

Atomico (UK) Partners LLP

Modern Slavery and Human Trafficking Statement

March 2024

Introduction

Atomico (UK) Partners LLP ("**Atomico**") is committed to carrying out business responsibly which includes ensuring that modern slavery and human trafficking are not taking place in any part of our business or supply chain.

This statement is provided by Atomico for and on behalf of its corporate group in accordance with the UK Modern Slavery Act 2015 to describe the steps that we have taken to combat modern slavery and human trafficking in our organisation and our supply chain during the Financial Year ending 31 March 2024.

Our Business

Atomico is a leading European venture capital firm based in London. The funds advised by the firm invest in early and late stage technology companies in Europe and across the world. Atomico is built on the vision that great companies can come from anywhere, and entrepreneurs are the gamechangers creating a better world.

Atomico is authorised and regulated by the Financial Conduct Authority as an investment advisor. Atomico is headquartered in London and has 73 total staff members (as at 31 March 2024).

Our Policies and Commitments

As an investor, we firmly believe that when correctly and fully embedded, sustainable business practices will generate superior long-term performance as well as enable greater positive societal impact. We want both Atomico and the businesses we invest in to be genuinely focused on doing well for all stakeholders including their own employees, customers, suppliers, shareholders, the environment and the wider world at large. We firmly believe that responsible business practices help generate superior long-term performance.

Atomico is a signatory to the UN Principles of Responsible Investment and reports on an annual basis. We have also adopted a comprehensive Sustainability Policy which can be found on our website at <https://atomico.com/sustainability-policy>. In furtherance of our sustainability commitments, we have also implemented a programme of sustainability initiatives designed to help founders build enduring, category winning businesses that are also conscious about their impact on the wider world. More details regarding the Conscious Scaling programme as well as our annual report in respect of the programme can be found on our website at <https://atomico.com/conscious-scaling>.

In order to assist our portfolio companies and the wider venture capital community, Atomico has also made publicly available a number of sustainability resources including our Conscious

Scaling roadmap, ESG policy template, DEI policy template, code of conduct template, whistleblowing policy template and anti-harassment and discrimination policy guidance.

Key Risks & Risk Management Strategies

Due to the nature of our business and operations, Atomico is at low risk of exposure to issues related to modern slavery and human trafficking.

We strive to ensure that the risks and opportunities associated with modern slavery and human trafficking are consistently managed at Atomico and that, where applicable, our policies are implemented across our portfolio companies, locations and suppliers. We regularly review the implementation of our policies and standards to identify and address areas for improvement.

In respect of the current period to which this statement relates, we have assessed the likelihood of direct modern slavery and human trafficking risks in the areas below:

- **People:** In respect of our staff, including prospective hires, we have assessed that potential risks are low given the nature of our business, our regulatory requirements and our own internal vetting and onboarding process. As part of our hiring and onboarding procedures, our People Team carry out checks on all prospective staff members to ensure that they have the right to live and work in the United Kingdom. All Atomico staff members are also required to adhere to our Staff Handbook which sets out our standards of conduct.
- **Suppliers:** In respect of our suppliers, we have assessed that potential risks are low and we have not identified any concerns in respect of our key professional and business suppliers. We acknowledge that the key area of potential risk in our supply chain relates to our facilities management, catering and courier services connected with our office at 29 Rathbone Street. Atomico has sought to mitigate any such risks by using only reputable suppliers under suitable contractual terms. The firm has also implemented a Sustainable Supplier Policy which aims to ensure that the procurement, purchase and use of products and services by the firm are aligned with our environmental and social values
- **Portfolio Companies:** The funds advised by Atomico invest in both early and late stage technology companies around the world. The nature of the business models being pursued by our portfolio companies will often involve multi-jurisdictional operations. We acknowledge that depending on the countries in which our portfolio companies operate, there may be an increased risk of modern slavery or human trafficking. As part of our due diligence process, we carry out due diligence specifically around environmental, social and governance ("**ESG**") issues prior to making any investments. Such due diligence is done in addition to our standard legal, financial, technology and operational due diligence. Our portfolio companies are also required to implement an ESG policy and to nominate a specific board member who will have responsibility for ESG at the company.

Training & Reporting

In order to ensure appropriate understanding of the risks of modern slavery and human trafficking within our business, Atomico is committed to the ongoing education of our employees, officers and other individuals who work for us about modern slavery, the Modern Slavery Act 2015 and the means of recognising, preventing and reporting suspected instances of modern slavery. Annual mandatory compliance training is conducted for all staff members (including members of our Management Committee) on topics including anti-bribery, anti-money laundering, data protection, cyber security and the FCA Senior Managers and Certification Regime.

Approval Procedures

This statement was approved by the General Counsel of Atomico on behalf of the firm's Management Committee in March 2024.

Kasit Rochanakorn
Partner & General Counsel