1 January 2026

MFS Investment Management Company (Lux) S.à r.l. ("MFS Lux"), a subsidiary of Massachusetts Financial Services Company and part of the MFS group of companies that collaborate to provide investment management services on a global basis (collectively "MFS"), serves as the management company to the MFS Meridian Funds and MFS Investment Funds (each, a "MFS Lux Fund" and collectively, the "MFS Lux Funds") and provides portfolio management services to institutional clients.* In this capacity, we are pleased to provide information relating to the integration of environmental, social and governance ("ESG") factors, including sustainability risks, in our investment process and remuneration practices, and the consideration of principal adverse impacts of investment decisions on sustainability factors, as required under Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector ("SFDR"). As explained below, within the MFS global investment and research platform, MFS integrates ESG factors, including sustainability risks, into our fundamental investment process and ownership practices to the extent we believe that such factors could materially impact the economic value of a company.**

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1. MFS Approach to Responsible Investing and ESG Integration

At MFS, our core purpose is to create value responsibly through the integration of ESG factors, including sustainability risks, into our investment decision making process and ownership practices where we consider such factors and risks to be financially material. The MFS Policy on Responsible Investing and Engagement sets out the framework for how we integrate ESG factors including sustainability risks. It applies across our fundamental equity and fixed income investment strategies and guides our engagement with issuers. The MFS Policy on Responsible Investing and Engagement applies to all MFS entities including MFS Lux and has been in effect since 2009. We believe that this global approach ensures consistency in, and demonstrates our commitment to, the integration of ESG factors, including sustainability risks, in our investment process and ownership practices.

* MFS Lux is authorized as a management company under EU Directive 2009/65/EC by the Luxembourg Commission de Surveillance du Secteur ("CSSF").

** The contents of this document are intended to satisfy MFS (Lux)'s public disclosure requirements set out in Article 3, Article 4, and Article 5 of SFDR.

2. Governance and Oversight

In 2022, MFS enhanced its global leadership and oversight framework that facilitates the incorporation of ESG factors into our investment process and ownership practices.

The **Sustainability Executive Group (SEG)**, a working group of the MFS Enterprise Leadership Team ("ELT")[1], is responsible for providing strategic leadership concerning MFS' sustainability strategy. It meets regularly to develop long-term sustainability strategy at MFS, including climate change related issues; advise on and coordinate the implementation of that strategy; and resolve any issues of prioritization and resource allocation for sustainability-related projects. The membership of SEG includes MFS senior leadership, including members of the MFS' Executive Chairman's Committee.

MFS has also established the following committees that are part of its existing committee governance structure. These committees are focused on the implementation of specific aspects of our sustainability strategy.

The **Investment Sustainability Committee (ISC)** is responsible for ensuring that the investment team is properly integrating ESG factors into its research and engagement activities. This committee will implement MFS' integration of ESG factors in the investment process, engagement with issuers and escalation activities, and MFS' adherence to relevant stewardship codes. In addition, the ISC determines which investment-related collaborative organizations that MFS will join and monitors and oversees MFS' ongoing alignment with the strategy and mission of those organizations.

The **Proxy Voting Committee** oversees our proxy voting activities, including the consideration of ESG issues when voting securities owned by our clients for which we have been delegated voting authority as well as our engagement with portfolio companies on proxy voting matters. The Proxy Voting Committee works with the ISC to create an integrated approach to setting engagement goals and priorities.

The **Corporate Sustainability Committee (CSC)** provides governance and oversight with respect to matters related to client and corporate sustainability strategies and policies. The CSC is accountable for overseeing execution and implementation of MFS' client and corporate strategy and policies related to: (i) membership to groups that have client or corporate sustainability and/or diversity, equity and inclusion (DEI) implications; and (ii) meeting client and regulatory expectations regarding disclosure and reporting on sustainability and DEI matters. The CSC is also responsible for implementing MFS' corporate strategy and policies related to climate and other environmental matters.

The CSC has also established the **SFDR Strategy Group** that is responsible for developing and overseeing strategic initiatives related to SFDR, including without limitation, monitoring regulatory developments related to SFDR, developing recommendations with respect to the designation of the MFS Lux Funds under SFDR, developing and enhancing any environmental or social characteristic under Article 8 of SFDR adopted by a MFS Lux Fund, assessing related ESG data / service providers and overseeing related technology and operational matters.

[1] Effective 1 January 2025, the MFS Executive Chairman's Committee was formed to oversee the overall strategic direction of MFS, replacing the former MFS Management Committee. The MFS Executive Chairman's Committee includes the Chair of the MFS Board of Directors, MFS' Chief Executive Officer and General Counsel. In addition, the ELT was formed effective January 1, 2025, and is designed to execute the firm's strategy as instructed by the Chairman's Committee.

3. Incorporation of ESG Factors, including Sustainability Risks, into MFS' Investment Analysis

At MFS, ESG factors, including sustainability risks, are integrated into our investment decision-making process alongside traditional economic factors to the extent we believe that such factors and risks may be material to and have a long-term economic impact on a company's value.

MFS believes that certain ESG factors could materially impact the value of an issuer by representing a source of economic opportunity that contributes to an issuer's growth and outperformance relative to its peer group or a source of risk that may result in a condition or the occurrence of an event that could have a material negative impact on an issuer's value. MFS's consideration of the impact of ESG factors on the value of an issuer often involves a long-term investment horizon, and the impact of such ESG factors may not be materalised in the short term. The universe of ESG opportunities and sustainability risks is very broad and may include, without limitation, physical and transitional impacts related to climate change, resource depletion, shifting market or consumer preferences or demand, a company's governance structure and practices, data protection and privacy issues, diversity and labor practices, and regulatory and reputational risks.

