

## Modern Slavery Act Statement

### Introduction

Actis is committed to promoting world-class standards in health and safety, environmental protection, social issues and business integrity (including sound corporate governance and transparent accounting). This includes taking all reasonable steps to eliminate the risk of slavery and human trafficking in any part of our business or primary supply chain.

Modern slavery generally encompasses slavery, servitude, forced and compulsory labour and human trafficking. Traffickers and slave drivers coerce, deceive and force individuals against their will into a life of abuse, servitude and inhumane treatment.

This statement is issued on behalf of Actis LLP, Actis GP LLP and their UK incorporated subsidiaries (together "**Actis**") pursuant to Section 54 of the UK Modern Slavery Act 2015 (the "**Act**") in respect of the financial year ending on 31 December 2016. Actis LLP and Actis GP LLP are regulated by the UK Financial Conduct Authority.

### Our business

Actis is a global platform and a leading investor in growth markets across Africa, Asia and Latin America and focuses on investments within the consumer, energy/infrastructure, financial services, healthcare, industrials and real estate sectors. We invest with an exclusive focus on intra-growth market investing (our 'south-south' approach): sharing knowledge and experience across regions and businesses to help deliver consistent competitive returns, responsibly. Founded in 2004, we have an unparalleled heritage in growth markets, set within a culture of active ownership. We have raised USD\$12bn since inception and we operate through 13 offices globally.

### Our responsible investment approach

Investing responsibly is particularly important in the markets where we invest. We aim to ensure that civic society, our investors, our employees and the wider community all benefit from our investment activities as we work to build successful sustainable businesses.

Actis has been a signatory to the UN-supported Principles for Responsible Investment (PRI) since 2009, and has reported publicly to the PRI since 2010. In 2015, PRI launched a Reporting and Assessment process to measure signatories' ESG activities and reporting frameworks, for which Actis achieved an A rating.

Our responsible investment (RI) approach means that across all sectors we actively seek opportunities to create long-term, sustainable value and we integrate an assessment of Environmental, Social and Governance (ESG) standards into our investment decision making (see the following link: [Actis Environmental, Social and Governance Code](#)). This approach means that:

- before making an investment our due diligence review will consider the operational risks of the relevant business (which will include an assessment of supply chain risk); and
- post investment, we seek to apply international ESG standards across our portfolio, regardless of the local regulatory environment.

As part of this approach we also recognise the importance of engaging with our business partners to encourage them to adopt such standards and we expect them to understand and share our commitment

to integrating the management of those standards and practices into their business processes. This includes responsible supply chain management processes.

We maintain a full-time in-house team of ESG professionals to support the development and implementation of our policies and best practice.

### Our Social issues policy

The objectives of our Social issues policy are:

- to treat all Actis employees fairly and to respect their dignity, well-being and diversity;
- to require the businesses in which Actis invests to treat all of their employees and contractors fairly, and to respect their dignity, well-being and diversity;
- to be objective, consistent and fair with all Actis stakeholders;
- to work towards full compliance of Actis investments with the International Labour Organisation Fundamental Conventions, the UN Declaration of Human Rights and IFC Performance Standard 2: Labour and Working Conditions; and
- to comply with the UK Modern Slavery Act 2015.

In addition, our policy is that Actis aims only to invest in businesses which:

- do not employ forced labour of any kind, either directly or via their primary supply chain; and
- do not allow children to form part of their workforce, either directly or via their primary supply chain.

### Modern Slavery Act

Actis does not support and is not aware of any dealings with any business which is involved in modern slavery and we will not knowingly work with any party who we suspect is connected with any such conduct or behaviour. Nonetheless we recognise the heightened risk of becoming involved with modern slavery in some of the countries where Actis has a presence and where we invest, primarily where we engage with contractors or third party service providers.

In the event that we became aware of a heightened risk of modern slavery with respect to our own operations or any investment in our portfolio, then we would require the development of a clearly articulated action plan as to how that risk is addressed and eliminated. In all such scenarios our objective would be to have a zero tolerance of any form of modern slavery.

### Our supply chain

A supply chain is a system of organisations, people and activities to bring a product or service from inception to the sale and delivery of such product or service to the end user.

As a manager of alternative investment Funds, Actis' supply chain is relatively short, and is comprised of predominantly professional and business service providers. As the relationship between (i) a fund (and its manager) and (ii) a portfolio company is one of investor to investee, and not a relationship based on the supply of goods or services, our investment portfolio does not form part of our supply chain. Similarly our

non UK offices fall outside ambit of the Act. However our responsible investment approach means that we are equally committed to address the risk of modern slavery and to eliminate its existence, regardless of whether it arises in our own operations or in our investments (and regardless of geography).

### Our own operations

We reviewed the contractors and third party service providers ("**suppliers**") that we used in 2016 for our own operations and made a risk assessment as to whether they were likely to be affected by modern slavery. This included considering the type of business in question and the location from which the relevant service was provided. Certain checks and follow up actions were agreed as part of this review.

Generally we manage the risk of such suppliers having an involvement with modern slavery through a number of mitigating controls including:

- general due diligence and referencing of the relevant parties prior to their engagement;
- a risk assessment of suppliers to determine whether specific and bespoke due diligence measures are appropriate (e.g. site visits or agreeing with certain suppliers what mitigating steps are required);
- the provision of a clear statement as to what we expect with respect to any connection with modern slavery (and our zero tolerance approach);
- ongoing monitoring of any material change in the risk associated with a particular supplier; and
- the use of counter parties who we believe to be reputable.

### Our investments

As part of our existing responsible investment approach, we undertake ESG due diligence at the time of investment. Alongside many other ESG risks, the risk of slavery and human trafficking is assessed and, if necessary, detailed due diligence would be undertaken to ensure that the company's operations do not involve these activities.

For each of our investments, we request that management sign up to an ESG undertaking as part of the shareholders agreement. Whilst this has always referred to fair treatment of employees with respect to remuneration and conditions of employment, in the future it will be enhanced to include a reference to ensuring that modern slavery is not taking place within the business and its operations, including its primary supply chain.

For those companies whose operations may give rise to a potential risk of modern slavery in their supply chains, our Responsible Investing and deal teams work closely with management to strengthen and improve systems and controls to mitigate this risk. This would include, for example, ensuring that a robust Responsible Sourcing policy and programme is in place.

### Our policies

We have always had a zero tolerance approach to modern slavery across our business. In light of the heightened interest in modern slavery issues as a result of the implementation of the Act, we have updated our Social issues policy to make more specific reference to supply chain risk.

Actis' Social issues policy and its other policies in relation to Health and Safety, the Environment and Business Integrity are accessible via the following link: [Actis Environmental, Social and Governance Code](#)

Effectiveness and training

During 2017 we will continue to monitor our supply chain and our portfolio with a view to identifying and managing any heightened risk of modern slavery.

We will also keep under review what ongoing training is appropriate for our staff, particularly those who manage key supplier relationships and those deal team members who are involved in the management of higher risk investments.

Actis maintains a dedicated whistleblower facility which may be used by anyone who has questions or concerns relating to the conduct of Actis, its people or its companies. This facility provides access to our Responsible Investing team via [RI@act.is](mailto:RI@act.is) and may be used by anyone who has concerns with respect to Actis' supply chain or its investments.

Approval

This statement was approved by the members of Actis LLP and Actis GP LLP on 6<sup>th</sup> June 2017.



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Senior Partner



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Andrew Newington  
Chief Operating Officer



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Paul Owers  
Designated member

Date: 6<sup>th</sup> June 2017