

Modern Slavery Statement

Financial Year Ended 31 March 2026 — Joint Modern Slavery Statement under the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018 (Cth)

INTRODUCTION

Hamilton Lane is committed to ensuring that acts of human trafficking and modern slavery form no part of its business or supply chains. Hamilton Lane acknowledges our responsibility under the UK Modern Slavery Act 2015 (the “UK Act”) and, as explained in the Scope and Basis of this Statement section below, the Australian Modern Slavery Act 2018 (Cth) (the “Australian Act,” and together with the UK Act, the “Acts”), and will take steps to seek to ensure transparency within our own organisation and with suppliers of goods and services with whom we contract.

References in this statement to “Hamilton Lane,” “we” and “our” are references to Hamilton Lane Advisors, L.L.C. and its subsidiaries.

SCOPE AND BASIS OF THIS STATEMENT

This statement is a joint modern slavery statement made by Hamilton Lane Advisors, L.L.C., and its subsidiaries. It has been prepared using the international reporting template on modern slavery, forced labour and child labour jointly developed by the UK, Australian and Canadian governments, which groups the legislative requirements of those jurisdictions into seven overarching reporting requirements.

For the purposes of the Australian Act, the Australian reporting entity covered by this statement is Hamilton Lane (Australia) Pty Limited (ABN 33 618 896 290), the Hamilton Lane group has annual consolidated revenue of at least AUD 100 million for the financial year. Consequently, the group is a reporting entity under the Australian Act and is required to publish an annual modern slavery statement addressing the mandatory criteria in section 16(1) of that Act. This statement is submitted to satisfy both the UK Act and the Australian Act and will be lodged on the Australian Modern Slavery Statements Register within six months of the end of the reporting period. The reporting entities covered by this statement are Hamilton Lane Advisors, L.L.C. and Hamilton Lane (Australia) Pty Limited (ABN 33 618 896 290), and Hamilton Lane UK.

1. STRUCTURE, OPERATIONS, ACTIVITIES AND SUPPLY CHAINS

We are a global private markets investment solutions provider with approximately \$142 billion of discretionary regulatory assets under management (“AUM”), and approximately \$905 billion of non-discretionary assets under advisement (“AUA”) as of March 31, 2026. We work with our clients to conceive, structure, build out, manage and monitor portfolios of private markets' funds and direct investments, and we help them access a diversified set of such investment opportunities worldwide. Our clients are principally large, sophisticated, global investors that rely on our private markets expertise, deep industry relationships, differentiated investment access, risk management capabilities, proprietary data advantages and analytical tools to navigate the increasing complexity and opacity of private markets investing. While some maintain their own internal investment teams, our clients look to us for additional expertise, advice, and outsourcing capabilities. In addition to our institutional client base, we have a growing number of non-

institutional clients stemming from the private wealth channel, which includes family offices and high-net-worth individuals, who utilize our products and services to gain access to the private markets.

We were founded in 1991 and have been dedicated to private markets investing for over three decades. We currently have over 800 employees, including 311 investment professionals, operating across 22 global offices servicing our clients throughout the world.

We offer a variety of investment solutions to address our clients' needs across a range of private markets, including private equity, private credit, real estate, infrastructure, natural resources, growth equity, venture capital and impact investing. These solutions are constructed from a range of investment types, including primary investments in funds managed by third-party managers, direct investments alongside such funds and acquisitions of secondary stakes in such funds, with several of our clients utilizing multiple investment types. These solutions are offered in a variety of formats covering some or all phases of private markets investment programs:

- *Customized Separate Accounts:* We design and build customized portfolios of private markets funds and direct investments to meet our clients' specific portfolio objectives regarding return, risk tolerance, diversification and liquidity.
- *Specialized Funds:* We organize, invest and manage specialized primary, secondary and direct investment funds. Our specialized funds invest across a variety of private markets and include equity, equity-linked and credit funds offered on standard terms, as well as shorter duration, opportunistically oriented funds. We launched our first specialized fund in 1997. Since then, our product offerings have grown steadily and now include evergreen offerings that primarily invest in secondaries and direct investments in equity and credit and are available to certain high-net-worth individuals.
- *Advisory Services:* We offer investment advisory services to assist clients in developing and implementing their private markets investment programs. Our investment advisory services include asset allocation, strategic plan creation, development of investment policies and guidelines, the screening and recommending of investments, monitoring of and reporting on investments and investment manager review and due diligence. Our advisory clients include some of the largest and most sophisticated private markets investors in the world.

Our Supply Chain

- *Hamilton Lane's supply chain is relatively short and consists predominantly of the purchase of professional services (such as lawyers, accountants and other consultants) and business supplies (such as IT providers, office equipment, office maintenance/cleaning services and travel services). As a private markets investment firm, we do not manufacture, produce or import goods.*
- *We regard providers of professional advice generally as presenting particularly low risk and believe that there is a low overall risk of slavery or human trafficking in connection with our business and direct supply chain. However, there may be higher risk deeper in the supply chains of our suppliers, and in the operations and supply chains of the assets and companies in which the funds we manage or advise are invested, where our visibility is more limited.*

