

# Coller Capital

## Slavery and Human Trafficking Statement, 2021

### 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.

This Slavery and Human Trafficking Statement (this “Statement”) has been produced by Coller Capital Limited (the “Company”), a private English company that is authorised and regulated by the Financial Conduct Authority in the UK and forms part of the Coller Capital group of companies (“Coller Capital” or “the firm”).

This Statement is made in accordance with section 54 of the Act and reports on the steps taken during the financial year ending 31<sup>st</sup> March 2021, and steps planned for the financial year to 31<sup>st</sup> March 2022, to ensure that slavery and human trafficking are not taking place in the business or supply chains.

### Organisational Structure and Supply Chains

Coller Capital is a specialist private equity secondaries firm with offices in London, New York, Hong Kong and Guernsey. The firm sponsors private funds (“Coller Funds”) that mainly acquire positions in third-party private equity funds from limited partners, and portfolios of unquoted companies from their corporate or institutional owners.

Coller Capital carries on business in the UK through the Company, which acts as a non-discretionary adviser in respect of the Coller Funds.

As an investor in the private equity secondaries market, our actions around slavery and human trafficking relate to:

- Ensuring slavery or human trafficking is not taking place in the Firm’s own supply chain
- Exercising our influence over managers of portfolio funds into which Coller Funds invest to encourage adoption of measures to reduce slavery and human trafficking.

The supply chain pertaining to the Company’s advisory business encompasses service providers that one would typically expect for an office-based financial services business, covering professional services, information technology, communications, building services/facilities, food, travel, office furniture, among other goods and services.

Further information on our approach to responsible investment can be viewed at <http://www.collercapital.com/About-us/Responsible-investment.aspx>.

### Organisational Policies

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 ESG policy to serve as guidance for its implementation efforts under the Act.

This Statement and our ESG Policy have been approved by the Company's board of directors.

### **Due Diligence, Assessing and Managing Risk**

Coller Capital reviews its business and supply chains regularly 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 selectively, the firm also reviews risks related to current or prospective investments by Coller Funds.

Following a risk-based approach, Coller Capital's engagement has largely focused on key suppliers. For this purpose, the firm has ranked supplier relationships based on fees or other amounts spent; in addition, an important consideration has been which suppliers operate in sectors considered to present generally heightened risks of slavery or human trafficking. Over time we have expanded the number of suppliers to be included in the assessment and for the next reporting year all suppliers will be subject to assessment and contacted.

#### *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 requirement that relevant suppliers address modern slavery risks and, in the case of suppliers subject to the Act, comply with their obligations under the Act.

On an annual basis, 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 their businesses. The results of this exercise inform the firm's overall risk assessment and any further implementation steps. For the next reporting year all suppliers will be subject to assessment and contacted.

When undertaking and documenting its annual risk assessment, the firm reviewed published information sources and made use of a third-party database to identify any media coverage of key suppliers in respect of modern slavery. This third-party database is used to monitor key suppliers on an on-going basis (watchlist) from a wider ESG perspective, including any allegations pertaining to slavery and human-trafficking risk.

A majority of suppliers examined as part of our review had modern slavery statements readily available, although there is substantial variation in depth of disclosure.

Through our third-party monitoring of our key suppliers, we became aware of incidences of slavery related allegations in our supply chain in the year. These relate to large corporate providers of either food or information technology services with exposure to complex supply chains (including in China). The allegations are well publicised, and we raised queries about their response.

#### *Responsible Investment*

As far as investments by Coller Funds are concerned, Coller Capital seeks appropriate ESG information on portfolio funds and, to the extent available and relevant, underlying investments. This information is integrated into the firm's analysis, review and decision-making processes, both before and after making an investment. The risks of slavery and human trafficking represent one of many ESG factors considered when investment recommendations or decisions are made and are also reflected in Coller

Capital's annual ESG Questionnaire that managers of portfolio funds are asked to complete on an annual basis.

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

### **Training and Awareness**

Collier Capital provides awareness training and information to employees on slavery and human trafficking and on the implications of the Act for the firm's business. Awareness-raising materials, which have been prepared by in-house personnel and incorporate information received from external experts, have been provided to key personnel across the firm.

The firm's objective in providing training and information is to provide employees with enough knowledge and understanding to identify potential slavery and human trafficking risk factors and to highlight the steps taken and planned by the firm to address these risks.

### **Advocacy and Engagement**

As a private equity secondaries firm, Collier Capital recognises the importance of "influence" in its approach to investing. This means, among other things, that the firm seeks to leverage its role as a responsible investor to raise awareness of and mitigate the risk of modern slavery in supply chains, including those relating to investments by Collier Funds.

As part of its broader engagement activities related to the issues of modern slavery and human trafficking, Collier Capital has contributed to the development and promotion of the following:

- 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.
- Issuance of thematic notes on various ESG factors (observations and practices) to managers of portfolio funds, including one on the topic of "Human Rights Due Diligence" and another on ESG and Covid-19, issued to circa 100 major managers of portfolio funds.
- Assessment of some of the largest underlying asset exposures for human rights issues (among other ESG risk indicators) in conjunction with an external third-party service provider using open source intelligence (OSINT) techniques.

During the next reporting period Collier Capital plans to take the following measures:

- At firm level:
  - Continue to enhance our engagement with suppliers and amend our risk assessment processes as appropriate.
  - Continue to raise awareness of modern slavery and human trafficking among our workforce.
  - Attend and speak at industry events to raise awareness of, and encourage shared action on, anti-slavery and human trafficking.
- At the level of Collier Funds:
  - Continue to apply existing processes when undertaking due diligence on prospective investment opportunities and to raise modern slavery and human trafficking risks with

underlying managers, both within the firm's annual ESG Survey (of underlying managers) and when analysing investment opportunities.

- Revisit the firm's "Human Rights Due Diligence" note issued to managers last year, which may be reissued in updated and amended form, if appropriate.
- Expand the use of OSINT approaches to identify slavery and human trafficking risk at the underlying asset level.

The Company is committed to continuing to take positive steps to prevent slavery and human trafficking in its business and supply chains.

### **Approval**

This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015 and is Collier Capital's slavery and human trafficking statement for the financial year ending 31<sup>st</sup> March 2021. It was approved by the Company's Board of Directors on 15th June 2021.



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Helen Lamb

COO

15<sup>th</sup> June 2021