

Morgan Stanley Modern Slavery and Human Trafficking Statement – Financial Year 2021

This Statement is being published in accordance with Section 54 of the United Kingdom’s Modern Slavery Act 2015 and Section 16 of Australia’s Modern Slavery Act 2018 (Cth).¹ It outlines the steps taken by Morgan Stanley² during the 2021 financial year to address the risk of modern slavery³ in our own operations or in any of our supply chains, as well as our future plans in that regard. This Statement applies to the global operations and supply chain of Morgan Stanley and our consolidated subsidiaries.

Introduction

Morgan Stanley is a leading global financial services firm providing a wide range of investment banking, securities, wealth management and investment management services. With offices in more than 41 countries, Morgan Stanley’s employees serve clients worldwide including corporations, governments, institutions and individuals.

Morgan Stanley’s employees procure goods and services from Morgan Stanley’s supply chain, which is made up of over 13,000 vendors (as of December 31, 2021) with the majority in the US and UK. Key categories of goods and services procured by Morgan Stanley mainly include: IT (Hardware, Software, Telecommunications, etc.), Non-IT (Advertising, Office Machines, Office Supplies, Printing, Travel and Entertainment, etc.), Professional Services (IT-Consulting, Other Professional Services, Outsourced Services, etc.) and Space and Occupancy (Design and Construction, Facilities, Furniture and Fixtures, Security, etc.).

Morgan Stanley is committed to being a responsible corporate citizen, respecting human rights and supporting the protection and advancement of human rights. With operations around the world, we strive to uphold global standards for responsible business, including equal opportunity, the freedom to associate and bargain collectively, and the elimination of modern slavery, human trafficking and harmful or exploitative forms of child labor.

We endeavor to exercise our influence in part by conducting our business operations in ways that attempt to preserve, protect and promote the full range of human rights, such as those described in the United Nations Universal Declaration of Human Rights (UDHR), the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work (ILO), and the UN Guiding Principles on Business and Human Rights (UNGP).

While this Statement covers our direct operations and supply chain, we also acknowledge that our client and customer base constitutes an additional area of focus; you can access more information on our approach to environmental and social risk management, human rights and anti-money laundering in our [Statement on Human Rights](#), [Code of Conduct](#) and [Sustainability Report](#).

¹ Please refer to the section below “Australian Requirements (Additional Information)” for further details required under Australia’s Modern Slavery Act 2018 (Cth).

² References to Morgan Stanley in this document are to Morgan Stanley, a Delaware corporation, and its consolidated subsidiaries, including the following entities that are subject to the requirements of Section 54 of the Modern Slavery Act 2015: Morgan Stanley & Co. International plc (UK company registration number 02068222); Morgan Stanley Investment Management Ltd (UK company registration number 01981121); Morgan Stanley UK Group (UK company registration number 01281415); Morgan Stanley UK Limited (UK company registration number 04071123); Morgan Stanley Employment Services UK Ltd. (UK company registration number 05065987); Morgan Stanley Bank International Ltd (UK company registration number 03722571); Morgan Stanley International Limited (company registration number 03584019) and the following entities that are reporting entities under Australia’s Modern Slavery Act 2018 (Cth): Morgan Stanley Australia Limited; Morgan Stanley Australia Securities Limited; Morgan Stanley Wealth Management Australia Pty Ltd; Morgan Stanley (Australia) Securities Holdings Pty Limited.

³ For the purposes of this Statement, the term “Modern Slavery” includes “slavery and human trafficking” as defined in Section 54 of the UK’s Modern Slavery Act 2015 and “modern slavery” as defined in Section 4 of Australia’s Modern Slavery Act 2018 (Cth).

Our Approach

Morgan Stanley's activities and operations are integrated globally, with core risk management policies and procedures established at a global level. Morgan Stanley has a global Enterprise Risk Management framework that ensures that Morgan Stanley's risks are managed in a sound manner and escalated as appropriate. This includes management of sourcing and outsourcing, supplier selection, franchise risk and environmental and social risk.

In 2021, Morgan Stanley's Modern Slavery Executive Global Committee continued to drive implementation of enhancements to improve our ability to identify modern slavery risks across the organization and assess the effectiveness of our response.

Policies

Morgan Stanley is guided by the rights outlined in the UDHR and in the ILO, and Morgan Stanley expects that its suppliers, affiliates and partners do the same. Morgan Stanley's Supplier Code of Conduct outlines Morgan Stanley's expectations that suppliers have appropriate policies in place to ensure they are not complicit in human rights abuses, including modern slavery and human trafficking.

