

Modern Slavery Statement

BC Partners' Modern Slavery Act Statement

This statement is issued by the senior management of BC Partners LLP and BC Partners Advisors Holdings Limited (“**BC Partners**”) pursuant to section 54 of the Modern Slavery Act 2015 (“**MSA**”) which came into force in October 2015. Senior management have also taken into account the work of supranational bodies, such as the United Nations and International Labour Organisation (ILO) when approving this statement.

Section 54 MSA requires any commercial organisation which (i) supplies goods or services, (ii) carries on a business or part of a business in the UK, and (iii) whose annual turnover is £36m or above, to produce a statement for each financial year. This statement describes the steps that BC Partners has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains, and in any part of its own business.

For a description of BC Partners' structure and a summary of its operations, please refer to the rest of the website.

Overarching Commitment

BC Partners is committed to ensuring that there is no slavery or human trafficking taking place either in its business or its supply chains. Whilst we consider our business model of providing investment advice to be lower risk than other types of businesses, we also recognise the significance and importance of the MSA's aims and objectives. Senior Management have therefore approved the following initiatives during the financial year:

Steps Taken

Policies – BC Partners has a Modern Slavery Act Policy which is made available to all staff through its internal staff policy communication platform. The Policy sets out senior management's commitment to the MSA and provides helpful definitions to staff on the key concepts. The Policy also makes it clear that all new relationships with suppliers that pose a higher risk, must be pre-approved by the Compliance Team.

Risk Assessments – all new supplier relationships entered into during the period, were risk assessed and any relationships that were deemed to be higher risk have been actioned (see procedures below).

Procedures – all “higher risk” suppliers to BC Partners were sent a MSA questionnaire and the responses to the questionnaires were reviewed by the Compliance Team. BC Partners then worked with any suppliers that provided unsatisfactory responses, to ensure that they implemented appropriate systems and controls.

Due Diligence – the Compliance Team has carried out background checks on all higher risk suppliers, which includes law enforcement and adverse media screening.

Training- all relevant staff have been made aware of the MSA and its implications for BC Partners. In

particular, all relevant staff were reminded that any new supplier relationships must be pre-approved by Compliance before the contract is entered into and that BC Partners will not do business with any higher risk supplier that does not have adequate systems and controls in place to prevent modern slavery and human trafficking.

Contracts – clauses added to higher risk contracts on the MSA.

External Advisors – BC Partners has worked with external consultants and advisors to ensure that its systems and controls met the requirements of the MSA.

Monitoring – the independent Compliance Team will monitor the business for compliance against the Policy and notify any breaches to senior management. BC Partners has not identified any instances of or indicators of modern slavery in its supply chains in respect of the year ended 31 March 2019.

Approved by the Senior Management of BC Partners LLP for the year ended 31 March 2019 on 09 April 2019.



Graeme Dell

LLP Designated Member, BC Partners LLP
Director, BC Partners Advisors Holdings Limited

09 April 2019