Equitix Supplier Code of Conduct

Contents

Introduction **3**

1. Ethical business practices 3

1.1 Anti-bribery and anti-corruption 3

1.2 Gifts, travel and entertainment 4

1.3 Conflicts of interest 4

1.4 Fraud prevention 4

1.5 Prevention of tax evasion 5

1.6 Financial crime 5

1.7 Confidentiality, privacy and data protection 5

1.8 Artificial intelligence 6

1.9 Grievance and whistleblowing arrangements 6

2. Labour and human rights 7

2.1 Modern slavery, forced labour and human trafficking 2.2 7

Child labour 8

2.3 Right to work and prevention of illegal working 8

2.4 Wages and benefits 8

2.5 Working hours 9

2.6 Freedom of association and collective bargaining 9

2.7 Respect, equality and non-discrimination 9

2.8 Safe and healthy working environment 9

3. Environmental stewardship 10

3.1 Energy and emissions 10

3.2 Water 10

3.3 Waste and hazardous materials 10

4. Business continuity, resilience and emergency preparedness 11

11

5. Management systems and governance 12

6. Escalation of concerns 12

7. Compliance with the Code

Introduction

The Equitix Supplier Code of Conduct (the "Code") describes Equitix's expectations regarding how its suppliers conduct business.

This Code applies to all suppliers, service providers, contractors, consultants, advisers, agents and other third parties (collectively, "Suppliers") engaged to provide products or services to Equitix or any member of the Equitix group ("Equitix"). All vendors engaged in providing products and services to Equitix are expected to be aware of and act in accordance with the Code, including aligning guidelines, policies and practices, and communicating and enforcing the Code provisions throughout their organization including their subcontractors.

Suppliers are also expected to:

- Act with integrity and demonstrate a commitment to legal, ethical, safe, fair and environmentally responsible business practices
- Comply with all applicable laws, regulations and professional standards in each jurisdiction in which they operate

Where this Code establishes a higher standard than local law, Equitix expects Suppliers to seek to meet that standard unless prevented from doing so by applicable law.

1. Ethical business practices

Equitix is committed to conducting its business ethically, with integrity and in compliance with applicable laws and regulations. Suppliers are expected to share these principles and maintain policies, controls and training appropriate to the nature, scale and complexity of their operations.

1.1 Anti-bribery and anti-corruption

Equitix has a zero-tolerance approach to bribery and corruption.

Suppliers must comply with all applicable anti-bribery and anti-corruption laws, including the UK Bribery Act 2010, where applicable.

Suppliers, and any persons acting on their behalf, must not directly or indirectly:

- Offer, promise, give, request, agree to receive or accept a bribe
- Make or accept a facilitation payment
- Provide kickbacks or secret commissions
- Offer anything of value to obtain or retain business or secure an improper business advantage
- Seek improperly to influence the performance of a public, regulatory, commercial or other function or
- Route an improper payment through an agent, subcontractor, intermediary or other third party

"Anything of value" may include money, gifts, hospitality, travel, entertainment, charitable or political contributions, employment or internship opportunities, preferential treatment and payments disguised as legitimate fees or expenses.

Suppliers must maintain proportionate anti-bribery procedures, appropriate financial controls and accurate books and records. Contracts with agents, intermediaries and subcontractors should contain suitable anti-bribery provisions.

1.2 Gifts, travel and entertainment

Suppliers must not offer or provide gifts, hospitality, travel, entertainment, fees, favours or other benefits that:

- Are intended to influence a business decision
- Could reasonably appear to influence a business decision
- Create an inappropriate obligation or expectation
- Are excessive, lavish or disproportionate or
- Otherwise breach applicable laws, Equitix policies or relevant contractual requirements

Any business hospitality provided in connection with Equitix must be reasonable, proportionate, transparent and for a legitimate business purpose.

1.3 Conflicts of interest

Suppliers must avoid actual, potential or perceived conflicts of interest that could compromise, or appear to compromise, their objectivity or the interests of Equitix.

Suppliers must promptly disclose any conflict involving:

- An Equitix employee, officer or director
- Another Equitix supplier or service provider
- An Equitix fund, investor, asset or portfolio company
- A personal, family or financial relationship or
- Any other circumstance that could affect impartial decision-making

Disclosure does not necessarily prevent the Supplier from continuing to act, provided appropriate mitigation measures can be agreed with Equitix.

