

Modern Slavery and Human Trafficking Statement for the year ended 31 December 2018

Introduction

This statement is made by Bridgepoint Group Limited for itself and on behalf of any other qualifying Bridgepoint corporate group companies (reference to 'Bridgepoint', 'we' or the 'Firm' are in relation to these entities) pursuant to Section 54 of the Modern Slavery Act ('MSA').

Our Organisation

Bridgepoint is an international fund management group comprising twelve offices around the world (Amsterdam, Frankfurt, Istanbul, London, Luxembourg, Madrid, New York, Paris, San Francisco, Shanghai, Stockholm and Warsaw). Our primary area of focus is private equity investing in the middle market. With over €19 billion of assets under management, we aim to deliver attractive returns to our investors by investing responsibly in well-managed companies and building stronger, broader-based businesses with greatly enhanced long-term growth potential.

We have a limited supply chain, predominantly comprising reputable international professional services firms who we expect to operate to the highest ethical standards. As such we consider there to be a low risk of modern slavery to be present in our direct supply chain. However, we acknowledge that some of our suppliers from certain sectors may be more at risk to these issues than others and therefore we continue to consider the implications of modern slavery in our day-to-day operations as appropriate.

Our policies

Our Responsible Investment Policy ("Policy") sets out the Firm's approach to the integration of environmental, social and corporate governance ("ESG") considerations into its operations and the entire investment lifecycle, from pre-investment due diligence through to ownership monitoring and exit. The policy is built on industry-specific best practice guidance and standards developed by the UN-supported Principles for Responsible Investment, an international organisation representing responsible investing activities of the financial industry.

We take our commitment to acting as a responsible investor very seriously and have developed processes and systems to address ESG and sustainability-related considerations across the Firm and to engage with our portfolio companies on such matters. As a Firm, we do not tolerate forced labour either within our business or within our supply chain and expect our supply chain (whether direct suppliers or those that directly or indirectly supply our direct suppliers), and the boards of our portfolio companies, to share the same values.

Our commitment to the consideration of modern slavery issues is detailed in our Policy and the Firm's employee handbook, 'Working at Bridgepoint', which has been issued to all employees.

Risk assessment

Bridgepoint Supply Chain

We have completed an initial mapping of our supply chain across Bridgepoint's office network as well as a preliminary desk-based risk assessment of a selection of suppliers. This assessment has predominantly focused on those suppliers where we spend more than £50,000, as well as suppliers that are from industries / regions that could be more exposed to these risks. During our assessment we made use of good practice reference materials such as the Global Slavery Index.

Bridgepoint Portfolio Companies

We recognise that risks from modern slavery extends beyond Bridgepoint's own supply chain to those of the portfolio companies we invest in. Our well-established pre-investment and post-investment ESG practices enables our Investment Teams to identify material ESG and sustainability issues, including modern slavery, where appropriate. During 2018, modern slavery issues, such as compliance with the Modern Slavery Act, were factored into a number of pre-investment ESG due diligence assessments, with input from our ESG team where appropriate.

For more detail on our approach to analysing ESG issues, please refer to our Annual Review available on our website.

Measuring effectiveness

Based on our assessment of our supply chain, we have identified some suppliers from across our office network that we intend to engage with further. This will help us to validate our initial desk-study findings and confirm what policies and processes they have in place to address modern slavery issues and to determine any relevant next steps.

Training and Awareness

Our approach to raising awareness on modern slavery issues has been predominantly undertaken by our ESG team. This has included one to one dialogue with relevant employees in our Investment, Legal and Finance teams, particularly in relation to supporting the Investment Teams scope ESG due diligence assessments.

In addition, the ESG team has been collaborating with portfolio companies to identify and discuss supply chain management good practices as part of the Firm's wider ESG monitoring and engagement programme.

In 2019 modern slavery will be integrated into Firm-wide online mandatory training for all Bridgepoint staff.

William Jackson



Managing Partner
31 May 2019