

# Wafra

## Modern Slavery Act Statement

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## *Introduction*

The UK Modern Slavery Act 2015 requires organizations operating in the United Kingdom to publish an account of the actions taken throughout the year to ensure slavery and human trafficking are absent in their operations.

This policy extends to Wafra, Inc. and its controlled affiliates (collectively, “Wafra” or the “Firm”), Wafra’s employees and, Wafra’s investments on its own behalf or on behalf of Wafra’s clients, and Wafra’s third-party vendors.

## *About Wafra*

Founded in 1985, Wafra is an investment adviser, which together with its affiliates manages assets and commitments of approximately \$24 billion (estimated as of December 31, 2019) across a range of investment strategies, including strategic partnerships, alternative finance, real assets, real estate, liquid markets, venture capital and private equity.

## *Policy Statement*

Wafra pledges to act responsibly and has a zero-tolerance policy for slavery or human trafficking in any form. We are committed to best practices to ensure such acts do not exist within our business and supply chains.

Wafra expects every employee to conduct themselves in the highest ethical manner and to act in the wellbeing, health and safety of others. The Firm supports and encourages practices that promote a safe and inclusive workplace environment. Wafra will comply with all recognized laws and pledges to take necessary actions if cases of modern slavery are discovered within our operations and those of portfolio companies.

Wafra will not invest or provide capital to third parties that willingly participates in modern day slavery, human trafficking or servitude practices. The Firm expects all its controlled affiliates to acknowledge Wafra’s Modern Slavery Statement and adhere to our guidelines.

Wafra recognizes the responsibility we hold towards our investors to make suitable investment decisions and manage risk. We believe responsible ownership can lead to risk reduction, growth of investment efficiencies and increased brand value.

The Firm uses United Nations Principles for Responsible Investing (PRI) standards to guide investments and aims to create partnerships with ethical investors who share our long-term values. We screen our investments for those that violate the United Nations Global Compact Principles (UNGC). This includes the violation of human rights, labor rights, environmental standards, or engaging in bribery or corruption. We conduct extensive research and ongoing diligence to ensure our investments have strong governance structures and are ethically compatible with our values.

## *Training and Ongoing Review*

The Firm conducts annual training designed to equip employees with knowledge and skills to identify modern slavery related risks.

Modern slavery risk assessments are performed across the Firm’s operations and suppliers. The Firm evaluates all potential third-party vendors and conducts ongoing engagement with current suppliers to ensure modern slavery is

nonexistent within their business activities. Additionally, the Firm diligences potential business relationships to confirm they are not currently on international watch lists.

Risks identified during diligence are disclosed and accompanied by an action plan, detailing steps taken to mitigate these findings. Wafra's Modern Slavery Act statement will be reviewed annually and updated where applicable. Responsibility for the annual review of this statement has been designated to the Chief Operating Officer.