In conducting analysis of ESG factors, MFS investment professionals may use a variety of tools, including, but not limited to, (i) proprietary issuer and industry research, (ii) internally developed analytical tools designed to evaluate issuer performance and risk-exposure, and (iii) third-party generated issuer and industry research and ratings.

At MFS, it is our belief that our approach to sustainability is part of our fundamental investment process, and as such, our integration and active ownership process requires that our investment professionals are actively engaged in, and responsible for, its success. In order to facilitate the implementation and enhancement of these practices across the investment team, we employ individuals who are dedicated to sustainable investing and who provide strategic leadership on sustainability topics. Our investment team includes a variety of specialists who are dedicated to ESG research and/or stewardship and who facilitate MFS' sustainability efforts by supporting and enhancing our ongoing research on sustainability topics, engagement and/or voting activities (collectively, “MFS Sustainability Professionals”). The inclusion of these MFS Sustainability Professionals within the broader investment team improves the collaboration between our sustainability professionals and our investment professionals with the goal of more efficient and impactful research and engagements across our holdings. We currently have eight MFS Sustainability Professionals responsible for carrying out our stewardship efforts, including engagement and the exercise of our proxy voting rights (when acting in such capacity, “MFS Stewardship Professionals”), and three additional MFS Sustainability Professionals who focus on fixed income-related research and engagement.

4. Strategies Classified as Article 8 under SFDR

As of the date of this document, MFS has classified a range of the Funds' sub-funds as Article 8 under SFDR. Information on the Article 8 sub-funds including website disclosures are available at **meridian.mfs.com** (for the MFS Meridian Funds) and **fcp.mfs.com** (for the MFS Investment Funds).

Consideration will be given to the classification of separate accounts managed by MFS (Lux) as Article 8 where requested by clients.

5. Incorporation of ESG Factors, including Sustainability Risks, into MFS' Ownership and Engagement Practices

5.1 Proxy Voting and Reporting

MFS has adopted proxy voting policies and procedures (“MFS Proxy Voting Policies and Procedures”) with respect to securities owned by MFS’ clients for which MFS has been delegated voting authority. The exercise of voting rights is overseen by MFS' Proxy Voting Committee, and the MFS Proxy Voting Policies and Procedures contain guidelines that describe how MFS votes proxies with respect to certain issues, including ESG issues. All votes will be cast in what MFS believes to be in the best long-term economic interest of a company's shareholders. Day-to-day application of the MFS Proxy Voting Policies and Procedures are conducted by the MFS Stewardship Professionals.

5.2 Engagement Activities[2]

Members of MFS' investment team raise ESG-related issues, including sustainability risks, during meetings with management of current or prospective portfolio companies where, based on their consideration, this may enhance their understanding of a company's practices and goals to enhance long term shareholder value. In certain instances, members of MFS' investment team may escalate an engagement with investee companies through appropriate measures, for example writing letters to the management team or the board of directors of portfolio companies, when they believe that such escalation is necessary to further an ESG-related issue that has not adequately been addressed through other engagement methods. Our engagement approach is driven by strong collaboration among all members of our investment team, including our MFS Sustainability Professionals.

Our MFS Stewardship Professionals may engage with a portfolio company when they believe that such engagement may enhance understanding of certain ESG related matters, including sustainability risks, on the company's proxy statement. MFS Stewardship Professionals may engage with a portfolio company in advance of its formal proxy solicitation to discuss certain ESG related proposals and may also conduct such engagement in writing. Escalation of such engagement may include, but is not limited to, voting against the board of directors, voting against management proposals, supporting shareholder proposals, and increased dialogue with a company's management (either oral or written), including the board of directors.

MFS' investment personnel (including MFS Sustainability Professionals) prioritize engagements based on a number of factors, such as the size of a holding and the financial materiality of the ESG-related issues that may impact the company.

5.3 Collaborative Efforts

MFS may participate in organizations, initiatives, and other collaborative industry efforts to enhance MFS’ knowledge of specific ESG issues or to support ESG-related initiatives that MFS believes may have a material impact on its investment decisions. MFS typically joins an industry initiative or other collaborative group either

[2] When engaging with companies, including engagements on proxy voting topics, MFS’ focus is discussing, gathering information about, and seeking appropriate transparency on matters so that MFS may make an informed voting decision that advances MFS clients’ long-term economic interests. MFS does not engage for the purpose of trying to change or influence control of a company. Engagements may consist of ongoing communications with a company.

because (i) the work or objective of the group or initiative aligns with our investment philosophy on a specific topic or (ii) the initiative or group provides access to research or data that enhances our investment or stewardship process and that it is in the long-term best interests of our clients.

MFS will report on its sustainability and engagement efforts and stewardship activities as required by any collaborative bodies or organizations which MFS joins, or regulatory body that governs MFS' activities. MFS may, in its discretion, share such reports with clients, prospective clients, and other interested parties. Further information on these activities is available at MFS' public website (**www.mfs.com**).

6. Incorporation of ESG Factors, including Sustainability Risks, into MFS' Remuneration Practices

MFS Lux has implemented a remuneration policy, which describes MFS Lux's remuneration practices for certain employees that have a material impact on the risk profile of MFS Lux and/or the Funds or separate accounts managed by MFS Lux. Pursuant to MFS Lux's remuneration policy, and as required under SFDR, MFS includes, as a component of the variable remuneration paid to employees responsible for making investment decisions, the integration of ESG factors, including sustainability risks. Specifically, when determining such variable remuneration, the investment staff are evaluated on, among other factors, their consideration and communication of material ESG factors in forming opinions about long-term investment decisions.

7. Consideration of Principal Adverse Impacts

MFS Lux will publish its annual statement on principal adverse impacts of investments decisions on sustainability factors by 30 June each year, for reporting period 1 January to 31 December.