TRANSPARENCY STATEMENT ON MODERN SLAVERY AND HUMAN TRAFFICKING

This statement is published on behalf of Campbell Lutyens Holdings Limited and its subsidiaries (collectively "Campbell Lutyens" or the "Firm") in accordance with section 54(1) of the Modern Slavery Act 2015 (the "Act").

It constitutes the Firm's slavery and human trafficking statement for the year ended 30 April 2022.

ZERO TOLERANCE

Campbell Lutyens' aims include always considering the firm's wider responsibilities in society and its approach to environmental, social and governance ('ESG') matters. In doing so the Firm has a zero-tolerance approach to modern slavery.

The Firm is committed to acting ethically and with integrity in all business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in the Firm's own business or in any of its Supply Chains (as defined below).

ORGANISATION AND SUPPLY CHAINS

Campbell Lutyens specialises in providing fund placement, secondary advisory and GP capital advisory services to leading fund managers and investors globally, operating from offices across North America, Europe and Asia.

Group companies have been established and, where appropriate, are authorised and regulated in each relevant jurisdiction. This includes in the United Kingdom, Campbell Lutyens Holdings Limited, Campbell Lutyens & Co. Ltd and CL & Co. Management Services Ltd, in France, Campbell Lutyens & Co (France) SA, in the United States, Campbell Lutyens & Co. Inc., in Hong Kong, Campbell Lutyens Asia Pacific Limited and in Singapore, Campbell Lutyens (Singapore) Pte Ltd.

The Firm is employee owned and seeks to offer outstanding opportunities for the team, which is principally made up of permanent employees and a small number of Advisory Directors and Senior Advisors. In addition, the Firm offers short term paid internships and work experience. By exception, it has fixed term or contractor arrangements in place, for example to cover parental leave or to meet specific requirements. All are subject to standard contractual terms appropriate to the jurisdiction in which they are based.

Campbell Lutyens' supply chains (the "Supply Chains") are relatively straightforward and typical of a regulated financial services advisory firm, principally comprising:

- professional services suppliers, supporting us on matters such as recruitment, accounting, audit, taxation, legal and compliance;
- other outsourced service providers, principally relating to technology, telecoms, employee benefits and payroll; and
- goods and service providers relating to our global offices, such as property and facility management, cleaning, security, catering, utilities and office supplies.

POLICIES, RISK ASSESSMENT AND MANAGEMENT

The Firm has taken steps to minimise the risk of slavery across its business and in any of its Supply Chains, this includes putting in place policies and procedures covering ESG, modern slavery and human trafficking, supplier take-on, employment, whistleblowing and training, as well as undertaking a formal risk assessment of our suppliers.

The Firm assesses suppliers at the point at which we take the decision to take-on any new supplier and periodically throughout the supplier relationship. This assessment includes categorising suppliers from low to high risk, considering the nature of the supplier's services, those working for them and

their geography of operations. The level of risk identified is taken into consideration as part of supplier selection and contract renewal processes, as well taking actions to mitigate any identified risks.

We ensure that appropriate terms are in place for all supplier relationships. For any significant contractual arrangements, we provide a written statement explaining the Firm's approach to modern slavery and human trafficking, Campbell Lutyens' commitment to this and expectations regarding compliance by the supplier with the Act. If a supplier is not willing or cannot agree to these terms, Campbell Lutyens will not proceed and will terminate the relationship with that supplier, as necessary.

The Firm has undertaken a risk assessment (the "Risk Assessment") and established that there is a low risk of modern slavery and human trafficking within the Firm's business or in any of its Supply Chain Furthermore, due to the nature of the Firm's business, there is a low risk of such issues arising in the future. The Risk Assessment will be repeated in each forthcoming financial year in order to ensure that the Firm's internal and external processes continue to be held to high standards as required under the Act.

PERFORMANCE INDICATORS

While we have determined our business to be low risk and expect suppliers to comply with legal requirements, we still follow processes that help validate this.

We recognise that the prevention, detection and reporting of modern slavery in any part of our business or Supply Chain is dependent on and the responsibility of all those working for the Firm. Employees are required to avoid any activity that might lead to a breach of the law or a violation of human rights and are asked to raise any concerns regarding modern slavery in any part of our business, or our Supply Chains, as early as possible. To the extent that any potential issues are identified by employees, the Firm's Whistleblowing Policy encourages the reporting of concerns and the protection of whistle blowers. We also seek assurances, typically through terms and conditions, that suppliers are complying with applicable laws.

The effectiveness of the steps we are taking to ensure compliance is assessed by monitoring any reports that are received indicating non-compliance or other concerns as well as actions taken to reduce the risks identified as part of our Supply Chain assessment.

TRAINING

To maintain awareness and ensure an understanding of the risks of modern slavery in our business, our Modern Slavery Policy is made available to all employees and is communicated as part of the induction process.

From time to time after induction, the Firm provides information and resources promoting awareness of ESG issues and encouraging individuals to identify improvements and report potential risks. This includes specific focus and consideration of the risks relating to modern slavery and human trafficking for those responsible for procurement and supplier relationships.

This statement has been approved by the Partners of the Firm.

Andrew Sealey
Director, Campbell Lutyens Holdings Limited