

UK Modern Slavery and Human Trafficking Act – Annual Transparency Statement 2025

Introduction

This statement on modern slavery and human trafficking highlights the steps taken by Siguler Guff & Company, LP (“Siguler Guff” or the “Firm”), including all of its affiliates operating within the United Kingdom, during the 2024 fiscal year ended 31 December 2024 in connection with the prevention of slavery and human trafficking in its operations and supply chains.

Siguler Guff acknowledges the importance of compliance with the UK Modern Slavery Act 2015 (“UK MSA”) and takes its commitment to understanding and preventing modern slavery very seriously.

Pursuant to section 54 of the UK MSA, Siguler Guff is committed to upholding high ethical standards and responsible business practices in all aspects of the Firm’s investment activities and has, through all reasonable means, attempted to ensure that there is no modern slavery or human trafficking in Siguler Guff or its related supply chains. Siguler Guff is also committed to respecting the human rights of our employees through our internal employment policies and procedures and to respecting local laws and regulations dealing with human rights.

Firm Structure, Business and Supply Chains

Siguler Guff has offices and business interests globally in New York, Boston, Hong Kong, London, Mumbai, São Paulo, Tokyo, Seoul, Shanghai, Houston, West Palm Beach, FL, and provides services to over 800 institutional clients, including corporate and public employee benefit plans, endowments, foundations, government agencies, sovereign wealth funds, financial institutions, family office and high net worth individuals. The Firm is a global multi-strategy private markets investment firm with its core strategies including small buyout, small business credit, opportunistic credit, real estate, and emerging markets. The Firm conducts its UK business through its UK affiliate, Siguler Guff UK LLP (“SG UK”), which is authorised and regulated by the Financial Conduct Authority (“FCA”) (FRN: 471987) and is a subsidiary of Siguler Guff Europe Ltd, which is also established in the UK.

Siguler Guff is committed to holding ourselves and our suppliers to high standards of business conduct, integrity and free from any slavery and human trafficking. The Firm upholds this by carrying out appropriate due diligence on suppliers and ensuring there is clear communications of Siguler Guff policy, which is described in more detail below. Due to the nature of our business and operations in the UK, which is limited to private fund management, the Firm is at low risk of exposure to these issues, and our supply chain remains to be not complex.

Policies in relation to Modern Slavery

As part of our broad effort to integrate consideration for human rights into the Firm, Siguler Guff has various policies and procedures designed to prevent our products and services from being used for improper purposes.

To achieve this, Siguler Guff adopts a responsible investing culture highlighted by an investment discipline that integrates responsible investing factors into the investment process, including

sourcing, due diligence, negotiation of terms and conditions, monitoring of fund compliance and remedial action, if and when required. Siguler Guff defines responsible investing issues to include:

- (i) credible allegations or findings (including allegations or findings by regulatory or law enforcement agencies, allegations contained in news accounts and allegations reported by whistleblowers) that a fund investment or a portfolio company in which one of the Firm's funds has invested has materially violated any law or regulation relating to: protection of the environment; worker safety; fair wages and working conditions; collective bargaining; unlawful discrimination; child or forced labor; bribery or corruption; or product or drug safety, or
- (ii) any of the aforementioned allegations or findings regarding a company that is a material link in the supply chain of the Firm and with which the Firm has a direct supply chain relationship.

The Firm maintains and monitors policies and procedures pertaining to anti-bribery and corruption, anti-money laundering ("AML"), and know your customer ("KYC") due diligence for clients and all business relationships Siguler Guff enter in to. For example, as part of its due diligence process, the Firm checks for portfolio companies whose financial activity may show involvement in human trafficking and communicates actionable information directly to relevant law enforcement. In addition, the Firm's business principles and Code of Ethics communicate the Firm's expectations that business must be conducted ethically and in compliance with the law. These policies and procedures mentioned were reviewed and updated during 2024.

Siguler Guff treats malpractice or impropriety very seriously. As part of our corporate culture, it is important that employees, external contractors, and third parties are encouraged and feel supported in speaking up about their concerns and the Firm aims to provide a culture where everyone feels confident to do so. Siguler Guff maintains a Whistleblowing Policy for all jurisdictions in which it operates to allow employees, contractors or third parties to raise any concerns confidentially.

As part of its governance, Siguler Guff maintains a Responsible Investment policy and has a Responsible Investment Committee (the "Committee") comprised of key professionals across the Firm's investment, marketing, investor relations, and legal/compliance teams. The Committee reviews the Firm's Responsible Investment policies and discusses the management of any issues identified, including those related to environment, social, and governance items. The Committee reports material items or issues for additional review or consideration to Siguler Guff's Management Committee.

Risk Assessment and Due Diligence

Siguler Guff incorporates responsible investing considerations into its investment activities and seeks to capture the value and mitigate the risks related to these facts. Siguler Guff is proud to be a signatory to the United Nations Principles for Responsible Investment ("UNPRI") and regards

UNPRI as a key framework for implementing responsible investment considerations into its investment due diligence process.

The Firm follows due diligence procedures to assess human rights, ethical and environmental risks when sourcing external suppliers. Our contractual arrangements with our main suppliers are reviewed to ensure they continue to have sufficient procedures in place against slavery and human trafficking in their business operations or own supply chain. The due diligence process includes verifying that they have sufficient policies and procedures in place to ensure fair treatment and pay for employees, adequate whistleblowing procedures and confirming that all those employed in the provision of services have the necessary documentation to legally work in the UK. If we become aware of any allegations of modern slavery or human trafficking activities against any of our suppliers, we will take appropriate action depending on the nature of the incident. This may include engaging with the supplier to ensure they investigate the issue, accessing victim support to protect any modern slavery victims and reporting it to the authorities where appropriate.

Training on modern slavery and trafficking

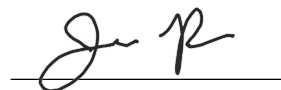
Where relevant to their line of business and function, employees receive training on policies and procedures that pertain to the products and services we provide to our clients. This includes training on the ethical principles in our Code of Ethics as well as the Firm's Anti-Bribery and Corruption, AML and KYC policies and practices. All newly hired employees are assigned Code of Ethics training and current employees are assigned training on an ongoing basis. Employees are periodically required to affirm their compliance with the Code of Ethics. Siguler Guff is committed to ensuring its employees understand and are aware of their responsibilities in relation to modern slavery. The relevant employees received their annual compliance training on these topics in December 2024.

Siguler Guff will continue to comply with the requirements of the UK MSA and uphold its commitment to enforcing a robust policy designed to prevent violations involving slavery and human trafficking.

For additional information please contact the Siguler Guff Compliance team at legal@sigulerguff.com.

This statement has been approved by the Firm's senior management and will be reviewed and updated on at least an annual basis.

Signed by

A handwritten signature in dark ink, appearing to read 'J. Posner', is written over a horizontal line.

Joshua Posner

Director, Siguler Guff Europe Ltd.

June 10, 2025