- *We acknowledge the limits of our current supply chain knowledge: we have visibility of our direct suppliers but have not yet mapped lower tiers of our supply chain or undertaken detailed mapping of the supply chains associated with underlying portfolio investments. Improving this understanding, including enhanced supplier and investment due diligence, is an area of focus for Hamilton Lane.*
- *Responsibility for identifying, assessing and responding to modern slavery risk sits with the sustainability team, vendor management, compliance, and Hamilton Lane's senior management, with oversight provided by our relevant committees and ultimate accountability resting with the relevant legal entity boards. This governance structure provides senior-level oversight of how modern slavery risk is managed across our operations, supply chain, and investment activities.*
- *This statement was prepared by drawing together information from our legal, compliance, procurement, human resources and responsible investment functions across the jurisdictions in which we operate.*
- *For the purposes of the Australian Act, the Australian reporting entity covered by this statement is Hamilton Lane (Australia) Pty Limited (ABN 33 618 896 290). Australian reporting entity forms part of the global Hamilton Lane group and shares the group's centralised policies, governance and risk-management framework.*

2. POLICIES IN RELATION TO MODERN SLAVERY, FORCED LABOUR AND CHILD LABOUR

Hamilton Lane has adopted other relevant policies and procedures, which reinforce the firm's fundamental values, including:

- A Code of Ethics Policy, which describes the standards of behaviour expected by Hamilton Lane's employees. All employees are required to certify that they have read and understood all the provisions of our Code of Ethics;
- A Whistleblowing Policy for the reporting of suspicious and illegal activity;
- A Hiring Policy, which provides that recruitment of employees, is by written agreement in accordance with local employment law; and
- Our Responsible Investment Committee provides oversight on the implementation of Sustainability policies at Hamilton Lane.

Our Policy on Modern Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business or our supply chains. We are also committed to acting ethically and with integrity in all our business relationships and for this purpose, we regularly review the systems and controls we have in place to ensure that the risk of modern slavery and human trafficking in our business and supply chains is eliminated to the maximum possible extent.

Our policies are reviewed periodically and updated as our understanding of modern slavery risk develops. We did not make material changes to these policies during the reporting period, and we plan to keep them under review.

3. RISK MANAGEMENT PROCESSES

We undertake the following steps as part of our efforts to eliminate slavery and human trafficking:

- Conduct due diligence and monitoring of suppliers;
- Include standard questions and representations relating to MSA concerns in requests for proposals from prospective suppliers;
- Continue to educate employees on MSA requirements by providing training for the relevant employees; and
- Communicate with suppliers and employees to ensure they understand our obligations and expectations.
- We assess modern slavery risk by reference to risk to people rather than risk to our business. Reflecting our risk profile as a professional services and private markets firm, the most significant potential exposure lies not in our direct operations but in lower tiers of our suppliers' supply chains and in the operations and supply chains of underlying investments, which we manage through the due diligence and monitoring processes described below.
- We consider the risk in our direct operations and professional-services supply chain to be low, with elevated residual risk concentrated in higher-risk sectors and geographies that may feature deeper in supplier supply chains.

4. DUE DILIGENCE AND REMEDIATION

Our due diligence processes include conducting due diligence and ongoing monitoring of suppliers, incorporating standard modern slavery questions and representations into requests for proposals and supplier onboarding, and communicating our expectations to suppliers and employees. We use these processes to identify and respond to potential modern slavery risks in our supply chain and operations.

Workers and others can raise concerns, including any concern relating to modern slavery, through our Whistleblowing Policy and associated reporting channels, which allow reports to be made confidentially. We did not identify any actual instances of modern slavery in our operations or supply chains during the reporting period; if any were identified, we would respond through remediation pathways consistent with the UN Guiding Principles on Business and Human Rights.

The actions taken by each reporting entity described above are applied consistently across the group under our centralised framework.

5. TRAINING

We provide training to relevant employees on modern slavery and the requirements of the applicable legislation, so staff can recognise potential indicators of modern slavery and understand our obligations and expectations. We keep the scope and frequency of this training under review as part of our continuous improvement approach. The training is updated annually by the Compliance team.

6. ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

We assess the effectiveness of the actions we take to prevent and respond to modern slavery primarily through our ongoing supplier due diligence and monitoring, the operation of our whistleblowing and grievance channels, and periodic review of our policies and processes by the relevant group functions.

For the purposes of the Australian Act, the Australian reporting entity covered by this statement is Hamilton Lane (Australia) Pty Limited (ABN 33 618 896 290). The Australian entity assesses the effectiveness of these actions through the group's centralised governance and monitoring arrangements, with oversight provided by senior management, the relevant committees.

7. OTHER RELEVANT INFORMATION, APPROVAL AND SIGNATURE

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and, in respect of each Australian reporting entity covered by it, section 16 of the Australian Modern Slavery Act 2018 (Cth). It constitutes Hamilton Lane's modern slavery and trafficking statement for the financial year commencing 1st April 2025 and ending 31st March 2026.

This statement was approved by the principal governing body of Hamilton Lane UK on 22nd of July and is signed by Richard Hope, Head of EMEA and Global Co-Head of Investments, who is a responsible member of the reporting entity and is authorised to sign on behalf of the entities covered by this statement.

This statement was approved by the Head of Global Client Solutions of Hamilton Lane (Australia) Pty Limited (ABN 33 618 896 290) on 6th of July and is signed by James Martin, Head of Global Client Solutions, who is a responsible member of the reporting entity and is authorised to sign on behalf of the entities covered by this statement.

Signed for and on behalf of Hamilton Lane UK and Hamilton Lane (Australia) Pty Limited (ABN 33 618 896 290):

Name: James Martin Title: Head of Global Client Solutions, Hamilton Lane (Australia) Pty Limited

Signature: *James Martin*

Date of Hamilton Lane UK board approval: 22nd of July