

CVC ADVISERS LIMITED

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Slavery and Human Trafficking Statement

Introduction

CVC Capital Partners (“**CVC**”) comprises those companies which sit within the separate CVC advisory and CVC management and investment businesses. CVC has been a signatory of the Principles for Responsible Investment (PRI) since 2012. It is committed to implementing the PRI’s Six Principles with a view to aligning the investment activities of funds managed or advised by CVC (“**CVC Funds**”) to the interests of wider stakeholders. In addition, during the CVC Funds’ investment process CVC takes into account the ten principles of the UN Global Compact, including “the protection of internationally proclaimed human rights” (principle one), and “the elimination of all forms of forced and compulsory labour” (principle four).

UK Modern Slavery Act

Pursuant to the UK Modern Slavery Act (“**MSA**”) any large commercial organisation which supplies goods and services and carries on a business, or part of a business, in the UK must produce an annual “slavery and human trafficking statement.”

CVC carries on business in the UK through the London-based entity CVC Advisers Limited (the “**Company**”), which is authorised and regulated by the Financial Conduct Authority in the UK. The Company acts as a non-discretionary sub-investment advisor to CVC Funds.

Adopting the applicable international law definitions as its starting point, the Company understands the concept of “modern slavery and human trafficking” for these purposes to comprise at least the principles espoused in Article 3 of the Palermo Protocol and Article 2 of the International Labour Organisation Forced Labour Convention 1930.

The Company is committed to maintaining consistently high business and ethical standards and seeks to prohibit any form of modern slavery or human trafficking within its own business and supply chains. In respect of the financial year ending 31 December 2021, the Company has taken the following steps:

- **Supplier Review**

The Company has undertaken a review of its supplier base, taking a risk-based approach to assess the likelihood of the existence of slavery within its supply chains. The criteria used for assessing suppliers included, for example, (i) the nature of the services being provided (in particular the likelihood of employees being engaged on higher risk short-term contracts or providing physical labour) and (ii) the geographical location(s) from which the supplier operates. As a provider of financial services a large proportion of the Company’s suppliers are “low risk” professional services providers. Those suppliers who were identified as “high risk”, and who had not previously been contacted by the Company, were notified by the Company of its expectations of their and their own suppliers with regards to modern slavery and human trafficking.

Having taken these steps, should the Company identify a reasonable cause for concern that a supplier represents a modern slavery or human trafficking risk, the Company will either request that the supplier addresses these concerns within a pre-determined time period, or discontinue their engagement, depending on nature of the issues identified. The Company may also report any such supplier to the relevant authorities, where appropriate. To date the Company has not identified any cause for concern about compliance with the Company's expectations amongst its suppliers.

- **Supplier Contracts**

Contractual clauses forbidding the use of slavery and human trafficking are included in new supplier contracts entered into by the Company which are deemed to be high risk and will also be included on the renewal of existing supplier contracts deemed to be high risk.

- **Review of Policies and Procedures**

The Company's Employee Handbook clearly sets out the Company's expectations with regards to modern slavery and human trafficking, and directs employees to the Company's whistleblowing policy should any employee have any concerns in relation to compliance with these expectations by the Company or any of its suppliers.

- **Raising Internal Awareness**

We periodically raise awareness and educate the Company's employees, where relevant to their role, in relation to the MSA's implications.

The Company is committed to continuing to take positive steps pursuant to its aim of prohibiting any form of slavery within its own business and supply chains.

The above statement is made pursuant to section 54 of the MSA and constitutes the Company's slavery and human trafficking statement for the financial year ended 31 December 2021.



CVC Advisers Limited

30 June 2022