2026
Modern Slavery and Human Trafficking Statement

LPPI Modern Slavery and Human Trafficking Statement March 2026
Local Pensions Partnership Investments Ltd, trading as LPPI
Registered in England and Wales, Company Number: 09835244

LPPI voluntarily publishes this Modern Slavery and Human Trafficking Statement (the "Statement") for the financial year ended 31 March 2026.

Section 54 of the Modern Slavery Act 2015 (the "Act") requires commercial organisations carrying on business in the United Kingdom, with an annual turnover of £36 million or more, to publish an annual slavery and human trafficking statement.

In previous years, Local Pensions Partnership Ltd ("LPP") published a Modern Slavery and Human Trafficking Statement in respect of the wider LPP group. Following group restructuring in 2026, LPPI is no longer part of the LPP group and did not meet the turnover threshold requirement set out in Section 54 for this reporting period. However, LPPI's Board of Directors has chosen to publish this Statement voluntarily, in line with good governance practice and to provide clear, accessible disclosure on the steps LPPI has taken, and intends to take, to identify and manage modern slavery and human trafficking risks in its operations, business relationships and supply chains.

For the purposes of this Statement, references to "modern slavery" include slavery, servitude, forced or compulsory labour and human trafficking, as defined in the Act. This Statement covers LPPI only.

This Statement will be reviewed, updated and approved by the Board of LPPI annually and published on LPPI's website.

INTRODUCTION

Modern slavery is a crime and a fundamental violation of human rights. It can take many forms, including slavery, servitude, forced or compulsory labour, and human trafficking. These practices share a common feature: the deprivation of a person's liberty for personal or commercial exploitation.

LPPI is committed to acting ethically, responsibly and with integrity in all our business activities. We take a proportionate approach to ensuring, as far as is reasonably within our control, that modern slavery and human trafficking are not present in our operations, business relationships or supply chains. We are committed to transparency in the way we work and in how we address the risks of modern slavery, having regard to the principles set out in Section 54 of the Modern Slavery Act 2015.

Given the nature of the services we provide, the inherent risk of modern slavery and human trafficking within our direct operations is generally considered low. However, we recognise that risks may arise indirectly through our supply chains and investments and therefore apply appropriate due diligence and oversight on a risk-assessed basis as detailed in this Statement. We expect the same high standards from our contractors, vendors and business partners.

SECURING TRANSPARENCY IN OUR SUPPLY CHAINS

1. Organisational Structure

Our business

Established in 2016, LPPI is authorised and regulated by the Financial Conduct Authority and acts as an Alternative Investment Fund Manager under the UK implementation of the Alternative Investment Fund Managers Directive in relation to certain alternative investment funds and investment vehicles that it manages.

LPPI provides clients with investment management services, investing c. £26.6bn (as at 31 March 2026) on behalf of local authority and public pension funds across a wide range of asset classes. Around 50% of assets are invested in public markets and investments tend to be in large cap and well-established companies. Investments may be made via LPPI's internally managed portfolio or via external fund managers. LPPI has c. 158 employees across the UK, and its main offices are based in London and Preston (as at 31 March 2026). LPPI does not manufacture, assemble or distribute goods.

Responsibility for LPPI's approach to identifying and managing modern slavery risk is embedded across the relevant first-line business owners, supported by Enterprise Risk, Compliance, Legal, Procurement, People and Culture, Investment Due Diligence and Operational Due Diligence, as applicable. Any modern slavery risks or concerns identified through supplier, investment or operational due diligence processes are reported on an exception basis to the Executive Committee and escalated, where appropriate, to the Audit and Risk Committee and ultimately to the Board.

LPPI has reviewed and documented its principal stakeholder relationships and first-tier supply-chain arrangements for the purposes of this Statement. These include:

- Local authorities and public pension funds (as clients);
- Professional advisers, financial services firms, investment managers, institutional investors and consultants; and
- Corporate services support such as IT providers, recruitment agencies, data providers, and outsourced service providers.

LPPI's direct supply chain partners are primarily based in the UK, Europe and North America. Some suppliers operate globally through international offices, service centres or subcontracting arrangements, and LPPI recognises that visibility below tier 1 is more limited. LPPI will continue to improve its understanding of these arrangements on a proportionate, risk-assessed basis.