Morgan Stanley's Global Franchise Risk Policy requires heightened sensitivity and review for business activities, operations or projects in countries or locations experiencing human rights abuses. Our approach to environmental and social risk management, including human rights and modern slavery considerations, is set out in our [Environmental and Social Policy Statement](#). As outlined in the Policy Statement, Morgan Stanley will not knowingly engage in transactions where there is evidence of direct involvement in modern slavery, such as forced labor, human trafficking, or harmful or exploitative forms of child labor. Our Policy Statement is reviewed annually and updated to reflect our current strategy and key developments.

Morgan Stanley has a number of mechanisms in place to assess the effectiveness of our actions to identify and mitigate the risk of modern slavery. With respect to our own workforce, we regularly review representation, hiring, promotion, attrition, compensation and other key data and leverage that data to identify gaps, shape our strategy and goals and evaluate progress against those goals. All employees must read and acknowledge the Morgan Stanley Code of Conduct annually, which underscores our values and our commitment to ensuring a workplace that includes equal opportunity, dignity and respect, including with respect to our suppliers, affiliates and partners. Morgan Stanley also has a global Integrity Hotline providing employees and other stakeholders, including suppliers, with a mechanism to report concerns regarding potentially unlawful, improper or questionable conduct.

Due Diligence Process

Supply Chain

Morgan Stanley's vendor due diligence program, using a risk-based approach, assesses risks associated with third party suppliers. In 2021, reviews were conducted for over 2,850 suppliers. Reviews ranged from a search and analysis of online public records, including significant litigation and regulatory actions for high-risk suppliers to a negative media search for suppliers determined in prior assessments to be low risk. The reviews identify, among other things, potential for risks associated with human rights and other social and/or environmental issues. Where appropriate, potential issues are escalated to senior management.

Given the nature of the services provided by Morgan Stanley, the skilled nature of our workers, and the level of transparency and oversight we have over our direct workforce and operations, we consider there is a low risk of modern slavery in our operations. Our greatest potential areas of risk of involvement with modern slavery is through our supplier relationships and other third-party relationships.

Within Morgan Stanley's supply chain, the following key areas were identified as presenting a relatively higher risk of modern slavery and human trafficking:

- IT Products and Services – Hardware, Software and Telecommunications Equipment;
- Non-IT Products and Services – Office Machines (Rentals, Equipment, Maintenance and Repair);
- Professional Services – IT Outsourcing and Consulting and Project Consulting; and
- Space and Occupancy - Design and Construction, Facilities, Food Services and Furniture and Fixtures.

Client Transactions

As outlined in Morgan Stanley's Environmental and Social Policy Statement, our due diligence and risk management processes are designed to identify, assess and address potentially significant environmental and social issues that may impact the firm, our clients and other stakeholders. Business Units and internal control groups refer transactions to the Environmental and Social Risk Management Group for due diligence when they identify potential environmental and/or social issues that may pose Franchise risk to Morgan Stanley. Potential human rights issues (including within a company's supply chain, as may be relevant) are considered in our due diligence processes as appropriate. Areas of potential heightened human rights risk undergo enhanced due diligence and may require escalation to the Global or Regional Franchise Committees and/or senior management based on the identification of environmental and/or social issues in the due diligence process.

Additionally, within our Investment Management business, we recognize that risks relating to various sustainability factors such as labor retention, supply chain disruption, and human rights violations can pose actual or potential material risks to our investments at the individual asset and portfolio levels. Furthermore, given our role as a global investment manager, we acknowledge that an unintended consequence of some of our investments may include some level of adverse impact on broader systemic sustainability factors such as social and employee matters, respect for human rights, anti-corruption and anti-bribery matters. The Morgan Stanley Investment Management [Sustainable Investing Policy](#) outlines how we look to identify, understand, and mitigate such potential sustainability risks in our portfolios, and also how we aim to reduce potential adverse impacts through a combination of actions, including investment teams' engagement with investee management, our global stewardship program, our thematic research, and our collaborative efforts in the broader investment industry.

Morgan Stanley is committed to combating financial crimes and our Global Financial Crimes policies and standards are designed to enable us to comply with all relevant laws and regulations as well as industry guidance and best practice. Throughout the client lifecycle we deploy methods to detect and disrupt modern slavery and human trafficking, including using client screening technologies (such as adverse media) to identify relevant risk factors and escalate them to financial crimes teams.

