

## **Slavery and Human Trafficking Statement Introduction**

Lightrock LLP (the “**LLP**”) with its affiliates (“**Lightrock**”) is a global investment platform committed to building a sustainable future. Operating across private and public markets, Lightrock funds invest in Europe, North America, Latin America, India, and Africa. Lightrock is a certified B Corp with a dedicated team of over 130 professionals working across a network of seven offices.

Lightrock is committed to implementing the PRI’s Six Principles with a view to aligning the investment activities of funds managed or advised by Lightrock to the interests of wider stakeholders. In addition, during the investment process Lightrock takes into account the ten principles of the UN Global Compact, including “the protection of internationally proclaimed human rights” (principle one), and “the elimination of all forms of forced and compulsory labour” (principle four), the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

## **UK Modern Slavery Act**

Pursuant to Part 6, Section 54 of the UK Modern Slavery Act 2015 (the “**MSA**”), any large commercial organisation which supplies goods and services and carries on a business, or part of a business, in the UK must produce an annual “slavery and human trafficking statement.”

Lightrock carries on business in the UK through the London-based LLP, which is authorised and regulated by the Financial Conduct Authority in the UK. The LLP acts as an investment advisor to investment funds and investment vehicles advised (directly or indirectly) by the LLP (the “**Lightrock Funds**”).

This statement has been prepared pursuant to the relevant section of the MSA and constitutes the LLP’s slavery and human trafficking statement for the financial year ending 31 December 2025.

Adopting the applicable international law definitions as its starting point, the LLP understands the concept of “modern slavery and human trafficking” for these purposes to comprise at least the principles espoused in Article 3 of the Palermo Protocol and Article 2 of the International Labour Organisation Forced Labour Convention 1930.

## **The LLP’s Commitment to the Principles of the MSA**

The LLP is committed to maintaining consistently high business and ethical standards with integrity and seeks to prohibit any form of modern slavery or human trafficking within its own business and supply chains.

The LLP, as a certified B-corp, is committed to acting as a responsible investor to equitably unlock human potential, sustainably improving resource efficiency and responsibly accelerating business innovation. The LLP joined the Operating Principles for Impact Management as an inaugural signatory in April 2019. The LLP’s dedicated Impact and ESG team, in conjunction with the Compliance, Legal and Investment teams, drive a robust environmental, social and governance programme that informs the LLP’s business, policies and practices, including preventing and mitigating any risks related to modern slavery as described in this statement.

## **The LLP’s actions taken to address risks of modern slavery and human trafficking**

In respect of the financial year ending 31 December 2025, the LLP has taken the following steps:

- **Supplier Review**

During the reporting period, Lightrock undertook a high-level human rights risk assessment of its supplier categories. The assessment focused on the most significant supplier categories by spend. The criteria used for assessing potential human rights risks included:

- (i) the potential severity of adverse human rights impacts associated with each supplier category; and
- (ii) the likelihood of such impacts occurring, taking into account factors such as the use of contracted or outsourced labour, and the extent to which human rights risks are commonly associated with sector and value chain.

As a provider of financial services, a large proportion of the LLP's suppliers are "low risk" professional services providers. However, should the LLP identify a reasonable cause for concern that a supplier represents a modern slavery or human trafficking risk, the LLP will either (i) request that the supplier addresses these concerns within a pre-determined time period; or (ii) discontinue the engagement, depending on nature of the issues identified. The LLP may also report any such supplier to the relevant authorities, where appropriate. To date, the LLP has not identified any cause for concern about compliance with its expectations amongst its suppliers.

- **Review of Policies and Procedures**

The LLP has adopted relevant policies and procedures, which reinforce the firm's fundamental commitment to fight modern slavery including:

- (i) The LLP's Employee Handbook clearly sets out its expectations with regards to modern slavery and human trafficking;
- (ii) Hiring Policy, which provides that recruitment of employees, is by written agreement in accordance with local employment law;
- (iii) Whistleblowing Policy for the reporting of suspicious and illegal activity;
- (iv) A Compliance Manual, which describes the standards of behaviour expected from the LLP's members and employees. All individual members and employees are required to certify that they have read and understood all of the provisions of the Compliance Manual; and
- (v) ESG Policies which outline the LLP's commitment to addressing ESG challenges in its own operations and in those of Lightrock's portfolio companies.

- **Lightrock Funds' Portfolio Companies**

The Lightrock Funds' portfolio companies fall within threshold requirements for reporting under the MSA. As these companies are not part of Lightrock's supply chain, it remains their respective responsibility to comply with the MSA, where applicable.

Lightrock continues to work with all portfolio companies, current or potential, on awareness and compliance with the MSA or equivalent local legislation, regardless of their own reporting responsibilities under the MSA or equivalent legislation.

Prior to pursuing potential investments, Lightrock undertakes extensive due diligence on all targets, which extends to a review of operational risks which may arise in a business and its supply chain. In line with Lightrock's commitment to investing responsibly, this due diligence process additionally includes an Environmental, Social and Governance assessment which specifically seeks to understand the risk of modern slavery and human trafficking within the target business and its supply chain. Following the investment, Lightrock works with each new portfolio company to promote the respect of human rights across their operations and supply chains.

- **Raising Internal Awareness**

The LLP continues to raise awareness and educate its members and employees in relation to the MSA's implications across its business.

The LLP is committed to continuing to take positive steps pursuant to its aim of prohibiting any form of slavery within its own business and supply chains.

The above statement is made pursuant to section 54 of the MSA and constitutes the LLP's slavery and human trafficking statement for the financial year ended 31 December 2025.

**Kevin Bone**

**Designated Member  
Lightrock LLP**

**15 June 2026**