

PRIVATE EQUITY LABOR POLICY COMPARISON

OVERVIEW

As more public pension funds and investors identify the need for labor standards within their private equity portfolio due to risks associated with these investments, this document provides some examples of existing frameworks to mitigate and address such risks.

INVESTOR POLICIES EXAMINED*

			
<p>NY State Common Retirement Fund Responsible Workforce Management Policy and Principles (NYS CRF): Adopted April 18, 2024 for the private equity asset class</p>	<p>California Public Employee Retirement System (CalPERS): Adopted portfolio-wide labor principles in 2023</p>	<p>Illinois State Board of Investment Labor Principles for Private Equity: Adopted September 20, 2024</p>	<p>Maryland SRPS Responsible Workforce Management Principles for Private Equity: Adopted June 17th, 2025</p>
<p>NY State Common Retirement Fund Responsible Workforce Management Policy and Principles</p>	<p>Total Fund Investment Policy, Governance and Sustainability Principles - Human Capital Management (amended Nov 2023)</p>	<p>ISBI Labor Principles for Private Equity</p>	<p>SRPS Responsible Workforce Principles</p>

*Table contains excerpts from each of the listed policies, please review full documents for additional details

GENERAL

NYS CRF	CALPERS	ISBI	MSRPS
<p>The New York State Common Retirement Fund (“CRF”) believes that workforce management best practices prioritize the protection of health, safety, fair compensation, reasonable benefits and rights of companies’ workers. Implementing workforce management best practices can create an engaged and stable workforce that in turn can provide a competitive advantage for companies and their investors.</p> <p>CRF’s PE Managers should, subject to the investment objectives of the relevant investment funds and the duties of the PE GPs to the relevant funds and their limited partners, encourage the management of their Portfolio Companies to:</p>	<p>As reflected in our Investment Beliefs, CalPERS considers that long-term value creation requires the effective management of three forms of capital – Financial, Physical, and Human.</p>	<p>In accordance with the goal of creating and enhancing the value of its private equity investments, the Board supports the implementation of the following guiding labor principles. Such implementation is subject at all times to the Board’s fiduciary duties of loyalty and prudence. ISBI’s private equity managers should, subject to their own fiduciary duties as well as the investment objectives of their funds, encourage the implementation of the following principles within their portfolio companies.</p>	<p>The Maryland State Retirement and Pension System (“the System”) believes that workforce management best practices provide for the protection of health, safety, fair compensation, reasonable benefits and rights of companies’ workers. Implementing workforce management best practices can help reduce workplace injuries and create an engaged and stable workforce that in turn can provide a competitive advantage for companies and their investors. These Principles are intended to help guide the Investment Division Staff’s (“Staff”) due diligence review, as well as its monitoring and oversight of private equity asset class investments with respect to responsible workforce management practices.</p>

RIGHT TO ORGANIZE

Workers’ right to organize and bargain collectively

NYS CRF	CALPERS	ISBI	MSRPS
<p>Adopt policies and practices to protect their workers’ international human rights as defined by the Core Conventions of the International Labor Organization (ILO), the ILO Declaration on Fundamental Principles and Rights at Work, and the UN Universal Declaration of Human Rights, including, but not limited to ... freedom of association, including non-interference, the right to collective bargaining ...</p>	<p>Freedom of association and the effective recognition of the right to collective bargaining</p> <p>Seek to support and improve the well-being of employees as part of human capital management strategy and in compliance with applicable laws</p>	<p>Respect workers’ right to freedom of association. Support policies of neutrality when workers seek to exercise their freedom to join a union and avoid any interference with legitimate organizing efforts. For companies with union-represented workforces, negotiate in good faith with the goal of reaching mutually beneficial collective bargaining agreements.</p>	<p>Adopt policies and practices to protect their workers’ human rights, including, but not limited to: eradication of all forms of forced or obligatory labor; effective abolition of illegal child labor; freedom of association, including non-interference; the right to collective bargaining; and the elimination of employment discrimination.</p>

NEUTRALITY

Remaining neutral in workers' decision to bargain collectively

NYS CRF	CALPERS	ISBI	MSRPS
Adopt a position of neutrality and commit to non-interference in the event there is an attempt by a labor organization to organize workers at a portfolio company. While expressing their views on unions, portfolio companies should not make any direct or indirect threats, create an atmosphere of intimidation or fear, or retaliate against employees exercising their right to freedom of association.	—	Respect workers' right to freedom of association. Support policies of neutrality when workers seek to exercise their freedom to join a union and avoid any interference with legitimate organizing efforts. For companies with union-represented workforces, negotiate in good faith with the goal of reaching mutually beneficial collective bargaining agreements.	Adopt a position of neutrality and commit to non-interference in the event there is an attempt by a labor organization to organize workers at a portfolio company. While expressing their views on unions, portfolio companies should not make any direct or indirect threats, create an atmosphere of intimidation or fear, or retaliate against employees exercising their right to freedom of association. Portfolio companies should commit to bargaining in good faith with their union-represented workforces to reach mutually beneficial collective bargaining agreements.