1.4 Fraud prevention

Equitix does not tolerate fraud or dishonest conduct in any form.

Suppliers must not directly or indirectly engage in, encourage, assist, conceal or facilitate any fraudulent or dishonest act intended to:

- Make a financial or non-financial gain for the Supplier, Equitix or another person
- Cause, or expose another person to the risk of, financial or other loss
- Mislead an investor, client, regulator, public authority or other stakeholder
- Falsify or manipulate accounts, records, invoices or supporting documentation or
- Misrepresent the nature, quality, delivery or price of goods or services

Suppliers must maintain reasonable and proportionate fraud prevention procedures, having regard to the nature and extent of the risks associated with their activities.

Where applicable, these procedures must support the Supplier's compliance with the corporate failure-to-prevent-fraud offence introduced by the Economic Crime and Corporate Transparency Act 2023 and must address fraud committed by its employees, agents, subsidiaries, subcontractors and other associated persons.

At a minimum, relevant controls should include:

- Clear senior-management responsibility
- Proportionate fraud risk assessments
- Due diligence on employees and third parties in higher-risk roles
- Financial and payment controls
- Accurate recordkeeping
- Appropriate contractual protections
- Staff training
- Confidential reporting arrangements
- Investigation and remediation procedures
- Periodic monitoring and review

Suppliers must not permit any person acting on their behalf to commit fraud intended to benefit Equitix, the Supplier, an Equitix client, fund, investor, asset or portfolio company.

1.5 Prevention of tax evasion

Suppliers must not engage in, encourage or facilitate tax evasion.

Suppliers must maintain reasonable prevention procedures designed to ensure that their employees, agents, subcontractors and other associated persons do not criminally facilitate UK or overseas tax evasion.

1.6 Financial crime

Suppliers must comply with applicable laws concerning:

- Money laundering
- Terrorist financing
- Sanctions
- Fraud
- Tax evasion
- Market abuse
- Other forms of financial crime

Suppliers must undertake risk-based due diligence on customers, suppliers, agents, intermediaries and business partners where appropriate having regard to applicable law and the nature of the services provided.

No Supplier may make funds, economic resources, goods or services available to a sanctioned person or entity in connection with services provided to Equitix.

1.7 Confidentiality, privacy and data protection

Suppliers must protect all confidential, proprietary and personal information accessed, received, created or processed in connection with services provided to Equitix.

Suppliers must:

- Comply with applicable privacy and data protection laws, including the UK GDPR and Data Protection Act 2018; where applicable
- Use Equitix information only for authorised purposes
- Maintain appropriate technical and organisational security measures
- Control access to Equitix information
- Ensure that employees and subcontractors are subject to appropriate confidentiality obligations
- Comply with agreed retention and deletion requirements
- Notify Equitix promptly of any actual or suspected loss, unauthorised access, disclosure, cybersecurity incident or personal data breach

Unauthorised use or disclosure of information may have legal, regulatory, financial and reputational consequences for Equitix, the Supplier and affected individuals.

1.8 Artificial intelligence

Where a Supplier uses artificial intelligence in providing products or services to Equitix, it must do so responsibly, lawfully and transparently.

Suppliers must:

- Obtain any notification, approval or consent required under their contract with Equitix
- Maintain appropriate human oversight and accountability
- Identify and mitigate material risks, including bias, discrimination and inaccurate outputs
- Protect the privacy, confidentiality and security of Equitix data
- Not use Equitix data to train or develop an AI model without Equitix's prior written consent
- Not use Equitix data with any public-based AI tools or services
- Ensure that any transfer, processing or storage of Equitix data through AI systems complies with applicable laws and contract terms
- Disclose material AI service providers, model providers and sub-processors used in delivering services to Equitix, upon request
- Remain fully responsible for all deliverables provided to Equitix regardless of whether AI systems were used in their preparation
- Promptly report any material AI-related or cyber incidents affecting Equitix information or services
- Maintain appropriate records concerning material AI use
- Comply with applicable AI, intellectual property, data protection and information security laws

1.9 Grievance and whistleblowing arrangements

Suppliers should maintain accessible arrangements through which workers and other stakeholders can raise concerns confidentially and without fear of retaliation.

Suppliers must not retaliate against any person who reports a concern in good faith or assists with an investigation.

