HUMAN-TRAFFICKING AND MODERN SLAVERY STATEMENT

INTRODUCTION

This Statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 ("**UK MSA**"), and the Commonwealth Modern Slavery Act 2018 of Australia (the "**Australian Act**") and constitutes the Human Trafficking Statement and Modern Slavery Statement (the "**Statement**") for the financial year ending 31 March 2026. References to "we" or "our" are to the HarbourVest Group ("**HarbourVest**").

The reporting entity for the purpose of the Australian Act is HarbourVest Partners (U.K.) Limited ("**HV UK**"), a private limited company incorporated in the UK and registered in England and Wales with Companies House. HV UK is a wholly owned subsidiary of HarbourVest Partners LLC ("**HVP LLC**"), an investment adviser company, registered with the US Securities and Exchange Commission. HV UK was registered as a foreign company in Australia on 8 April 2013 (Australian Registered Body Number 163 197 153). Its Australian registered office is in Sydney, New South Wales.

HarbourVest Partners (Ireland) Limited ("**HV Ireland**") and HarbourVest Partners Switzerland GmbH ("**HV Switzerland**") are wholly owned subsidiaries of HV UK. HV Ireland has also established a German Branch in accordance with the AIFMD passporting regime, HarbourVest Partners (Ireland) Limited, Zweigniederlassung Deutschland (**"German Branch**").

HarbourVest's response to modern slavery is rooted in the firm's values and its dedication to running its business with integrity and according to the highest ethical standards. Our firm is committed to combatting modern slavery and human trafficking to the extent they may impact our business. This Statement describes our approach towards ensuring that modern slavery and human trafficking are not taking place in our business operations or supply chain and highlights the specific steps HV UK has taken to uphold its obligations under the UK MSA and the Australian Act.

OVERVIEW OF THE GLOBAL HARBOURVEST ORGANISATION

HarbourVest Group Overview

HarbourVest is an independent investment firm that provides private market solutions to institutional and professional investors, worldwide. More information about the HarbourVest group can be found at www.harbourvest.com. With more than 44 years of experience and more than $164.5 billion of assets under management as at 31 March 2026. Our interwoven platform provides clients access to global primary funds, secondary transactions, direct co-investments, real assets and infrastructure, and private credit. Our strengths extend across strategies, enabled by our team of 1,291 employees, including 237 investment professionals across Asia Pacific, Europe, the Middle East, and the Americas as at 1 April 2026. Across our private markets platform, our team has committed more than $68.6 billion to newly formed funds, completed over $78.3 billion in secondary purchases, and invested over $56.1 billion directly into operating companies from the inception of the firm to 31 March 2026. We partner strategically and plan our offerings innovatively to provide our clients with access, insight, and global opportunities.

HarbourVest Group Locations

HVP LLC is headquartered in Boston and has offices around the world, including: HV UK in London (established in 1990), HarbourVest Partners (Asia) Limited in Hong Kong (1994), HarbourVest Partners (Japan) Limited in Tokyo (2010), HarbourVest Partners, LLC Oficina de Representación in Bogotá (2011), HarbourVest Investment Consulting (Beijing) Company Limited in Beijing (2012), HarbourVest Partners (Canada) Limited in Toronto (2014), HarbourVest Partners Korea Ltd in Seoul (2015), HarbourVest Partners (Israel) Ltd in Tel Aviv (2015), HV Ireland in Dublin (2018), HarbourVest Partners (Singapore) Pte Ltd in Singapore (2020), HarbourVest Partners (Ireland) Limited, Zweigniederlassung Deutschland in Frankfurt (2021), HarbourVest Partners (Australia) in Sydney (2022), HV Switzerland in Zurich (2024), and HarbourVest Partners (GCC) Limited in Abu Dhabi (2025), HarbourVest Global Operations (EMEA) Limited (Ireland) (2025).

HarbourVest Client Base

HarbourVest's clients are principally institutional investors who are pension funds, endowments, foundations, and financial institutions as well as private wealth clients in North America, Europe, Asia Pacific, Latin America, and the Middle East.

HarbourVest's Supply Chain

As a private markets investment specialist, HarbourVest's supply chain is relatively short and consists predominantly of the purchase of professional services and business supplies, operating in specific sectors, for example, office catering, recruitment, electronics and computer hardware, information technology services, healthcare services, and facilities management.

HV UK's professional services and business suppliers are typically located within the UK; however, the original source countries for such goods and services provided may be located outside of the UK. HV UK typically documents the arrangements agreed between itself and its suppliers, taking into account the nature of the service provided. For instance, such arrangements may be short-term and changeable, or long-term and stable.

HarbourVest does not regard its commingled funds or separately managed accounts, which invest into funds and operating companies, as part of HarbourVest's supply chain. HarbourVest's direct co-investments are primarily minority, non-control investments in operating companies alongside a lead sponsor who generally has voting control over the company. Despite not regarding these operating companies as part of its supply chain, HarbourVest is committed to ethical and responsible investing, and is also conscious of the reputational damage to the Firm and its funds or accounts if a slavery, human trafficking, child labour, or supply chain issue were to occur at an operating company in which the funds or accounts were invested. We describe below the due diligence processes and ongoing monitoring of investments undertaken by HarbourVest.

