

**GRAPHITE CAPITAL MANAGEMENT LLP**

**HUMAN RIGHTS POLICY**

January 2023

**Introduction**

Graphite is committed to respecting the Human Rights of all those connected to its business operations, supply chain, and the wider communities in which it operates.

Graphite’s Human Rights Policy is guided by various international Human Rights principles encompassed in:

- The Universal Declaration of Human Rights;
- The International Covenant on Civil and Political Rights;
- The International Covenant on Economic, Social and Cultural Rights;
- The International Labour Organisation’s (ILO) Declaration on Fundamental Principles and Rights at Work; and
- The United Nations Global Compact

**Scope**

This policy applies to all Graphite personnel and contractors. It is also expected that any supplier of Graphite will comply with the policy, or at a minimum, comply with applicable domestic laws where they apply to Human Rights.

**Definitions**

Human Rights are the rights of all human beings – regardless of gender, age, nationality, ethnicity, religion, sexuality, colour, caste, neurodiversity, or disability – to live and work freely and without discrimination.

In the context of this policy, Human Rights include, but are not limited to:

- Non-discrimination and equity
- Ensuring no child or forced labour
- Freedom of association and collective bargaining
- Health and safety in the workplace
- Working conditions, including fair working hours
- Fair wages and compensation

- No harsh or degrading treatment or harassment
- Accessibility for those with disabilities
- Maternity, paternity, adoption and family leave

## Human rights due diligence

Graphite's Managing Partners are responsible for ensuring that the commitments set out in this policy are adhered to, and that any breaches of Human Rights are investigated thoroughly and appropriately.

Any breach of this policy will be investigated by a Managing Partner and may result in disciplinary action.

It is the responsibility of all personnel if they suspect or witness an act or acts that breach Human Rights, to report them, either in person to the Managing Partners, or via Graphite's whistleblowing procedure.

It is the responsibility of the relevant member of staff procuring the services of a supplier to ensure that a copy of this policy is available upon request, along with Graphite's Supplier Code of Conduct.

Graphite undertakes to carry out an annual assessment of its key suppliers and partners in order to flag any human rights breaches and will act accordingly if there is any reason for concern.

## Policy

### Non-discrimination and equity

All Graphite personnel, as well as contractors, associates, suppliers and partners, shall be treated with equity, dignity and respect, in accordance with the Firm's policies on non-discrimination, anti-harassment, and diversity & inclusion.

### Modern slavery and child labour

No child or forced labour is to be used within Graphite's operations or supply chain. The Firm has a zero-tolerance policy for modern slavery, forced labour, child labour, and human trafficking, and will ensure that our operations are free from these practices, as outlined in our Modern Slavery Statement.

### Working conditions and wages

Graphite personnel have the right to fair wages and compensation that is sufficient to meet their basic needs, as well as to fair working hours and rest breaks.

Personnel have the right work in an environment that is safe and sanitary, and where policies and procedures concerning health and safety are properly adhered to.

Employees have the right to freedom of association and collective bargaining.

## Security and data

Graphite is committed to ensuring the security and protection of the data it handles, and to ensuring responsible and ethical marketing and communications.