COMPULSORY LABOR

Avoiding employment of workers against their will through force, fraud or coercion

NYS CRF	CALPERS	ISBI	MSRPS
Based on ILO	<p>The elimination of all forms of forced or compulsory labor</p> <p>Respect the human rights of those affected by their investment activities and seek to confirm that their investments do not flow to companies that utilize forced labor</p>	Adopt policies and practices to respect their workers' international human rights as defined by the Core Conventions of the International Labor Organization ("ILO"), the ILO Declaration on Fundamental Principles and Rights at Work, and the UN Universal Declaration of Human Rights with respect to elimination of all forms of forced or obligatory labor, the effective abolition of child labor, and the elimination of discrimination and harassment in employment.	Adopt policies and practices to protect their workers' human rights, including, but not limited to: eradication of all forms of forced or obligatory labor; effective abolition of illegal child labor; freedom of association, including non-interference; the right to collective bargaining; and the elimination of employment discrimination. If portfolio companies adhere to specific international human rights standards, in keeping with those standards, where national law and international human rights standards differ, portfolio companies should strive to follow the higher standard. Where they are in conflict, portfolio companies should respect local law, while seeking to respect the principles of internationally recognized human rights.

CHILD LABOR

Avoiding illegal employment of minors

NYS CRF	CALPERS	ISBI	MSRPS
Based on ILO	<p>The effective abolition of child labor</p> <p>Respect the human rights of those affected by their investment activities and seek to confirm that their investments do not flow to companies that utilize child labor</p>	Adopt policies and practices to respect their workers' international human rights as defined by the Core Conventions of the International Labor Organization ("ILO"), the ILO Declaration on Fundamental Principles and Rights at Work, and the UN Universal Declaration of Human Rights with respect to elimination of all forms of forced or obligatory labor, the effective abolition of child labor, and the elimination of discrimination and harassment in employment.	Adopt policies and practices to protect their workers' human rights, including, but not limited to: eradication of all forms of forced or obligatory labor; effective abolition of illegal child labor; freedom of association, including non-interference; the right to collective bargaining; and the elimination of employment discrimination. If portfolio companies adhere to specific international human rights standards, in keeping with those standards, where national law and international human rights standards differ, portfolio companies should strive to follow the higher standard. Where they are in conflict, portfolio companies should respect local law, while seeking to respect the principles of internationally recognized human rights.

DISCRIMINATION & HARASSMENT

Ensuring workers are not subject to an environment of discrimination or harassment

NYS CRF	CALPERS	ISBI	MSRPS
<p>Implement policies and practices that ensure portfolio companies' workers can safely report, without fear of retaliation, violations of these Principles to PE Managers and relevant regulatory agencies. To facilitate worker safety, PE Managers should encourage Portfolio Company management to:</p> <p>a. share these Principles with Portfolio Company workers; and</p> <p>b. establish an open line of communication with any labor union representing workers at a Portfolio Company.</p>	<p>The elimination of discrimination in respect of employment and occupation</p> <p>Respect the human rights of those affected by their investment activities and seek to confirm that their investments do not flow to companies that maintain discriminatory policies.</p>	Prohibit discrimination and harassment in the workplace. Take reasonable steps to eliminate any discriminatory practices or policies at portfolio companies.	Adopt policies that encourage workforce inclusion, opportunity, and belonging; prohibit discrimination and harassment in the workplace.

