



**Modern Slavery Act Statement**

**August 2025**

## 1. Introduction

Oakley Capital Limited (“Oakley”, “we”). Oakley is committed to acting ethically and with integrity in all of its dealings and relationships and to implementing and enforcing effective systems and controls to combat modern slavery and human trafficking, to the extent that they may impact our business and/or supply chain. As a private equity firm, we recognise the importance of working with the companies whose services we engage, as well as those we invest in, to encourage and support them to adopt responsible supply chain processes.

This statement has been prepared pursuant to Part 6, Section 54 of the UK Modern Slavery Act 2015 (“MSA”) and constitutes Oakley’s slavery and human trafficking statement for the financial year ending 31 December 2024.

## 2. Our organisation & policies

Oakley is a mid-market European private equity firm with more than 220 employees across offices in the United Kingdom, Luxembourg, Madrid, Munich and Milan. With funds under management of over €15bn, Oakley invests in a diverse range of industries primarily across Europe in the four core sectors of technology, consumer, education and business services. Oakley is authorised and regulated in the UK by the Financial Conduct Authority.

Oakley is committed to acting as a responsible investor and has been a signatory of the UN-supported Principles for Responsible Investment (“PRI”) since 2016. Oakley’s Sustainability team, in conjunction with the Compliance, Legal and Investment teams, drive a robust programme that informs our business, policies and practices which in turn supports our modern slavery programme and this statement. Oakley has a number of policies in place to mitigate the risk of modern slavery and human trafficking within its own supply chain and portfolio companies. These policies are reviewed and updated annually and are available to all Oakley employees. Oakley has an approved Modern Slavery Policy which sets out the minimum standards for the business and directly supports this and subsequent statements. Oakley’s suite of policies including the Compliance Manual, Whistleblowing Policy and Code of Ethics underpin our business principles of acting responsibly and with integrity, amongst colleagues and with our partners. These include but are not limited to those relating to equal opportunity, anti-discrimination and harassment, grievance mechanisms and whistleblowing.

## 3. Due diligence & managing risk

As a financial services business, our supply chain is short and comprises primarily of business services, including professional advisors, but also contracted employees who provide services including the provision of office supplies, facilities maintenance, catering and cleaning.

We have reviewed our main suppliers to identify significant risks of modern slavery or human trafficking within our operations. We do not consider that our contractual arrangements with suppliers who provide Oakley with professional advice give rise to material risks. The main risks therefore relate to contractors who provide operational services such as facilities management.

We manage these risks by using suppliers who we consider to be reputable, who have undertaken their own modern slavery assessment and who have demonstrated their commitment to the MSA. Oakley includes reference to our expectations related to the MSA within material supplier contracts and engagement letters, and within material supplier due diligence processes.

## 4. Oakley funds' portfolio companies

Oakley funds’ portfolio companies that fall within the MSA requirements, while these companies are not part of Oakley’s supply chain, endeavour to remain compliant with the MSA.

Oakley continues to work with our portfolio companies on awareness and compliance with the MSA or equivalent local legislation..

Prior to pursuing potential investments, Oakley 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 Oakley's commitment to investing responsibly, this due diligence process additionally includes a sustainability assessment, which specifically seeks to understand the risk of modern slavery and human trafficking within the target business and its supply chain, where material. Following an acquisition, Oakley works with new portfolio companies to identify and develop policies that support responsible supply chains.

#### 5. Training and awareness

Oakley delivers annual modern slavery and human trafficking training to all employees. The purpose of this training is to ensure an embedded awareness of modern slavery and human trafficking across the business, to encourage employees to identify and highlight any potential instances of or risks related to modern slavery and/or human trafficking, and to understand steps taken by Oakley to manage and minimise such risks. The contents of the employee training and modern slavery policy are reviewed annually by Oakley to ensure they remain up to date.

#### 6. Ongoing steps

We recognise that monitoring the risks associated with modern slavery and human trafficking requires constant commitment and vigilance. We continue to identify opportunities to further reduce the risk of human trafficking and modern slavery, increase transparency in Oakley's operations and supply chains and respond effectively to new risks as they are identified. This statement will be reviewed in line with MSA requirements to assess material changes to our modern slavery risk profile, and updates to our supply chain or portfolio companies that may necessitate updates to this statement or our policy.

#### 7. Oversight & implementation responsibilities

Oakley's approach to the MSA has been developed with input from all operational areas in our business, including sustainability, risk and compliance, finance, human resources and legal.

This Modern Slavery Statement was approved by the Oakley Capital Limited board in August 2025.