

MODERN SLAVERY ACT ANNUAL TRANSPARENCY STATEMENT

For the Year Ended December 31, 2022

I. Introduction

Sands Capital Management, LLC and its control affiliates (collectively, “**Sands Capital**,” the “**Firm**,” “**we**,” or “**our**”) support fundamental principles of human rights across our entire business and everywhere in the world where we have a presence. We recognize that modern slavery issues, such as forced labor and human trafficking, are a significant global challenge. We also believe that we have a role to play in promoting respect for human rights. To that end, our annual Modern Slavery Act Annual Transparency Statement (this “**Statement**”), made pursuant to section 54 of the UK Modern Slavery Act 2015 and sections 13 and 14 of the Australian Modern Slavery Act of 2018, outlines the actions we have taken to mitigate the potential risk of enabling modern slavery through our business, our vendor network, or our investments.

During the reporting period this Statement covers, we actively engaged and consulted with all companies we own or control in the development of this Statement (such companies are identified in **Attachment A**). We discussed details of the Modern Slavery Act 2018’s reporting requirements; information regarding the actions we intend to take to address these requirements and provided them with relevant materials and updates.

II. Business Structure and Supply Chain

Sands Capital is an independent investment management firm that delivers a range of investment management services to a large and diversified client base that includes collective investment vehicles, corporations, charitable organizations, state and municipal government entities, sovereign wealth funds, pension funds, superannuation funds, and individuals. Our purpose is to add value and enhance the wealth of our clients with prudence over time. We focus on equity investments and the strategies we offer are typified by deep, proprietary, business-focused global research, concentration, and a long-term investment horizon. We operate primarily through Sands Capital Management, LLC, a Delaware limited liability company, and to a lesser extent through our overseas control affiliates identified in **Attachment A**.

At December 31, 2022, our client portfolios held investments in 129 companies (152 companies during 2022) across 11 investment strategies, spanning 21 countries. At 2022 calendar year end, Sands Capital had 197 full-time employees, with our headquarters in the Washington, D. C. area and offices in London and Singapore.

In providing our investment management services and operating our businesses, we engage a number of third parties to provide various kinds of services. As of December 31, 2022, we worked with approximately 228 vendors and service providers, covering a wide range of services. Sands Capital’s supply chain predominantly comprises professional service providers such as lawyers, tax consultants, accountants, and administrators, and business vendors such as information technology service providers, suppliers of office equipment, and event caterers.

It is our belief that given the nature of the services that Sands Capital provides and the footprint of the Firm, there is a relatively low risk that we could unintentionally enable modern slavery and human trafficking through our employment practices or vendor relationships. The biggest risk that we see related to modern slavery is in our portfolio holdings.

III. Policies

At Sands Capital, we have numerous policies that govern our responsible investment and stewardship activities. Policy review is critical to ensuring that we are fully aligned with our values and that our policies enable active stewardship. To evaluate their effectiveness, we use:

- Internal reviews conducted by relevant internal stakeholders, including our stewardship team and compliance team, among others. All changes and the creation of new policies are approved by the relevant oversight body within Sands Capital.
- Reviews by third-party consultants, where appropriate, such as Slave-Free Alliance.

Our policies are reviewed regularly and the methods we employ for review vary depending on the policy. The following outlines the key policies related to our environmental, social, and governance (“ESG”) integration and active ownership activities.

The Firm’s **Environmental, Social, and Governance Policy Statement** sets forth our purpose, guiding principles, executional process, ability to address specific client requirements, collaborations with third parties, and program governance. This statement is overseen and administered by the Stewardship Team, a cross-functional group of professionals who are responsible for guiding our stewardship program execution.

The Firm’s **Proxy Voting Policy & Procedures** specifies internal processes for our proxy voting activities. This policy is maintained by the Compliance Team and overseen by our Proxy Committee. We hire an external party who audits and tests our proxy voting process to verify that it is aligned with our policy and procedures on an annual basis.

The Firm’s **Engagement Policy** details our approach to engagement. The policy is administered by the Stewardship Team.