WAGES & BENEFITS

Workers are fairly compensated and provided with affordable healthcare

NYS CRF	CALPERS	ISBI	MSRPS
<p>Comply with all national, state, and local laws, including, but not limited to, those pertaining to wages, health, occupational safety, labor relations, withholding taxes, and insurance.</p> <p>Support the payment of industry standard wages for all portfolio company employees and contracted workers defined by federal and state prevailing wage regulations and local living wage ordinances...</p> <p>Encourage retention by providing workers with reasonable and industry-customary benefits, such as retirement benefits, comprehensive health care, unemployment insurance, workers compensation benefits, and adequate sick leave.</p>	—	<p>Support the payment of industry-standard wages that provide an adequate standard of living for all employees. Respect federal and state prevailing wage regulations where applicable.</p>	<p>Comply with all national, state, and local laws, including, but not limited to, those pertaining to wages, health, occupational safety, labor relations, withholding taxes, and insurance.</p>

LAYOFFS

Providing severance pay for employees in the event of layoffs

NYS CRF	CALPERS	ISBI	MSRPS
<p>Minimize adverse impacts on portfolio company workers and existing collective bargaining agreements resulting from mergers, acquisitions, restructurings, reorganizations or bankruptcies.</p>	—	<p>Minimize adverse impacts on workers resulting from company transactions, restructurings, reorganizations or bankruptcies. Such efforts could include respecting existing collective bargaining agreements when companies are acquired, negotiating successorship clauses regarding collective bargaining agreements when companies are sold, and providing reasonable severance pay where applicable.</p>	—

DIVERSITY, EQUITY, AND INCLUSION

Increasing the inclusion of historically marginalized groups in workforce and management

NYS CRF	CALPERS	ISBI	MSRPS
Adopt policies that encourage workforce diversity, equity and inclusion; prohibit discrimination and harassment in the workplace; and disclose pay rates by job category, disaggregated by race, ethnicity and gender (such disclosures can be made using widely used standards like EEO-1).	Seek to improve diversity, equity, and inclusion in portfolio investments to address recruitment, retention, and compensation.	Support recruiting and retention efforts that represent best practices across industries. Adopt policies that encourage a diverse and inclusive workforce and provide opportunities for employee growth and development.	—

HEALTH & SAFETY

Providing a safe working environment for employees

NYS CRF	CALPERS	ISBI	MSRPS
Make occupational safety and health a top priority and maintain and disclose relevant safety and health metrics.	<p>A safe and healthy working environment.</p> <p>Seek to support and improve the well-being of employees as part of human capital management strategy that includes providing a safe, harassment-free and healthy workplace.</p>	Promote a safe and healthy working environment. Properly train employees and adopt policies and practices that prioritize occupational safety and health for all workers.	Maximize the productivity and effectiveness of their workers by investing in training, safe workplaces, fair compensation, and reasonable health and retirement benefits.; Make occupational safety and health a top priority; measure and disclose relevant safety and health metrics, including workplace injuries.

WORKING CONDITIONS

Employees experience equitable scheduling

NYS CRF	CALPERS	ISBI	MSRPS
<p>Adopt policies that provide for reasonable work hours and reliable work schedules for portfolio company workers and discourage labor policies that result in impractical work schedules for workers...</p> <p>Reject the use of non-disclosure and forced arbitration provisions in employment contracts.</p>	—	Adopt policies that provide for reasonable work hours as well as reliable work schedules for workers. Discourage labor policies that result in impractical work schedules.	Support policies that provide for reliable work schedules, compensation levels, and benefits for all employees that allow for an adequate standard of living, and provisions for sick leave.

APPLICABILITY

The portfolio companies and investments in which the GP will guarantee compliance with these principles

NYS CRF	CALPERS	ISBI	MSRPS
This Policy applies to private equity asset class investments, other than funds of funds, secondary funds, and funds that don't have a strategy of independently making equity investments.	Portfolio-wide	Intended to guide ISBI's private equity managers as they make investments on ISBI's behalf.	Due diligence review, as well as its monitoring and oversight of private equity asset class investments with respect to responsible workforce management practices. The principles will be most applicable to Staff's review of a direct investment by the System into funds with investment strategies that focus on the control of portfolio companies. For investments with indirect investment strategies, such as funds-of-funds or funds engaged in the purchase and sale of limited partner fund interests on the secondary market the PE manager should be aware of the principles and encouraged to employ them in their evaluation of investments. Managers, future capital allocations will be evaluated for evidence of a pattern of persistent non-compliance.

DISCLOSURE/REPORTING

How the GP reports workplace issues to investors

NYS CRF	CALPERS	ISBI	MSRPS
—	See Corporate Reporting KPIs	Implement policies and practices to allow portfolio company employees to safely report any violations of these principles to private equity managers. Maintain an open line of communication with portfolio company workforces and any labor union representing workers at a portfolio company. Prohibit retaliation of any kind against employees who report such violations.	Implement policies and practices that ensure portfolio company workers can safely report, without fear of retaliation, violations of these Principles to PE Managers and relevant regulatory agencies.