

THE BLACKSTONE GROUP INTERNATIONAL PARTNERS LLP UK MODERN SLAVERY ACT TRANSPARENCY STATEMENT

In October 2015, the UK Modern Slavery Act (“MSA”) came into force and requires large organisations doing business in the United Kingdom, such as Blackstone, to produce a public “slavery and human trafficking statement”. The concept of “modern slavery” encapsulates behaviours such as forced, compulsory or coerced labour, deprivation of personal freedom or facilitating the movement of people for exploitation.

Blackstone is one of the world’s leading investment firms. We seek to create positive economic impact and long-term value for our investors, the companies we invest in, and the communities in which we work. We do this by using extraordinary people and flexible capital to help companies solve problems. Our global asset management businesses, with over \$449 billion in assets under management, include investment vehicles focused on private equity, real estate, public debt and equity, non-investment grade credit, real assets and secondary funds.

With respect to the application of the MSA, Blackstone carries on business in the UK through its UK based affiliates, including The Blackstone Group International Partners LLP. The Firm acts as a sub-advisor to its Blackstone US affiliates in relation to the investment and re-investment of European, Middle-Eastern and African based assets of Blackstone managed funds as well as arranging transactions to be entered into by or on behalf of Blackstone funds. The Firm also acts as a distributor of Blackstone funds in EMEA. Accordingly, the Firm is authorised and regulated by the Financial Conduct Authority in the UK. The Firm’s principal place of business is in London and it has a branch in Milan and a Representative Office in the Dubai International Financial Centre and in Paris.

Steps Taken During the Financial Year

For the period covering our last financial year, we took the following steps towards assessing that slavery and human trafficking is not taking place in any of our supply chains or in any part of our own business:

1. Review of the Firm’s Business and Supply Chain

- We reviewed our own employment practices and identified all suppliers that we have paid in the last financial year as our relevant supply chain for the purposes of MSA analysis.

2. Due Diligence

- We reviewed our list of suppliers to determine how best to assess the risk to the ultimate victims of any human rights breach, rather than the risk to the business itself.
- The criteria we used to evaluate suppliers included: 1) geography of the supplier’s services; and 2) nature of services (particularly when a supplier is providing physical labor, manufacturing, catering or staff contracting services). Suppliers that provide us with professional advice were deemed to be of low risk. We reviewed suppliers based in potentially lower risk geographies if we deemed the nature of their services to be higher risk.

3. Background Checks

- We undertook additional background checks on relevant suppliers to confirm if any supplier has been named on international watch lists or has any negative press associated with its business, and new suppliers will be subject to background checks going forward.

4. Communications with Supply Chain and Confirmation Letter

- We believe that we undertook effective communications with our supply chain based on our due diligence analysis. We sent relevant suppliers a contractual notice explaining the MSA and our expectations of compliance with the MSA within the supplier and its own supply chain. We took a policy decision that we would discontinue engagement with any supplier that subsequently informed us that it had concerns about complying with the MSA requirements. We may also report any such supplier to the UK police or other equivalent foreign authority where appropriate, as well as refer any victim of the practices addressed by the MSA to the National Referral Mechanism if deemed appropriate in the circumstances and with such person's consent. None of our suppliers have identified any concerns about compliance with the MSA requirements in this financial year review.

5. Review of the Firm's Procurement Procedures / Standard Contracting Terms

- We reviewed our policies that may have a touch-point with the concepts of the MSA. In that connection, Blackstone already has a comprehensive whistleblowing policy. We made updates to other relevant policies and procedures which govern our own business (e.g. UK Employee Handbook and Recruitment Guidelines).
- We have also incorporated additional contractual terms to be included in future engagement letters with new suppliers to address the requirements on MSA at the point of engagement.

6. Raising Awareness

- We took steps to educate and raise awareness of the MSA requirements and its implications with staff and the following governance bodies:
 - Executive Committee
 - Business Heads and department heads
 - Blackstone's Enterprise Risk Committee

We continue to progress in raising awareness and educating our staff and our supply chain about the requirements of the MSA. To this end, we will continue to review our business and our supply chain each financial year.



Gerry Murphy
Chairman

The Blackstone Group International Partners LLP
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