The Firm’s **Service Provider Due Diligence Policy** outlines our approach to conducting due diligence on unaffiliated service providers and vendors. The Chief Administrative Officer reviews the policy on an as-needed basis. The most recent review was conducted in June 2022. The head of each functional team is responsible for the implementation and monitoring of this policy and its embedded procedures for service providers engaged by the functional team.

Our internal **Compliance Manual and Code of Ethics, Anti-Slavery and Human Trafficking Policy** and our **Vendor Code of Conduct (“Vendor Code”)** communicate the Firm’s expectation that business be conducted ethically and in compliance with the law.

IV. Governance

Sands Capital is governed by its controlling shareholder, Frank Sands, who serves as Chief Executive Officer and Chief Investment Officer. He is supported by an Executive Management Team that provides strategic leadership across the investment research, client relations, and general business management functions of the Firm. Membership of the Executive Management Team includes leaders of different functional areas and will change over time to incorporate a range of viewpoints from existing and emerging leaders and provide cross-functional insight to a broad set of senior personnel. The Executive Management Team is supported by several committees consisting of staff members representing functional areas across the Firm, including the Conflicts of Interest Board, Best Execution Committee, Fair Valuation Committee, Proxy Committee, Directing Research Team, Incident Management Team, and Emergency Response Team.

Our Stewardship Team comprises staff with diverse functional knowledge who are committed to implementing our stewardship program, which encompasses ESG research integration, active ownership, and stakeholder communications. The team meets on a monthly basis to discuss progress in areas such as:

- Policy and strategy formulation.
- Education and training.
- Tools and infrastructure development.
- Legal and regulatory compliance.
- Collaboration with external partners.

The Director of Stewardship leads the Stewardship Team and reports to our Executive Management Team. This reporting relationship helps to support organizational alignment around our stewardship policies and processes and keeps senior leaders apprised of our program developments.

A subset of the Stewardship Team meets regularly to establish priorities, assess resource requirements, and prepare recommendations for meetings of the larger team. This steering group drives process improvements related to the sourcing and integration of data into our investment research and client reporting systems.

Within the Stewardship Team, we also form project-specific temporary subteams on an as-needed basis. Modern slavery has been named an explicit priority of the stewardship work program, so a subset of the Stewardship Team has been working to implement changes in processes and policies around modern slavery.

V. Partnerships

With a global investment portfolio, Sands Capital recognizes the importance of managing modern slavery risks through each tier of the supply chain. To address these risks in our portfolios, we undertook several initiatives, including internal training, engagement with companies on material human rights risks, and partnership with third-party organizations focused on modern slavery for independent expertise and support.

In 2022, Sands Capital established a relationship with an outside organization, Slave-Free Alliance (“SFA”), which specializes in anti-trafficking and reducing the risk of modern slavery, to further our work to better understand and mitigate modern slavery risks at both the portfolio and operational levels at Sands Capital. The Firm has engaged SFA to establish a risk assessment framework for current and potential investments as well as building a training and awareness program across the whole Firm. This work also includes a review of various Firm documents specific to human rights standards such as policies, reports, and legislative disclosures. The deliverables from this project included:

- An evidence-based report that details identified risks and best practices
- A set of clear, defined, and actionable recommendations that are proportionate to Sands Capital’s capability
- A bespoke action plan that prioritizes the recommendations based on risk and leverage, to include trainings at both the Firm and function-specific levels.

“Slave-Free Alliance is proud to partner with Sands Capital, to support the business with progressing its anti-modern slavery initiatives and demonstrating industry leadership. This year, we completed a comprehensive gap analysis on the business. The analysis comprised a combination of document reviews and multi-stakeholder discussions to independently review the business’s understanding of its modern slavery and labor exploitation risks across its operations and investment portfolio and assess current due diligence activities. Through the analysis, Slave-Free Alliance was able to detail where risk areas lie for Sands Capital and the proportionate steps that can be taken to prevent and mitigate these risks. Slave-Free Alliance also identified a wealth of best practices happening within Sands Capital that demonstrate its commitment to this agenda. The process was a great success and Slave-Free Alliance commends Sands Capital for its transparency and willingness to digest the findings and implement further improvements. There is also a real desire to empower employees and Slave-Free Alliance was pleased to deliver tailored modern slavery awareness training to Sands Capital employees to help further embed responsible practices across the business. Sands Capital employees are highly engaged in our projects; keen to play their part to mitigate the modern slavery risks and we are looking forward to further engagements on these crucial initiatives.”

