



ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

Vistra's Commitment

As a global organization, Vistra understands that we need to lead by example in the way we do business. We recognize that modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We aim to act fairly, ethically and openly in everything we do and are committed to practices to combat slavery and human trafficking in our supply chains or in any part of our business.

About Vistra

Vistra is a leading provider of essential business services to support the global progress of companies and funds. Vistra operates across 50+ jurisdictions throughout the Americas, Asia Pacific, Europe and the Middle East. The global Vistra network consists of separate legal entities that support service delivery. Vistra employs 9,000 staff and uses contractors to deliver professional services to its clients and support its operations.

Our Policies on Slavery And Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

The Vistra Board and our Senior Management is responsible for overseeing the implementation of our Anti-Slavery Policy and our Chief Compliance Officer is responsible for the preparation of this statement annually.

Our Supply Chain

In order to provide our services and expertise we procure a range of goods and services from third party suppliers who may, in turn, enter into sub-contracts with their suppliers. We may also, from time to time, outsource some of our back-office functions to suppliers. We procure third-party suppliers for provision of information technology, office supplies, cleaning, maintenance and catering.

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain to comply with our values and ethics.

Our Actions to Prevent Slavery and Human Trafficking

Our Values and Culture

Our Code of Conduct and Business Ethics outlines the purpose and values which govern the Vistra way of working across our business units globally. The Code of Conduct and Business Ethics provides a framework for prudent decision making, in line with our values and behaviours and relevant legislative and regulatory requirements.

The Code of Conduct and Business Ethics acts as a guide for framing our policies and reflects best practice for governance and compliance. The Code of Conduct and Business Ethics provides clear parameters within which Vistra Staff members are empowered, enabled, and expected to make decisions within the business.

Our Code of Conduct and Business Ethics provides the framework for how we act with honesty and integrity in relation to our:

- Business Dealings
- Vistra Group Activities
- Investors
- Colleagues



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About Vistra

Here at Vistra, **our purpose is progress**. As a close ally to our clients, our role is to remove the friction that comes from the complexity of global business. We partner with companies and private capital managers along the corporate and private capital lifecycle. From HR to tax and from legal entity management to regulatory compliance, we quietly fix the operational and administrative frustrations that hamper business growth. With over 9000 experts in more than 50 markets, we can accelerate progress, improve processes and reduce risk, wherever your ambition takes you.

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- Communities.

Identifying and Managing Risks

As part of our supplier onboarding process, we assess the modern slavery and human trafficking risk of our suppliers to minimize these risks within our supply chain.

While the risk of modern slavery is considered to be low based on our supply chain (e.g. information technology or office supplies. Professional service providers etc), we nonetheless recognize that there is a risk of being directly linked to contributing to the facilitation of modern slavery in providing professional services to our client. We have incorporated anti-modern slavery clauses into our client agreements.

We have suitable channels of communication by which any Vistra Staff member employee or contractor can confidentially report an issue or suspicion of modern slavery without fear of retribution which are set out in our Speak Up Policy.

We conduct regular reviews to ensure we remain compliant with our policy and procedures.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will provide training to our staff involved in procurement and/or with responsibility for our supply chain management. We also require all staff to complete Global Business Ethics training.

Our Effectiveness In Combating Slavery And Human Trafficking

If we discover a violation of our Anti-Slavery Policy we will respond in a manner proportionate to the nature and extent of the violation.

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