



Tower Peak Partners

# ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

July 2025

## 1. Statement Definitions

References to “we,” “us,” and “our” are to Tower Peak Partners LLP (TPP) and its subsidiaries. The terms “you” and “your” apply to all those responsible for ensuring compliance with this statement, including employees, suppliers, contractors, portfolio companies, and business partners.

**Modern Slavery:** A term encompassing all forms of slavery, servitude, forced or compulsory labor, and human trafficking as defined under the Modern Slavery Act 2015.

Key aspects include:

- **Slavery and Servitude:** The exploitation and dehumanization of individuals, where they are treated as property or forced into servitude for someone else’s benefit.
- **Forced or Compulsory Labor:** Where people are coerced into working through threats, violence, abuse, or manipulation.
- **Human Trafficking:** The act of facilitating or arranging the travel of individuals for exploitation, regardless of their consent to the movement, often using deception or coercion.

## 2. Purpose and Scope of Statement

**2.1 Commitment to Zero Tolerance:** TPP has a zero-tolerance statement toward modern slavery and human trafficking. These are crimes and gross violations of human rights, incompatible with our ethical standards and business practices.

**2.2 Global Responsibility:** As a private equity firm with global investments, we recognize the unique challenges modern slavery poses in complex supply chains, particularly across different jurisdictions. Therefore, we commit to proactively identifying, preventing, and addressing risks related to modern slavery both in our own operations and in the companies and supply chains we invest in.

**2.3 Integration into Operations and Investments:** As part of our business strategy and investment decisions, TPP integrates modern slavery assessments into the due diligence process for all acquisitions, mergers, and investments. We do this to ensure that all potential portfolio companies adhere to the highest ethical standards and comply with anti-slavery legislation.

**2.4 Scope:** This statement applies to all individuals and entities working with TPP, including:

- Employees (full-time, part-time, and contractors)
- Portfolio companies
- Suppliers and third-party service providers
- Business partners and external consultants

Each of these groups is required to comply with this statement and our associated ethical standards.

## 3. Governance and Responsibility

**3.1 The firm’s Global Management Committee:** The Global Management Committee (GMC) have ultimate oversight and responsibility for compliance with the firm’s anti-slavery statement, ensuring

that TPP meets all its legal and ethical obligations. The GMC is responsible for approving the annual Modern Slavery Statement and ensuring its effective implementation across the firm, the firm's operations, and its portfolio companies.

**3.2 Compliance Team:** The **Chief Compliance Officer** is responsible for:

- **Statement Implementation:** Ensuring that the anti-slavery statement is embedded across all levels of the organization, including in portfolio companies.
- **Risk Assessment and Monitoring:** Leading regular audits of operations and investments to identify modern slavery risks.
- **Training Programs:** Coordinating training on modern slavery for employees, investment teams, and third parties to raise awareness and prevent violations.

**3.3 Investment Teams:** Investment professionals are responsible for:

- **Due Diligence:** Incorporating modern slavery and human rights risk assessments into the evaluation of potential portfolio companies. This includes evaluating their supply chains, labor practices, and adherence to international human rights standards.
- **Ongoing Monitoring:** Post-acquisition, the investment teams must continuously monitor portfolio companies' compliance with anti-slavery regulations and implement remediation strategies where needed.

**3.4 All Employees:** All staff are required to understand and adhere to this statement, attend relevant training sessions, and report any concerns relating to modern slavery.

## **4. Statement Compliance and Reporting Concerns**

### **4.1 Employee and Partner Responsibilities**

Every individual working with or on behalf of TPP must take responsibility for identifying and mitigating the risk of modern slavery within the firm, its portfolio companies, and supply chains.

### **4.2 Reporting Procedures:**

Employees, contractors, and partners are encouraged to report any concerns about modern slavery without fear of retaliation. Reports can be made through:

- **Confidential Whistleblowing Hotline:** Employees and third parties can anonymously report concerns related to modern slavery via the whistleblowing hotline, managed by an external provider.
- **Direct Reporting:** Concerns can also be raised with immediate supervisors, the firm Chief Compliance Officer, or through the legal team.

**4.3 Action on Reports:** Any reports of suspected modern slavery will be promptly investigated, and appropriate actions will be taken, which could include:

- Engaging with relevant authorities if legal violations are identified.
- Auditing and reviewing suppliers or portfolio companies involved.
- Termination of relationships with suppliers, portfolio companies, or partners found to be in breach of anti-slavery policies.

## 5. Due Diligence and Risk Management

**5.1 Investment Process Due Diligence:** TPP integrates anti-slavery due diligence into its Environmental, Social, and Governance and Sustainability (ESGS) framework. This ensures that potential investments are reviewed for any human rights violations, particularly those related to modern slavery.