Rachel Hartley – Consultancy Director, Slave-Free Alliance

In 2022, Sands Capital also held discussions with another anti-human trafficking organization, Polaris, to potentially establish a relationship that identifies and prioritizes engagement on modern slavery risks with fintech companies in our investment portfolios and on anti-modern slavery policy with technology companies in our portfolios.

Sands Capital continues to build relationships with other select organizations that enable us to understand stakeholder perspectives on sustainability issues, apply learnings to our research analysis and engagements with portfolio businesses, and collaborate with stakeholders to enhance corporate disclosure practices. Because we work with such dynamic companies in evolving industries, we view these partnerships as an indispensable way to share best practices and gain insights on effectively managing ever-changing externalities. More information on these partnerships can be found in the Industry Partnerships, Affiliations, and Memberships section of our [2022 Stewardship Report](#).

VI. Due Diligence, including Risks and Steps Taken

As an investment management firm, we have developed ways to address the risk of enabling modern slavery through our business operations separately from how we address the risk of enabling modern slavery through the investments we make on behalf of our clients. We discuss each in turn below.

Our Business Operations

1. Employees

Sands Capital is committed to respecting the human rights of our employees through our internal employment policies and practices. Integrity, trust, and doing what is right are the cornerstones of our corporate culture, and we strive to ensure that employees can work in a safe, professional work environment. Concern for the personal dignity and individual worth of every person is an indispensable element in the standard of conduct that we have set for ourselves. In addition, compensation and benefits, as part of our talent development strategy, play a critical role in our ability to attract, retain, and motivate our employees. We are committed to providing competitive and equitable compensation for our employees, and benefits that support our employees’ needs.

While applicable local regulations regarding minimum compensation vary across geographies where we have employees, in all cases we meet or exceed the minimum wages applicable in respective jurisdictions.

Staff who become aware of or who suspect violations of human rights, including with respect to forced or child labor, related to the Firm's business, are encouraged to report such concerns. This can be done through various channels described in the respective policies, including by contacting the Firm's human resources team, the Firm's reporting hotline (which is administered by a third party), or through other appropriate resources. In many situations, reporting through the reporting hotline may be done anonymously. In 2023, a Human Rights Violation, to include modern slavery and labor exploitation, will be added as an explicit reporting option through our NAVEX EthicsPoint reporting tool, one such reporting channel.

2. Vendors

Sands Capital has a comprehensive vendor management policy and program, which provides a risk-based framework designed to manage vendor risk. We do not tolerate slavery, forced labor, child labor, or human trafficking in any form and will not knowingly work with vendors who engage in these practices. Sands Capital is committed to holding ourselves and our supplier community to high standards of business conduct and integrity.

Our Vendor Code sets out our principles and expectations for suppliers, vendors, consultants, contractors, and other third parties working on behalf of the Firm, as well as the owners, officers, directors, employees, contractors, and sub-contractors of these supplier organizations and entities. At a minimum, we expect our vendors and their supply chains to fully comply with all applicable laws and regulations in the conduct of their business, including in relation to slavery, forced labor, child labor, and human trafficking. In addition, we expect our vendors to meet appropriate standards related to labor practices, wages, and workplace safety. Our Vendor Code also addresses the following areas: ethical business practices, environmental stewardship, management systems, and governance.

All vendors engaged in providing products and services to Sands Capital are expected to act in accordance with our Vendor Code, including by ensuring their guidelines, policies, and practices are consistent with our Vendor Code and by communicating and enforcing the Vendor Code provisions throughout their organizations and supply chains, as appropriate. A violation of the requirements of the Vendor Code by a vendor will be considered when the Firm decides whether we will renew our relationship with the vendor and, in circumstances where following engagement with the relevant vendor such violation is not remedied in a timely and sensitive manner, a violation may result in the termination of our relationship with the vendor.

Through our Service Provider Due Diligence Policy, our teams are aided in implementing this policy and the procedures by a third-party risk management firm ("**TPRM**") and software application. The head of each team is responsible for ensuring that all applicable service providers are evaluated for risk and, if necessary, using the TPRM to conduct and review assessments.

