

TOWERBROOK

**Modern
Slavery
Act
Disclosure
FY 2025**

Introduction

The UK Modern Slavery Act came into force in October 2015 and introduced a requirement for covered commercial organizations operating in the United Kingdom to publish a statement setting out the steps they have taken during the preceding financial year to ensure that slavery and human trafficking are not taking place in their own businesses or in any of their supply chains.

This statement constitutes the slavery and human trafficking statement for TowerBrook Capital Partners for the financial year ending 31 December 2025 (FY 2025).

About TowerBrook

TowerBrook carries out business in the UK through its UK-based affiliate, TowerBrook Capital Partners (U.K.) LLP, which acts as a sub-advisor to affiliated funds under management in relation to investments in the UK and Europe. TowerBrook Capital Partners (U.K.) LLP is authorized and regulated by the UK Financial Conduct Authority, and has its principal place of business in London.

Policy Statement

TowerBrook has a zero-tolerance approach to slavery and human trafficking in all forms and is committed to using best efforts to ensure that slavery and human trafficking are not taking place in any part of its business or supply chains.

We expect every member of the TowerBrook team to exemplify the highest standards of ethical conduct and to act with regard for the well-being, health and safety of others. We encourage and support practices at TowerBrook to ensure an engaged, healthy, safe and productive workforce. We remain committed to complying with applicable national and local labor laws, including those relating to slavery and human trafficking, as well as workplace health and safety laws.

We support a diverse and inclusive workforce that promotes respect, integrity and teamwork, and encourages new ideas and perspectives. We aim to encourage diversity in, and the development of, our people through recruitment and retention programs as well as through training and mentoring. We expect our partners, employees and other stakeholders to treat others fairly and without prejudice to race, color, ethnic or national origin, gender (including pregnancy, childbirth, or related medical conditions), gender identity, gender expression, sexual orientation, socioeconomic status, age, religion, immigration status, status as a protected veteran, health status, status as an individual with a disability, or other applicable legally protected characteristics.

We have implemented anti-slavery policies, anti-harassment policies, equal opportunity employment policies and complaints procedures, and we encourage our portfolio companies to do the same. TowerBrook maintains a hotline for employees to raise concerns without fear of retaliation, including concerns relating to modern slavery and human trafficking. Any such

reports would then be thoroughly investigated in accordance with TowerBrook's policies and procedures.

Portfolio Companies

Although our portfolio company investments do not form part of our supply chain, we operate a responsible ownership policy which requires that environmental, social and governance issues be taken into account in our investment process and ongoing ownership. We respect the human rights of those affected by our investment activities and seek to ensure that our investments do not support companies that use child or forced labor or maintain discriminatory practices. We encourage our portfolio companies to ensure their key suppliers have policies that demonstrate a commitment to respect human rights. We encourage and support practices at our portfolio companies to ensure a healthy, safe and productive workforce and expect our portfolio companies to comply with applicable national and local laws, including those relating to slavery and human trafficking, as well as workplace health and safety laws.

We ensure that the Boards and management teams of our controlled portfolio companies are familiar with our Responsible Ownership Statement. At acquisition, we use reasonable efforts to diligence the anti-slavery/anti-trafficking and supply chain policies and procedures of target companies. The 200-day Plan that we develop for each prospective controlled portfolio company includes a relevant Responsible Ownership Policy, together with procedures to implement the policy and monitor its effectiveness. The 200-day Plan may include steps to implement or enhance anti-slavery/anti-trafficking or supply chain policies and procedures, as appropriate. In cases where TowerBrook is a minority investor, we will make reasonable efforts to encourage consideration of relevant Responsible Ownership-related principles by the investee company, including around anti-slavery/anti-trafficking and supply chain considerations. We also encourage portfolio companies to assess critical vendors (including, without limitation, banks, administrators and lenders) to understand any exposure to any potential supply chain risk, where material. Because of our commitment to this important issue and the limited nature of our supply chain given the nature of our business, we consider the risk of slavery or human trafficking occurring in our business or supply chain to be low.

Since 2017 TowerBrook has surveyed all our controlled portfolio companies and, where possible, our minority investee companies, on KPIs across people, planet and partnership, which include business ethical policies. Our FY 2025 responsible ownership survey included specific questions on whether a company has (i) a human rights policy, (ii) a due diligence process in place to identify, prevent, mitigate and address adverse human rights impacts, (iii) an anti-human trafficking policy, (iv) a published modern slavery statement, (v) a sanctions policy, (vi) a Supplier Code of Conduct, (vii) grievance/complaints handling mechanisms and (viii) detail on any formal grievances or formal complaints. TowerBrook reports publicly on the percentage of our portfolio companies that have implemented a human rights policy and that have implemented an anti-human trafficking policy, and we intend to continue to do so on an annual basis going forward.

