



25 January 2024

M&G plc (“M&G”) Sanctions Declaration

This declaration encompasses all M&G subsidiaries globally and is intended for the use of other financial institutions conducting due diligence on M&G, to provide an overview of how M&G manages sanctions risks.

Sanctions Compliance

- As a matter of Policy, M&G is compliant with all applicable country financial sanction regimes, which include as a minimum, but is not limited to those administered by:
 - the Security Council of the United Nations (UN);
 - the United Kingdom’s Office of Financial Sanctions Implementation (OFSI);
 - the United States Department of the Treasury’s Office of Foreign Assets Control (OFAC);
 - the Council of the European Union (EU); and
 - any other sanction authorities in jurisdictions where M&G operates or is licensed
- M&G, including its subsidiaries, directors and officers, is not the target of any economic or financial sanctions
- M&G maintains robust controls, governance and screening systems and, as a regulated firm, fully adheres to relevant sanctions laws and regulations in the UK and all jurisdictions in which M&G operates
- Sanctions compliance policies and procedures are in place, which are regularly reviewed and updated to reflect changes in sanctions laws and requirements
- Policies and procedures prohibit the provision of any activities with individuals and entities listed on sanctions lists issued or maintained by the UN, OFSI, OFAC, EU or local authorities in jurisdictions in which M&G operates

Screening

- M&G ensure sanctions screening is always performed against the most up to date versions of the applicable sanctions lists by using external providers whose lists are updated daily
- Daily, weekly and monthly batch screening is undertaken, including screening of the issuers of securities in which we have positions
- Screening of transactions, potential and existing business relationships is conducted against the applicable sanctions regimes
- Any positive sanctions matches in our existing book of business are reported (internally and externally) and the freezing/blocking actions required for the relevant sanctions regime(s) are put in place

Exposure

- For the purposes of this document, business activities refer to operations, presence, distributors, goods/services provided, contracts, third party relationships, suppliers, connections, significant assets held, receiving instructions from, interactions with/exposure to state owned or controlled entities or commercial exposure.
- M&G does not conduct business activities involving any sanctioned jurisdictions [Cuba, Iran, North Korea, Syria, Crimea Region, Kherson Region, Zaporizhzhia Region, Donetsk People’s Republic (DNR), and Luhansk People’s Republic (LNR)]
- M&G has been working to reduce the exposures it had prior to the Russian invasion of Ukraine and have publicly stated that it will not be making further investments in Russia for the foreseeable future. As a result, the revenue from such sources is significantly less than 0.05% of the total book



- M&G does not rely on general or specific OFAC licences to conduct its business in any sanctioned jurisdiction
- M&G does not have any commercial presence or operations in the Russian Federation, nor do we conduct business activities there

A handwritten signature in black ink that reads 'DJPowers'.

David Powers
Group MLRO, M&G plc