As previously stated, we believe our vendor network as a whole is low risk in respect of modern slavery and human trafficking. To focus our efforts, we have adopted risk-based measures to enhance our scrutiny and assessment of select segments of our vendor network where we believe the vendors' commitment towards mitigating the risks associated with modern slavery and human trafficking are especially important. We require all vendors who are ultimately on-boarded to abide by our Vendor Code. We specifically screen our vendors for modern slavery in our initial vendor risk assessments and have also introduced specific due diligence questions relating to modern slavery and human trafficking in our vendor due diligence questionnaires for vendors that we perceive to be critical service providers.

Our enhanced due diligence measures may also include scrutiny of policies relating to measures taken by such vendors to prevent slavery and human trafficking in their operations and supply chains and seeking additional contractual representations regarding compliance where we deem it appropriate.

Our Investment Activities

Sands Capital embraces the fundamental investment philosophy that, over time, stock prices reflect the earnings power and growth of the underlying businesses. As such, we attempt to identify and invest in high quality businesses that have the capacity to generate sustainable, above-average earnings growth over time, on a global basis. We have long believed that a company's ESG practices, such as its policies and actions to mitigate modern slavery, have the potential to impact the drivers of earnings and growth. For this reason, we are a signatory to the Principles of Responsible Investing and are committed to equipping our investment team with the necessary resources to conduct high-quality ESG research and analysis.

We expect our portfolio companies to respect internationally accepted human rights and labor rights throughout their business operations and value chain, such as those principles and standards set out in the United Nations Global Compact. This includes the maintenance of health, safety, and wellbeing management systems, particularly in high-risk sectors; the management of exposure to labor and human rights risks throughout their value chain, especially human slavery; and encouraging positive relationships with local communities.

To assess and manage the risk of modern slavery in our investments, we follow an ESG-integrated investment due diligence process as part of our investment process. We utilize both proprietary research and third-party resources to evaluate the ESG risks and opportunities associated with each company. Once we purchase a company, we continue to monitor it for a range of ESG issues including potential human rights violations.

We treat ESG incidents, including those related to modern slavery, at a portfolio company just as we treat any material development at any company. Our analysts, who are the business experts, will identify, evaluate, and then create a research/action plan. When these issues are material, the analysts will frequently report the issue to the relevant portfolio managers before following up with a more detailed analysis after further work is completed. This supplemental work may include coordination with the Stewardship Team and the portfolio management team to ensure that the entire team is focused on the issue if it is deemed material.

We are also active owners of our portfolio companies and routinely engage with management, and boards when appropriate, on a range of ESG issues, including where the risk or allegations of modern slavery exist. We view ongoing oversight and engagement with investee companies as an essential part of our stewardship work. We prioritize engagements through our fundamental research. When we believe human rights risks are relevant to the business model or industry, we often engage the management team to understand their practices for mitigating human rights risks in their supply chain. We tend to focus on companies with large supplier bases in certain high-risk markets or industries and seek to understand the level of supply chain oversight and standards.

Generally, we prefer for our businesses to conduct third-party auditing of the supply chain on a regular basis. When we have reason to believe the company is not adequately managing supply chain standards, we will engage the company to advocate for improved oversight and compliance with accepted standards.

As an example of our ongoing engagement, through our conversations with Polaris, we began engaging one of our portfolio companies focused on financial technologies about human trafficking and the use of peer-to-peer (“P2P”) payment platforms. A review of data from the U. S. National Human Trafficking Hotline, operated by Polaris, suggests that human traffickers are increasingly using P2P platforms to facilitate their businesses. We

shared research from Polaris with this portfolio company, including some engagement models Polaris has implemented with other financial services companies, and have connected members of the company with Polaris to continue a more in-depth conversation on this.

Other case studies of engagements with portfolio companies on issues related to modern slavery and labor exploitation, including risk assessment and management, can be found in our [2022 Stewardship Report](#).