TowerBrook's full Responsible Ownership Statement is available at <https://www.towerbrook.com/responsible-ownership/>

TowerBrook's Responsible Ownership Report 2025 is available at https://www.towerbrook.com/TowerBrook_Responsible_Ownership-2025-Online.pdf

Training

TowerBrook is committed to delivering training for all our personnel on anti-slavery and human trafficking, and the implications of the Act for our business. The training is designed to provide personnel with the knowledge to identify the risk factors around slavery and human trafficking. TowerBrook expects that this training will be provided on a periodic basis by various means, including by in-house personnel, external experts and via online training modules.

- Beginning in 2019, we required that all TowerBrook personnel firm-wide complete training on Modern Slavery on an annual basis. The purpose of this training is to create awareness for both TowerBrook senior leadership and employees around the concept of modern slavery and its potential impacts on organizations. The course introduces the countries, industries and types of workplaces where modern slavery risks are known to be high, as well as the legislation intended to protect individuals. In 2025 TowerBrook required all personnel to complete an online course on Modern Slavery or attend a live in-person training on this topic with legal counsel, and will require the same again during 2026. The Modern Slavery online course is also required to be completed by all new joiners within 30 days of joining the firm.
- We provide training to our Senior Advisors and Operating Advisors on modern slavery risks upon joining, and periodically thereafter. TowerBrook will require that all Senior Advisors and Operating Advisors complete an online course on Modern Slavery during 2026.
- We also provide training periodically to senior management of our controlled portfolio companies on modern slavery, human rights and supply chain risks, with at least one member of senior management from each such portfolio company to attend. In 2024 we held a live training session for our controlled portfolio companies provided by Kirkland & Ellis that addressed modern slavery, human rights and supply chain risks. We expect to provide a similar training for our controlled portfolio companies in 2026.

Supply Chain and Supplier Contracts

We request additional representations in engagement letters to be entered into with new key suppliers, advisors, consultants and other counterparties regarding compliance with applicable anti-slavery and human trafficking laws, statutes and regulations. We also conduct checks on key suppliers, advisors, consultants and other counterparties to confirm if any such person has

been named on any international watch or sanctions list. Sanctions checks are conducted prior to payments being made or received, and names are screened on a continuous basis thereafter. We will assess our business, policies and supply chain each financial year going forward.

Risk Assessment

TowerBrook assesses modern slavery and human trafficking risk across two dimensions: its own operations and supply chain, and the operations and supply chains of its portfolio companies. At the firm level, TowerBrook's corporate supply chain consists primarily of professional services, technology, and facilities management providers. While these categories are generally considered lower risk for modern slavery, TowerBrook recognizes that risk can exist in any supply chain and applies a proportionate assessment approach. Key suppliers are identified and assessed with reference to sector risk, geographic risk (including country-level indicators such as the Global Slavery Index), and the nature of the labor involved in delivering the service. At the portfolio company level, TowerBrook assesses modern slavery risk as part of its pre-acquisition due diligence and ongoing Responsible Ownership program, as material. During due diligence, TowerBrook considers the target company's sector, geographic footprint, supply chain structure, and workforce composition to identify areas of elevated risk. Sectors involving manual labor, outsourced or subcontracted workforces, long or opaque supply chains, or operations in jurisdictions with weaker labor protections would receive enhanced scrutiny. Where issues are identified, TowerBrook works with portfolio company management teams post-acquisition to ensure that modern slavery risk is integrated into the company's broader risk management framework and that proportionate controls are in place. TowerBrook reviews its risk assessment periodically and updates it to reflect changes in portfolio composition, regulatory guidance, and emerging risk indicators.

Remediation and Reporting

If modern slavery or human trafficking were identified in TowerBrook's operations or supply chain, or in the operations or supply chain of a portfolio company, TowerBrook would take immediate steps to address the situation. This would include: engaging with the affected entity to understand the nature and scope of the issue; cooperating fully with law enforcement and relevant authorities; supporting access to appropriate remedy for affected individuals, which may include compensation, rehabilitation, or other forms of redress as appropriate; and reviewing internal controls to prevent recurrence.

TowerBrook encourages the reporting of concerns relating to modern slavery or human trafficking. TowerBrook maintains an anonymous hotline through Safecall for stakeholders to raise concerns of non-compliance without fear of retaliation, including concerns relating to modern slavery and human trafficking. Any such reports would then be thoroughly investigated in accordance with TowerBrook's policies and procedures. A report to Safecall may be made by

telephone (+1-866-901-3295 / +44 (0)800 915 1571), through the internet (www.safecall.co.uk/report) or by e-mail (towerbrook@safecall.co.uk).

Ongoing Review

We review our policies that touch upon slavery and human trafficking on a periodic basis, and have enhanced our policies in these areas, including our whistleblowing policy. We ensure that such policies are discussed with and approved by the board of TowerBrook Capital Partners (U.K.) LLP on at least an annual basis.

Approval

This statement has been approved by the Board of Directors of TowerBrook Capital Partners Limited, the Managing Member of TowerBrook Capital Partners (U.K.) LLP, and is signed by:



Karim Saddi, Director, Co-CEO
and Managing Partner



Jonathan Bilzin, Director, Co-CEO
and Managing Partner