PRIVATE & CONFIDENTIAL

PANTHEON

2026

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Modern Slavery and Human Trafficking Statement

Modern Slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor and human trafficking all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. The UK Modern Slavery Act ("the Act") came into force on 29th October 2015. It created additional criminal offences for those committing such acts and had the intention of seeking to establish transparency in supply chains in modern commercial organizations. Section 54 of the Act provides that a commercial organization which supplies goods or services in the UK and has a prescribed turnover (currently £36 million) shall establish a policy on how to combat modern slavery.

Set forth below are a policy statement and an overview of the steps taken by Pantheon Ventures (UK) LLP ("PV (UK) LLP" or "Pantheon") for the financial year ending 31 December 2025 to mitigate the risk of modern slavery taking place in its business or supply chains.

PV (UK) LLP is a member of the Pantheon Group[1]. The Pantheon Group provides primary fund investment, secondary fund investment, and direct co-investment strategies across the private equity, real asset, infrastructure and credit asset classes and other innovative investment solutions, to a globally diverse range of clients and investors, directly through customized separate account programs or indirectly through funds managed by a member of the Pantheon Group. In the UK, Pantheon Group's business is carried on by PV (UK) LLP.

Our Commitment

As an investment manager investing predominantly in private funds, we operate in a sector which is at relatively low risk of modern slavery occurring. Furthermore, the vast majority of our staff and operations are in countries which have received a positive rating by the Global Slavery Index for their response to modern slavery. Nevertheless, Pantheon seeks to provide its services according to the highest ethical and professional standards and we take our responsibilities to our clients, our people, our suppliers and the communities in which we do business seriously. As part of our corporate culture, we advocate a zero-tolerance approach to modern slavery and human trafficking. In accordance with section 54 (1) of the Act, Pantheon will prepare a slavery and human trafficking statement for each financial year.

[1] Pantheon Group comprises Pantheon Ventures Inc. and AMG Plymouth UK Holdings and their respective subsidiaries and subsidiary undertakings, which includes operating entities principally based in the US (San Francisco and New York), UK (London), Ireland (Dublin), Singapore, S. Korea (Seoul), Japan (Tokyo) and Guernsey. Pantheon Ventures Inc., Pantheon Ventures (US) LP and Pantheon Ventures (UK) LLP are registered as investment advisors with the U.S. Securities and Exchange Commission ("SEC"); Pantheon Securities, LLC. Is a broker dealer registered with the SEC and is a member of the Financial Industry Regulatory Authority ("FINRA). Pantheon Ventures (UK) LLP is authorized and regulated by the Financial Conduct Authority (FCA) in the United Kingdom. Pantheon Ventures (Singapore) Pte. Ltd. is Regulated by the Monetary Authority of Singapore. Pantheon Ventures (Asia) Limited is registered as a Type II Financial Instruments Business and Investment Advisory and Agency Business Operator under the registration entry "Director General of the Kanto Local Finance Bureau (Financial Instruments Business Operator) No. 3138" under the Financial Instruments and Exchange Act of Japan (the "FIEA") and a regular member of the Type II Financial Instruments Firms Association of Japan and Japan Investment Advisers Association. Pantheon Ventures (Guernsey) Ltd is regulated by the Guernsey Financial Services Commission ("GFSC"). Pantheon Ventures (Ireland) DAC is regulated by the Central Bank of Ireland and is an appointed representative of Pantheon Ventures (UK) LLP in respect of activities carried on in the UK.

Our Approach to Combatting Modern Slavery and Human Trafficking

Our approach to combatting modern slavery and human trafficking is discussed further below under Staff, Training & Awareness, Supply Chains plus environmental, social and governance considerations and the Investment Processes. In addition, the Risk team on behalf of the Risk Committee conducts a periodic assessment of the main areas of modern slavery risk within the firm's global operations and takes appropriate action to mitigate any such risks.

Staff, Training & Awareness:

While Pantheon Group does not have (or consider that it should have) a formal human rights policy, our policies are consistent with international human rights principles, and we comply with applicable human rights requirements in all countries in which we operate. We have established policies covering matters such as equal opportunities, health and safety and employee behavior. In particular:

- Detailed background checks are carried out on all new staff through an independent outsourced provider, ensuring that any history of human rights abuses, if known, will be flagged and identified prior to any new employee joining the firm.

- We have a Global Code of Ethics which represents the standards by which all Pantheon Group staff are expected to conduct their business, and the personal conduct responsibilities of employees, and any other staff that represent the Pantheon Group and its business.

- Staff are always encouraged to report any unprofessional or illegal behavior internally via designated reporting lines. This includes any concerns that they may have regarding modern slavery or human trafficking. In addition, we have a Whistleblowing Policy enabling staff to raise concerns about modern slavery / human trafficking to senior management without fear of recrimination.

Supply Chains:

Pantheon has a number of outsourced and third-party vendor relationships and expects the same high standards from all of its contractors, suppliers and other business partners. Our key suppliers provide a range of financial and commercial services to Pantheon. Pantheon aims to deal with reputable and well-established suppliers of goods and services only and carries out risk-based due diligence depending on the criticality of the supplier. As part of its vendor oversight, Pantheon considers its key vendor relationships and whether there are any particular locations or categories of suppliers which present a higher risk of modern slavery and hence more needs to be done to combat modern slavery. Pantheon will also ensure that all new key suppliers provide an appropriate declaration or assurances that it has satisfactorily assessed its own risk of involvement in Modern Slavery.

Sustainability and the Investment Processes

Although the investment portfolios of clients and funds managed by the Pantheon Group do not fall within the ambit of the Act, Pantheon Group has an existing approach, which incorporates appropriate sustainability considerations into our due diligence processes and post investment monitoring. Pantheon's Sustainability policy (available at Investing Sustainably - Pantheon) sets out the firm's approach to integrating sustainability factors into the investment process, in line with its status as a signatory to the United Nations-supported Principles for Responsible Investment ("PRI").

As part of this Sustainability Policy, we formally incorporate sustainability factors into our investment processes. The due diligence procedures consider the portfolio manager's approach to sustainability considerations, including governance and board oversight, whether there is a formal approach to integrating sustainability factors into their investment process and whether there have been any material related incidents in their operations or across their supply chains.

Furthermore, as part of the ongoing monitoring of its investments, Pantheon seeks to understand and assess sustainability issues within all material underlying portfolio investments through its standard engagement with portfolio fund managers and through the use of a third party subscription service.

Responsibility for the policy Statement

The Chief Risk Officer has overall responsibility for ensuring that this policy statement complies with Pantheon's legal and ethical obligations whilst those under our control comply with the Act. Management at all levels are also responsible for ensuring those who report to them understand and comply with this statement and receive adequate and regular training on it and the issue of modern slavery in supply chains.

PANTHEON VENTURES (UK) LLP

Graeme Keenan

GK Keenan

Designated Member PV (UK) LLP
Partner, Chief Risk Officer
Date: 09 September 2026

Pantheon Board Approval
Date: 09 September 2026

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