



M&G plc

Modern Slavery Transparency Statement 2024

Table of contents

1. Introduction	3
2. 2024 Overview	3
3. Our business and organisational structure	4
4. Our values and policies.....	5
5. Our approach to due diligence and risk assessments	7
6. Our training.....	10
7. Our approach to whistleblowing and access to remedy.....	11
8. Our effectiveness and performance indicators	11
9. Approval date.....	12
Appendix	13

1. Introduction

M&G is committed to its efforts to prevent, mitigate and, where relevant, remediate the risks of human trafficking and modern slavery, within its sphere of influence. Forced labour - a subcategory of modern slavery – is estimated to affect approximately 27.6 million people, of which almost two-thirds occurs in the private economy.¹ Furthermore, it has been calculated that G20 countries together import an estimated US\$468 billion worth of goods at risk of modern slavery annually.² Often described as a hidden crime, the drivers behind modern slavery are well known, including exploitative labour practices. Migrant workers that lack protections are particularly prone to this kind of exploitation. M&G recognises that businesses have a responsibility to respect human rights and to do this effectively requires an understanding of the causes behind this abuse.

Our approach to preventing and addressing modern slavery continues to align with the United Nations Guiding Principles on Business and Human Rights (UNGPs), the UK Stewardship Code 2020, the UN Principles for Responsible Investment (PRI) and the United Nations Global Compact (UNGC) Principles. M&G plc is also an accredited UK Living Wage Employer.

This statement applies to M&G plc and its in scope subsidiaries that are required by section 54 of the UK Modern Slavery Act 2015 to publish an annual statement for the financial year ending on 31 December 2024 (please see the appendix for subsidiaries that are in scope). The statement outlines the measures undertaken by M&G plc throughout the fiscal year aimed at identifying, preventing and rectifying instances of forced labour, human trafficking, child labour, or other forms of modern slavery within our business operations and supply chain. M&G plc takes a zero-tolerance stance towards modern slavery and is committed to taking necessary actions to address such occurrences. We acknowledge the updated Home Office guidance for businesses on Transparency in Supply Chains published in March 2025, which we have taken account of to the extent reasonably practicable given the timing of its publication, and we intend to use and implement the guidance going forward.

2. 2024 Overview

We believe in supporting human rights, while acting responsibly and with integrity in everything we do. We are committed to working with our suppliers and stakeholders to help end modern slavery, and any other abuse of human rights. During 2024, we continued to make progress, including the following efforts:

- Continued our focus on human rights/modern slavery related engagements across our clients' portfolio. During 2024 we undertook 23 engagements across 21 companies and used our influence to vote on 31 human rights-related shareholder resolutions;

¹ According to the [Global Estimates of Modern Slavery](#), 2022, International Labour Organisation, International Organisation for Migration and Walk Free Foundation (see p.25)

² Based on research by the [Global Slavery Index](#) 2023, Walk Free Foundation (see p.2)

- To move from commitment to action on human rights and labour rights, we signed up to take part in the UN Global Compact Business and Human Rights Accelerator programme, with participants representing both our Life and Asset Management businesses, to establish an ongoing human rights due diligence process;
- Undertook our annual assessment of potential high-risk suppliers for modern slavery. An external specialized supply chain monitoring and assessment firm conducted the assessment. It was performed on 48 suppliers identified as high-risk for modern slavery management; and
- Our Chief Sustainability Officer (CSO) continues to lead the Central Sustainability Office, which leverages best practices, seeks alignment across the business, and contributes towards sustainability-related reporting. The CSO also chairs the monthly Executive Sustainability Committee, where updates on human rights and modern slavery are given.

3. Our business and organisational structure

M&G is an international savings and investments business, managing money for over 4.5 million retail customers and more than 900 institutional clients. We have 39 offices across six continents and 20 countries including the UK, India, Poland, Luxembourg, Singapore and Ireland. Across our global operations we employ over 6,000 employees, of which 95% are full-time and the remaining 5% are part-time employees.

As of 31 December 2024, M&G had £345.9 billion assets under management and administration.

Asset management

Our Asset Management business is focused on active management across public and private markets, with broad investment expertise and capabilities across asset classes.

Life

Our Life business creates distinctive risk and investment solutions, including PruFund, alongside integrated insurance propositions, and offers a comprehensive savings proposition to UK clients, including investment solutions, portfolio allocation and advice.

Central functions

Our Finance, Risk and Compliance, Technology, Workplace Solutions, Internal Audit, Legal, and People and Corporate Affairs functions support the key business areas described above. The Central Sustainability Office coordinates activities across the Group through its Working Group to identify and address potential human rights and modern slavery risks.

