

# TRANSPARENCY IN SUPPLY CHAINS: MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

## **OVERARCHING STATEMENT**

As part of Permira's commitment to its core values, being a responsible investor and complying with the UK Modern Slavery Act 2015 (the 'MSA'), we are committed to preventing modern slavery or human trafficking in our own operations and our supply chain. This requires us to understand the potential risk in its supply chain and work in partnership with our suppliers to understand any steps which are being undertaken. Permira's policy and approach is used to inform the 'Transparency in Supply Chains: Slavery and Human Trafficking Statement', updated annually and available on the Permira website.

## WHAT WE EXPECT FROM OUR SUPPLIERS

We expect our suppliers to:

- Be familiar with our expectations relating to the MSA and act in a way which is consistent with these
- Comply with both the letter and the spirit of applicable laws, regulations and contractual obligations, including those in relation to modern slavery, human trafficking and supply chain transparency
- Prohibit and/or take appropriate steps to prevent any form of modern slavery and human trafficking in their own operations or supply chains. These steps may vary by supplier but could include developing and applying company standards and policies, assessing the risk of modern slavery and human trafficking in their operations and supply chains and/or undertaking supplier
- Provide information, which Permira may at times request, on its approach to preventing modern slavery and human trafficking in their operations and supply chains
- Make Permira aware as soon as reasonably practicable, if modern slavery and/or human trafficking is identified in their operations or supply chains

# **OUR COMMITMENTS**

We are committed to mitigating and addressing the risk of modern slavery and human trafficking in our operations and our supply chain. The Permira group has a robust set of business principles and employee handbook to guide the behaviour of all our professionals and underpin the way we operate. These form a key part of our commitment to corporate responsibility and treatment of Permira's employees and partners.

Permira is committed to:

- Prohibit any form of modern slavery and human trafficking in its own operations
- Risk rate its suppliers at least annually and engage with suppliers considered to be higher risk to understand the supplier approach to preventing any form of modern slavery and human trafficking in their own operations or supply chains
- Provide briefings or training for employees with oversight or responsibility for suppliers' relationships and contracting
- Strengthen partnerships with suppliers considered to be higher risk to identify potential areas for improvement, where necessary, and continuing engagement to understand status of improvements. Where a supplier is found not to meet our expectations (particularly those considered by Permira to be at higher risk from modern slavery and human trafficking), we will engage with the supplier to discuss improvement. Where the improvement is not considered to be reasonably sufficient, we may take steps to review the terms of the contract, and in some cases end the supplier relationship where applicable
- Produce an annual 'Transparency in Supply Chains: Slavery and Human Trafficking Statement' for the Permira website
- Periodically review and update this policy, as required.

## PERMIRA FUNDS' PORTFOLIO COMPANIES

Permira fund portfolio companies do not fall under Permira's supply chain and it is the responsibility of each such portfolio company to comply with its obligations under the MSA. As part of its overarching commitment to responsible investment, Permira is committed to considering ESG risks in the investment process, including modern slavery, where relevant.

## **OVERSIGHT AND IMPLEMENTATION RESPONSIBILITIES**

This policy is implemented with inputs from functional areas, where appropriate (e.g. ESG/responsible investment, risk and compliance, events, IT, finance and office managers). Responsibility for the annual review of this Policy has been designated by the Permira group to the Head of ESG.

## **FURTHER INFORMATION**

For further information, including definitions for Modern Slavery and Human Trafficking, please refer to: UK Government guidance: Transparency in Supply Chains: A practical guide; Modern Slavery Act 2015 (Part 6, Section 54).