OUR POLICIES

Sustainable Investing Policy

HarbourVest's Sustainable Investing Policy is regularly reviewed to ensure it reflects our evolving understanding and treatment of the financial risks and opportunities that sustainability and business conduct considerations present to the assets we manage on our clients' behalf in the short, medium, and long-term. By taking these considerations into account as part of our broader risk management and opportunity assessment, our objective is to reduce financial risk to client portfolios and to enhance value protection and creation potential.

HarbourVest's Sustainable Investing Policy includes a commitment to respect and endeavour to uphold human rights to the best of our ability through our internal business and investment activities. HarbourVest implements the UN Guiding Principles on Business and Human Rights ("**UNGPs**") through our broader sustainable investing framework. Please "click here" to view HarbourVest's Sustainable Investing Policy.

HarbourVest has been a proud signatory to the Principles for Responsible Investment ("**PRI**")1 since 2013, which offers a menu of possible actions for incorporating ESG into investment practice. The six principles were developed by investors, for investors, and signatories represent a majority of the world's professionally managed investments.

Other Key Policies and Actions

HarbourVest has adopted the following policies, procedures, and initiatives which reinforce the Firm's fundamental values, including:

- A Global Code of Ethics and Anti-Bribery and Anti-Corruption Policy, which describes the standards of behaviour expected from HarbourVest employees;
- HV UK Whistleblowing Policy for the reporting of suspicious and illegal activity. Reports can be made via a range of channels including (i) a web platform administered by an independent third party, (ii) a global 24-hour confidential live telephone hotline or (iii) raising any concerns formally or informally with a line manager/Human Resources/UK Head of Compliance/Group Chief Compliance Officer;
- HV Ireland has implemented a Protected Disclosures Policy to comply with applicable Irish and EU requirements. The policy details the channels through which HV Ireland and its German Branch employees may raise concerns of wrongdoing.
- Global Respectful Workplace Policy and HV UK Employee Handbook, which aim to ensure that all individuals with whom we interact on behalf of the Firm are free from discrimination, workplace violence, harassment, bullying, and other forms of inappropriate conduct; and
- A Complaints Policy, which provides a framework for the effective consideration and proper handling of complaints from HarbourVest customers, potential customers, or former customers.

RISK MITIGATION

Investment Due Diligence Process

Our most fundamental commitment is to seek to deliver superior risk-adjusted returns for our clients within the mandates they grant us, consistent with our fiduciary duties and contractual obligations. HarbourVest has instituted robust sustainable investing due diligence procedures within each of our investment strategies. HarbourVest believes these procedures support sound investment decision-making, which is at the core of how we seek to create compelling, risk-adjusted returns for our investors.

Our investment teams rely on two primary tools: (i) our internally developed Manager Scorecard which we use to assess private markets fund managers on their sustainability-related policies and processes, including their efforts to monitor and support portfolio companies to adhere to sustainability or ethical business guidelines; and (ii) RepRisk®, an external database, to perform due diligence, monitor sustainability-related and business conduct risks, and collect relevant data. Sustainability-related analysis is typically included in investment committee materials and would , where material and relevant, be factored into the committee's final approval of whether HarbourVest commits to any investment.

Areas of heightened scrutiny

HarbourVest generally seeks to incorporate an analysis of applicable legal and governance factors into its investment diligence. Such factors may include, among others, a history of a company's compliance with applicable laws or regulations, adherence to business integrity norms, and high ethical standards. HarbourVest will not invest into companies that it knows are engaged in forced labour and/or child labour in contravention of applicable laws, human trafficking, and/or which are out of compliance with applicable sanctions prohibitions. Further, HarbourVest takes a cautious and case-by-case approach to investing in certain categories of investments, which may present heightened risks. These include, but may not be limited to, portfolio companies that HarbourVest knows are materially engaged in deforestation, manufacturing of firearms and/or weapons, and certain "vice" or "sin" industries such as gambling or tobacco.

Operational Due Diligence ("ODD")

We recognise the goals identified by the Liechtenstein Initiative, Finance Against Slavery & Trafficking. Goal one being to strengthen compliance with laws against modern slavery and human trafficking. We request available compliance policies of private market fund managers that are subject to our operational due diligence process, which typically includes, but may not be limited to:

- Code of Ethics or equivalent;
- AML and counter-terrorist financing policy;
- Anti-bribery and anti-corruption policy;
- Global economic sanctions policy;
- Data protection/privacy policy; and
- Modern Slavery Act policy.

In addition, for private market fund managers which are subject to an ODD review, one of the current conditions of our ODD process is that the manager runs their investor base through an OFAC/Sanctions listing to ensure their client base is not included on one of these listings.

