Policy Statement
Advent is opposed to human trafficking and slavery, is fully supportive of the principles in the MSA and is committed to operating its business respecting human rights and wider environmental and social concerns. We have a long standing Code of Ethics and Employee Handbook which outline our expectations that employees adhere to high ethical standards in all dealings and act in accordance with applicable laws and regulations.

Supply Chain Assessment
As a financial services business, our supply chain is relatively short and is comprised primarily of professional service organizations. For our own operations, we have completed a review of our supply chain to assess whether the opportunity for risks of human trafficking or slavery could be present. Utilizing a risk based approach, we have identified a small number of suppliers in potentially higher risk areas (e.g., catering, facilities management, etc.). We manage this potential risk in this category of vendors through engaging with vendors whom we consider to have high ethical standards of their own.

Application, Training and Reporting
In connection with the MSA, we seek to undertake diligence on new vendors across a range of ethics and compliance matters. We are implementing a Supplier Code of Conduct, pursuant to which our vendors are expected to comply with all applicable laws and ethical standards and to take reasonable steps to ensure that slavery and human trafficking is not present in their business operations.

We seek to ensure good governance and ethical standards through a range of policies and procedures including our Anti-Corruption policy, our Code of Conduct, our Whistle Blower Policy and our broader ESG efforts.

With respect to the specific MSA requirements, we work with our vendors regarding the consistency of these standards. We perform a periodic review of our vendor list and will, when appropriate, incorporate MSA language in vendor contracts.

To remain up-to-date on the MSA and related issues, in addition to seeking support from legal counsel, Advent has registered on the Home Office’s ‘Modern Slavery Database.

We have reviewed our current statement against the updated government guidance on MSA reporting, as well as any changes to our business model. We will continue to review this Statement annually and publish it on our website at: https://www.adventinternational.com/global-reach/united-kingdom/.

We will also post our relevant MSA statement on the Business and Human Rights Resource Centre ‘Modern Slavery Registry’ and Transparency in Supply Chains (“TISC”) ‘MSA Compliance Tracker.’

In order to raise awareness, Advent has provided and will continue to provide training as to the requirements, considerations and provisions of the MSA to those key employees who are responsible for engaging and managing vendors.

If any issues are identified in relation to the MSA, these will be reported to our Board of Directors (the “Board”) and, if necessary, to the appropriate authorities.

Approvals
Members of the Board have reviewed and approved this Modern Slavery Act Statement (the “Statement”) on behalf of Advent.

This Statement is made pursuant to section 54(1) of the MSA and constitutes Advent’s slavery and human trafficking statement for the current financial year.

Signed on behalf of Advent International Plc

James Brocklebank
Managing Partner