Slave-Free Alliance Gap Analysis

As part of our due diligence around modern slavery, both within our business operations and our investment activities, we leveraged our relationship with SFA as an outside expert. During the early stages of our relationship with SFA, we commissioned a gap analysis of our operations and investment practices. This gap analysis is an independent review of our organization's understanding and response to our modern slavery and labor exploitation risks, conducted in view of relevant legislation and industry best practices. The key output is a detailed, evidence-based report that details identified risks and best practices and provides a set of clear, defined, and actionable recommendations. Started and completed over a period of several months in 2022, the gap analysis yielded a bespoke action plan that prioritizes the recommendations based on risk and leverage, including six key risk areas for Sands Capital to address in the years ahead.

The five stages of this gap analysis were:

1. Document review of relevant policies, processes, and reports.
2. Stakeholder discussions with individuals across the Firm.
3. Report and recommendations creation.
4. Stakeholder presentation on findings.
5. Delivery of a tailored action plan and implementation support.

VII. Training

Sands Capital requires all staff review our Compliance Manual and Code of Ethics and other relevant policies upon joining the Firm and on a regular basis thereafter. We seek to ensure that all staff are trained and empowered to identify, and know how to report and escalate, potential exposures to modern slavery relating to our internal operations, vendor relationships, or investments.

2022 Modern Slavery Training

In December 2022, SFA and Sands Capital provided high-level modern slavery and human trafficking training to employees firmwide. The aim of this training was to raise general awareness of the issue and to understand how it can affect Sands Capital's work, with the intended goals as follows:

- Begin to understand what modern slavery is and how it occurs in the United States.
- Consider the impact modern slavery can have on the individual, organization, and the community.
- Recognize types and signs of modern slavery specific to Sands Capital's industry and portfolio companies.
- Consider the risks of modern slavery and ways to mitigate them within Sands Capital's industry.
- Observe case studies of modern slavery and labor exploitation relevant to Sands Capital's industry and portfolio companies.
- Respond appropriately if a victim or incident of modern slavery is identified inside or outside of work.

Slave-Free Alliance provided several training sessions across two days during Sands Capital's quarterly in-office week, facilitating smaller groups in each session and greater participation through breakout sessions. Each

training session was attended by a range of business functions, which fostered conversations around modern slavery risks within a range of business areas. For instance, one breakout exercise focused on attendees' discussing a theoretical identification of modern slavery within a portfolio business's supply chain. Attendees were asked to break into smaller groups to discuss the impact on the investor, the portfolio business, and the victims. Given the range of business functions present within the training, attendees were able to hear insights from others within the Firm around such a potential risk that the attendee might not encounter in their daily work.

Future training

We have planned a more targeted training session for the investment team in 2023, focusing on more hands-on work surrounding due diligence on investments. We are exploring conducting additional targeted trainings for our investment team, staff members involved in managing vendor relationships, and other constituencies within Sands Capital where additional guidance may prove helpful.

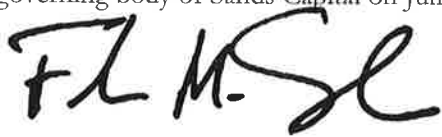
VIII. Effectiveness

We believe that our actions to address modern slavery are commensurate with the risks presented by our business model, but as with everything we do, we will continue to seek ways to improve. We will continue to raise awareness among our staff, our vendors, and our portfolio companies around these issues and to continue to consider adopting additional measures to ensure we are not unintentionally enabling modern slavery through our business, our vendors, or our investments.

Over the course of 2023, we will continue our progress on the priority items from the SFA Gap Analysis, which largely fall into the following buckets:

- Enhancing our Modern Slavery Statement.
- Operational due diligence, including reviewing and updating policies as appropriate, updating due diligence processes around relationships with service providers, and adding modern slavery and labor exploitation to the types of reports that can be made within our internal ethics reporting system.
- Consideration of more formal escalation processes and crisis communication plans.
- Investment due diligence enhancements.
- Firmwide and function-specific training.
- Broader strategic focus, including around Sands Capital's focus on the "S" of ESG.

This Statement for the year ending December 31, 2022 was approved by Frank M. Sands in his role as principal governing body of Sands Capital on June 28, 2023.



Frank M. Sands

Chief Investment Officer and Chief Executive Officer

Sands Capital Management, LLC

ATTACHMENT A

(Control Affiliates)

Sands Capital Advisors - UK Ltd.

Sands Capital - Pacific Pte. Ltd.

Sands Capital - Atlantic Limited