



MFS INTERNATIONAL (U.K.) LIMITED TAX STRATEGY

MIL UK

The Board of MFS International (U.K.) Limited ("MIL UK") is responsible for ensuring that the tax obligations of MIL UK, are fully complied with and properly governed within the MFS risk framework. MIL UK is a subsidiary of Massachusetts Financial Services Company ("MFS"), The ultimate parent company of MFS is Sun Life Financial Inc.

The Tax Strategy applies to MIL UK's direct parent company, MFS International Holdings Pty Ltd, and to MIL UK's branches and subsidiaries.

MIL UK Tax Strategy

The Tax Strategy for MIL UK sets out our approach to the management of UK tax affairs in supporting business activities in the UK.

We aim for our tax affairs to be well-governed and transparent, meeting all legal requirements and mitigating tax uncertainties, while maintaining an open, transparent, co-operative and constructive relationship with HM Revenue and Customs (HMRC).

The Tax Strategy is reviewed annually and approved by the MIL UK Board.

MIL UK's approach to effective tax risk management and governance

Risk management for MIL UK is addressed using a framework of policies, procedures and internal controls. Policies are subject to on-going review by the relevant functional committee, Policy Committee and senior management. Compliance with regulation, legal and ethical standards is a high priority for the MIL UK.

We actively manage the tax risks affecting our business with the aim of minimizing unexpected adverse financial impact, ensuring that tax is accounted for correctly and all tax submissions and payments are made on time.

MIL UK's attitude towards tax planning

Management decisions are made after careful consideration of all the key metrics, including the regulatory, legal, accounting and tax implications in accordance with our risk framework. Where tax issues are identified from a proposed management action, we need to identify and understand them in order to ensure that there are no unintended tax costs. Whilst the management of the MIL UK's tax affairs contributes to achieving business objectives, all management actions are based on an underlying business purpose with commercial and economic substance. We do not engage in tax planning which is considered abusive or enter into transactions or arrangements where the main purposes is the avoidance of tax.



Where there is uncertainty about how a management action is taxed, we will discuss it with HMRC and take external advice where appropriate. We may also use external advisors to provide specialist expertise or to help us to understand new tax legislation or Industry practice.

MIL UK's assessment of acceptable tax risk

The way in which we assess and manage acceptable levels of tax risk is consistent to that used across MIL UK for managing other risks within the risk management framework. We have low tolerance for the risk of tax return errors or omissions, or late submissions or tax payments as part of our tax compliance obligations. We also have low tolerance for losses suffered as a result of failing to develop, implement and monitor controls to manage our tax risks.

All material tax risks are reported as part of the risk management process and reviewed by the Enterprise Risk Management team and MIL UK Compliance Officer as part of the MIL UK key risk identification process.

MIL UK's approach to dealings with HMRC

We seek to maintain an open, transparent, co-operative and constructive relationship with HMRC, engaging with honesty, integrity and fairness. In certain situations, we may engage with HMRC on a real time basis in order to agree or understand the operation of tax legislation. We aim to discuss any significant issues prior to the filing of tax returns, in order to bring any tax issues to a timely conclusion. At HMRC's Business Risk Review meeting, we will openly discuss tax issues and provide HMRC with the opportunity to understand our business and to discuss our tax strategy and business developments.

The above information published in December 2024 complies with our duty to disclose our UK Tax Strategy as set out in Paragraph 16(2) Schedule 19 Finance Act 2016 for the year ended 31 December 2024.