Suppliers including outsourcing

Our suppliers are a critical and necessary extension of our operations and long-term success. The Group's supply chain includes a number of outsourcing arrangements, which provide various business operations and technology services/support to the Asset Management and Life businesses, including a significant part of customer facing operations, UK back office/investment operations activities, as well as a number of IT support functions for the Group.

Memberships and Initiatives

In 2024, M&G plc became a member of the UN Global Compact Climate and Human Rights peer-learning Working Group, enabling us to connect with and gain insights from fellow businesses.

At the end of 2024, we also signed up to take part in the [UN Global Compact Business and Human Rights Accelerator programme](#), with participants representing both our Life and Asset Management businesses. This is a six-month programme designed to help businesses move from commitment to action on human rights and labour rights through establishing an ongoing human rights due diligence process. The programme is scheduled to run from February to July 2025.

4. Our values and policies

Our purpose

Our purpose is to give everyone real confidence to put their money to work.

Our values

M&G plc's core values of care and integrity are central to everything we do:

- Care – we act with care, treating our customers, clients and colleagues with the same respect we would expect ourselves and we invest with care, making choices for the long term; and
- Integrity – we empower our people at M&G to do the right thing, honouring our commitments to others and acting with conviction.

Our business is built on trust, and we do not take this lightly. We believe in supporting human rights, while acting responsibly and with integrity in everything we do. We're committed to working with our suppliers and stakeholders to help prevent and end modern slavery, and any other abuse of human rights.

Our governance

We have established a Group Governance Framework (GGF) which defines the approach of M&G plc and its subsidiaries (the Group) to governance and internal controls and helps us to meet regulatory requirements. The GGF mandates compliance with all M&G policies and supporting standards across the Group, subject to certain limited exceptions. The GGF includes information and policies to ensure a consistent approach to the way colleagues work and make decisions across the entire business below Board level. These policies provide general principles by which we conduct our

business. Any instances of non-compliance with these requirements are reported to the Executive Risk Committee and Board Risk Committee.

In 2024, our Chief Financial Officer (CFO) acted as executive sponsor for sustainability across the group. Our Chief Sustainability Officer (CSO) supported the CFO by leading on sustainability strategy, policy, commitments, governance and responsibility for coordination on modern slavery. The CSO leads the Central Sustainability Office, which leverages best practices, seeks alignment across the business, and contributes towards sustainability-related reporting. The CSO also chairs the monthly Executive Sustainability Committee, where updates on human rights and modern slavery are given, including developments and risks identified by the relevant Central Sustainability Office Working Group, which includes participants from the asset owner and asset manager.

Our risk management

The Board plays a crucial role in fostering a strong risk culture by establishing the organisation's purpose, behaviours, and values. It sets the strategic direction and risk appetite for the Group and also oversees the top risks facing our business.

Our M&G plc Risk Management Framework and internal controls systems follow a 'three lines of defence' model: the first line business areas identify and manage risks, including complying with regulatory requirements and are overseen by the second line risk and Compliance functions. The second line is structurally independent of the first line, providing risk and compliance oversight, advice and challenge. Third line Internal Audit function is empowered by the Audit Committee to audit the design and effectiveness of our system of internal controls, including governance, risk management and control processes.

Our Risk Management Framework is designed to manage risk within agreed appetite levels, aligned to the delivery of our strategy and defines our approach to managing operational risks and associated controls, including outsourcing arrangements. We are enhancing the existing third-party risk management policy framework, which incorporates the selection, on-boarding, ongoing management and termination of third-parties.

Our policies, standards and codes

Our policies are developed in accordance with our policy governance framework, which subject matter experts (SMEs) across the business lead. ESG policies are approved by the ESG policy owner, and relevant governance forums. Our policies are available to all employees via the internal policy hub.

Compliance with M&G policies is referred to in our governance section above. Accountability for ensuring compliance sits with the designated M&G plc Executive Committee Owner for each policy, who is responsible for the content and oversight of implementation of the policy across the business. There are specific individuals with additional responsibilities, as laid out in the policy governance framework. On an annual basis the relevant accountable senior managers attest against the policies.

