



## Modern Slavery Act Statement

This Statement is issued by the senior management of BC Partners LLP, BCPL Holdings Limited and BC Partners Advisors Holdings Limited ("**BC Partners**") pursuant to Section 54 of the Modern Slavery Act 2015 ("**MSA**") which came into force in October 2015 and references to "we" and "our" in this Statement are to each.

Section 54 MSA requires any commercial organisation which (i) supplies goods or services, (ii) carries on a business or part of a business in the UK, and (iii) whose annual turnover is £36m or above, to produce a statement for each financial year. The financial year for BC Partners runs from 1 January to 31 December. This statement describes the steps that BC Partners has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains, and in any part of its own business.

Founded in 1986, BC Partners is a leading alternative investment manager focused on private equity, credit, and real estate, with deep networks across Europe and North America. BC Partners Advisors Holdings Limited and BCPL Holdings Limited are UK incorporated parent undertakings of BC Partners LLP.

For a more detailed description of BC Partners' structure and a summary of its operations, please refer to the rest of the website.

## Overarching Commitment

BC Partners does not tolerate slavery or human trafficking within its business, or its supply chains and we expect our officers, directors, staff, board members and those providing services for or on behalf of BCP (our "**Associates**") to conduct themselves in accordance with this Statement and our Modern Slavery Policy (the "**MSA Policy**"), in each case as updated and amended from time to time.

Whilst we consider our business model of providing investment advice to be lower risk than other types of businesses from an MSA perspective, we also recognise the significance and importance of the MSA's aims and objectives and the fact that slavery and human trafficking offences can occur in a wide variety of situations. Generally speaking, our supply chains are relatively simple, including placement agents, distributors, IT personnel and equipment providers and cleaning suppliers.

Senior Management have also taken into account the work of supranational bodies, such as the United Nations and International Labour Organisation (ILO) when approving this Statement. Senior Management have reviewed and sought to improve upon the following MSA initiatives since our last MSA Statement was published:

**Policies** - BC Partners has a detailed MSA Policy which is updated on a regular basis and on which all relevant staff are trained. The MSA Policy sets out Senior Management's commitment to the MSA, provides legislative background to the MSA and provides helpful definitions to staff on the key concepts.

The MSA Policy also makes it clear that all new relationships with suppliers that pose a higher risk must be pre-approved by the Compliance Team.

## MSA Statement 2023

BC Partners' MSA Policy is in addition to our other policies and procedures concerning business ethics matters, such as our Anti-Corruption Policy, Reporting Suspicious Activities and Concerns Policy and Oversight of Service Providers Policy. All of these policies are actively communicated to staff.

**Risk Assessment and On-boarding Procedures** - all new supplier relationships are subject to a detailed risk assessment that includes MSA matters, and where higher risk suppliers have been identified (e.g. those based in jurisdictions or industries that are considered to be higher risk from a modern slavery and human rights perspective), further analysis is carried out.



This includes the supplier filling out a questionnaire focusing on a number of different business ethics areas, including modern slavery, which the Compliance Team then reviews in full. BC Partners then seeks to work with any suppliers that provide unsatisfactory responses, to ensure that they are implementing appropriate systems and controls.

As part of our supplier due diligence, our Compliance Team carries out background checks on all higher risk suppliers. This consists of adverse media screening and due diligence questionnaires.

**Training** – all relevant staff have been made aware of the MSA and its implications for BC Partners. Our MSA policy is contained in the BC Partners Compliance Manual which is provided to all staff. In particular, all relevant staff continue to be reminded on a regular basis that any new supplier relationships must be pre-approved by our Compliance Team before the contract should be entered into and that BC Partners will not do business with any higher risk supplier that does not have adequate systems and controls in place to prevent modern slavery and human trafficking.

**Contracts** – we ensure that specific contractual protections are added to higher risk contracts with our material service suppliers in respect of modern slavery and human rights issues.

**External Advisors** – BC Partners works with external advisors to ensure that our systems, controls and our MSA Statement meet the requirements of the MSA.

**Monitoring and Reporting** – our independent Compliance Team continues to monitor the business for compliance against our MSA Statement, MSA Policy and progress against our MSA objectives.

Any actual or suspected breaches of our MSA Statement or MSA Policy should be notified to the Compliance Team in the first instance, and where appropriate, will be referred to Senior Management.

We encourage all of our staff, officers and Associates to report any concerns about modern slavery issues in accordance with our Reporting Suspicious Activities and Concerns Policy, which is designed to make the reporting process as simple as possible and for staff to be able to report any issues or concerns anonymously via our third-party whistle blowing hotline.

**Review** – This Statement will be reviewed by our Compliance Team on an annual basis and may be amended from time to time. We will continue to work with external advisors to ensure that our MSA Statement meets the requirements of the MSA.

#### **MSA Statement 2023**

Board Approvals

Approved by the Senior Management of BC Partners LLP and the Board of Directors of BC Partners Advisors Holdings Limited and BCPL Holdings Limited on 05 April 2023

*Mark Philip Hersee*

LLP Designated Member, BC Partners LLP  
Director, BC Partners Advisors Holdings Limited  
Director, BCPL Holdings Limited