

# CapMan's Supplier Code of Conduct

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## 1. Doing Business with CapMan

CapMan operates in the field of investments and financial services. Long-term success in this field of operation is built on trust between the parties. We believe that to earn this trust, we must always act according to the highest ethical standards in everything we do, be it with investors, other clients, portfolio companies, shareholders, colleagues, suppliers, competitors or other stakeholders. High ethics is one of CapMan's core values and CapMan's Code of Conduct (<https://www.capman.com/shareholders/statements-policies/code-of-conduct/>) is a representation of our commitment to this value statement and an expression of how we apply high ethics in our everyday professional lives.

The purpose of this supplier code of conduct (the "Supplier Code") is to establish basic principles and ethical standards of business behaviour that CapMan Plc, its group companies and the funds managed within CapMan group ("CapMan") expect of companies and/or individuals which supply goods, materials or services (the "Suppliers") to CapMan as well as personnel employed by or engaged to provide services to such Suppliers. The Supplier Code is based on CapMan's Code of Conduct, and it sets out the general principles, rather than complete set of detailed rules that cover all situations.

CapMan expects its Suppliers to fully embrace the basic principles and ethical standards of business behaviour set forth in this Supplier Code throughout their own operations and supply chains and act accordingly. CapMan expects that actions inconsistent with this Supplier Code are corrected promptly. If such inconsistencies are not corrected, CapMan may discontinue the existing business relationship.

CapMan has joined the United Nations (UN) Global Compact and supports the UN Sustainable Development Goals. In addition, CapMan is committed to the Science-Based Targets Initiative (SBTi) and encourages the Suppliers to do the same.

## 2. Compliance with laws

CapMan conducts its business in compliance with applicable legislation and rules and regulations of competent authorities, for example in relation to governance, anti-trust and competition, anti-bribery, anti-corruption, anti-money laundering and sanctions, insider trading and market abuse, communications and disclosures, data protection and taxation. CapMan expects equivalent compliance of its Suppliers.

### 3. Professional Ethics

CapMan goes further than being compliant with the applicable laws and regulations as CapMan is also committed to apply high ethical standards in its decision-making and business activities. CapMan deals fairly and honestly with its investors, other clients, portfolio companies, shareholders, colleagues, suppliers, competitors, and other stakeholders.

CapMan aims to avoid conflicts of interest; however, they inevitably arise within business operations. Where a conflict of interest cannot be fully avoided, CapMan discloses the conflict to the parties concerned. CapMan has internal policies and procedures to identify, prevent, mitigate, manage, and disclose conflicts of interest.

CapMan respects the confidential information of CapMan or other companies and individuals and treats all confidential information with due care. We only use confidential information for legitimate business purposes.

CapMan is committed to maintaining effective and high-quality infrastructure to ensure data and cyber security.

CapMan expects equally high ethical standards and fairness, as well as equivalent comparable compliance, conduct and measures concerning conflicts of interest, confidential information and cyber and data security of its Suppliers.

### 4. Human rights

CapMan respects, protects and promotes internationally proclaimed human rights. CapMan upholds the Universal Declaration of Human Rights, UN Guiding Principles on Business and Human Rights, International Labour Organisation's Labour Declaration on Fundamental Principles and Rights at work, as well the Organisation for Economic Co-operation and Development's Guidelines for multinational enterprises. CapMan expects that its Suppliers are committed to the principles set forth in these declarations and address any activity within their sphere of influence that violates or may violate human rights and to take measures to remedy the situation and minimise the risks.

CapMan has zero tolerance regarding forced, compulsory and child labor, as well as human trafficking. CapMan expects the same of its Suppliers.

### 5. Responsible workplace

At CapMan we respect each other and the diversity of people around us. We treat each other fairly and equally, and promote a diverse, inclusive, healthy and safe workplace. CapMan provides equal opportunities for all its employees. CapMan prohibits any discrimination based on gender, age,

sexual orientation, race, religious faith, marital status, pregnancy, gender identity and expression, disability, political affiliation, and national or ethnic origin or any other criteria. CapMan does not intimidate, harass, or discriminate against employees who exercise their legal rights related to freedom of association, collective bargaining, and peaceful assembly. We do not accept any violent, abusive or harassing behaviour. CapMan expects equivalent conduct of its Suppliers. Furthermore, CapMan expects that its Suppliers are paying wages, including overtime and benefits, that shall equal the level required by applicable laws and regulations and shall constitute a living wage.

## 6. Environmental responsibility

CapMan comply with all applicable environmental laws and regulations and we support the Paris Agreement. CapMan continuously improves its environmental performance by identifying, assessing, and managing environmental risks and impacts throughout CapMan's value chain.

CapMan expects its Suppliers to be aware of the environmental impact and environmental risks of their activities and to minimise the adverse effects of their activities.

Suppliers are encouraged to identify, measure, and monitor their environmental impacts and risks relevant to their industry, which include but are not limited to: greenhouse gas emissions and energy consumption, pollution prevention and waste reduction, water consumption and emissions to air, water and soil, resource efficiency and circularity, as well as biodiversity and nature protection.

Suppliers should take immediate action to address any activities within their sphere of influence that may be harmful to the environment and to take measures to remedy the situation and minimise the risks.

Suppliers are encouraged to reduce the carbon dioxide emissions from their own activities by increasing the carbon neutrality of their energy sources and other purchases and by improving energy efficiency.

## 7. Whistleblowing

CapMan's Suppliers and their employees are encouraged to report potential misconduct or violations of this Supplier Code or CapMan's Code of Conduct. Suppliers can raise their concerns to their CapMan contact person. In addition, CapMan's Whistleblowing channel offers a possibility to anonymously alert CapMan on suspected or detected violations of CapMan's basic principles and ethical standards (<https://report.whistleb.com/en/capmanexternal>).