

Slavery and Human Trafficking Statement for the financial year ended 31 December 2024

UK Modern Slavery Act

This statement is made by certain subsidiaries of CVC Capital Partners plc, as listed below (the Entities), which are required to publish a Modern Slavery Statement.

Adopting the applicable international law definitions as their starting point, the Entities understand 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.

CVC Capital Partners plc and its subsidiaries (together the Group) are committed to maintaining consistently high business and ethical standards and seek to prohibit any form of modern slavery or human trafficking within the Group's own business and supply chains.

More information on all the matters below can be found in the Group's latest Sustainability Statement, published within the CVC Capital Partners plc [Annual Report and Accounts](#).

1. Organisation structure and supply chains

Organisation structure

CVC Capital Partners plc, a global private markets manager focused on four strategies of Private Equity, Secondaries, Credit and Infrastructure, is a company whose shares are listed and traded on Euronext Amsterdam.

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'.

This Modern Slavery Statement has therefore been prepared to meet this requirement for the relevant subsidiaries of the Group:

- **CVC Advisers Limited**, a private limited company formed under the laws of England and Wales, whose business is primarily that of providing investment advisory and related services within the Group's Private Equity strategy to other members of the Group. The company is authorised by the Financial Conduct Authority (FCA) in connection with the conduct of those activities subject to the provisions of the UK Financial Services Act 2012 and the Financial Services and Markets Act 2000 (the Acts).
- **CVC Credit Partners Investment Management Limited** is a private limited company formed under the laws of England and Wales, whose business is primarily that of acting as investment manager for certain funds, with a specific focus on the Credit investment strategy of the Group. The company is authorised by the FCA in connection with the conduct of those activities subject to the provisions of the Acts.

- **CVC Credit Partners European CLO Management, LLP** is a limited liability partnership formed under the laws of England & Wales, whose business is primarily acting as collateral manager of CLOs and related structures within the Credit investment strategy of the Group. The partnership is authorised by the FCA in connection with the conduct of those activities subject to the provisions of the Acts.
- **CVC Secondary Partners, LLP** is a limited liability partnership formed under the laws of England & Wales, whose business is primarily acting as the adviser and/or portfolio manager for the CVC Capital Secondary Opportunities Funds programme within the Secondaries investment strategy of the Group. The programme consists primarily of two strategies targeting LP fund portfolios and GP-led transactions to capitalise on the secondary market. The partnership is authorised by the FCA in connection with the conduct of those activities subject to the provisions of the Acts.

Supply chain

As a provider of investment advisory and management services, a large proportion of the Entities' suppliers are 'low risk' professional services providers, as previously confirmed by each Entity in the respective supplier reviews undertaken.

Due to the listing and acquisitions that took place in 2024, the Group is currently undertaking a review of procurement processes across the Group. Once this process is complete, the Group intends to update the supplier review for all Entities.

Oversight of modern slavery risk

As with all sustainability matters, the Group's Board provides oversight on modern slavery and delegates day-to-day responsibility and risk management to the Sustainability Committee and Group Risk Committee. The Sustainability Committee is responsible for assessing and monitoring material sustainability matters, and the Group Risk Committee is responsible for monitoring, managing and overseeing risk, including sustainability risk, and overseeing business conduct.

CVC's [Responsible Investment Policy](#) sets out the Group's approach to the management and oversight of material sustainability factors within its investment processes.

2. Policies in relation to slavery and human trafficking

The Group has a number of policies relevant to slavery and human trafficking that are applicable to the Entities:

Employee Handbooks

The Entities' Employee Handbooks clearly set out the Group's expectations with regards to modern slavery and human trafficking, and direct employees to the Group's whistleblowing policy should any employee have concerns in relation to compliance with these expectations by the Group or any of its suppliers.

UN PRI signatories

Each of the strategies within which the Entities operate is a signatory to the United Nations-sponsored Principles for Responsible Investment (PRI): Private Equity since 2012; Credit and Secondaries since

2021. Each strategy is committed to implementing the PRI's Six Principles with a view to aligning the investment activities of funds managed or advised by the Group with the interests of wider stakeholders. In addition, during the investment process CVC takes into account the ten principles of the UN Global Compact (UNGC), including 'the protection of internationally proclaimed human rights' (principle one), and 'the elimination of all forms of forced and compulsory labour' (principle four).

Responsible Investment Policy

This [Group-level policy](#) defines the Group's approach to managing material sustainability factors within investment processes. It is supplemented by asset-level guidelines, applicable to the Entities as relevant, which provide more detail on responsible investment activities in the different strategies.

The Responsible Investment Policy has been drafted to align with the PRI's Six Principles. In addition, CVC may consider a number of frameworks and international standards in its responsible investment approach including, but not limited to, the Science-Based Targets initiative (SBTi), the Sustainability Accounting Standards Board (SASB) standards, the 10 principles of the UNGC and the Task Force on Climate-related Financial Disclosures (TCFD).

