



**Ares Management Limited  
Ares Management UK Limited**

**UK Modern Slavery Act Transparency Statement**

This transparency statement, made pursuant to section 54 of the UK Modern Slavery Act 2015 (the “Act”), sets out the steps this organization has taken to endeavour to minimize the risk that slavery and human trafficking may be taking place in its business and supply chains.

***Background***

Ares Management Corporation (together with its affiliated companies, “Ares” or the “group”) is a global alternative asset manager, operating integrated businesses across the credit, private equity, real estate and secondaries markets. Ares is Los Angeles-based and carries on business in the UK through UK affiliates including Ares Management Limited and Ares Management UK Limited (together referred to as the “UK Entities”). The UK Entities are authorized and regulated by the Financial Conduct Authority in the UK and have their principal places of business in London.

Ares recognizes the importance of ensuring that its business is conducted responsibly. Over a number of years, the group has built a track record of disciplined investment practices and demonstrated a commitment to adhering to legal and regulatory requirements applicable to it as well as voluntarily establishing responsible policies, procedures and practices in connection with the broad scope of its business.

This statement is published on behalf of the UK Entities in line with the Act, and references to “we”, “us”, or “our” refer to both the UK Entities.

***Supply Chain***

As a financial services business, we consider the risk of slavery or human trafficking existing within our business or supply chain to be low. The goods and services we purchase to enable the delivery of our asset management services are primarily limited to areas such as professional services, real estate, facility management, office equipment, software and catering.

***Policies and Procedures***

Over a number of years procedures have been implemented to address modern slavery issues at the point of engagement with vendors and to incorporate standard modern-slavery-connected provisions into relevant contracts. In this connection, Ares performs due diligence on critical vendor relationships, including risk assessments covering a number of areas including legal and regulatory compliance, and involving asking of relevant third parties whether modern slavery and related human rights concerns are a potential material risk in their sector, business, or supply chain.

Moreover, the group's policies and procedures support Ares' commitment in this and broader areas of responsibility, including for example Ares' Code of Ethics, covering standards of behaviour and expectations of good business practice expected of staff; its anti-bribery & corruption and gifts & entertainment policies, setting out standards of behaviour in such areas; the group's whistleblowing policy, which includes appropriate contact information for reporting misconduct and raising concerns; and Ares' responsible investment policy, covering environmental, social and governance issues across the Ares platform.

### **Board Approvals**

The Boards of Directors of each of the UK Entities approved this statement on 24 June 2021.

Signed on behalf of Ares Management Limited and Ares Management UK Limited:



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Blair Jacobson  
Director, Ares Management Limited  
24 June 2021



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Kevin Early  
Director, Ares Management UK Limited  
24 June 2021