



**Bain Capital Private Equity (Europe), LLP  
2018 Modern Slavery Act Transparency Statement**

## Business Overview

Bain Capital is one of the world's leading private multi-asset alternative investment firms with over \$105 billion in assets under management that creates lasting impact for our investors, teams, businesses and the communities in which we live. Founded in 1984, we 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, we have organically expanded this approach across asset classes to build one of the strongest alternative asset platforms in the world.

Today, our teams apply analytic rigor and deep domain expertise, investing on behalf of a wide range of limited partners across multiple platforms and geographies. We believe that our people and the shared values we've espoused since our founding remain the core of our competitive advantage. This has empowered us to deliver an enduring impact to a diverse group of investors including pensions, endowments, foundations and individuals.

## Introduction

This statement is published on behalf of Bain Capital Private Equity (Europe), LLP ("Bain Capital") in line with the United Kingdom's Modern Slavery Act 2015, and references to "we", "us", "our" or the "firm" are to Bain Capital.

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 our commitment to sound ESG management, and as a supplement to our firm's Guidelines for Responsible Investment Statement, we have developed a Modern Slavery Policy which addresses and manages 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.

We also commit to updating this Modern Slavery Act Transparency Statement annually, and to posting this information on our website.

## Supply Chain

Given that Bain Capital's business relates to alternative asset investments and professional services, our supply chains are relatively simple. They primarily include property and facility management and maintenance, office supplies, catering and hospitality services provided to our offices and information technology.

However, recognizing that modern slavery and human trafficking are clear violations of human rights, Bain Capital'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

During 2017, we implemented our 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. We continued such efforts in 2018. In addition to our Modern Slavery Policy, we also have in place a variety of policies and procedures designed to address our commitment to robust ESG management, including Guidelines for Responsible Investments and Anti-Corruption policies.

## Due Diligence and Risk Assessment

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

- We focus on building strong relationships with suppliers clearly setting out our standards of ethical business behavior
- We have examined our supply chains to identify where the higher areas of risk to our business lie.
- We carry out due diligence on new suppliers, including supplying them with an onboarding questionnaire, which covers slavery and human trafficking issues.
- We generally include enhanced contractual protections with new suppliers 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.

## Monitoring and Reporting

Bain Capital Private Equity (Europe), LLP's General Counsel takes responsibility for overseeing our Modern Slavery Policy and the goals promoted in this statement.

Bain Capital's global Director of Procurement and global Director of ESG and Communication will monitor progress of our efforts in this area, and issues (should they arise) will be reported to the Chief Operating Officer.

This document will be reviewed annually and published on our website.

## Training

We will provide training to targeted 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.

## Approvals

This statement was approved by our applicable governing bodies as of January 29, 2019.

Signed on behalf of Bain Capital Private Equity (Europe), LLP



Bart Gombert

European General Counsel, Bain Capital Private Equity (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 2018.*