

---

# Human Rights Policy

February 2023

**CONFIDENTIAL**

## Contents

1. Purpose .....	3
2. Scope.....	3
3. Policy Responsibility.....	3
4. Commitment to Human Rights .....	3
5. Reporting Concerns.....	4
6. Remedies.....	4
7. Policy Updates.....	5

## 1. Purpose

---

The purpose of this Human Rights Policy (the “Policy”) is to provide guidance as to the commitment of Primergy to respecting human rights across its domestic and global operations and its supply chain.

This Human Rights Policy formalises Primergy’s commitment to respect human rights.

## 2. Scope

---

This Policy is applicable to Primergy, and each of its related corporations and affiliates. This Policy will be interpreted subject to local laws and regulations in each jurisdiction. The specific approach to implementation of the Policy across various Investments and as between portfolio companies, may also need to be considered on a case-by-case basis to comply with relevant local requirements.

## 3. Policy Responsibility

---

Oversight and accountability for compliance with this Policy and its revision from time to time is the responsibility of the Board. The Board is responsible for adherence to and regularly supporting the review of this Policy and overseeing the implementation of this Policy. The Policy is required to be read and understood by all Primergy team members and its implementation will be supported by senior management primarily responsible for each of Primergy’s key operating locations.

## 4. Commitment to Human Rights

---

*Primergy:*

- recognises its responsibility, under the UN Guiding Principles on Business and Human Rights, to respect human rights in all areas of its operations;
- respects, at a minimum, internationally recognised human rights, as set out in the International Bill of Human Rights and the International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work;
- is committed to the ten principles of the United Nations Global Compact which relate to human rights, labour, environment and anti-corruption, and supports the international agenda to abolish human trafficking, slavery, forced and child labour; and

- supports equal opportunity and treatment for all to ensure the elimination of discrimination throughout its activities and to create a fair and inclusive workplace, engaging a workforce that reflects the local population diversity.

*As a purchaser of goods and services, Primergy:*

- seeks to enter contractual arrangements with suppliers that can comply with and promote the principles contained in this Policy and Primergy's Supplier Code of Conduct;
- endeavours to undertake due diligence within its operations and supply chains, to identify and remediate actual or potential adverse human rights impacts which Primergy may cause, contribute or be directly linked to;
- will communicate to potential key suppliers that it has a zero tolerance policy with regards to slavery; and
- will work with suppliers to assist them in their understanding of human rights and adoption of best practices to ensure respect for human rights.

*As an employer, Primergy:*

- is committed to providing a workplace where all staff are treated without discrimination or harassment;
- strives to provide working conditions that are safe, healthy and respectful of human rights; and
- is opposed to and will oppose all forms of slavery, forced or compulsory labour and child labour, both within its organisation and within its supply chain.

## 5. Reporting concerns

---

Any concerns related to human rights impacts in Primergy's operations or in its supply chain should be reported in accordance with Primergy's whistleblowing framework. All Team Members are expected to report known or suspected violations of applicable laws, regulations, policies and Primergy's broader ethical standards.

## 6. Remedies

---

Primergy is committed to providing effective remedies where its operations cause or contribute to adverse human rights impacts. Primergy will engage directly with affected persons, and work with its business partners and other stakeholders to remediate such

---

impacts and consider how its internal processes can be improved to prevent similar impacts in the future.

## 7. Policy Updates

---

This Policy is the primary responsibility of the Board. It will be reviewed regularly and updated as deemed necessary by the Board.