LPPI's assessment of modern slavery risk across its operations, supply chains and investment activity is set out further below. Information for this Statement was gathered from procurement/vendor records, supplier contractual documentation, risk management processes, investment due diligence inputs, People and Culture information and corporate governance review.

Our people

One of LPPI's strategic goals is to make it an "exciting, forward thinking and collaborative place to work", and this is supported by clear objectives to seek out and value the benefits of diversity, in all its forms, on our business, and to create and maintain an inclusive culture.

As a responsible business, we pride ourselves on treating all employees fairly, facilitated through policies and processes that are transparent and consistently applied. We use relevant and experienced agency partners for the recruitment of permanent, consultant and interim employees, and they are contracted to uphold the same standards that we extend to our direct employees.

Members of our People and Culture team actively manage agency partner relationships ensuring they meet our employment requirements and that their processes are fit for purpose. We carefully monitor this area and believe the policies and processes we have in place mean the risk of forced or trafficked labour being employed directly by LPPI is very low.

2. Our Due Diligence Processes

Modern slavery considerations form part of LPPI's broader approach to responsible business and human rights due diligence, including its procurement, operational risk, investment due diligence and operational due diligence activities. Risk assessments are undertaken at onboarding and reviewed periodically, including periodic or annual vendor reviews, as applicable, contract renewals and material changes.

Supply chains

We work with a diverse range of vendors and do not tolerate slavery or human trafficking. As part of our procurement and contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or any form of slavery or servitude—whether involving adults or children. We also expect our vendors to apply these standards to their own supply chains.

To help ensure that those within our supply chain and contractors operate in accordance with our values and ethical standards, we apply a robust, risk-based approach to vendor selection, due diligence and procurement, supported by the following policies and frameworks:

- *Supplier Mandatory Provisions* – set out the mandatory requirements and contractual standards with which suppliers must comply when providing services to LPPI, including obligations relating to legal and regulatory compliance, modern slavery, ethical business conduct, anti-bribery, fraud prevention, data protection and responsible business practices. These provisions are further detailed in this Statement, below.
- *Supply Chain Code of Connection Policy* – defines LPPI's expectations of suppliers and supply chain partners in relation to information security, governance and risk management, including the maintenance of appropriate controls and the cascading of relevant requirements through their own supply chains.

- *Operational Risk Framework* – establishes LPPI's approach to identifying, assessing, managing and monitoring operational risks across the organisation, including risks arising from third-party and supply chain arrangements.

As part of our Vendor Risk Assessment and ongoing due diligence processes, we conduct regular reviews to ensure vendors are appropriately assessed and that vendor records remain up to date. Depending on the nature, location and risk profile of the goods or services being provided, this may include enhanced due diligence or additional assurance activities. Where issues or potential risks relating to modern slavery are identified, LPPI will seek appropriate remediation, enhanced assurance or escalation, and may take contractual action, including termination of the vendor relationship, where necessary and proportionate.

Given LPPI's business model, direct engagement with workers in supplier workforces has not been undertaken during the reporting period. LPPI expects suppliers to maintain appropriate reporting and grievance channels for their own workers and will review whether targeted engagement is appropriate for higher-risk suppliers as its modern slavery framework develops.

As part of LPPI's contracting process, vendors and suppliers are sent a copy of LPPI's Supplier Mandatory Provisions. These provisions set out the mandatory requirements and contractual standards that suppliers are expected to meet when providing services to LPPI, including requirements relating to compliance with applicable laws, ethical business conduct and the prevention of modern slavery and human trafficking. It is LPPI's practice to include these provisions, or equivalent protections, in relevant contractual arrangements on a risk-assessed basis. In relation to modern slavery and human trafficking, the Supplier Mandatory Provisions require that:

- The Vendor acknowledges LPPI's commitment to preventing modern slavery and human trafficking in its operations and supply chains, including as described in this Statement.
- The Vendor represents and warrants that it has not been convicted of any offence involving slavery or human trafficking and has not been the subject of any investigation, inquiry or enforcement proceedings regarding any offence, or alleged offence, relating to slavery or human trafficking.
- In performing its obligations under the Agreement, the Vendor shall:
    - comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes from time to time in force, including the Modern Slavery Act 2015;
    - not engage in any activity, practice or conduct that would constitute an offence under sections 1, 2 or 4, of the Modern Slavery Act 2015 if such activity, practice or conduct were carried out in the UK;
    - include in contracts with its relevant subcontractors and suppliers provisions which are at least as protective as those set out in the Supplier Mandatory Provisions.
    - notify LPPI as soon as it becomes aware of any actual or suspected slavery or human trafficking in any supply chain connected with the agreement between LPPI and the Vendor.