An overview of our key policies and standards in relation to ESG and modern slavery is detailed below:

ESG risk policy (Internal)	In 2024, the ESG Risk Policy set out the key requirements for the management of ESG Risk on an ongoing basis, supporting the delivery of M&G plc's strategic plans and objectives, in a manner consistent with M&G Plc's Risk Management Framework, Non-Financial Risk Appetite and Key Risk Indicators. The policy is being reviewed in 2025.
Business Standard for Supply Chain Modern Slavery (Internal)	Key to how M&G's mitigates modern slavery risk within its supply chain and is part of the third-party risk framework. It describes internal processes to ensure compliance with the UK Home Office minimum standards and the Modern Slavery Act 2015. This standard will be reviewed in 2025 (previously reviewed in 2023).
Code of conduct	Outlines the purpose, values and behaviours that govern our ways of working and how we operate our business. The code encourages violations of human rights to be reported via "Speak Out" (see below). It requires the use of approved suppliers only and to be vigilant about the risks of modern slavery.
M&G Investments ESG Integration and Sustainable Investing Policy	Sets out our asset manager's approach to how it integrates financially material ESG factors into our investment process and how we approach sustainable investing for those products that integrate sustainability considerations.
Prudential Assurance Company ESG Investment Policy	Sets out our asset owner's approach and the ESG investment principles which we use to inform and guide every investment practice, including that we are committed to working with our stakeholders, e.g. our investment managers and investee companies, to help fight slavery, human trafficking, child labour and any other abuse of human rights.
Whistleblowing (internal)	Our whistleblowing policy is a key component of the "Speak Out" framework (see below) established to ensure that colleagues feel confident to raise concerns about potential wrongdoing. It reassures colleagues that their concerns will be taken seriously, advises what action can be expected, and stipulates the types of matters that should be reported, including in relation to modern slavery and possible human rights violations.
Supplier Code of Conduct	Our supplier code of conduct highlights our expectations of suppliers across a range of topics, including human rights and modern slavery. It is accessible to suppliers on our website (see below for more details).

5. Our approach to due diligence and risk assessments

We have determined the risk of modern slavery in relation to our direct employees to be low. The financial sector, including asset managers and insurance companies, primarily involves desk-based roles, which typically require specialist qualifications, such as accountancy, finance and human

resources. Where we consider the risk of modern slavery to be higher is in our investments and supply chains. We recognise that implementing effective and proportional due diligence is required to identify and manage modern slavery risks across our value chain.

Our recruitment of permanent employees is led by our internal recruitment team. Where contractors are used, they are recruited via third parties who, under section 54 of the UK Modern Slavery Act, are required to publish modern slavery statements. Our third-party risk management framework is used to identify and seek to prevent modern slavery exposure when recruitment agencies are utilised.

Our suppliers, including outsourcing

Suppliers are classified as high-risk for modern slavery based on the procurement spend category and location. Examples of categories considered material for modern slavery risk include:

- Travel, transport, and accommodation;
- Branded and non-branded goods not for resale;
- Manufacturing of hardware and software, including printers, scanners, and computers;
- Cleaning, including housekeeping;
- Facilities management, including maintenance, repair, and operational suppliers; and
- Office services, stationery, and office equipment.

We expect our suppliers to apply the principles of fair and honest dealings to all others with whom they do business, including employees, sub-contractors, and other third parties.

M&G plc has a supplier code of conduct, to which suppliers sign up as part of our procurement process through the Central Procurement Team, which leads on procurement in the UK, Ireland and India. Modern slavery prevention is explicitly stipulated in the supplier code of conduct.

In 2024, the risk identification process was shifted from being retrospective (post-contract) to proactive at the point of onboarding a service provider. The primary focus was on mitigating risks associated with third parties, including modern slavery within the supply chain. Modern slavery risk continued to be assessed by re-evaluating and categorizing potential high-risk procurement categories, using the Global Slavery Index as guidance.

Throughout 2024, thorough reviews of M&G's high-risk suppliers with UK-originated spend were conducted to understand the potential inherent risk to the business. An assessment of all potential high-risk suppliers for modern slavery was then conducted by an external specialised supply chain monitoring and assessment firm, using a bespoke framework (including process documents and business standards). The assessment was performed on 48 suppliers identified as high-risk for modern slavery management. The third-party was instructed to complete a due diligence questionnaire assessing their governance, maturity, and alignment with M&G's interpretation of the 2015 UK Modern Slavery Act. The results did not indicate any modern slavery issues; however, they highlighted better ways to conduct due diligence, including improvements to the questionnaire.

Efforts to strengthen the due diligence approach continued throughout 2024. This strengthened framework included supplier segmentation by risk domain at the pre-onboarding stage and a central repository to capture supplier data and enhance visibility over inherent risk, including modern slavery. The repository provided an ongoing view of third parties and supported risk assessments and supplier due diligence on a more regular basis compared to the annual frequency. Starting in 2025, the scope will expand to cover suppliers at onboarding, not just as part of the annual assessment.

