

TRANSPARENCY IN SUPPLY CHAINS: MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

INTRODUCTION

As part of Permira’s commitment to its core values of partnership, creativity and integrity, being a responsible investor and complying with the UK Modern Slavery Act 2015 (the ‘MSA’), Permira has committed to preventing modern slavery or human trafficking in our own operations and supply chain. This requires us to understand the potential risk in our supply chain and engage with relevant suppliers, as appropriate, to understand steps which are being undertaken to mitigate potential risks.

Permira’s policy and approach is used to inform the ‘Transparency in Supply Chains: Modern Slavery and Human Trafficking Statement’, updated annually and available on the Permira website.

OUR COMMITMENTS

Permira is committed to mitigating and addressing the risk of modern slavery and human trafficking in its operations and supply chain. Permira has a robust set of business principles and policies to guide the behavior of its professionals and underpin the way the firm operates. These form a key part of Permira’s commitment to corporate responsibility and treatment of its professionals.

Permira is committed to:

- Prohibit any form of modern slavery and human trafficking in its own operations
- Conduct a modern slavery risk assessment of its suppliers at least annually and engage with higher-risk suppliers to understand their approach in preventing 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
- Monitor higher risk suppliers using RepRisk, a reputational risk screening tool
- Strengthen partnerships with higher risk suppliers to identify potential areas for improvement, where necessary
- Where a supplier does not meet our expectations (particularly those considered 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
- Produce an annual ‘Transparency in Supply Chains: Modern Slavery and Human Trafficking Statement’ for the website
- Periodically review and update this policy, as required.

WHAT WE EXPECT FROM SUPPLIERS

We expect our suppliers to:

- Be familiar with Permira's expectations relating to the MSA
- Comply not only with the letter but also 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 implement measures to prevent any form of modern slavery and human trafficking in their operations and 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 audits
- Provide accurate information, which Permira may at times request, on their approach to preventing modern slavery and human trafficking in their operations and supply chains
- Inform Permira as soon as reasonably practicable, if modern slavery and/or human trafficking is identified in their operations or supply chains.

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 human rights and 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, compliance, events, IT, finance and office managers). Responsibility for the annual review of this Policy has been designated by Permira 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).