Going forward, we will continue to:

- communicate our expectations to vendors and their obligations in relation to preventing modern slavery and human trafficking to existing vendors on a risk-assessed basis;
- include appropriate anti-slavery and human trafficking obligations in significant procurement agreements and subcontracting arrangements, and consider their inclusion in other procurements where appropriate based on risk; and
- maintain and enhance proportionate due diligence processes when sourcing vendors and subcontractors, and when undertaking acquisitions, aligned to assessed risk.

Investment Management Activity

LPPI's investment due diligence process assesses external managers across all asset classes, including whether an investment manager or investee company has a modern slavery policy in place.

To do so, LPPI has dedicated Investment Due Diligence and Operational Due Diligence teams which carry out due diligence on external fund managers and investee companies ahead of investment and on an ongoing basis, including review of relevant reports and assessments covering topics such as modern slavery, anti-money laundering and fraud. Private market assets are also subject to LPPI's applicable investment and operational due diligence processes, tailored to the relevant asset class, structure and risk profile. When entering into joint ventures or co-investment opportunities, LPPI carries out background investigations and due diligence on asset owners and potential co-investment partners.

These due diligence activities, together with LPPI's wider risk management approach, seek to identify and take account of modern slavery-related risks and controls as part of investment decision-making and ongoing monitoring.

3. Our Policies

LPPI has implemented internal policies and processes designed to ensure that business is conducted ethically, responsibly and transparently. The policies most relevant to LPPI's approach to preventing modern slavery and human trafficking include:

- **Whistleblowing** – LPPI's whistleblowing policy ensures that employees can raise concerns about the treatment of colleagues or potential unethical business practices, including failures to comply with legal, professional or regulatory requirements, without fear of reprisal. Our whistleblowing procedures are designed to ensure that matters raised are investigated thoroughly, promptly and confidentially.
- **Anti-bribery policy** – sets out LPPI's approach to preventing and countering bribery in accordance with the Bribery Act 2010, including how employees should report suspected instances of bribery.
- **Recruitment** – LPPI operates robust recruitment and onboarding processes, including checks to confirm that individuals employed by LPPI have the right to work in the UK,

are paid in accordance with applicable requirements and are not subject to human trafficking or forced labour.

- **Health and safety** – our health and safety policies set out LPPI's approach to providing a safe and healthy working environment for employees and contractors working from our premises.

- **Codes of conduct** – LPPI expects business activities to be conducted ethically and professionally, and employment contracts clearly articulate the consequences of misconduct. Employees are also expected to report illegal or unethical behaviour promptly, and LPPI complies with applicable employment legislation relating to employee terms and conditions.

Policies are communicated internally via email, and copies are hosted electronically on the Policies Hub, a dedicated page of LPPI's intranet. Certain policies are reinforced through specific training modules, as detailed in Section 5 "Training and awareness", below. Externally, LPPI does not publicly publish its internal policies; however, it seeks to ensure that relevant contractual engagements reflect its policies and commitments, including through the Supplier Mandatory Provisions and equivalent protections where appropriate.

During the next reporting period, LPPI will review its policy development and review processes to consider whether further disclosure should be made on external stakeholder engagement and alignment with relevant international standards.

4. Risk assessment and management

LPPI assesses modern slavery risk through its existing procurement, vendor management, operational risk, investment due diligence and operational due diligence processes. These processes are applied on a proportionate, risk-based basis and are designed to identify whether particular suppliers, service providers, investment managers, counterparties or investee exposures may present an elevated risk of modern slavery or human trafficking. In conducting these assessments, LPPI considers information from vendor due diligence records, contractual responses, manager due diligence questionnaires, policy reviews, adverse media and background checks, compliance monitoring and issue or escalation data.

