

Black Creek Modern Slavery Statement

Modern Slavery Statement for the year ending September 30, 2023.

This statement is made on a voluntary basis pursuant to Section 54(1) of the UK Modern Slavery Act (2015), Section 16 of the Australian Modern Slavery Act 2018 (Cth), and Section 11 of Fighting Against Forced Labour and Child Labour Supply Chains Act (Canada’s Modern Slavery Act, 2023) and constitutes the Modern Slavery Act transparency statement for Black Creek Investment Management (“Black Creek”) which summarizes the potential risks of modern slavery within our business and actions taken to mitigate this risk.

Firm structure

Black Creek is a privately held investment firm whose primary objective is to provide exceptional long-term investment performance for our clients.

The firm provides investment management services on a fully discretionary basis to clients located in several jurisdictions around the world.

Black Creek is registered in as a portfolio manager, exempt market dealer and investment fund manager in Ontario, Quebec, and Newfoundland and Labrador, as a portfolio manager and exempt market dealer in British Columbia, Alberta, Saskatchewan, Manitoba, New Brunswick, and Nova Scotia.

Black Creek’s principal regulator in Canada is the Ontario Securities Commission. Black Creek is also registered with the SEC as an investment adviser in the U.S. under the Investment Advisers Act of 1940.

The firm offers its services out of a single location in Toronto, Canada.

Risk in Operations

Black Creek believes there is a low risk of causing, contributing or being directly linked to modern slavery practices in the supply chain of our operations. Much of our supply chain consists of professional services firms – brokers, legal advisers, regulated banks, IT providers, custodians, back-office operations, and property management. We believe that the industry and geographies in which our key suppliers operate bear a relatively low risk of modern slavery and human trafficking due to many being professional services firms headquartered exclusively in either Canada or the United States, both countries governed by human rights codes.

Black Creek has a vendor oversight process to review key suppliers to assess their business operations and controls. This process takes account of the type of service provided as well as the jurisdiction of the counterparty. We have asked key suppliers for confirmation that they have not committed modern slavery or human trafficking offenses and look to be informed of any supplier outsourced arrangements that may carry higher risk. While it is possible that a supplier has engaged in modern slavery, we believe this risk to be low and will continue to take steps to try to mitigate any risk noted.

Responsible Investment

As an investor in companies throughout the world, Black Creek is aware of the potential risks with modern slavery. Black Creek's Responsible Investment and Engagement Policy outlines how our portfolio managers identify, analyze, and monitor any material ESG risks and opportunities that may impact investment performance. Specific to modern slavery, we periodically screen our firm's holdings against factors including alignment with UNGC, OECD, and ILO principles, policies to prevent forced labour, and human rights controversy flags. In addition, our investment team has access to research and data from a variety of sources including news publications, Sustainability Accounting Standards Board ("SASB") research, MSCI ESG reports, and broker research to monitor these risks. If a potential risk is identified, we will engage with the company in question following our engagement guidelines as specified in our Responsible Investment Policy.

As a signatory to the UN Principles for Responsible Investments (UNPRI) we are committed to incorporating ESG issues into our investment analysis and decision-making processes and mitigating any material risks that arise. Embedded within Sustainable Finance Disclosures Regulation ("SFDR") are several principal adverse impacts ("PAI" s) related to modern slavery risk, namely the mandatory PAIs 10 (UNGC/OECD violations) and 11 (existence of UNGC/OECD compliance policies).

Education

Members of our investment team attend in-person and virtual conferences on ESG matters and actively share learnings across the firm to enhance our overall process. We have provided staff with training regarding the risks surrounding modern slavery and human rights within our holdings and practices to reduce those risks. We believe the relevant Black Creek employees are well positioned to identify and mitigate risks of modern slavery within our investment activities and we subscribe to services and tools to assist in this process. We supplement our internal resources with external advice as needed.

Staff responsible for vendor relationships have been made aware of potential risks around modern slavery in our supply chain.

All staff are required to review the firm's Compliance Policies and Procedures Manual, adhere to the Code of Ethics and Standards of Professional Conduct of the Chartered Financial Analyst Institute, and annually sign off on the Code of Ethics.

Approval

This Statement is approved by Black Creek Investment Management for the year ending September 30, 2023.

Signed by:

Richard Jenkins
Chairman of the Board & Managing Director

On behalf of the Board of Directors
Black Creek Investment Management Inc.
December 18, 2023