

## **Cinven Partners LLP**

### **Modern Slavery and Human Trafficking Statement 2018**

The UK Modern Slavery Act ('MSA') requires large companies operating in the UK to publish a modern slavery and human trafficking statement. This statement constitutes Cinven Partners LLP's ("Cinven Partners") modern slavery and human trafficking statement for the financial year ending 31 December 2018 and applies to Cinven Partners and its subsidiaries.

This statement was approved by the members of Cinven Partners on 28th June 2019.

Cinven Partners does not tolerate modern slavery and seeks to prevent any form of slavery or human trafficking in its business and supply chains. We are committed to acting responsibly and with integrity across all areas of our business.

Cinven Partners, as investment adviser to the Cinven funds, also fully recognises the importance of engaging with portfolio companies in which the Cinven funds invest on this important subject and continued to do so in 2018.

#### **About Cinven**

Cinven is a leading international private equity firm, founded in 1977. Funds advised by Cinven Partners acquire companies with a European focus that will benefit from Cinven's expertise of growing and building companies globally. Cinven funds can also invest selectively in businesses in North America. Cinven focuses on six sectors: Business Services, Consumer, Financial Services, Healthcare, Industrials, and Technology, Media and Telecommunications (TMT).

Cinven Partners provides investment advice to the managers of the Cinven funds and has its principal place of business in the UK. It is authorised and regulated by the UK Financial Conduct Authority. Other entities within the Cinven group operate out of offices in Frankfurt, Guernsey, Hong Kong, Luxembourg, Madrid, Milan, New York and Paris.

#### **Our Policies and Processes**

Cinven is a responsible employer and is committed to creating an inclusive working environment and providing equal employment opportunities.

The Cinven group has a number of policies in place to mitigate the risk of modern slavery across its business including an Employee Code of Conduct, an Equality Policy and a Whistleblowing Policy, all of which apply to staff globally and are periodically communicated within the group.

## **Responsible Procurement**

### *Risk Assessment*

As a financial services business, Cinven's commercial supply chains are direct and involve the provision of business and professional services. We continue to consider the risk of modern slavery and human trafficking arising from these services to be low.

We have, however, undertaken the following:

- Assessed the risk arising from the provision of ancillary services to Cinven which predominantly relate to the premises in which Cinven staff work;
- Reviewed our material suppliers and assessed the risk of slavery or human trafficking in relation to the goods and services supplied. We determined materiality by reference to the nature and the geography of the services supplied and the related costs.

This risk assessment identified catering and facilities management as services where a risk of modern slavery would more likely be present (compared to providers of office equipment, computer hard/software or travel booking services which comprise the majority of ongoing services provided to us in addition to business and professional advisory services).

### *Diligence*

Our contracted suppliers of catering and facilities management are both publicly listed companies and both subject themselves to the MSA. We have engaged with them and reviewed their latest public statements to understand and assess their commitments and processes.

New material suppliers are subject to a risk assessment and appropriate background checks. Additionally, we renewed our background checks on key suppliers.

## **Responsible Investment**

Responsible investing by the Cinven funds has long been an area of focus and is set out in Cinven's Environment, Social and Governance ('ESG') policy, which is published on our website.

While the portfolio companies of the Cinven funds do not fall within the remit of our MSA statement, as adviser to the Cinven funds, we take a number of steps designed to ensure that the Cinven funds invest responsibly and in line with Cinven's ESG policy. We have communicated with each company in which the Cinven funds have invested and which are

subject to the MSA to ensure that both a statement will be published in respect of the last financial year and also that such statement is representative of an ongoing process to counter modern slavery and human trafficking. In line with the spirit of the UN Guiding Principles on Business and Human Rights, we are committed to use our influence and ability to affect change within our portfolio if modern slavery issues or risks are identified.

### *Diligence*

Prior to any investment by Cinven funds, we carry out due diligence on all aspects of the business including the supply chain. Once the acquisition has completed, we undertake a more detailed ESG assessment – requiring all our new portfolio companies to complete a comprehensive ESG questionnaire. The ESG assessment includes questions on whistleblowing policies and processes, labour conditions, migrant workers, and supply chain standards and modern slavery.

### *ESG Procedures*

As part of Cinven's overall approach to responsible investing, we seek to ensure that the boards of the portfolio companies' of the Cinven funds take responsibility for ESG topics, including modern slavery, by:

- Undertaking an ESG assessment and implementing appropriate policies and processes to address any risk;
- Complying with the UK MSA reporting requirements; and
- Reporting on a social KPI which monitors reported workplace grievances within portfolio companies, and allows identification of modern slavery-related complaints.

### **Awareness**

Cinven Partners is committed to ensuring suitable awareness of modern slavery and human trafficking considerations amongst its management and staff. Periodically, we take steps to educate and raise awareness of the MSA requirements and its implications with (i) our Executive Committee, (ii) our department heads and (iii) our ESG Steering Group. In 2018, all Cinven staff completed an online financial crime training course which covered modern slavery.

In addition, further updates are provided through internal and portfolio company updates, periodic training, pre-investment due diligence procedures and our portfolio company monitoring process.

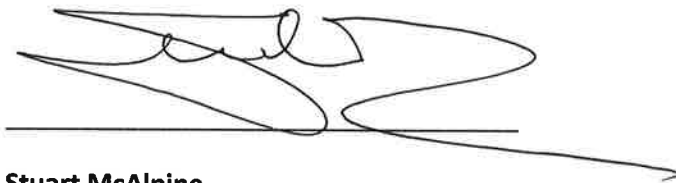
## **Next steps**

### **Cinven procurement**

- Cinven aims to ensure compliance with MSA requirements by new material service providers, and when contracts with material suppliers are retendered.
- In line with MSA expectations to take steps to assess and manage risks in other parts of the business, Cinven aims to remind all Cinven offices (across three continents) of the importance of background checks of key suppliers.

### **Due diligence and engagement with portfolio companies**

- Cinven aims to increase monitoring on supply chain risks within relevant portfolio companies.
- Cinven aims to add a social KPI on modern slavery training conducted for portfolio companies with higher risk of forced labour.
- ESG Steering Committee to consider Modern Slavery as a regular agenda item.



**Stuart McAlpine**  
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**Cinven Partners LLP**  
**28<sup>th</sup> June 2019**