For suppliers and vendors, LPPI's assessment considers factors such as the nature of the goods or services provided, the supplier's location and operating footprint, the extent of subcontracting or outsourced service delivery, the criticality of the services provided to LPPI, and whether the supplier has appropriate policies, controls and contractual commitments in place.

For investment-related activity, LPPI's Investment Due Diligence and Operational Due Diligence teams consider modern slavery and wider responsible business risks as part of initial and ongoing due diligence on external managers, investment counterparties and relevant private market investments. This may include reviewing whether the manager or relevant entity has a modern slavery statement or policy, the scope of its due diligence arrangements, its approach to supply-chain or portfolio-company oversight, and whether any material concerns have been identified.

LPPI considers its direct operational exposure to modern slavery risk to be low, given the professional and financial services nature of its business, its UK-based workforce and its regulated operating environment. However, LPPI recognises that indirect risks may arise through third-party suppliers, outsourced services, global service centres, subcontracting arrangements, external investment managers and underlying investment exposures. LPPI therefore continues to apply proportionate, risk-based due diligence and monitoring to those areas where visibility, control or influence may vary.

Where potential modern slavery risks are identified, LPPI will assess the nature and severity of the concern, the degree of connection to LPPI's activities, and the extent of LPPI's ability to prevent, mitigate or remedy the issue. Appropriate actions may include requesting further information, enhanced due diligence, contractual assurances, remediation plans, escalation through governance channels, restrictions on onboarding or continued engagement, or, where necessary and proportionate, termination or disengagement as a last resort.

Current limitations

LPPI's current visibility is strongest in relation to its direct suppliers, material contractual counterparties and external managers reviewed through established due diligence processes. LPPI has more limited visibility below tier 1 of its supply chain, including in relation to subcontractors, global service centres and other outsourced delivery arrangements used by suppliers. LPPI also recognises that visibility into underlying external manager, investee and portfolio-company supply chains varies by asset class, investment structure and degree of influence. LPPI will continue to improve its understanding of these areas on a proportionate, risk-assessed basis and will prioritise further work where the nature of the service, location, subcontracting model or investment exposure indicates a higher risk of modern slavery or human trafficking.

During the reporting period, LPPI did not undertake external stakeholder engagement specifically for the purposes of supply-chain mapping or modern slavery risk assessment. LPPI will consider targeted engagement with suppliers and external managers during the next reporting period, prioritising those relationships where the nature of the services, location, subcontracting model or investment exposure indicates a higher modern slavery risk.

5. Training and awareness

LPPI recognises that effective training and awareness are important in helping employees identify modern slavery risks, understand relevant warning signs and know how concerns should be reported and escalated.

LPPI did not deliver dedicated modern slavery training during the 2025/26 reporting period. Related controls and reporting routes were supported through broader training on Anti-Bribery, LPPI Code of Conduct, Principles for Business, and Whistleblowing.

During the next reporting period, LPPI will review and develop proportionate modern slavery training or awareness activity for employees whose roles may involve greater exposure to modern slavery risk. This includes colleagues involved in procurement, vendor management, recruitment, People and Culture, Legal, Compliance, Enterprise Risk, Investment Due Diligence, Operational Due Diligence and investment management activity.

The review will consider whether role-specific training and guidance should cover:

- the meaning of modern slavery and human trafficking;
- examples of risk indicators relevant to LPPI's suppliers, outsourced services and investment activity;
- supplier and investment due diligence expectations;
- contractual requirements and escalation triggers;
- the use of whistleblowing and other reporting channels;
- how concerns should be documented, assessed and escalated internally; and
- the governance route for material issues, including escalation to the Executive Committee, Audit and Risk Committee and Board where appropriate.

LPPI will also consider whether modern slavery awareness should be incorporated into onboarding or periodic refresher training for relevant employees, and whether completion of such training should be monitored as part of LPPI's future effectiveness indicators. Relevant data will be reviewed annually to inform supplier management, training needs, escalation processes, contractual terms and the content of future modern slavery statements.

6. Monitoring, effectiveness and future actions

LPPI monitors the effectiveness of its approach through existing supplier oversight, procurement, compliance monitoring, investment due diligence, operational due diligence and risk management processes. Modern slavery considerations are reviewed on a risk-assessed basis as part of initial due diligence, periodic supplier reviews, material contract renewals, external manager assessments and relevant operational risk reporting.