Our role as a responsible investor

With £345.9 billion assets under management and administration, M&G's influence extends far beyond its direct operations or those of its supply chain. M&G became a signatory of the UN Global Compact in March 2021, committing to its ten principles across human rights, labour rights, the environment and anti-corruption, and which we report against on an annual basis.

No specific asset types, sectors or regions are totally free from modern slavery risk. We do, however, know that some sectors and geographies are more exposed than others. Examples include textiles and apparel, agriculture, construction, and leisure. We utilise external research from independent bodies to inform our view on high risk areas and update accordingly with new developments. Where companies operate within higher risk sectors or geographies, we factor such considerations into our investment research, decision-making, and in our engagements. Further details are available in the stewardship reports for both the [asset manager](#) and [asset owner](#).

As an asset owner, we expect all of our appointed asset managers to be managing ESG risks appropriately, including those relating to modern slavery and human rights, both in direct operations of investee companies and within their supply chains. This includes our internal asset manager. We assess our managers' associated policies and processes upon selection and monitor them regularly once appointed. We also identify holdings considered to be at highest risk of exposure to modern slavery, and our appointed managers are asked to conduct targeted engagement on modern slavery with the holdings in question, where they hold these companies on the asset owner's behalf. This builds on, and is complementary to, the asset managers' own processes on modern slavery monitoring and engagement. The asset owner's appointed asset managers have been encouraged to refer to CCLA's 'Find It, Fix It, Prevent It Engagement Expectations', as guidance on how to conduct engagement on modern slavery issues.

As an asset manager, we use norms-based screening data from several vendors, including specialist advisors such as MSCI, ISS and Sustainalytics, to identify companies that egregiously violate global norms in the areas of human rights, labour rights, environmental standards and anti-corruption. Modern slavery forms a key part of our proprietary ESG scorecard, and we integrate material factors such as modern slavery in our ESG research and analysis. The purpose of the ESG scorecard is to provide data-driven insights into company performance including specific metrics on whether companies have a modern slavery statement and policies on child labour, forced labour and whistleblowing. The scorecard also captures controversies related to modern slavery, which can reduce the investees' score, depending on the severity.

M&G Investments is a member of the Investor Initiative on Human Rights Data (II-HRD), which is a collaborative initiative where institutional investors work together to advance the corporate human rights data environment (in recognition of human rights data limitations).

Modern slavery and broader labour factors are considered within our sustainability research. These form both part of our quantitative screening approach and our qualitative research, especially for companies which operate in sectors or geographies which are considered to be higher risk, and where there is therefore increased financially material risks. The asset manager's working group on social issues, including modern slavery, brings together SMEs to develop frameworks and approaches, in line with best practice within the industry.

As an active asset manager, M&G Investments' ESG Integration & Sustainable Investing Policy emphasises the principle of engagement with companies, as constructive dialogue can encourage better corporate behaviour and support real world impacts. Our main client, the asset owner, sets out expectations on modern slavery, which is built into a targeted engagement programme.

In certain circumstances, the outcome of engagement activities will be the requirement to exclude an issuer or instrument from an investible universe, and/or to divest of existing holdings. The timeline and framework for exclusion and divestment is set out in the specific exclusion policy or within the specific product commitment. Divestment decisions are usually the result of a combination of factors and depend on the fund. For example, divestment would occur if a company was added to the Global Norms exclusion list on the back of modern slavery or forced labour issues. Our Global Norms Committee decides whether we consider companies to be responsible for severe, repeated and/or systemic breaches of norms. Our asset manager [stewardship report](#) goes into more detail about our engagement activities. In addition, where fund managers have material concerns that a company is failing to appropriately manage modern slavery risk, they could divest the holding.

We continually strive to understand the latest developments in this area and aim to contribute to the broader discussion about how financial services should play its part in tackling modern slavery and human trafficking, through dialogue with other investors and participating in programmes such as the Business & Human Rights Accelerator, run by the United Nations Global Compact.

6. Our training

M&G provides mandatory training to all employees on modern slavery. The training provides an introduction to modern slavery and why it's relevant to the financial sector. The training also emphasises the importance of understanding modern slavery, its impacts on business and society and the actions that can be taken to combat it within the industry. By educating employees on these aspects, the training aims to raise awareness and equip them with the knowledge to recognise and address modern slavery, thereby fostering a more responsible and ethical work environment.