**5.2 Portfolio Company Monitoring:** Ongoing monitoring of portfolio companies is essential. TPP will:

- Conduct regular audits to ensure compliance with anti-slavery regulations.
- Provide guidance and support to portfolio companies in managing their own supply chain risks.
- Use KPIs to measure compliance, such as the number of audits conducted, issues identified, and remediated cases.

### 5.3 Supply Chain Due Diligence – Third-Party Service Providers:

TPP maintains a zero-tolerance approach to modern slavery, human trafficking, forced labour, and exploitative practices in any form. All third-party service providers, contractors, consultants, agents, and suppliers engaged by TPP (collectively “Service Providers”) are required to uphold equivalent standards and ensure full compliance with the Modern Slavery Act 2015 and this Policy.

Accordingly, Service Providers shall:

1. **Legal Compliance**  
Warrant that neither they, nor any entities within their own supply chains, engage in or support any form of modern slavery, human trafficking, child labour, or forced labour. Service Providers must comply with all applicable laws, regulations, and international standards addressing modern slavery, including, where applicable, maintaining a public modern slavery statement.
2. **Contractual Obligations**  
Ensure that all contracts with their subcontractors, agents, and suppliers contain enforceable provisions prohibiting modern slavery and requiring compliance with applicable anti-slavery legislation. Service Providers must take reasonable steps to ensure that such provisions are effectively implemented and monitored throughout their supply chains.
3. **Risk Assessment and Transparency**  
Cooperate with TPP’s reasonable requests for information and evidence to support anti-slavery due diligence, including providing details of policies, procedures, and risk assessments undertaken to mitigate modern slavery risks in their operations and supply chains.
4. **Audit and Inspection Rights**  
Acknowledge that TPP reserves the right to conduct audits, inspections, or third-party assessments (announced or unannounced) at any time during the term of engagement, particularly where a Service Provider operates in high-risk jurisdictions or sectors. Failure to cooperate or to rectify identified issues promptly may result in termination of the relationship.
5. **Notification Obligation**  
Promptly notify TPP if they become aware of, or have reasonable grounds to suspect, any actual or potential breach of anti-slavery laws or practices within their operations or supply

chains. Notification must be made within five business days of becoming aware of such matters, along with a proposed remedial action plan.

#### 6. Remedial Measures and Termination

TPP reserves the right to take appropriate remedial action, including suspension or immediate termination of the relationship, if the Service Provider is found to be in breach of this clause or fails to take timely and adequate corrective measures in response to identified risks or violations.

## 6. Statement Communication and Training

**6.1 Communication:** Our commitment to preventing modern slavery is communicated to all employees, business partners, portfolio companies, and suppliers. This statement is published both internally and externally to ensure that all stakeholders are aware of our stance and obligations.

**6.2 Training Programs:** All relevant employees, especially those in business relations and investment roles, will receive training on modern slavery risks. This training will cover:

- How to identify signs of modern slavery.
- How to mitigate risks in investment decisions.
- How to report concerns internally and through external whistleblowing mechanisms.

## 7. Training and Awareness

To ensure that our staff across the Group have a base level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, all staff are periodically required to re-read key Group policies, including (amongst others) this Policy, our Anti-Bribery & Corruption policy and our Code of Ethics and sign an attestation that they have read and understood the contents and requirements of the policies. We are able to track and report on which staff have completed this activity using our HR system and, when the process was last undertaken, all staff in the Group (other than longer term absentees) had signed the form.

We also raise awareness of modern slavery and human trafficking through our mandatory annual Governance, Risk and Compliance training, which is reviewed periodically, and which includes a module on preventing modern slavery (the “**GRC Training**”). It is required to complete the GRC Training within a specified time period. All new starters are also required to complete this training when they join the Group as part of the employee induction process.

## 8. Statement Breaches and Consequences

Breaches of this statement will not be tolerated. Consequences include:

- **For employees:** Disciplinary actions, which may include dismissal.
- **For suppliers or partners:** Termination of contracts, business relationships, or investment agreements.

- **For portfolio companies:** If a portfolio company is found in breach, we will work with them to implement corrective measures. If non-compliance persists, we will consider divesting or taking legal actions.

## 9. Relevant Legislation, Standards, and Guidance

- Modern Slavery Act 2015
- UN Guiding Principles on Business and Human Rights
- International Labour Organization (ILO) Conventions
- TPP Principle for Responsible Investing Statement
- TPP Code of Conduct
- TPP Whistleblowing Policy


## 10. Statement Review and Updates

This statement will be reviewed annually by the firm Chief Compliance Officer and reviewed and approved by the Global Management Committee, or earlier if required by changes in law, best practices, or the discovery of significant risks. Updates will be approved by the Managing Partners.

### Section 54(1)

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2025.

Signed:

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**Authorised signatory, for and on behalf of Tower Peak Partners**

Date: 7/18/2025