LPPI recognises that effective monitoring should consider, both, activities undertaken and the quality of outcomes, and will continue to develop proportionate indicators as its modern slavery framework matures.

Initial Key Performance Indicators	
Suppliers and investment managers engaged on modern slavery-related expectations	Suppliers and investment managers are engaged through Supplier Mandatory Provisions, contractual conditions and due diligence self-declaration requirements

Known reported modern slavery cases in our direct areas of influence	No confirmed incidents identified during the reporting period
Number of reported cases resolved	N/A

LPPI has not identified any confirmed incidents of modern slavery or human trafficking in its own operations or supply chains during the reporting period. LPPI recognises that the absence of identified incidents does not, in itself, demonstrate that no risk exists. LPPI will therefore continue to strengthen its approach to identifying, assessing, documenting and escalating potential risks, and to reviewing whether further assurance or remediation is appropriate where concerns arise.

2025/26 progress	**2026/27 priorities**
Prepared LPPI's first standalone voluntary modern slavery Statement following the Group restructure	Continue to review and update the Statement annually, reflecting any material changes in LPPI's business, supply chains or risk profile.
Documented LPPI's principal stakeholder relationships, supply-chain arrangements, relevant supplier categories and information sources used to prepare the Statement.	Consider developing a more detailed supplier profile and improve understanding of visibility below tier 1, including subcontractors, global service centres and other outsourced delivery arrangements.
Clarified governance ownership across first-line business owners, Enterprise Risk, Compliance, Legal, Procurement, People and Culture, Investment Due Diligence and Operational Due Diligence.	Continue to monitor modern slavery risks through relevant governance channels and escalate material concerns to the Executive Committee, Audit and Risk Committee and Board where appropriate.
Maintained a risk-based approach to supplier onboarding, vendor risk assessment, procurement, investment due diligence and operational due diligence.	Strengthen risk assessment by considering targeted engagement with suppliers and external managers where service type, location, subcontracting model or investment exposure indicates elevated risk.
Used Supplier Mandatory Provisions to communicate modern slavery and ethical business expectations to vendors and suppliers through contractual arrangements.	Review contract coverage and supplier compliance on a risk-assessed basis, including whether additional assurance, remediation or escalation is required for higher-risk suppliers.
Confirmed that no dedicated modern slavery training was delivered during the reporting period and relevant employee groups identified for future training or awareness activity.	Review and develop proportionate modern slavery training or awareness activity for employees whose roles may involve greater exposure to modern slavery risk.
Confirmed that no modern slavery or human trafficking incidents were identified in LPPI's own operations or supply chains during the reporting period.	Establish proportionate indicators to monitor effectiveness, including contract coverage, vendor reviews, enhanced due diligence, concerns raised, training completion and investment manager reviews.

During the next reporting period, LPPI intends to monitor a set of proportionate indicators to help assess the effectiveness of its approach. These may include:

- the proportion of material supplier contracts that include modern slavery or equivalent ethical business provisions;
- the number and proportion of critical or important suppliers reviewed through periodic or annual due diligence, as applicable;
- the number of suppliers or managers subject to enhanced due diligence because of elevated risk factors;
- the number of modern slavery-related concerns raised through whistleblowing, procurement, vendor oversight, investment due diligence, operational due diligence or other reporting channels;
- the completion rate for targeted modern slavery training or awareness activity by relevant employee groups;
- the number of investment managers reviewed for modern slavery statements, policies or equivalent responsible business controls; and
- any material actions taken in response to identified concerns, including remediation, enhanced monitoring, escalation or contractual action.

CONCLUSION

LPPI will continue to review and strengthen its approach to identifying, assessing and managing modern slavery risks, and will update this Statement annually to reflect progress and any material changes in LPPI's business, supply chains or risk profile.

This Statement has been approved by the LPPI Board and is published voluntarily in the interests of transparency and good governance, having regard to the principles set out in Section 54 of the Modern Slavery Act 2015. It relates to the financial year ending 31 March 2026 and was approved by the LPPI Board on 15 September 2026. The Statement will be reviewed, updated and approved annually.

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Chief Executive Officer
LPPI

21 September 2026