

Anti-Slavery and Human Trafficking Policy

1. Policy 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 policy, 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. Policy Statement

2.1 Commitment to Zero Tolerance: TPP has a zero-tolerance policy 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 policy 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 policy and our associated ethical standards.

3. Governance and Policy 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 policy, 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:

- **Policy Implementation:** Ensuring that the anti-slavery policy 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 policy, attend relevant training sessions, and report any concerns relating to modern slavery.

4. Policy 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:

TPP will conduct risk assessments on high-risk suppliers to ensure that they comply with the Modern Slavery Act 2015. This includes:

- **Contractual Clauses:** Requiring suppliers to include clauses prohibiting modern slavery in their own operations and supply chains.
- **Audits and Inspections:** We reserve the right to conduct inspections and audits of suppliers and business partners, particularly those in regions or industries with a higher risk of human rights violations.

6. Policy Communication and Training

6.1 Communication: Our commitment to preventing modern slavery is communicated to all employees, business partners, portfolio companies, and suppliers. This policy 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. Policy Breaches and Consequences

Breaches of this policy 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.

8. Relevant Legislation, Standards, and Guidance

- Modern Slavery Act 2015
- UN Guiding Principles on Business and Human Rights
- International Labour Organization (ILO) Conventions
- TPP Responsible & Sustainable Investment Policy
- TPP Code of Conduct
- TPP Whistleblowing Policy

9. Policy Review and Updates

This policy 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.