

UK Modern Slavery Act Statement 2024-2025

Introduction

Lexington does not tolerate any form of modern slavery and our Firm is committed to preventing modern slavery and human trafficking in our business and supply chains. Lexington firmly believes that a commitment to strong environment, social and governance (“ESG”) and stewardship policies and practices can create lasting value for our limited partners, enhance long-term investment performance, and support alignment with Lexington’s Principles for Responsible Investment (“PRI”) signatory commitment while promoting ESG principles in our industry and society. Readers should also refer to our ESG and Stewardship Policy and the Responsible Investment Annual Report published on our website.

Section 54 of the UK Modern Slavery Act 2015 (“MSA”) requires commercial organisations in the UK which have an annual turnover of greater than £36 million to publish a statement setting out the steps they have taken during the financial year to ensure that modern slavery is not occurring in their own business or their supply chains.

This MSA statement applies only to Lexington Partners UK LLP (“LPUK LLP”). The financial year ended 30 September 2024 was the first time that LPUK LLP met the turnover threshold in the MSA. In future years, we intend to develop and enhance this MSA statement.

Overview of Lexington Partners UK LLP and the global Lexington organisation

LPUK LLP is authorised and regulated by the UK Financial Conduct Authority. LPUK LLP acts primarily as an investment advisor for the private equity investment funds (the “Funds”) managed by Lexington Partners L.P., a U.S.-based subsidiary of Franklin Templeton, which is a global investment management organisation incorporated in the USA. More specifically, LPUK LLP has been appointed by Lexington Partners L.P. as sub-advisor to advise the latter as to the investment and re-investment of the assets of each of the Funds and to arrange investment transactions to be entered into by, or on behalf of, any of the Funds in accordance with the investment objectives of the Funds. LPUK LLP does not have any subsidiaries.

Lexington is a global firm with nine offices strategically located in major centres for private equity and alternative investing – New York, Abu Dhabi, Boston, Menlo Park, Miami, London, Hong Kong, Santiago and Luxembourg. Lexington stands as one of the world’s largest and most sought-after managers of secondary and co-investment private equity funds. In 1990, Lexington helped pioneer the development of the institutional secondary market, and in 1998, created one of the first discretionary co-investment programs. Lexington’s founding principles are: leadership in our core strategies, a consistent, time-tested market approach, and an unwavering dedication to devising new solutions that uphold the time-honed standards defining our legacy of excellence.

Risk mitigation

Below is an outline of some of the key steps that LPUK LLP is taking to identify, assess, mitigate and manage the risk of modern slavery in its business and supply chains.

Supply chain

As a private equity investment advisor based in the UK, LPUK LLP's supply chains are relatively short and primarily consist of professional and business services firms (such as technology suppliers, data and analytics providers, advisory consultancies, travel agencies, accounting firms and law firms) and suppliers of office essentials (such as maintenance, cleaning and catering services). LPUK LLP therefore believes there is a low overall risk of modern slavery or human trafficking in connection with its business and supply chains. Nevertheless, LPUK LLP is considering the implementation of proportionate measures to help understand and review the steps its key suppliers are taking to address modern slavery risks in their own operations and supply chains.

Funds managed by Lexington invest in a number of companies around the world. As a general matter, these portfolio companies do not form part of LPUK LLP's supply chain.

Policies and procedures

LPUK LLP's staff must comply with Lexington's Code of Ethics which requires them to act with integrity, competence, dignity and in an ethical manner when dealing with their colleagues and others. Furthermore, LPUK LLP has adopted other Lexington policies and procedures relevant to modern slavery, including, for example, the ESG and Stewardship Policy, the Policy for Reporting Suspicious Activity and Concerns, the Complaints Policy, and the Oversight of Service Providers Policy.

Training

LPUK LLP is considering training for staff to raise awareness of modern slavery risks affecting the firm, particularly for those employees who handle procurement and manage relationships with key suppliers.

Investment due diligence

Lexington's primary objective is to generate attractive, risk-adjusted returns for the investors in our funds. As set out in Lexington's ESG and Stewardship Policy, we have incorporated relevant ESG factors into our secondary and co-investment policies and procedures and believe that such consideration of ESG principles in our investment process is integral to achieving our desired investment outcomes and is consistent with our fiduciary duty.

As part of our investment analysis, Lexington's secondary and co-investment professionals comprehensively evaluate each transaction that advances to confirmatory due diligence, including material short-term and long-term ESG risks and opportunities. The process combines detailed 'bottoms-up' analysis with a qualitative assessment of a sponsor's strategy and reputation. Investment professionals are expected to report any identified material ESG issues during the due diligence process.

We believe modern slavery and human trafficking risks are limited within the operations of the high-quality sponsors with whom we invest. While Lexington has limited ability to influence portfolio companies' practices as a secondary and co-investment fund manager, we consider modern slavery risks during due diligence, focus on understanding underlying sponsors' ability to manage risks within their portfolios, and seek to stay apprised of any serious human rights violations in our portfolios.

Stewardship

As a manager of secondary and co-investment funds, Lexington does not typically control the underlying investments of the Lexington funds and, therefore, Lexington has limited ability to engage portfolio companies directly on ESG-related issues. However, we believe that ongoing communication with sponsors can help us to achieve common goals, including but not limited to improving data transparency among sponsors, encouraging greater integration of ESG practices, and promoting strong business practices.

Lexington's stewardship approach aims to foster two-way communication through an annual survey requested of underlying sponsors in actively investing funds about their ESG policies and approach. The survey, inspired by PRI guidelines, is intended to capture the underlying sponsors' views on responsible investment, obtain insights into their ESG initiatives, and collect relevant data to advance our stewardship activities.

This statement has been approved by the members of Lexington Partners UK LLP's Management Board and signed by Pal Ristvedt.



Lexington Partners UK LLP

13 March 2026