

Slavery and Human Trafficking Statement ✕ Hg

1. Introduction

Hg is committed to carrying out business responsibly, which includes ensuring that slavery and human trafficking are not taking place in any part of our business or supply chain. In addition, as an investor, we recognise the importance of engaging with the companies in which we invest to encourage them to take steps to adopt responsible supply chain processes.

This statement is intended to provide details of the steps we have taken as a business during the last financial year towards ensuring that slavery and human trafficking are not taking place in our organisation, or in our supply chain.

2. Our organisation

Hg is a private equity investor focussed on the European mid-market. With close to 130 employees in two investment offices in the UK and Germany, Hg has assets under management of more than £8 billion, serving over 100 highly regarded institutional investors, including private and public pension funds, endowments, insurance companies and fund of funds. Hg is a signatory to the United Nations-supported Principles for Responsible Investment (UNPRI) and is committed to their six principles seeking to include Environment, Social and Governance (ESG) issues into our policies and practices.

As a financial services business, our supply chain is relatively short, and comprises predominantly business and professional services.

As at 30 October 2017, we have investments in 31 companies through our mid-market and small buyout funds, and in 5 project platforms through our renewable energy infrastructure fund. Although none of these forms part of our supply chain, 12 companies fall within the threshold requirements for reporting under the Modern Slavery Act in their own right.

3. Our policies

We adopted a Responsible Investment policy in 2012 (last reviewed and updated in March 2016), which includes provisions that we will not invest in a company which (amongst other things):

- has production or other activities that involve harmful or exploitative forms of forced labour or child labour; or
- is, in the opinion of Hg's Investment Committee, exploitative of vulnerable groups in society.

Regarding our own supply chain, our long-standing Guidelines for Business Conduct and Ethics, which forms part of our Staff Handbook, emphasise the need for us to act with integrity, in accordance with laws, and in a manner which strengthens the trust of our stakeholders and enhances our reputation.

4. Our due diligence processes

Although not part of our supply chain, the investments which we make have potentially greater impacts than our own business operations. Before making any investment, we carry out due diligence into all aspects of the relevant business, which includes operational risks such as those which could arise through material risks within its supply chain.

5. Our approach to assessing and managing risk

For our own operations, we conduct a regular review of our material suppliers and assess whether any particular risks of slavery or human trafficking arise. We do not consider that our key relationships with professional or business services suppliers give rise to material risks in this area. The biggest risks which we consider to arise within our business are in relation to facilities management, catering, and the supply of office electronic equipment, most of which are provided under one-off arrangements rather than an ongoing contractual relationship. We manage the risk through the use of suppliers whom we consider to be reputable, and we have specifically requested that all material regular suppliers in these areas confirm that their own business activities do not involve slavery or human trafficking.

6. Our effectiveness in combating slavery and human trafficking

Within our own business, we have identified a small number of suppliers in higher risk areas with an annual spend in excess of £50,000. We have reached out to those suppliers and conducted due diligence on their compliance with the Modern Slavery Act. All of the suppliers (bar 2) have engaged with us on this process. We will continue to monitor and engage with all our material suppliers on the steps they are taking over the next year.

For the companies which we invest in, we have taken the following steps:

- Carried out due diligence at the time of investment to be satisfied that their business operational activities did not involve forced or child labour.
- Raised awareness of the issues and the requirements of the Modern Slavery Act.
- For those which are subject to the Modern Slavery Act, set out our expectations as a shareholder that they will take steps to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in their own business or in any of their supply chains.
- For those which are not subject to the Modern Slavery Act, but which nonetheless have business operations giving rise to a potential risk of modern slavery within their supply chains, we have started engaging with them to understand how they are managing this risk and encouraging them where necessary to implement additional systems and controls.

We anticipate that over the course of the next year, we will continue to engage with the companies we have invested in on the steps which they are taking in relation to any potential modern slavery risks which they have identified within their own supply chains.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Hg's slavery and human trafficking statement for the financial year ending 31 March 2017. It has been approved by the Operating Committee on behalf of the partnership.