

Modern Slavery Statement for PIMCO Australia

Introduction

This is a joint Modern Slavery Statement (**Statement**) for the financial year ended 31 December 2024 for the following reporting entities, who have actively consulted with each other and discussed the details of the *Modern Slavery Act 2018* (Cth) (**Act**), in order to prepare and execute this statement pursuant to the Act:

- PIMCO Australia Pty Ltd (ACN 084 280 508); and
- PIMCO Australia Management Limited (ACN 611 709 507)

(together referred to as “**PIMCO Australia**”).

PIMCO Australia does not own or control any other entities.

PIMCO Australia wholeheartedly supports the Modern Slavery Act 2018, which aims to drive out all forms of modern day slavery and human trafficking from business practices. PIMCO Australia has zero tolerance towards human rights violations and is committed to the highest standards of ethical and sustainable business practice, both in our own business and in our supply chains.

Organisation, Risks and Policy

PIMCO Australia is part of the PIMCO group (**PIMCO**), one of the world's premier fixed income investment managers. PIMCO Australia provides a range of investment products and services primarily to clients within the APAC region. PIMCO considers human capital risk as part of its integration of ESG across client portfolios. In 2017, PIMCO became a signatory to the UN Global Compact (<https://www.unglobalcompact.org/participation/report/cop/create-and-submit/active/439234>) as a commitment to advancing the principles of human rights, labour, environment and anti-corruption within its sphere of influence. PIMCO also partners with organizations such as Business in the Community to leverage best practices related to human rights and corporate citizenship. Furthermore, PIMCO maintains a dialogue with external stakeholder groups seeking to improve the analysis of human capital risks including UN Principles of Responsible Investment and International Sustainability Standards Board. PIMCO's Statement on Human Rights is available at <https://www.pimco.com/gbl/en/documents/8a92f94a-8f52-4143-aa0c-5eb1180a8039> and reiterates PIMCO's commitment to respecting human rights as outlined in the International Bill of Human Rights and the International Labor Organization's (ILO) core conventions in line with the United Nations Guiding Principles on Business and Human Rights (UNGP).

PIMCO Australia has considered its direct exposure towards all forms of slavery, human trafficking or child labour and, in particular, its employment practices which it believes eliminate any material risk of these occurring in its own business. As is generally the case with financial services firms, PIMCO Australia is required to be authorised, is subject to regulatory supervision and operates in a heavily regulated environment. PIMCO Australia undertakes comprehensive pre-employment checks in relation to all potential employees that are required to be satisfied prior to employment. In addition, the work carried out typically requires staff with a higher education or other professional qualifications who, in order to perform their roles, are often subject to individual regulatory authorisation and continuing professional training requirements. Our expectations for employees are outlined in our Code of Business Conduct, Code of Ethics, Employee Guides and mandatory firm wide Preventing Discrimination and

Harassment training. These reflect our commitment to fostering an inclusive and diverse workplace.

Structure, Operations and Supply Chain

Each PIMCO Australia entity has its registered office and head office in Sydney, at Level 19, 5 Martin Place, Sydney, New South Wales. PIMCO Australia has approximately 40 employees employed throughout Australia.

The key operational activities conducted by PIMCO include managing investments (primarily fixed income) on behalf of a range of clients and acting as trustee/responsible entity of a number of registered and unregistered managed investment schemes.

Risks in our Operations and Supply Chain

Given the nature of PIMCO Australia's business, the risk of modern slavery practices occurring within our own business operations is assessed to be low. This is based on PIMCO Australia's business being in a low-risk sector, combined with its operations being Australia-based.

It is noted that, being in a professional services industry, PIMCO Australia's procurement activities are also limited, primarily consisting of asset management services (e.g. custody, brokerage and research houses), professional services (such as lawyers, accountants and auditors), technology and technology support, office equipment, and travel services. Accordingly, PIMCO Australia's exposure to supply chain risks is also considered limited. However, PIMCO Australia undertakes a risk-based assessment of its material and high risk suppliers and performs due diligence based on the assessed level of risk associated with each such service provider. This process involves considering factors such as labour standards and working conditions policies, the potential for use of forced or bonded labour, training programs, record keeping, and risk and compliance program maturity.

Supply Chain Due Diligence

As part of PIMCO Australia's commitment to full compliance with the Modern Slavery Act, PIMCO Australia seeks to ensure that it knows who is providing it with goods and services at all times. The Company has previously communicated its policy of zero tolerance in writing to its existing suppliers and it does the same for all new suppliers. PIMCO Australia has controls in place to ensure that legal and regulatory requirements, including the Act, are considered prior to any material supplier agreement being finalised. The Company operates a Vendor Management Program which sets out the requirements for the appointment and ongoing oversight of its material vendors. The Company requests material vendors complete extensive due diligence questionnaires *prior to contract execution (and in certain cases on an annual basis)*. Practices related to inclusion and diversity, labour, and environmental management are included within the questionnaires and form part of the qualitative assessment of our vendors. Among the aspects evaluated are a vendor's documented certifications, policies, standards and practices with regard to these important areas. Where PIMCO Australia deems it appropriate, it will include contractual provisions on modern slavery in supplier agreements.

PIMCO Australia's material outsourcing relationships are with other financial services firms which, for similar reasons, are low risk from a modern slavery perspective. Notwithstanding, PIMCO Australia has Modern Slavery Statements (and, in some cases, additional information) from all such suppliers rated as posing a material or higher risk. PIMCO Australia also conducts routine periodic due diligence over its material outsourcing relationships and other vendors and will include modern slavery checks as part of these processes.

PIMCO Australia has reviewed material service providers involved in the provision of office facilities,

cleaning, and other products and services for its offices. PIMCO Australia Modern Slavery Statements (and, in some cases, additional information) from all such suppliers rated as posing a material or higher risk, and will routinely obtain Modern Slavery Statements (and, in some cases, additional information) from all such new suppliers.

PIMCO Australia has considered its product distribution channels and, whilst considered low risk for the reasons given, has circulated updated terms to each of its sub-distribution partners to cover the Modern Slavery Act. In addition, PIMCO Australia has updated its distribution agreement template to explicitly cover the Modern Slavery Act going forward.

Training

All staff involved with procurement and all other relevant staff have been trained on ethical procurement which addresses key supply chain issues, including human rights and the risk of modern slavery, in supply chains. Training is repeated annually to ensure that relevant employees understand the latest detection and mitigation methods.

Effectiveness

PIMCO Australia does not believe any incidents as outlined by the Modern Slavery Act have ever occurred within PIMCO Australia nor is it aware of any such incidents within its supply chain. However, PIMCO Australia continues to look at how it can further mitigate the risk of modern slavery in its supply chain and is ready to take appropriate action promptly to address any concerns that may arise. This includes ensuring that all of its suppliers, existing and new, that pose a material or higher risk have provided Modern Slavery Statements (and, in some cases, additional information); that contractual terms with any such new suppliers satisfy modern slavery requirements; that all relevant staff receive training appropriate to their needs; and that any material issues arising from implementation of this statement are effectively escalated should the need arise. At the same time, the Company is reinforcing its contribution to combatting modern slavery globally through its integration of ESG across client portfolios.

Conclusion

This Statement is made pursuant to *Modern Slavery Act 2018* (Cth). As required by the Act, it has been approved by the Board of Directors of each of PIMCO Australia Pty Ltd and PIMCO Australia Management Ltd.

Signed on 28 July 2025 on behalf of the Board of each PIMCO Australia entity:



Sam Watkins
Director, PIMCO Australia Pty Ltd
Director, PIMCO Australia Management Ltd

