



CODE OF CONDUCT

Suppliers

ThomasLloyd Group Limited

As of: July 2021

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1. Principles

The ThomasLloyd Group's aim is to *Realizing Sustainable Values*, and to do so by *Investing where our money makes a difference*. This is how the ThomasLloyd Group Limited (the "Company") together with its subsidiaries from time to time (collectively, the "Group") navigates the investment world and delivers value to our clients, stakeholders and communities in which it invests. Our values define our reputation, determine the behaviors we expect of our employees and shape how we do business.

The ThomasLloyd Group aims to employ team members and to work with suppliers who align with our values and support our goals. We expect our team members and suppliers to adhere to all relevant legislation and to act responsibly, fairly, ethically and safely at all times. These principles form an integral part of our sourcing activities and decisions.

Our Supplier Code of Conduct sets out the behaviors and high standards we expect from our third party suppliers and their subcontractors.

2. Legal and Regulatory Standards

ThomasLloyd requires its team members and suppliers to comply with all laws and regulations applicable to its business in the countries in which they operate and seek commitments from their own supply chain to also meet this requirement.

3. Human Rights

ThomasLloyd is committed to upholding all laws relating to the protection of human rights including but not limited to the UN Universal Declaration of Human Rights. We are committed to preventing slavery and human trafficking from taking place in our supply chain. We expect our team members, contractors, suppliers and their subcontractors to:

- Prohibit human trafficking and child or forced labor including modern slavery
- Comply with all applicable wage and working regulations
- Embrace diversity, fairness and inclusion in their workforce/work place
- Support freedom of association in line with local regulations
- Act ethically and with integrity and require their employees to do the same
- Have robust policies in place that require their employees to adhere to relevant regulations and treat their own employees fairly and ethically
- Have the ability to demonstrate robust procedures are in place to be confident that child labor, slavery or human trafficking is excluded from their supply chain.

4. Ethical Sourcing and Behavior

We expect all our team members and suppliers to conduct business with integrity and incorporate the ethical and responsible behavior and sourcing of goods into their processes and governance whilst complying with all relevant legislation. Suppliers will be expected to have policies in place to demonstrate robust governance.

5. Bribery and Corruption

We expect our team members, contractors and suppliers to operate with integrity, comply with the Foreign Corrupt Practices Act, the Bribery Act 2010, the Criminal Finances Act 2017 and have policies in place to prevent fraud, bribery and corruption, market abuse, money laundering, tax evasion and any other improper payments, or inducements within its business and seek to only work with suppliers that demonstrate similar commitments. Suppliers must not directly or indirectly offer improper payments or inducements to ThomasLloyd employees that may give rise to actual, potential or perceived conflicts of interest or engage in any other unethical behavior.

6. Diversity and Inclusion

ThomasLloyd is committed to Diversity and Inclusion, and aims to create a work environment that is characterised by diverse cultures, and where the individual differences among employees are respected. The vision of profiting from diversity – of people, cultures, viewpoints, products, services, markets and ideas – is reflected in our passion to create opportunities and to strengthen performance. Our suppliers are also expected to abide by all relevant equality legislation in the countries in which they operate and not discriminate in any employment or hiring practices.

7. Health and Safety

ThomasLloyd is committed to ensuring all employees and suppliers are provided with a safe working environment which meets the requirements of the Health and Safety at Work Act 1974, or the respective regulations in the countries where the Group operates offices and engage with suppliers. Suppliers are to provide a safe and healthy working environment for their employees which meets the requirements of all applicable occupational health and safety regulations and abide by all local laws and regulations including the Health and Safety at Work Act 1974. Both ThomasLloyd and Suppliers should ensure their employees receive the appropriate safety instruction and training to keep them safe and well in the workplace and have business management practices in place to address:

- Health and Safety Policy administration
- Hazard identification, risk assessments and relevant procedures
- Fire safety and emergency evacuation procedures i.e. disaster recovery
- First aid and accident reporting procedures
- Ergonomics
- Clean and safe working conditions

8. Environment

ThomasLloyd is 100% focused on sustainability. We recognise the role we play in protecting the environment and minimising our environmental impact. We expect suppliers, together with their supply chains, to minimise the environmental impact of their operations and ensure business practices meet all applicable environmental laws and regulations. We require our teams and suppliers to comply with all applicable environmental legislation and regulations and encourage suppliers to have policies for effective environmental management and to participate in voluntary environmental reporting and certification programs and endorse environmental efforts such as:

- Reducing consumption of greenhouse gas emissions
- Reducing consumption of gas and electricity and purchasing energy from renewable sources wherever practical and possible
- Reducing consumption of natural resources and environmentally damaging products and changing to recyclable and sustainable alternatives
- Effective waste management, targeting recyclable waste and minimizing waste to landfill

9. Confidential Information

ThomasLloyd expects any information received by a team member and our suppliers to be held securely with appropriate technical and organisational security in place to safeguard that information to ensure there is no disclosure of the data to any other party without our permission.

10. Compliance and Measurement

Our team members and suppliers must be able to demonstrate compliance with ThomasLloyd's Code of Conduct. Such compliance includes documented evidence and cooperation, upon reasonable notice, with any certification activity to demonstrate compliance with the Code. In line with our procurement procedures, suppliers participating in formal tender processes may be required to provide written acknowledgement of their adherence to the Code of Conduct. Where local laws and regulations do not meet the same standards as the Code of Conduct, the terms of the Code take precedence where they do not incur a breach of such local regulation.

Team member adherence and commitment to this Code of Conduct forms a key employment term. Failure to comply with the Code of Conduct and/or local laws and regulation may result in termination of employment.

Supplier adherence and commitment to this Code of Conduct forms an integral part of ThomasLloyd's sourcing activity and is used along with all other relevant decision criteria when selecting new suppliers or renewing current contractual relationships. In addition, failure to comply with the Code of Conduct and/or local laws and regulation may result in termination as a ThomasLloyd supplier.

