



WHITE SUMMIT CAPITAL

DIVERSITY & INCLUSION POLICY

MARCH 2023



I. INTRODUCTION

We firmly believe that diversity contributes positively to White Summit Capital and the wider community. We seek to create an inclusive and safe workplace where everyone feels valued and respected, regardless of their identity, including (without limitation) background, age, ethnicity, gender, origin, nationality, background, sexual orientation, disabilities, family status, religion, physical appearance, state of health, state of pregnancy or political views.

This D&I Policy applies to all companies of White Summit Capital Group, as well as to all investees over which the Group has effective control, within the limits established by law.

The D&I Policy sets out our expectations for all members at White Summit Capital to be met at all times and is applicable to all senior managers, officers, employees, temporary workers and contract staff at White Summit Capital.

This D&I Policy is not exhaustive. You are expected to exercise sound judgement and act in accordance with the Code of Conduct when considering the issues referred to in this policy.

II. DIVERSITY AND INCLUSION

We are an equal opportunities employer committed to following practices which are free from unfair and unlawful discrimination.

General principles

Diversity in the workplace is defined as a workplace consisting of employees with varying characteristics, such as their age, ethnicity, gender, origin, nationality, background, sexual orientation, disabilities, family status, religion, physical appearance, state of health, state of pregnancy or political views.

We firmly believe that diversity is a necessity in our modern and globally connected and evolving society, furthermore, enhancing the quality of work due to a variety of different perspectives while also increasing creativity. Diversity can bring fresh ideas, thinking and approaches which make the way work is undertaken more effective and efficient.

In essence, we aim to create and enforce a respectful and positive environment that encourages diversity and inclusion.

When recruiting, promoting and compensating, we consider positively inclusion and diversity parameters. We are committed to regular monitoring of these parameters within the firm and to appropriate analysis to ensure alignment with our objectives.

We strive to promote equal treatment for our employees in every step: recruitment, appraisal, career development, compensation and exit, while encouraging inclusion and diversity.

Fair treatment for all employees is essential. Identity must not be predictive of opportunities or workplace outcomes.

We strive to develop a sufficiently inclusive culture, such that all employees and members of the firm feel that their voices will be heard, which is critical to retain talent.

We stand for equal pay for work of equal value and seek to appoint diverse and inclusive committees and boards within the firm.

Anti-discrimination / anti-harassment

We stand against discrimination and harassment. Everyone must be treated with dignity and respect, whatever their background or identity, including (without limitation) age, ethnicity, gender, origin, nationality, background, sexual orientation, disabilities, family status, religion, physical appearance, state of health, state of pregnancy or political views.

We aim to guarantee the non-discrimination of all employees and members of the firm and strive to promote equal treatment for all of them. Thus, we seek to apply policies that not only comply with the applicable laws and regulations, but also go beyond and strongly promote diversity, equity and inclusion.

Human rights and labour rights

White Summit Capital adheres to the principles of the Universal Declaration of Human Rights, the International Labor Organisation (ILO) and the Organisation for Economic Co-operation and Development (OECD).

We understand that our success is built on long-term relationships and comply with all applicable labour and employment laws in the jurisdictions in which we operate. We are fair and honest in dealing with others, we treat fairly and with respect all those who work for us and with us.

Gender balance

We seek to encourage gender balance and to support women in accessing leadership positions and to achieve a balanced gender distribution in the firm.

We believe that having a balanced workforce with equal access and opportunities for anyone wishing to join and progress within our firm is essential to success and contributes to ensuring a good working environment.

We strive to achieve a balanced representation within the various decision-making bodies and levels, guaranteeing participation in all consultative and decision-making areas of the firm.

III. WHITE SUMMIT CAPITAL EMPLOYEES AND MEMBERS EXPECTATIONS

Expectations

Bullying, harassment or discrimination of any kind, including (without limitation) verbal or physical conduct within and outside the workplace, will not be tolerated.

In order to create such an environment, we set forth the expectations required for all members of the firm to follow.

Employees

You must:

- Always treat your colleagues with dignity and respect.
- Always engage respectfully with members regardless of their differences.
- Always be conscious of your words in the workplace and online.
- Challenge any behaviour that falls short of the expectations in this D&I Policy.

Manager / Senior

You must:

- Foster a culture in which compliance with this policy is regarded as integral to the way we conduct our business activities.
- Provide leadership on equity, diversity and inclusion and act as role models.
- Ensure that equity, diversity and inclusion is an integral part of all White Summit Capital activities.
- Ensure that all reasonable provisions are made for people with disabilities or accessibility requirements to ensure they have the environment and equipment required for their role.
- Address any inappropriate behaviour.

IV. RECRUITMENT, PROFESSIONAL DEVELOPMENT AND TRAINING

Recruitment

We welcome applications from a diverse range of candidates and are committed to an inclusive and equitable recruitment process.

Recruitment process

- All descriptions and specifications for posts will include only requirements that are necessary and justifiable for the effective performance of the job.
- Advertisements will be clear, use inclusive language and be capability based.
- All selection processes will be conducted following defined criteria and we will only interview applicants suitable for the role.
- We will choose the best professionals by means of selection tools and systems based on the knowledge and abilities of the candidates.
- We will not establish discriminatory salary differences and we will ensure appropriate integration of professionals within the company, workgroup and position.
- We are all committed to ensuring that external recruitment agencies and executive search companies, are made aware of the principles and approaches of this D&I Policy, and our commitment to implementing its goals.

Professional development

We take decisions concerning our employees and members based on merit and rewards excellence. Employees are promoted based on their performance as individuals, their contribution to the team and to the overall business.

We commit to ensure opportunities for promotion are made available on a fair and equal basis, through the evaluation of goals and performance. For that purpose, we will recognise the knowledge and skills required for each job, the contribution of professionals to the creation of value, as well as dedication and responsibility in the performance of their duties.

Standards of equal opportunity, non-discrimination and respect for diversity shall be taken into account in the assessment of performance and of any salary increases.

We strive to establish equal pay for work of equal value.

Training

We are committed to ensuring equal opportunities and inclusion in our training and professional development.

We make opportunities for training, development and progress available to all staff, who will be helped and encouraged to develop their full potential, so their talents and resources can be fully utilised to maximise the efficiency of the firm.

White Summit Capital will make its employees and members aware of the content of this D&I Policy. This includes training managers and all other employees about their rights and responsibilities under this D&I Policy.

We will incorporate inclusion and diversity within other learning modules where appropriate.

V. RAISING CONCERNS

Any employees or members of White Summit Capital who feel as though they have been treated in an inappropriate manner or have observed discriminatory behaviour should seek assistance from a supervisor.

All complaints will remain confidential, and action will be taken in an appropriate manner.

Persons who feel that they have witnessed, harassment or discrimination have a duty to report to:

- a) the supervisory manager if feeling comfortable doing so;
- b) Human Resources if feeling comfortable doing so; or
- c) via the whistleblowing channel that has been set up by White Summit Capital, with the following dedicated whistleblowing email (compliance@whitesummitcap.com), by following the White Summit Capital Whistleblowing Policy.

Allegations of discrimination and harassment shall be investigated and any behaviour violating this D&I Policy will be dealt with as misconduct under the organisation's grievance or disciplinary procedures. Thus, appropriate action will be taken.



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