# Advent International Ltd Modern Slavery Act Statement

#### **JUNE 2022**

### ADVENT INTERNATIONAL LTD

Advent International Corporation is one of the largest and longest serving independent private equity partnerships. With offices on four continents, we have established a globally integrated team of over 265 investment professionals, focused on buyouts and growth equity investments in five core sectors. Since initiating our private equity strategy in 1989, we have invested \$64 billion in over 390 private equity investments across 41 countries, and as of 31 December 2021, managed \$88 billion in assets.

Advent International Ltd provides advice to Advent International Corporation.

This Modern Slavery Act statement (the "Statement") is published on behalf of Advent International Ltd ("Advent") in line with the corporate reporting requirements of the Modern Slavery Act 2015 ("MSA"), and applies to the financial year ending 31 December 2021. References to "we", "us", "our" or the "firm" are in relation to Advent International Ltd.

### **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. In addition to having 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 we updated our Compliance Manual to include a section on MSA.

## **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.

### **DUE DILIGENCE AND RELATED POLICIES**

In connection with the MSA, we seek to undertake diligence on new vendors across a range of ethics and compliance matters. We have implemented 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 also 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. Our Whistle Blower Policy allows employees and other third parties to raise any concerns regarding a number of issues safely and confidentially, including in relation to potential MSA issues.

With respect to the specific MSA requirements, we have implemented a supplier on-boarding due diligence questionnaire and continue to work with our vendors regarding the consistency of these standards. We also work with our portfolio companies which have U.K. operations to make sure that they are aware of the MSA requirements and, when necessary, provide resources

(e.g., additional information, sample Supplier Code of Conduct, advisor introduction, etc.) for them to help ensure they are compliant..

### **MONITORING AND REVIEW**

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 this 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/transparency-disclosure/.

In addition to, we will also post our relevant MSA statement on the Transparency in Supply Chains ("TISC") 'MSA Compliance Tracker' and UK Government MSA registry in order to help improve transparency in this area.

## TRAINING AND REPORTING

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 on behalf of Advent on 21 June 2022.

This Statement is made pursuant to section 54(1) of the MSA and constitutes Advent's slavery and human trafficking statement for the financial year ending 31 December 2021.

Last updated: 9 June 2022.

Signed on behalf of Advent International Ltd.

Jeffrey D. Paduch Managing Partner