In addition, our country risk analysis, which includes human rights and modern slavery factors, underpins our financial crime risk management framework, directly influencing outcomes of processes such as transaction monitoring and client risk rating.

Activities in 2021

In addition to the steps delineated in our 2020 statement, in 2021 Morgan Stanley took the following steps to familiarize both our employees and our suppliers with the goals and requirements of both Modern Slavery Acts:

- Strengthened and extended our modern slavery training by hiring an external law firm to provide specific sessions on the identification of slavery and human trafficking within financial services firms, to Board members and senior management within our Investment Management business;
- Engaged an external consulting firm who specializes in sustainable business to review our global products and services related to our supply chain, and provided a comprehensive modern slavery risk assessment;

- Continued to integrate human rights and modern slavery considerations into our environmental and social risk due diligence processes related to transactions and portfolio investments;
- Participated in an external industry roundtable discussion hosted by a consulting firm, to gain insights on best practices on mitigating the risks of modern slavery and human trafficking; and
- Updated the [Supplier Code of Conduct](#) with the 2020 Modern Slavery Statement, to ensure the most up to date Statement continues to be incorporated into agreements with our suppliers.

Ongoing Plans

In the financial year ending December 31, 2022, in addition to the steps set out above, we intend to continue our efforts to ensure that slavery and human trafficking are not taking place within our operations or supply chain by taking the following steps:

- Continue to provide modern slavery and human trafficking training sessions to various groups and senior leaders within Morgan Stanley;
- Distribute a Global Financial Crimes training that includes a focused section on human trafficking and forced labor;
- Following the modern slavery risk assessment referred to in the activities section above, finalize a plan to review and, where appropriate, implement any recommendations;
- Continue to engage in external roundtables with other financial institutions to discuss the developing trends and emerging issues related to modern slavery and human trafficking;
- Continue to integrate human rights and modern slavery considerations into our environmental and social risk due diligence processes related to transactions and portfolio investments; and
- Update the Supplier Code of Conduct with the 2021 Modern Slavery Statement, to ensure the most up to date Statement continues to be incorporated into agreements with our suppliers.

Australian Requirements (Additional Information)

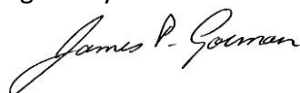
For the purposes of Australia's Modern Slavery Act 2018 (Cth), Morgan Stanley Australia Limited, Morgan Stanley Australia Securities Limited, Morgan Stanley Wealth Management Australia Pty Ltd and Morgan Stanley (Australia) Securities Holdings Pty Limited (together, the **Australian Reporting Entities**) are reporting entities covered by this Statement. The Australian Reporting Entities are Australian incorporated entities which are wholly-owned subsidiaries of Morgan Stanley and sit within the business units described above.

This Statement outlines the actions the Australian Reporting Entities have taken (consistent with Morgan Stanley's global policies and processes described in this Statement) to identify and mitigate the risks of modern slavery occurring in their operations and supply chain.

Consultation in relation to this Statement was undertaken between the Australian Reporting Entities and also by the Australian Reporting Entities with their respective controlled entities. This was done by circulating it to, and seeking input from, a working group responsible for Morgan Stanley's anti-modern slavery program. This Statement was also reviewed by the regional Morgan Stanley executives responsible for oversight of the Australian Reporting Entities and their controlled entities.

This Statement has been approved by the Board of Directors of Morgan Stanley on May 26, 2022.

Signed by:



James P. Gorman
Chairman and Chief Executive Officer

APPENDIX

2020 Modern Slavery and Human Trafficking Statement:

https://www.morganstanley.com/about-us-governance/pdf/Modern_Slavery_2020_Statement.pdf

2019 Modern Slavery and Human Trafficking Statement:

https://www.morganstanley.com/about-us-governance/pdf/Modern_Slavery_2019_Statement.pdf

2018 Modern Slavery and Human Trafficking Statement:

https://www.morganstanley.com/about-us-governance/pdf/Modern_Slavery_2018_Statement.pdf

2017 Modern Slavery and Human Trafficking Statement:

https://www.morganstanley.com/about-us-governance/pdf/Modern_Slavery_2017_Statement_Signed.pdf

2016 Modern Slavery and Human Trafficking Statement:

<https://www.morganstanley.com/about-us-governance/pdf/Modern-Slavery-Statement-6-9-2017-signed.pdf>