Investment Monitoring

Investments are typically monitored through RepRisk (which includes human rights abuses and corporate complicity asspecific topic flags in their reporting system) and subject to a regular, periodic review process that screens for potentially material sustainability-related incidents. We have protocols in place to discuss sustainability-related and business conduct incidents with the relevant manager or lead sponsor, where considered relevant and material, and to record the outcome of that engagement.

ACTIONS TAKEN TO ADDRESS AND ASSESS MODERN SLAVERY RISKS

Supplier Risk Assessment and Mitigation of Supply Chain Risk

We regard providers of professional advice as generally presenting a very low risk. We believe, therefore, that there is a low overall risk of slavery or human trafficking in connection with our business, and supply chain more generally.

Nonetheless, we understand the importance of ongoing monitoring in relation to modern slavery risks, in specific sectors, for example, office catering, recruitment, electronics and computer hardware, information technology services, healthcare services, and facilities management. Therefore, we continue to uphold a stringent set of internal procedures to ensure that we effectively identify, manage and minimise that potential risk exposure, by assessing HV UK suppliers as outlined below, in order to comply with the obligations of the UK MSA and the Australian Act:

- **Review of Business and Supply Chain:** HV UK, HV Switzerland, HV Ireland and its German Branch have reviewed their active suppliers for 2025 and Q1 2026 risk-ranked them for purposes of modern slavery analysis. The criteria used to make an assessment of suppliers includes, but is not limited to, the nature of services provided by the supplier, the jurisdiction in which the supplier operates, and the value of payments made by HV UK or its subsidiaries and their branches (if any), to those suppliers during the course of 2025 and Q1 2026. For the medium- and high-risk suppliers, we conducted enhanced due diligence checks using a reputable third-party screening service to assess any potential links to modern slavery or related concerns.
- **Due Diligence:** HV UK conducted a further due diligence review for each of its medium- and high-risk suppliers and engaged with them to address HV UK's supply chain risk. HV UK requested each in-scope supplier to complete a due diligence questionnaire, specifically created to address modern slavery.

To the best of its knowledge and taking into consideration the most recent review of our business and supply chain, and the supplier due diligence review, HV UK, HV Switzerland, HV Ireland and its German Branch have not caused or contributed to modern slavery in 2025 and currently have no ongoing or pending remediation projects in relation to this review cycle.

Our due diligence and review procedure has been designed to be proportionate to the risks identified, supported by our compliance function. In extreme cases, we may terminate a service agreement if the supplier due diligence questionnaire and review process identifies cause for concern.

Whilst we believe the likelihood of modern slavery existing within our organisation or supply chain to be very low, we have implemented relevant policies and procedures, such as the Protected Disclosures policy, HV UK Whistleblowing policy and the Complaints policy, which encourage employees to report concerns to us, without fear of reprisals including reporting anonymously via an online platform.

Training

We recognise the importance of ensuring that our employees, particularly those in positions to influence procurement and third-party relationships, are aware of the risks of modern slavery and human trafficking, as well as broader ethical concerns such as bribery and corruption, and HV UK provides dedicated training

for certain individuals, as necessary. Given our assessment that slavery and human trafficking risks are low to HarbourVest's business and with regard to our straightforward supply chains, our planned approach is one that is proportionate, and risk-based.

In 2025, HV UK issued an assessment-based online modern slavery training module to relevant staff members, which includes an introduction to modern slavery and the relevant laws and regulations.

ASSESSMENT OF EFFECTIVENESS

We assess the effectiveness of our actions outlined above by:

- Measuring the nature of roles captured for modern slavery training, to assess whether training offered is reaching appropriate cohorts of employees to raise their awareness;
- Measuring the number of modern slavery grievances raised and the type of concerns raised (including whether they are internal or external to HarbourVest), to assess whether the grievance mechanism is a trusted and well-known avenue through which modern slavery risks can be brought to our attention;
- Measuring the outcomes of the third-party screening checks to assess any potential links to modern slavery or related concerns; and
- Measuring the completion rates of supplier due diligence questionnaires, to assess whether the questionnaires are appropriately drafted to elicit complete responses from suppliers to allow modern slavery risks to be identified and addressed.

CONSULTATION

HV UK undertook a formal consultation process with the entities it owns, which include HV Switzerland, HV Ireland and its German Branch, to assess and address risks of modern slavery across its operations and supply chains. This process involved active engagement with representatives of each entity to share information on supply chain structures, onboarding practices, and risk assessment frameworks. We discussed the details of the Australian Act's reporting requirements, including this statement in full. No adverse findings or indicators of modern slavery were identified during this review.

APPROVAL

This Statement is made pursuant to section 54(1) of the UK MSA and the Australian Act and constitutes HV UK's modern slavery and human-trafficking statement for the financial year ending 31 March 2026. This Statement has been approved by the HV UK Board of Directors on 24 June 2026.

Signed by David A. Atterbury, Managing Director and Board Member of HV UK.

30 June 2026

(1) As a signatory to the PRI, HarbourVest has a regular obligation to complete the PRI Reporting Framework. HarbourVest's most recent PRI Transparency Report can be found on the PRI website.