2. Labour and human rights

Suppliers must respect internationally recognised human rights and treat workers fairly and with dignity.

Appropriate policies and controls should apply to permanent, temporary, agency, migrant and subcontracted workers.

2.1 Modern slavery, forced labour and human trafficking

Equitix has a zero-tolerance approach to modern slavery, forced labour and human trafficking.

Suppliers must comply with applicable laws, including the UK Modern Slavery Act 2015, where relevant.

Suppliers must not use or support:

- Slavery or servitude
- Forced or compulsory labour
- Bonded or debt-bonded labour
- Human trafficking
- Prison labour that has not been entered into freely and lawfully
- Retention of workers' passports or identity documents
- Restriction of workers' freedom of movement
- Withholding of wages as a means of coercion
- Threats, violence or intimidation or
- Recruitment practices that expose workers to exploitation

All work must be undertaken voluntarily and under terms that workers understand.

Suppliers should take proportionate steps to ensure that workers are not exploited by recruitment agencies or other labour providers. Relevant measures may include:

- Due diligence on recruitment and labour agencies
- Controls over recruitment fees
- Contracts in a language the worker understands
- Prohibiting compulsory deposits
- Preventing retention of identity documents
- Monitoring higher-risk operations and supply chains

Suppliers must implement appropriate due diligence to identify, assess, prevent and mitigate modern slavery risks in their operations and supply chains.

2.2 Child labour

Suppliers must not employ child labour and must comply with the applicable minimum working age in every jurisdiction in which they operate.

Suppliers must maintain proportionate age-verification controls and ensure that any lawful employment of young workers does not:

- Interfere with compulsory education
- Involve hazardous work
- Involve excessive hours or
- Adversely affect the worker's health, safety or development

2.3 Right to work and prevention of illegal working

Suppliers must ensure that every individual they employ or engage to provide services to Equitix has the lawful right to work in the relevant jurisdiction and is permitted to undertake the relevant role.

For individuals working in the United Kingdom, Suppliers must:

- Conduct legally compliant right-to-work checks before employment or engagement begins
- Conduct follow-up checks where an individual has time-limited permission to work
- Use the prescribed Home Office process applicable at the time of the check
- Verify that the individual is the person named in the evidence produced
- Retain appropriate evidence of completed checks for the legally required period
- Ensure that any restrictions on the type of work, working hours or location are observed
- Prevent discrimination by applying right-to-work procedures consistently
- Maintain controls over agency, temporary and subcontracted workers
- Promptly investigate suspected illegal working or fraudulent documentation

Suppliers must not knowingly employ or engage individuals who do not have the required permission to work.

Where personnel are supplied by an agency or subcontractor, the Supplier must undertake appropriate due diligence and obtain reasonable assurance that compliant checks have been completed. The Supplier remains responsible for managing right-to-work risks within the services it provides to Equitix.

Suppliers must notify Equitix promptly of any material right-to-work or immigration compliance breach affecting personnel providing services to Equitix, subject to applicable legal and confidentiality requirements.

2.4 Wages and benefits

Suppliers must provide wages, overtime payments, leave and benefits that comply with applicable law and any applicable collective agreement.

Workers must be paid accurately, regularly and on time. Suppliers are encouraged to support the payment of a living wage where reasonably practicable.

No deductions may be made from wages as a disciplinary measure or otherwise except as permitted by law and transparently communicated to the worker.

2.5 Working hours

Suppliers must comply with applicable limits on working hours, overtime, rest periods and working days.

Overtime must be voluntary where required by law and compensated in accordance with applicable law and contractual arrangements.

2.6 Freedom of association and collective bargaining

Suppliers must respect workers' lawful rights to freedom of association and collective bargaining.

Workers must not be discriminated or retaliated against because of lawful trade-union membership or activity.

2.7 Respect, equality and non-discrimination

Workers must be treated with respect and dignity.

Suppliers must maintain a workplace free from:

- Unlawful discrimination
- Harassment
- Bullying
- Victimisation
- Violence
- Intimidation
- Physical or verbal abuse

Suppliers must comply with applicable equality laws and promote equal opportunity in recruitment, pay, development and employment.

2.8 Safe and healthy working environment

Suppliers must provide a safe and healthy working environment and comply with applicable health and safety laws.

