

## Actis Supplier Code of Conduct

Recognition of our responsibility to wider society has always been central to our business and we are committed to promoting world-class standards in health and safety, environmental protection, social engagement and business integrity – as well as sound corporate governance and transparent accounting. We expect our suppliers to aspire to the same standards and to encourage their own suppliers to do the same.

This Supplier Code of Conduct sets out certain standards that our suppliers are expected to adopt in relation to managing their business operations, including their primary supply chain. As a minimum, suppliers should be compliant with all local laws and regulations. Any breach of the obligations stipulated in this Supplier Code of Conduct will be considered a material breach of contract by the supplier.

### Ethical Conduct

Actis expects its suppliers to adhere to the highest standards of ethical conduct, honesty and integrity. This expectation extends to such suppliers' operations and business practices, their external relationships and their primary supply chain. Suppliers must not:

- engage in any form of financial crime, corrupt practice or unethical behaviour under any circumstances; or
- make or offer to make any improper payment, gift or favour (i) to obtain preferential treatment directly or indirectly (during negotiation of a contract award, or in any other circumstances) or (ii) with the intent of seeking to influence others directly or indirectly to neglect their duties or to behave improperly.

### Confidentiality, Data & Conflict

Any information that a supplier receives through its business dealings with Actis must be kept confidential and must not be disclosed to any other person without Actis' permission.

All suppliers must ensure compliance with all applicable laws and directives providing for the protection, transfer, access and storage of personal data or information.

In the event of any conflict of interest arising (for example, where any person with a relationship with Actis also has an interest in or connection with the supplier's business), this must be disclosed by the supplier to Actis.

### Human Rights and Labour practices

Suppliers are expected to treat their workers with dignity and respect and to uphold the highest standards of human rights. Actis expects its suppliers to work towards full compliance with the International Labour Organisation Fundamental Conventions and with the UN Declaration of Human Rights. This expectation extends to such suppliers' operations and their primary supply chain.

Equality, harassment and discrimination – Suppliers must promote equal opportunities for workers irrespective of gender, marital status, race, religion, ethnicity, age, sexual orientation, political affiliation, union membership or personal disability or any other protected characteristic and shall not discriminate on any such basis. Suppliers must provide a workplace which is free of harsh and inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuses of workers and with no threats of such treatment. Disciplinary procedures should be clearly defined and communicated to workers.

Child labour - Suppliers must not employ children below the minimum age. The “**minimum age**” is the higher of (i) 14 years of age or (ii) the minimum age of employment permitted by the law of the country where the employment takes place or (iii) the age established for completing compulsory education in that country. Any worker under the age of 18 must not undertake hazardous work.

Modern slavery and forced labour - Suppliers must not engage in or support any practices relating to slavery, forced or compulsory labour or human trafficking. All workers must be free to leave their employment by providing reasonable notice and all overtime must be voluntary. Under no circumstances shall a supplier: (i) confiscate or withhold worker identity documents, work permits or any other valuable documents or items or (ii) impose financial or other penalties on workers (including deposits or security payments) triggered by them joining or leaving employment. Written contracts of employment must be provided to migrant workers in a language that they understand, clearly indicating their wage, working hours and other working and employment conditions. Workers should be fairly and reasonably paid in line with applicable wage laws relating to minimum wages, overtime hours and legally mandated benefits. Workers should be paid in a timely manner.

Freedom of association – subject to any local laws that may apply, suppliers must allow workers to join (or refrain from joining) organisations of their choice (such as trade unions and worker councils) and to bargain collectively, without interference, discrimination, retaliation or harassment. Suppliers must ensure that workers have a mechanism to report grievances confidentially and a process for effective remedy. Where workers' representation and collective bargaining are restricted by law, suppliers should facilitate open communication and direct engagement between workers and management to ensure that worker's rights, needs and views can be considered and acted upon.

Health & safety – all workers must be provided with safe and hygienic working conditions (including appropriate protective clothing and equipment) and appropriate steps should be taken to prevent accidents and injury to health. All suppliers must control hazards and take precautionary measures against accidents and occupational diseases. They must also provide documented training and ensure that employees are educated in health and safety issues.

### Environment

Suppliers should comply with or exceed all relevant local environmental laws and regulations and use reasonable efforts to meet industry best practices and standards. Appropriate processes should be in place to minimise the release of harmful emissions into the environment. We strongly encourage our suppliers to develop a sustainable environmental policy, which aims at reducing waste and minimising the environmental impact of their operations. Such a policy would often include:

- communicating environmental responsibilities to all staff and providing training on new areas of best practice and its implementation;
- incorporating specific environmental requirements into new contracts with suppliers;
- employing energy saving measures to reduce energy consumption;
- actively encouraging the recycling of business waste;
- sourcing supplies and materials required for the performance of services, or the supply of products, from sustainable and ethical sources; and
- reporting internally on environmental practices.

## General

By engaging or continuing to engage with Actis, you will be deemed to have acknowledged and accepted this Supplier Code of Conduct.

Actis expects all its suppliers not only to comply with this Code but also to monitor (on an ongoing basis) their performance against the standards set out in this Code. From time to time Actis may request a supplier to provide evidence to demonstrate such compliance.

In the event of:

- a violation of this Code by a supplier;
- any adverse finding (including any conviction) against a supplier (or any of its staff) by any governmental, judicial or administrative authority in connection with the breach of any local laws or regulations relating to the matters addressed in this Code,

the relevant supplier should promptly give written notice to Actis of any such development. Actis' expectation is also that the supplier would instigate immediate corrective action in consultation with Actis. Depending upon the particular circumstances of the violation, Actis reserves the right to terminate its arrangements with that supplier with immediate effect.

Actis maintains a dedicated whistleblower facility which may be used by anyone who has questions or concerns relating to the conduct of Actis, its people or its companies. This facility provides access to our Responsible Investing team via [RI@act.is](mailto:RI@act.is) and may be used by anyone who has concerns with respect to the application of this Code or Actis' supply chain more generally.

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