



# Pinnacle Investment Management Group Limited



Supplier Code of Conduct

## Compliance with this Code

This Supplier Code of Conduct ('**Code**') articulates the standards of behaviour expected of service providers, subcontractors and other third parties (**Suppliers**), which provide goods or services to Pinnacle Investment Management Group Limited (**Pinnacle**) and its subsidiaries. Suppliers must be able to demonstrate adherence to this Code if requested by Pinnacle, and failure to demonstrate compliance will lead to a review of the supplier contract.

This Code is based on the Ten Principles of the United Nations Global Compact (**UNGC**) in the areas of Human Rights, Labour, Environment and Anti-Corruption, and internationally accepted labour and human rights standards and guidance, including the International Bill of Human Rights and the International Labour Organisation's (**ILO**) Declaration on Fundamental Principles and Rights at Work.

Pinnacle's purpose is to enable better lives through investment excellence. Pinnacle's core values of excellence, client focus, honesty and integrity, innovation and empowerment serve as a foundation to deliver on its purpose and in conducting business with clients, Affiliates, and Suppliers.

Suppliers are expected to understand and contribute strongly to Pinnacle's purpose and values.

## Human Rights & Labor

Pinnacle will work with Suppliers who respect and protect fundamental human rights of employees, as well as all people and communities affected by its operations. Suppliers must ensure they are not complicit in violations against these human rights.

Suppliers are expected to complete a human rights risk assessment at the request of Pinnacle, or if applicable to their operational jurisdiction, provide Pinnacle with an adequate Modern Slavery Statement.

### **Modern Slavery**

Suppliers must ensure that its activities do not cause or contribute to modern slavery practices, including slavery, servitude and human trafficking. Pinnacle will work with Suppliers who ensure individuals in their employment are:

- (a) Of local legal age and free from all forms of child labour.
- (b) Working freely, without the use of involuntary labour, such as, forced, bonded, indentured or compulsory labour and not be involved with any human trafficking or exploitation.
- (c) Provided with fair remuneration and work conditions which comply with applicable national laws including days of rest, leave, working hours, wages, and benefits.
- (d) Able to exercise their rights to associate with others to form or join trade unions of their own choosing and to bargain collectively.

### **Non-discrimination**

Pinnacle expects Suppliers to treat individuals in their employment fairly, and with dignity and respect. Pinnacle expects Suppliers to have created a work environment that is free from harassment, discrimination and bullying in any form.

### **Diversity**

Pinnacle expects Suppliers to support diversity and afford equal opportunity to all qualified applicants and existing employees without regard to age, gender, sexual orientation, nationality, religion, physical or mental disability, pregnancy, parental status, medical history, physical features, political opinion, or any other characteristic protected by law.

Pinnacle's Diversity Policy is extended to Suppliers and available on Pinnacle's website.

### **Health & Safety**

Pinnacle expects Suppliers to provide a safe and clean environment for individuals in their employment, take all practical and reasonable measures to eliminate workplace fatalities, injuries and disease, and meet legal and regulatory requirements of the countries in which they operate.

### **Privacy**

Pinnacle expects Suppliers to respect the privacy of Pinnacle and its clients and comply with all laws in the collection, use and protection of personal information. Any transfer of confidential information must be executed in a way that secures and protects the intellectual property rights of Pinnacle and its clients.

Pinnacle's Privacy Policy is extended to Suppliers and available on Pinnacle's website.

### **Whistleblowing**

Pinnacle expects Suppliers to maintain policies and/or practices to allow violations, misconduct, or grievances to be reported and addressed without fear of discrimination, reprisal, intimidation, or harassment.

Pinnacle's Whistleblower Policy is extended to Suppliers and available on Pinnacle's website. All reports made under this Policy are treated seriously and will be investigated carefully.

## Environmental Responsibility

Pinnacle recognises that climate change poses a material risk for the economy, financial markets and society as a whole. Pinnacle encourages Suppliers to consider the environmental impacts of their operations.

### **Respect for the Environment**

Pinnacle expects Suppliers to adhere all applicable environmental laws, regulations and standards. Pinnacle will work with Suppliers that promote a culture that values the environment and acts to protect the environment in which they operate.

### **Reducing Emissions**

Pinnacle is committed to reducing its environmental impact by minimising its operational greenhouse gas emissions and encourages Suppliers to do the same.

### **Continuous Improvement**

Pinnacle expects Suppliers to continuously improve environmental management practises and enhance policies and programs to minimise direct environmental impact.

## Corporate Governance and Ethics

Pinnacle expects Suppliers to comply with all applicable laws and regulations in the countries where they operate.

### **Conflicts of Interest**

Pinnacle expects Suppliers to ensure personal activities and interests do not conflict with their responsibilities to Pinnacle. Pinnacle expects Suppliers to disclose all potential or perceived conflicts of interest to Pinnacle, on a timely basis.

### **Bribery & Corruption**

Pinnacle expects Suppliers to act ethically and with integrity, including to:

- (a) Not engage in bribery or corruption in any form, including the facilitation of payments or the giving or receiving of preferential treatment that may be perceived as a bribe for or on behalf of Pinnacle;
- (b) Comply with anti-competition and anti-trust laws;
- (c) Not to take advantage of their position or the opportunities arising from such position for personal gain, including accepting any financial or other benefit.

Pinnacle's Anti-Bribery and Corruption Policy is available on Pinnacle's website.

## Supplier Commitment

Suppliers who work with Pinnacle are expected to uphold the principles raised in this Supplier Code of Conduct by adopting and promoting the commitments in the Code and encouraging their own Suppliers to do the same.

## Document control

### Version control / revision history

This document has been through the following revisions:

Version	Date of approval	Remarks / Key changes / Reason for update
1	01 August 2022	First Version of Pinnacle Supplier Code of Conduct

### Authorisation

This document requires the following approvals:

Authorisation	Name
Initial version	PNI Board