Suppliers must:

- Identify and assess workplace hazards
- Implement suitable risk controls
- Provide appropriate training and supervision
- Provide necessary personal protective equipment without improper charge to workers
- Maintain emergency procedures
- Ensure workers and subcontractors are competent for their roles
- Report to Equitix promptly any serious accident, incident or safety concern connected with services supplied to Equitix

3. Environmental stewardship

Suppliers must comply with applicable environmental laws and manage their environmental impacts responsibly.

Having regard to the nature and scale of their activities, Suppliers should identify, monitor and seek to reduce adverse impacts relating to:

- Energy consumption
- Greenhouse-gas emissions
- Climate change
- Water consumption
- Waste and hazardous materials
- Air quality
- Pollution
- Raw-material use
- Biodiversity

3.1 Energy and emissions

Suppliers are encouraged to measure and manage material energy use and greenhouse-gas emissions and to pursue proportionate emissions reductions.

Where requested, Suppliers should provide relevant environmental data and information about applicable policies and performance. Any data provided must be complete, accurate and capable of reasonable substantiation.

3.2 Water

Suppliers should seek to conserve water and manage water resources responsibly, particularly where their operations may affect local communities or water-stressed areas.

3.3 Waste and hazardous materials

Suppliers must handle, transport, store, recycle and dispose of waste and hazardous materials safely and lawfully.

Personnel handling hazardous materials must receive appropriate training. Suppliers must use appropriately authorised carriers and disposal facilities where required by law.

4. Business continuity, resilience and emergency preparedness

Suppliers providing important or time-sensitive services to Equitix must maintain proportionate business continuity, operational resilience and emergency-response arrangements.

Plans should address relevant disruption scenarios, which may include:

- Cyber incidents
- System or technology outages
- Loss of premises
- Utility or telecommunications failure
- Severe weather or natural disaster
- Pandemic or epidemic
- Terrorism or security incidents
- Failure of a material subcontractor
- Labour or resource constraints
- Other events capable of disrupting services

Suppliers must test and periodically review relevant plans and, where reasonably requested, provide Equitix with appropriate information regarding those arrangements.

5. Management systems and governance

Suppliers must maintain governance and management systems appropriate to the nature, criticality and risk of the services provided to Equitix.

These should include:

- Clear allocation of responsibility
- Risk identification and assessment
- Proportionate policies and controls
- Employee training and communication
- Due diligence on relevant third parties
- Monitoring and testing
- Accurate record keeping
- Incident reporting
- Investigation and remediation
- Periodic review and continuous improvement

Relevant recognised standards may include ISO 9001, ISO 14001, ISO 45001, ISO 22301 and other standards appropriate to the Supplier's activities.

6. Escalation of concerns

Suppliers must promptly report to their Equitix relationship owner, or Equitix Legal and Compliance any:

- Actual or suspected material breach of this Code
- Inability to comply with a material requirement
- Bribery, corruption, fraud or financial crime concern
- Modern slavery, forced labour or human-trafficking concern
- Significant right-to-work or illegal-working breach
- Serious health and safety incident
- Material data breach or cybersecurity incident
- Material regulatory investigation or
- Other matter that could reasonably cause significant legal, regulatory, operational or reputational harm to Equitix

Reports should include, where legally permissible:

- The nature of the concern
- The relevant individuals or entities
- The services or locations affected
- Immediate containment measures
- Investigation and remediation steps
- Expected further action

Suppliers must not retaliate against any person who reports a concern in good faith.

7. Compliance with the Code

Suppliers are expected to cooperate transparently with Equitix in assessing compliance with this Code.

Equitix may, acting reasonably and subject to applicable contractual and confidentiality arrangements:

- Request relevant policies, procedures, records or certifications
- Require completion of compliance questionnaires or attestations
- Request information concerning subcontractors and supply chains
- Conduct or commission a risk-based compliance review
- Request evidence of remediation
- Exercise contractual audit or access rights

If a Supplier identifies a breach, it must:

1. Notify Equitix promptly
2. Take appropriate steps to contain and investigate the issue
3. Implement a proportionate corrective-action plan
4. Provide reasonable progress updates
5. Take steps to prevent recurrence

Material, repeated or unremedied non-compliance may lead to enhanced monitoring, suspension of work, restrictions on future engagements or termination of the relationship, subject to the applicable contract.

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