7. Our approach to whistleblowing and access to remedy

We recognise our duty to respect human rights and provide access to remedy to all stakeholders within our value chain. M&G plc's "Speak Out" whistleblowing programme enables the confidential reporting of concerns of misconduct and wrongdoing, including human rights and modern slavery. There are various methods by which concerns can be raised to Speak Out. These include using a confidential telephone or web service, or by scanning a QR code from a mobile phone, all hosted externally by a third-party supplier. The "Speak Out" Whistleblowing programme is overseen by a Whistleblowers' Champion, who is an independent Non-Executive Director and Chair of M&G plc's Audit Committee. M&G plc's Whistleblowing Policy applies to all M&G plc and subsidiary entity colleagues (including contractors, temporary personnel, agent intermediaries promoting M&G's products, and appointed representatives).

If we observe, have suspicions of, or experience violations of human rights, modern slavery or the associated law of the countries in which we operate, we report them to our managers and leaders, human resources, or to the Speak Out team, either directly or via our confidential reporting system. All whistleblowing reports are taken seriously and, where required, a thorough investigation is conducted by trained investigators.

In response to new legislation in EU member states, a whistleblowing link and external statement has been added to the M&G and Pru websites, enabling concerns to be raised by customers, third party service providers, and those in the supply chain. If a modern slavery incident is identified in our supply chain, the potential incident would be investigated in collaboration with the material outsourcing provider in question. Once the incident is confirmed to have occurred, dependent on its nature (unless sensitive or confidential), the supplier would be responsible for remediating the issue. The completion of the remediation process would be tracked by M&G via existing supplier oversight mechanisms. In addition, if the incident were to meet the threshold set by the M&G risk management framework, it would be recorded as a notifiable event in line with the existing processes on our internal Group Risk & Compliance system and tracked to closure.

8. Our effectiveness and performance indicators

Modern slavery risks are complex, often hidden and can be hard to detect. Nonetheless, key performance indicators are presented below to demonstrate our commitment to transparency and managing the risks. We plan to track indicators on a yearly basis going forward.

Supply Chain

- Number of modern slavery supplier assessments conducted on high-risk suppliers: 48
- Number of open corrective actions in 2024 was 51 and all were closed off by the end of the year.³

³ These actions addressed key gaps in supplier practices, including missing policies, inadequate training, limited audit coverage, and unclear remediation protocols. In response, suppliers strengthened their governance frameworks, introduced targeted training, expanded audit programmes, and formalised escalation procedures.

Investments

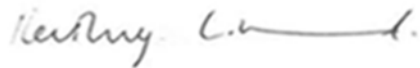
- Number of human rights/modern slavery related engagements across our clients' portfolio: 23 engagements across 21 companies (eight were successfully closed and the remainder are ongoing)⁴
- Total number of human rights-related shareholder resolutions we voted on: 31

Speak out

- Number of Speak Out reports raised, involving concerns about human rights and modern slavery: 0

9. Approval date

The M&G plc Board reviewed and approved this statement, and the M&G plc CFO signed the statement on behalf of M&G.



Signed,
Kathryn McLeland
Group Chief Financial Officer
26th June 2025

⁴ The majority of our engagements are multi-year. This is often because engagements require actions to address substantial matters that, by their nature, take longer to address than an annual reporting cycle (e.g. public disclosure on an investigation or a policy change).

Appendix⁵

List of subsidiaries identified within scope of section 54(2) of the Modern Slavery Act 2015

M&G FA Limited (London)

M&G Investment Management Limited (MAGIM) (London)

M&G Securities Limited (London)

M&G Real Estate Limited (London)

The Prudential Assurance Company Limited (London)

Prudential Distribution Limited (Stirling)

Prudential Pensions Limited (London)

PGDS (UK One) Limited (London)

Prudential Capital plc (London)

Investment Funds Direct Limited (IFDL) (London)

Prudential International Assurance (Dublin)

M&G Corporate Service Limited (London)

M&G Global Services Private Limited (Mumbai)

M&G Wealth Advice Limited (London)

M&G Luxembourg S.A (Luxembourg)

Prudential International Management Services Limited (Dublin)

⁵ M&G has determined these subsidiaries to be in-scope of the requirement under the Modern Slavery Act 2015 to publish a modern slavery statement based on tests set out in s.54 of that Act and in accordance with guidance from the Home Office Transparency in Supply Chain statutory guidance 2025. These subsidiaries are using this M&G plc statement to fulfil their requirement to produce a modern slavery statement.