

**MODERN SLAVERY
ACT
STATEMENT**

17 JUNE 2020

MODERN SLAVERY ACT STATEMENT

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the “**Act**”) and sets out the arrangements employed by Foresight Group LLP (“**Foresight Group**”) to prevent modern slavery and human trafficking in its business activities and supply chains. This statement refers to its financial year ended 31 March 2020.

Introduction

This statement was agreed by Foresight Group and is intended to cover all Foresight Group entities falling within the scope of the Act. The statement is made in respect of its business activities (as set out below) and Foresight Group’s supply chains, which include the supply of goods and services to both Foresight Group as well as the funds managed by it.

Foresight Group comprises various entities globally, including those with offices established in the UK, Italy, Spain, Luxembourg, Australia, South Korea and Guernsey. Compliance with the statement is overseen by Foresight Group, which is a limited liability partnership incorporated in England and Wales, with registered number OC300878 and registered office at Level 23 The Shard, 32 London Bridge Street, London SE1 9SG. Foresight is regulated by the Financial Conduct Authority.

Business Activities

Foresight Group provides independent infrastructure and private equity investment and asset management services, raising capital from institutional investors, family offices, private and high net-worth individuals.

Foresight Group is an engaged investor, maintaining close relationships with our fund boards, business partners, investors, investee companies and other stakeholders. Investing responsibly is important not only to Foresight but also to those parties and to the wider community and we actively focus and report on ESG (environmental, social and governance) and sustainability matters.

Services and Supply Chain Due Diligence

INFRASTRUCTURE

Capital raised is primarily invested in a range of renewable energy infrastructure projects (such as solar parks, wind farms, biogas, waste to energy plants etc.). Due to the limited number of employees typically employed on these projects and the nature of the supply chains involved, Foresight Group considers the risk of service suppliers in this industry being involved in slavery and/or human trafficking to be low. To mitigate this risk further, both prior to investment and throughout procurement and tendering processes during asset management activities, Foresight Group conducts due diligence itself and also instructs independent third parties to carry out due diligence on key counterparties, including in relation to slavery and human trafficking.

PRIVATE EQUITY

Foresight Group’s private equity investments focus on providing capital to small and medium-sized UK-based companies operating in sectors such as Business Services, Consumer and Leisure, Industrials & Manufacturing, Healthcare, Technology and Media & Telecommunications. Foresight Group takes care through its due diligence to only invest in companies with reputable supply chains and believes that its internal compliance procedures and monitoring are sufficient to satisfy the requirements of the Act.

ONGOING DUE DILIGENCE

While due diligence forms an important part of our investment selection process, our close relationships with our business partners and investee companies facilitates regular monitoring. A Foresight Group employee often joins an investee company board, which ensures matters such as compliance with the Act are continuously monitored.

PROFESSIONAL SERVICE PROVIDERS

The services utilised by Foresight Group are office based, with the supply chain consisting of other professional service providers, of which a high proportion are regulated. Foresight Group considers the risk of slavery and/or human trafficking amongst these providers to be very low. Consequently, Foresight Group believes that ongoing communication with these providers satisfies the requirements of the Act, and so takes no specific action in respect of these relationships.

Goods

As an investment and asset manager, most goods supplied to Foresight Group are for use in an office environment. Foresight Group considers the supply of such goods to have a low risk profile relating to slavery and/or human trafficking. Foresight Group looks to utilise reputable suppliers, subject to appropriate anti-financial crime checks, and all employees, including those responsible for ordering supplies, are subject to complying with Foresight Group's Compliance Manual, Sustainability and ESG Policy.

Policies

Foresight Group operates in a highly regulated environment and has a zero tolerance to modern slavery and human trafficking across its business and supply chains and is determined to operate and safeguard its business in an ethical and principled way. Consequently, it takes seriously its corporate responsibilities to its various stakeholders, internal and external, as well as the wider communities in which it carries out its business and has implemented various ESG compliant working practices across the business.

Foresight Group also has robust compliance policies and procedures incorporated into its Compliance Manual, including anti-financial crime policies, whistleblowing and raising concerns regarding business ethics. The AFC policies include measures to prevent funding of modern slavery and human trafficking. Foresight Group has also adopted a Sustainability and ESG Policy, which is available via its website.

All employees are required to abide by all policies at all times.

As part of the due diligence process carried out in respect of all investments, Foresight Group also seeks to ensure all investee companies and business partners have similar policies in place.

Training of Employees, Recruitment and Welfare of Our People

Foresight Group provides its employees with regular training on a range of compliance and other policies through various online and in-house training sessions, which include the obligations under the Modern Slavery Act 2015.

As part of its HR policies and procedures, Foresight Group only uses reputable recruitment firms and complies with all relevant local laws and regulations. All employees are paid at least the National Minimum Wage or National Living Wage, as appropriate, in the area in which they are employed to work.

This statement was approved by the Executive Committee of Foresight Group. It constitutes Foresight Group's Modern Slavery Act statement for the financial year ended 31 March 2020.

David Hughes

Chief Investment Officer

Foresight Group LLP

17 June 2020



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