

Park Square Capital - voluntary slavery and human trafficking statement

Introduction

Park Square Capital, LLP ("PSC" or the "Firm") is making a voluntary modern slavery and human trafficking statement relating to section 54 of the Modern Slavery Act 2015 (the "MSA"). We oppose slavery and human trafficking in all its forms and we make this statement to set out the steps being taken to monitor and address the risks of slavery and human trafficking throughout our business and supply chains. In this Statement, we use the term "modern slavery," which includes slavery, servitude and forced or compulsory labour and human trafficking, all of which constitute abuses of any person's freedoms and rights.

We are committed to ensuring that as far as we can be reasonably aware, no modern slavery takes place in any part of our business or our supply chains in line with the principles and goals advocated by the MSA and the relevant guidance. The same policies and procedures, due diligence, risk assessment and monitoring relating to modern slavery are employed across the PSC Group. This statement has been prepared for the most recent financial year, ending 31 December 2020.

PSC Organisation and Structure

We are an alternative investment management and advisory business. We employ over 90 professionals who conduct our business across the world.

We believe that the risk of modern slavery in our workforce is very low. Our workforce consists overwhelmingly of skilled professional employees and members. We maintain thorough hiring practices, given the size of our workforce we have full visibility of the employment practices across the Firm.

As outlined below, our view is that the risk of modern slavery at our suppliers and vendors is also very low. Given the nature of our business, we do not sell physical goods that require components or raw materials sourced through large supply chains.

PSC Approach

Our responsible investment practices underline our commitment to good corporate citizenship and strong governance. As part of our investment process, we assess potential investments on environmental, social, and governance ("ESG") matters, including human rights broadly and modern slavery specifically. PSC has a long-term practice of carefully considering ESG factors in its investment decisions and believes that careful attention to such factors makes sound investment sense. This statement does not discuss the compliance activities of any PSC portfolio companies, none of which are subsidiaries of PSC.

We have general policies that provide for fair treatment of staff and comply with applicable laws and set the business standards by which PSC personnel are expected to conduct business. All policies are reviewed regularly and updated to ensure they reflect legal and regulatory changes, while containing appropriate standards for all PSC staff and members.

The PSC Staff Handbook and Compliance Manuals are updated annually and summarise policies and procedures established for the benefit of the PSC team, UK entity employees, members and workers.

The PSC Compliance Manual encourages UK staff and members with any suspicion that any improper conduct which may relate to PSC or any other related UK entity or its supply chain has occurred or is occurring, to notify a manager or report it in accordance with PSC's whistleblowing policy. PSC staff are required to attest on a yearly-basis that they have read the latest version of the Staff Handbook and Compliance Manuals.

We have a grievance mechanism, including a whistleblowing policy, for personnel to report breaches of law or our policies. Third-parties also may contact us using the contact information on our website. It is important that individuals working for us and our suppliers feel comfortable and supported when reporting suspected legal breaches or violations of our policies. PSC's whistleblowing policy offers protection to personnel who report suspected wrongdoing.

Managing Breaches

PSC personnel who breach the Firm's policy towards modern slavery by failing to report known incidents or facilitating modern slavery will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate relationships with other individuals and organisations working with us, or on our behalf if they breach policies with respect to modern slavery.

Risk Assessment and Mitigation

To assess the risk of modern slavery in our business and our supply chains, we have considered the type of business activities undertaken and supply chains, including PSC's employment practices and procedures for the selection and approval of third-party vendors.

In addition, PSC reviews supply chains for areas of risk or concern, including vendors in higher risk geographies or offering higher risk types of services. These assessments are in addition to other measures we generally take as part of our corporate citizenship and good governance.

Our key vendors include professional services firms, such as legal, investment banking, accounting and other consulting firms, and providers of research and data analytics, software and information technology services. Given the nature of the services provided, our view is that the risk of modern slavery relating to these vendors is minimal.

To a lesser extent, we utilise other services such as food, cleaning and car services, and purchase off-the-shelf goods such as technology equipment, stationery, office furniture and certain merchandise branded with the PSC name, branding or logo. With respect to these services, we believe that the risk of modern slavery at these vendors is low in part due to the geographic location of the business activity. Given the limited nature of our business relationships with these vendors, we do not have the practical ability to complete detailed assessments for all of their employment practices and supply chains.

To help ensure that vendors are aware of our policies and expectations relating to modern slavery, this statement is available to our vendors on our website.

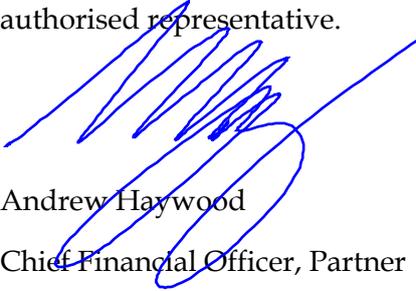
We are not aware of any incidents of modern slavery in our supply chains. If cases of non-compliance are uncovered, PSC will determine the appropriate course of action on a case-by-case basis. In cases where non-compliance cannot be resolved to PSC's satisfaction, it may terminate the arrangement with the vendor.

Ongoing Monitoring and Assessment

Members of PSC's ESG team will monitor progress of the Firm's efforts in complying with applicable laws and regulations relating to modern slavery and any issues, should they arise, will be reported to the Chief Financial Officer.

Approval

This Statement has been approved by the members of the Firm and the undersigned is an authorised representative.

A handwritten signature in blue ink, appearing to read 'Andrew Haywood', is written over the text of the signature block.

Andrew Haywood

Chief Financial Officer, Partner

Park Square Capital, LLP