investment funds and separate accounts for clients in a wide range of asset types including multi-asset, fixed income and alternative investments.

Risk of Modern Slavery in Our Operations and Supply Chain

As a regulated financial services organisation with a professional workforce, we consider the risk of modern slavery within PBIEL's direct business operations to be low.

As an employer we have robust recruitment and employment practices and comply with all applicable labour laws. We are committed to promoting diversity and equal opportunity, and our employment policies prohibit all forms of harassment and discrimination against employees.

We maintain a whistleblower program which provides a channel for staff to report concerns about illegal, unethical or unsafe activities occurring in the workplace confidentially and without fear of retaliation.

All of our employees must comply with the firm's Code of Ethics, which sets out our expectations of the highest standards of ethics and integrity in our staff. Employees are required to certify they have read the Code of Ethics at the time they begin employment and annually thereafter. We provide training to our employees on an annual basis on financial crime, whistleblowing, anti-bribery, and money laundering, among other topics.

We have in place policies and procedures designed to comply with global economic sanctions and prevent PBIEL from engaging in prohibited transactions with sanctioned parties. There is a broad degree of overlap between the countries that are identified as having a high prevalence of modern slavery (for example, in the Global Slavery Index 2018), and those countries that are subject to economic sanctions. Our policies require that the investments we make must be screened to ensure they are not subject to sanctions. At the same time, third parties with whom we have dealings including clients, business partners, counterparties, financial institutions and vendors are also required to be

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screened on a risk-assessed basis to ensure we do not transact with sanctioned or high-risk parties.

PBIEL's suppliers and vendors are mainly professional firms that provide us with services and products to support our business of providing pooled and segregated investment management services to clients. Key vendors include providers of financial software, enterprise applications and analytics; market data vendors; rating companies; fund administrators and custodians; law firms; auditors and tax advisors. Our third-party vendors also include providers of other services such as payroll administration, office facilities and cleaning services, either sourced directly from third parties or through our group affiliates. Our direct third-party vendors are predominantly located in the United Kingdom and other jurisdictions that are not associated with high modern slavery risks.

Due to their geographic location and the fact that services are typically provided by a highly skilled professional workforce, we consider that our key third party suppliers have a low risk of modern slavery. It is possible however that there may be risk exposure where the services are subcontracted to be provided from higher risk locations, or from using vendors for non-professional services such as cleaning and purchase of office stationery, where it can be more common to employ base skill workers and whose supply chains may extend to higher risk countries.

Statement on the UK Modern Slavery Act 2015

This statement is made in accordance with section 54 of the Modern Slavery Act 2015 (the "Modern Slavery Act") and constitutes PBIEL's modern slavery and human trafficking statement as required by the Modern Slavery Act, for our financial year ended 31 December 2024. All prospective due diligence procedures will be required to assess the nature and extent of our exposure to the risk of slavery. The following steps have been implemented by us in order to maintain and improve our practice to support the protection and advancement of human rights:

- Request information regarding third party suppliers' working practices and require the relevant supplier to confirm that it is aware of, and complies with, its obligations under the Modern Slavery Act.

- Communicate to potential new suppliers that we have a zero-tolerance policy with regards to slavery. Every supplier understands that we have a zero-tolerance policy with regards to slavery, and we emphasise our commitment to the prevention of slavery in our contractual arrangements with third party suppliers.

- We require all third party suppliers to notify us upon discovering any breach or potential breach of the Modern Slavery Act or any actual or suspected slavery or human trafficking in their supply chains.

- Firm-wide mandatory employee training programs on financial crime, whistleblowing, anti-bribery and money laundering, which includes education on the issues of modern slavery and human trafficking have been implemented.

- We have also developed an internal policy which is available to all of our employees in the UK and which provides further guidance on how to identify, manage and report such risks.

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- The prevention, detection and reporting of modern slavery in any part of PBIEL's organisation, supply chain or distribution network is the responsibility of all those working for us and on our behalf.

PineBridge is committed to ensuring modern slavery has no place in our organization, for further information please contact LON_Legal@pinebridge.com.

Approval

The Board of Directors of PBIEL has approved this statement on 23 June 2025.

Signed on behalf of the Board of Directors of PBIEL:

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Michael Sweeney
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Name: Michael Sweeney
Title: Director
Date: 23 June 2025