



**Bain Capital UK Group  
2023 Modern Slavery Act Transparency Statement**

## Business Overview

Bain Capital, LP (“Bain Capital”) is one of the world’s leading private multi-asset alternative investment firms with over \$165 billion in assets under management that creates lasting impact for our investors, teams, businesses, and the communities in which we live. Founded in 1984, Bain Capital pioneered a consulting-based approach to private equity investing, partnering closely with management teams to offer the insights that challenge conventional thinking, build great businesses and improve operations. Over time, Bain Capital has organically expanded this approach across asset classes to build one of the strongest alternative asset platforms in the world.

## Introduction

This statement constitutes our anti-slavery and human trafficking statement under Section 54 of the UK’s Modern Slavery Act 2015 (“MSA”) for the financial year ended 31 December 2023. It is published on behalf of Bain Capital Private Equity (Europe), LLP (BCPE), Bain Capital Credit Limited (BCC Limited) and Portfolio Company Advisors Europe, LLP (PCAE) along with certain other group entities that are technically not required to prepare a standalone statement (collectively, “Bain Capital UK”). References to “we” are to Bain Capital UK. The same policies, procedures, risk assessment, diligence, monitoring and training described below pertaining to modern slavery are employed across Bain Capital UK.

As one of the world’s largest private investment firms, Bain Capital believes that active management of environmental, social, and governance (ESG) considerations helps us to create lasting impact for all of our stakeholder groups, including investors, portfolio companies, employees and communities.

As part of Bain Capital UK’s commitment to sound ESG management, and as a supplement to the wider firm’s Guidelines for Responsible Investment Statement, we developed a Modern Slavery Policy and the below controls to address and manage risks in our supply chains. We are committed to engaging with our suppliers in an effort to prevent occurrences of modern slavery and human trafficking in our firm and supply chains in accordance with the principles and goals promoted by the Modern Slavery Act of 2015 and related guidance.

BCPE, BCC Limited, and PCAE commit to updating this Modern Slavery Act Transparency Statement annually, and to posting this information on our website.

## Supply Chain

Our supply chain primarily includes property and facility management and maintenance, office supplies, information technology, managed services, and catering.

In alignment with our ESG commitment on Fair Employment, Engagement & Well-being, and recognizing that modern slavery and human trafficking are clear violations of human rights, Bain Capital UK’s goal is to assess potential vendors before they enter our supply chain and on an ongoing basis throughout our relationship through a variety of risk-based measures.

## Policies and Procedures

Starting in 2017, we have increased attention to modern slavery concerns and one action we have taken is implementation of a Modern Slavery Policy to identify and monitor potential higher risk areas in our supply chain and mitigate the risk of slavery and human trafficking occurring in our supply chains, among other things.

## Due Diligence and Risk Assessment

We take the following steps to ensure that the risk of slavery and human trafficking is addressed in our business and supply chains:

- We have examined our supply chains to identify where we can most impactfully support fair labor practices and mitigate any risk of slavery and human trafficking.
- We carry out due diligence on new suppliers, which includes research of public records and other actions pertinent to the type of supplier and type of purchase.
- We include enhanced contractual protections with new suppliers wherever possible regarding compliance with slavery and human trafficking legislation.
- We continually monitor higher risk suppliers in our supply chain for any public issues regarding slavery and human trafficking.

## Training

We provide training to relevant employees to manage slavery and human trafficking risks in our business or supply chains and to educate on the importance of implementing and enforcing effective prevention systems.


## Monitoring and Reporting

The following individuals take responsibility for leading our modern slavery prevention efforts and the goals promoted in this statement: Global Head of ESG, Global Head of Diversity, Equity, and Inclusion, and Global Head of Procurement. These individuals collaborate to drive and monitor progress of our efforts in this area, and issues (should they arise) will be reported to and addressed by the Chief Operating Officer.

This document is reviewed annually and published on our website.

## Approvals

This statement has been approved by Bain Capital Private Equity (Europe), LLP, by Bain Capital Credit Limited and by Portfolio Company Advisors Europe, LLP on May 10<sup>th</sup>, 2024.



Tricia Winton

Global Head of ESG, Bain Capital

Signing for and on behalf of Bain Capital Private Equity (Europe), LLP / Bain Capital Credit Limited  
Portfolio Company Advisors Europe, LLP



Victoria Budson  
Global Head of DEI, Bain Capital  
Signing for and on behalf of Bain Capital Private Equity (Europe), LLP / Bain Capital Credit Limited /  
Portfolio Company Advisors Europe, LLP



Meghan Jiang  
Director of Procurement, Bain Capital  
Signing for and on behalf of Bain Capital Private Equity (Europe), LLP / Bain Capital Credit Limited /  
Portfolio Company Advisors Europe, LLP

*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 2023.*