

Modern Slavery Act Statement (2026)

Introduction

This Modern Slavery Act Statement ("**Statement**") is issued by the senior management of BC Partners LLP, BCPL Holdings Limited and BC Partners Advisors Holdings Limited (together, "**BC Partners**") pursuant to section 54 of the Modern Slavery Act 2015 ("**MSA**"). References to "**we**", "**us**" and "**our**" in this Statement are to BC Partners.

Section 54 of the MSA requires commercial organisations supplying goods or services, carrying on business in the United Kingdom, and with annual turnover of £36 million or more, to publish an annual modern slavery statement.

The financial year of BC Partners runs from 1 January to 31 December. This Statement describes the steps taken during the financial year ended 31 December 2025 and is published in 2026.

Founded in 1986, BC Partners is a leading alternative investment manager focused on private equity, credit and real estate, with investment activities across Europe and North America.

Our Commitment

BC Partners does not tolerate slavery, servitude, forced or compulsory labour, or human trafficking in any part of its business or supply chains.

We recognise that modern slavery is a global and complex issue that can arise across sectors and jurisdictions, including where risks are not immediately visible. While our activities are assessed as presenting a relatively lower inherent risk, we acknowledge that no organisation is entirely free from exposure.

BC Partners therefore commits to taking proportionate, risk-based and continuously improving steps to identify, assess and mitigate modern slavery risks, in line with the objectives of the Modern Slavery Act 2015 and international standards.

Our Supply Chains

BC Partners' supply chains primarily comprise professional, advisory and support services, including placement agents, professional advisers, IT service providers, and facilities management services.

We recognise that visibility beyond direct suppliers may be limited, and that risks may arise further down supply chains. We focus our efforts on areas where risks may be higher or less transparent and seek to enhance our understanding over time.

Policies and Governance

BC Partners maintains a Modern Slavery Policy forming part of its Compliance Manual. This Policy sets out our commitment, explains modern slavery risks and defines responsibilities and escalation procedures. It is reviewed periodically by the Compliance Team.

Related policies include our Anti-Corruption Policy, Oversight of Service Providers Policy, and Reporting Suspicious Activities and Concerns (Whistleblowing) Policy.

Risk Assessment and Due Diligence

All new supplier relationships are subject to risk-based onboarding due diligence, which includes assessment of modern slavery risks. Where suppliers operate in higher-risk jurisdictions or sectors, enhanced due diligence may be undertaken, including questionnaires, policy reviews and adverse media screening.

BC Partners periodically reviews its approach to risk assessment and due diligence to ensure it remains effective and proportionate. Where suppliers cannot demonstrate adequate controls, BC Partners will not enter into or continue the relationship.

Training and Awareness

Relevant staff receive training and ongoing communications regarding modern slavery risks and their responsibilities under BC Partners' policies, including the requirement for Compliance pre-approval of material suppliers.

Contracts and Supplier Expectations

Where appropriate, contractual provisions addressing modern slavery and human rights expectations are included in agreements with material or higher-risk suppliers.

Monitoring, Effectiveness and Continuous Improvement

The Compliance Team monitors compliance with this Statement and related policies. Monitoring includes review of supplier due diligence outcomes, consideration of reported concerns and assessment of legal and regulatory developments.

BC Partners views its approach to modern slavery risk management as evolving and subject to continuous improvement.

Reporting and Whistleblowing

Staff and Associates are encouraged to report concerns promptly via the Compliance Team or a confidential third-party whistleblowing hotline. Reports are handled sensitively and escalated where appropriate.

2026 Focus Areas

During 2026, BC Partners will continue to develop and enhance its approach to identifying, assessing and managing modern slavery risks. Key focus areas include:

- **Refinement of risk assessment:** continuing to review and, where appropriate, refine our supplier risk assessment and due diligence processes, with a particular focus on services, jurisdictions or labour practices that may present heightened or less visible risks.
- **Supplier engagement and awareness:** promoting greater awareness of modern slavery risks and expectations among relevant suppliers, including through due diligence engagement and contractual standards.
- **Training and internal awareness:** maintaining appropriate training and communications for staff, with a focus on reinforcing practical awareness of modern slavery risks within procurement and supplier onboarding activities.
- **Monitoring and continuous improvement:** reviewing the effectiveness of existing policies, controls and escalation processes, informed by regulatory guidance, industry developments and lessons learned, and making enhancements where appropriate.

BC Partners recognises that tackling modern slavery is an ongoing process and will continue to evolve its approach over time in line with applicable law, regulatory expectations and best practice.

Review and Approval

This Statement is reviewed annually and updated as necessary.

Approval

Approved by the senior management of BC Partners LLP and the boards of BC Partners Advisors Holdings Limited and BCPL Holdings Limited in 2026.

Christopher S. Heyworth
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Director, BC Partners Advisors Holdings Limited
Director, BCPL Holdings Limited