Human Rights Policy

The Group-level Human Rights Policy, which was under development as at the end of 2024, will specify minimum standards and principles for identifying and managing human rights risks across investment strategies. This includes a zero-tolerance approach to modern slavery, forced labour, child labour, and human trafficking. The Policy will be supplemented by strategy-specific policies or guidelines that align with, and at a minimum reflect, the standards set out at the Group level.

The policy will reference the United Nations Universal Declaration of Human Rights and the International Labour Organization core labour standards, and be guided by the human rights due diligence framework set forth in the UN Guiding Principles on Business and Human Rights. They will also draw upon principles from the PRI, the UNGC, and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises on Responsible Business Conduct.

3. Due diligence processes

Typically, the Entities' engage with those in their supply chain deemed to be high risk to confirm that their high risk suppliers and contractors adhere to the same high standards.

Supplier due diligence

Contractual clauses setting out CVC's zero tolerance approach to the use of slavery and human trafficking are typically included in new supplier contracts entered into by the Entities which are deemed to be high risk or upon the renewal of existing supplier contracts deemed to be high risk.

Should an Entity identify a reasonable cause for concern that a supplier represents a modern slavery or human trafficking risk that is not being adequately addressed, the Entity 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 Entities may also report any such supplier to the relevant authorities, where appropriate. To date the Entities have not identified any cause for concern regarding compliance with their expectations amongst their suppliers.

For any concerns, including those related to modern slavery, employees can raise grievances through any or all of the following avenues: the People team; the Compliance team; the whistleblowing hotline, which can protect user anonymity; and government-managed national contact points.

Investment due diligence

When pursuing new investment opportunities, as part of initial due diligence, the investment team typically checks public sources for sustainability information relevant to the prospective investment, including adverse sustainability matters such as incidents of modern slavery. Each investment team carries out further due diligence processes depending on nature of the investment and what sustainability factors have been determined to be relevant – for more detail, please refer to the Group's latest [Sustainability Statement](#).

4. Risk assessment and management

Given the nature of the business conducted, the Entities recognise that the risk of direct exposure to slavery and human trafficking is low. However, it is understood that there is a varying degree of inherent slavery and human trafficking risk when dealing with certain regions, and in relation to certain goods and supplies. The Entities have determined that the greatest level of risk is more likely to exist indirectly, via supply chains.

Suppliers

Previously, the Entities have each undertaken a review of their 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 investment advisory and management services a large proportion of the Entities' suppliers are 'low risk' professional services providers. Those suppliers who were identified as 'high risk', and who had not previously been contacted by Entities, were notified of the expectations of them and their own suppliers with regards to modern slavery and human trafficking.

Due to the listing and acquisitions taking place in 2024, the Group is undertaking a review of procurement processes. Once this exercise is complete, the intention is to update the supplier review and map the supply chain across the newly expanded Group.

Investments

As set out in CVC's [Responsible Investment Policy](#), during an investment's holding period, where in a position to do so, CVC engages with investee companies, borrowers, and sponsors, to monitor their sustainability maturity and performance, including matters related to modern slavery. This helps the Group identify and respond to material risks and opportunities, with the aim of creating and preserving value and to drive continuous improvements. The Group seeks to monitor sustainability risks and engage with management or private equity sponsors as appropriate and practicable within the context of the transaction or investment.

5. Key performance indicators to measure the effectiveness of steps being taken

The KPIs set out below are tracked and disclosed at Group level in the Group's fully assured CSRD-aligned FY24 [Sustainability Statement](#).

- Number of severe human rights incidents
- Percentage of new investments where sustainability is considered
- Percentage participation in annual sustainability monitoring programmes

For the full description, scope and context of these metrics, please refer to the Sustainability Statement.

6. Training on modern slavery and trafficking

CVC continues to raise awareness and educate their employees in relation to the Modern Slavery Act's implications across their businesses.

Following the publication of the Human Rights Policy, investment processes will be enhanced to include human rights considerations in investment processes across all strategies.

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

Further, a reminder of how to raise complaints and the different channels in which to do so was included in the online training for Group employees delivered in December 2024.

In summary, through the application of predominately Group policies and processes, the Entities are committed to continuing to take positive steps pursuant to its aim of prohibiting any form of slavery within their own business and supply chains.

The above statement is made pursuant to section 54 of the MSA and constitutes each Entity's slavery and human trafficking statement for the financial year ended 31 December 2024.

Signed:

Raj Hussain

CVC Advisers Limited, Director



CVC Credit Partners Investment Management Limited, Director

Douglas Maccabe

CVC Credit Partners European CLO Management, LLP, acting by a director of CVC Credit Partners European CLO Management (Holdings) Limited, its voting member

Charles Smith

CVC Secondary Partners, LLP, Member

30 June 2025