

## GRAPHITE CAPITAL MANAGEMENT LLP

# MODERN SLAVERY STATEMENT

January 2023

## Introduction

This Modern Slavery Statement sets out Graphite's actions to understand all potential modern slavery risks related to our business operations and processes and outlines the steps the Firm has put in place to ensure that no slavery or human trafficking exists, within our own business, supply chain or portfolio companies.

This statement relates to actions and operations undertaken during 2022 and will be updated annually.

## Managing Partner Statement

"The existence of modern slavery is abhorrent and against everything we value at Graphite. We will do everything in our power to ensure it does not exist in any part of our business, our portfolio, or our supply chain." *Markus Golser and Andy Gray*

## Definitions

**'Modern Slavery'** - the exploitation of other people for personal or commercial gain including the trafficking of people, forced labour, servitude, and slavery.

**'Child'** - children under 18 years of age are considered victims of trafficking whether or not they have been coerced, deceived or paid to secure their compliance. They need only have been recruited, transported, received, or harboured for the purpose of exploitation.

**'Human Trafficking'** - the movement of people by force, threat, deception, or exploitation, into or through a country.

## Our approach

We take a zero-tolerance approach to all human rights abuses, including modern slavery and human trafficking.

Human Rights are the basic rights and freedoms of all human beings to live and work independently and without discrimination, regardless of gender, age, nationality, ethnicity, religion, sexuality, colour, caste, neurodiversity, or disability.

## Our due diligence

We are headquartered in the UK but have operations in other countries via our investment portfolio.

We undertake the following due-diligence processes in order to determine whether or not our activities or countries of operation may be considered of high risk in relation to modern slavery or human trafficking:

- Risk assessment of both the geopolitical and economic situation of the country or regions the Firm operates in.
- Risk assessment of any current suppliers and partners, and application of our Supplier Code of Conduct.
- Due diligence of the operations of our portfolio companies, using third parties where relevant.
- Reporting procedures.

## Identification of high-risk activities

- None identified in year

## Training

All employees are made aware of this Statement and given guidance on how to recognise and raise the alert regarding modern slavery and human trafficking risks.

External help is also available via the [Modern Slavery Helpline](#).

## Our Policies

**Whistleblowing policy** - encourages our employees to report any concerns relating to our operations.

**Employee Code of Conduct** - makes clear to our employees the actions and behaviour expected of them while representing our business.

**Supplier Code of Conduct** - makes clear to our suppliers the actions and behaviour expected of them while trading with our business.

**Human Rights policy** - sets out our commitment to honouring human rights within our own operations, supply chain, partnerships and investments.

The above-mentioned policies are held internally and reviewed annually.

## Approval

This statement made pursuant to section 54(1) of the Modern Slavery Act 2015 for the year ending 2022 has been approved by the managing partners of Graphite Capital.

Markus Golser and Andy Gray  
January 2023