



WHITE SUMMIT CAPITAL

SUPPLIER CODE OF CONDUCT

MARCH 2023



I. INTRODUCTION

White Summit Capital seeks to ensure and promote responsibility and integrity throughout its supply chain.

The Supplier Code of Conduct sets out the guidelines formalized by White Summit Capital to promote responsible behaviour from its suppliers, service providers and subcontractors (indistinctly, Suppliers).

It does not replace the applicable national and international legislation to which all Suppliers must strictly adhere to.

The guidelines set out in herein are based upon the UN International Bill of Human Rights and the eight core ILO conventions as set out in the ILO Declaration of Fundamental Principles and Rights at Work.

II. EXPECTATIONS FOR SUPPLIERS

1. Complying with laws and regulations

Suppliers comply with applicable laws and regulations in every jurisdiction in which they operate. They must avoid causing or contributing to adverse human rights impacts. Where such impacts may occur / have potential to occur, suppliers seek to prevent or mitigate adverse human rights impacts, especially within their supply chain.

2. Respecting human rights

Suppliers respect and promote respect for human rights within their activities.

- Modern Day Slavery and Child Labour

No forced labour, modern slavery, human trafficking, or comparable labour shall be acceptable. Forced labour is any work or service which is conducted by individuals against their will, or under threat of punishment. Labour must be voluntary, workers must be free to end their employment at any time (subject to prior reasonable notice time) and workers shall not be forced to lodge money deposits or identification papers with their employer.

Suppliers do not employ children of compulsory school age or those that have not yet reached the minimum age for employment in the respective country, and they must comply with ILO Conventions on child labour.

- Labour rights

Workers must be remunerated in accordance with national applicable laws and must be at least the minimum wage set by legislation of the country where the work is performed.

Suppliers ensure that their employees have working hours and benefit from days off in accordance with the provisions of ILO Hours of Work Convention. Overtime must be voluntary and must comply with the specifications defined in ILO conventions.

- **Safe and healthy working conditions**

Suppliers provide and maintain a safe working environment for their employees to minimise the risk of exposure to unsafe acts, unsafe conditions and health risks in the workplace. This includes having comprehensive Health and Safety policies and procedures in place to ensure compliance with national Health and Safety regulations. Risk assessments shall be performed and workers shall be informed of health and safety risks and instructed on safe systems of work and emergency procedures.

- **Freedom of Association and the Right to Collective Bargaining**

Suppliers respect their employees' right of association and the right to form and join (or not), unions in accordance with applicable national legislation. They maintain a collaborative attitude in relation to the negotiation of working conditions collectively.

- **Local communities**

Suppliers are committed to respecting local communities and local businesses where they operate. Where applicable, they shall promote initiatives that contribute these communities.

3. Ensuring diversity and the absence of discrimination or harassment

Suppliers are committed to providing equal opportunities and seek to ensure that their workforce reflects, as far as is practicable, the diversity of the communities in which it operates.

No exclusion or preference shall be made based on race, colour, sex, religion, political opinion, social origin, disability, age, health status or sexual orientation which has the effect of impacting equality of opportunity, or treatment in employment or occupation. Suppliers maintain an environment free from any form of harassment, intimidation, or bullying.

4. Respecting the environment

Suppliers comply with environmental laws and regulations where they operate, perform work, or otherwise may impact the environment.

Suppliers will support a precautionary approach to environmental challenges. They are encouraged to establish and implement procedures to minimise any adverse impact of its operations on the environment and to demonstrate continuous improvement

In addition, where relevant, Suppliers who have a potential to cause an impact undertake to:

- control, monitor and appropriately treat wastewater, air emissions and waste generated from its operations including, without limitation, the treatment of hazardous waste, in compliance with applicable legislation;

- have systems in place to prevent and mitigate spills and uncontained releases to the environment;
- have systems in place to eliminate or reduce to potential impacts on the receiving environment and communities as far as reasonably practicable;
- maintain appropriate reporting systems for such unplanned events;
- manage and maintain chemicals and hazardous materials in such a way that ensures a safe handling throughout its entire life cycle in compliance with all relevant standards and regulations.

5. Preventing conflicts of interest

Suppliers take reasonable care to avoid and manage actual or potential conflicts of interest that could harm White Summit Capital. Suppliers must disclose any such conflicts.

6. Fighting corruption

Suppliers have adequate systems in place to prevent bribery and corruption. Bribes or other means of obtaining an illegal or improper advantage must not be offered or given, directly or indirectly, to any employee, representative, or a third party.

7. Fighting money laundering

Suppliers ensure that their employees are familiar with applicable laws governing matters related to money laundering and procedures in place to ensure compliance. They must apply vigilance in respect of any financial transaction to detect irregularities (country of origin, bank's location, etc.).

8. Promoting fair competition

Suppliers conduct business in compliance with applicable fair competition and anti-trust laws and fair business practices

9. Safeguarding confidentiality

Suppliers must not disclose any confidential or proprietary information related to any aspect of White Summit Capital or its portfolio companies.

Confidential information remains strictly confidential, even after the relationship between the Supplier and White Summit Capital has terminated.

Personal data shall be managed in accordance with applicable laws and regulations.

III. COMPLIANCE AND REPORTING

White Summit Capital reserves the right to review and audit Suppliers to verify their compliance with the Supplier Code of Conduct.

Suppliers shall cooperate with and shall ensure that its affiliates and their respective directors, officers, employees, agents, or representatives shall cooperate in any audit/review and promptly provide information to and answer any reasonable questions.

White Summit Capital recommends Suppliers to formalise a mechanism for reporting breaches, anomalies or concerns of the expectations set out in this Code. Given such breaches affect the relationship between the Supplier and White Summit Capital, the Supplier undertakes to notify any such reporting to the WSC Chief Sustainability Officer at the following e-mail address: esg@whitesummitcap.com.

In the event of any breaches to the Supplier Code of Conduct, Supplier is expected to propose to White Summit Capital a remedial action plan. Failure to correct the breach within a reasonable timeframe, White Summit Capital may terminate the relationship at its discretion.



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