

Coller Capital

Slavery and Human Trafficking Statement, 2018

The UK Modern Slavery Act, 2015

Background

The UK Modern Slavery Act 2015 (“the Act”) requires covered commercial organisations operating in the UK to report annually on the steps they have taken during the preceding financial year to ensure that slavery and human trafficking are not taking place in their own businesses or in their supply chains.

Set forth below are a policy statement and an overview of the approach followed by the Coller Capital group of companies (“Coller Capital” or “the firm”) for the financial year ending 31st March 2018, and the further measures planned during the financial year to 31st March 2019.

Coller Capital is a specialist private equity secondaries firm with offices in London, New York and Hong Kong. The firm operates private funds that mainly acquire positions in private equity funds from limited partners, and portfolios of unquoted companies from their corporate or institutional owners.

Policy Statement

Coller Capital is committed to preventing any form of slavery or human trafficking in its business and supply chains. The specific anti-slavery and human trafficking measures adopted by the firm form part of its overarching environmental, social and governance (“ESG”) framework, which is overseen by the firm’s ESG Committee and based on a written ESG policy.

Coller Capital’s ESG policy sets out the firm’s approach to responsible investment, in line with its status as a signatory to the United Nations-supported Principles for Responsible Investment (PRI). The firm has developed an Anti-Slavery and Human Trafficking addendum to the policy to serve as guidance for its implementation efforts under the Act.

This statement and our ESG policy have been approved by our group’s board of directors.

Due Diligence and Risk Assessment

Coller Capital reviews its business and supply chains on an ongoing basis to identify the main risk areas where slavery or human trafficking could exist. This exercise is largely focused on engaging with the firm’s suppliers but also encompasses how these issues are considered during the investment process for funds sponsored by Coller Capital.

Responsible Procurement

Coller Capital has a responsible procurement philosophy and engages with its suppliers on various ESG factors. The firm has introduced into its procurement process a formal requirement that all suppliers address modern slavery risks and, in the case of UK companies, comply with their obligations under the Act. Key suppliers are issued with a formal letter about the Act in order to obtain information relating to, and confirmation that slavery and human trafficking is not taking place in, the supplier’s business. The results of this exercise continue to help inform the firm’s overall risk assessment and any further implementation steps.

When undertaking our annual risk assessment we reviewed published information sources and made use of a third-party database to identify any media criticism of our key suppliers in respect of modern slavery.

Responsible Investment

At the fund level, Collier Capital seeks appropriate ESG information on portfolio funds and, to the extent available, underlying investments. This information is integrated into the firm's analysis, review and decision-making processes, both before and after making an investment. The risk of slavery and human trafficking is one of many ESG factors considered when making investment decisions and is part of Collier Capital's annual ESG Questionnaire that we ask managers of the funds we invest in to complete on an annual basis.

Consistent with Collier Capital's role as a private equity secondaries firm, it is important to highlight that the firm's approach to ESG matters in respect of fund investments varies with the extent of control and the ability to exercise influence in each case.

Training and Awareness

Collier Capital delivers training for employees on slavery and human trafficking and the implications of the Act for the firm's business. Training and awareness materials, prepared by in-house personnel and incorporating information received from external experts, have been provided to key personnel across the firm. These materials were designed to provide employees with sufficient knowledge and understanding to identify slavery and human trafficking risk factors and highlight the steps taken and planned by the firm to address these risks.

As part of our broader engagement activities related to the issue of modern slavery and human trafficking we contributed to the development and promotion of the following during 2017-18:

- Published Guidance from the PRI on "*Managing ESG risk in the supply chains of private companies and assets*".
- Workshop on "*Human Rights Due Diligence in Private Equity Investment*" organised by the PRI and the British Institute of International and Comparative Law.

Further information relating to Collier Capital's approach to responsible investment are available at <http://www.collercapital.com/About-us/Responsible-investment.aspx>.

Peter Hutton

Director

June 2018