



## SERVICE PROVIDERS, CONTRACTORS & SUPPLIERS CODE OF CONDUCT

Applicable to Curlew Alternative Asset Management Ltd, its subsidiaries and funds under its management collectively referred to as 'Curlew'

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### FOREWORD

This *Code of Conduct* for Service Providers, Contractors & Suppliers contains the principles and standards of conduct that Curlew expects from its suppliers, consultants, contractors and their employees (collectively "Services Providers") when conducting business on behalf of Curlew.

To be useful, this policy should be kept handy and shared with all employees assigned to perform work for or on behalf of Curlew.

Curlew strives to ensure that all our business decisions are guided by the highest ethical standards. We understand that strong compliance and ethics are the foundation to a long term, successful business.

We are fully committed to this policy and will take corrective actions if a service provider fails to meet our requirements set forth in this *Code of Conduct*.

We regard our suppliers, consultants and contractors as an integral part of our operations and we appreciate your commitments to this *Code of Conduct*.

### BUSINESS CONDUCT & ETHICS

All our Service Providers must comply with all the laws and regulations that apply to them as well as all those that apply to Curlew.

Curlew has a zero tolerance for Bribery or Corruption of any kind in its business dealings. Our own "Bribery & Corruption" policy prohibits all forms of corruptions, bribery, kickback, extortion and money laundering. We are committed to complying with all laws and regulations and we expect all our service providers to do the same – whether they are working for or on behalf of Curlew or not.

Except for incidental business meals and promotional items of no real value, Service Providers should refrain from offering to Curlew's employees any gift or gratuities in order to avoid the appearance of any sort of favouritism or sense of obligation. Service Providers shall not, directly or indirectly, take advantage

of any inside, non- public information acquired while working with or for Curlew. Inside information must not be disclosed to other parties. Service Providers must protect and maintain confidentiality and integrity with the information entrusted by Curlew. Specifics of any contract should not be disclosed to competitors. Service Providers should take reasonable steps to ensure that products and services procured for or on behalf of Curlew comply with the principles set in this *Code of Conduct*.

## **ENVIRONMENTAL ISSUES**

Curlew is committed to reducing the environmental impact of its activities and to conduct itself in an environmentally responsible manner as described in our Environmental Policy and our Sustainability Policy. Curlew requires that its service providers operate in a similarly environmentally responsible manner and must comply with all applicable environmental laws and regulations whether they are working for or on behalf of Curlew or not. Service Providers shall make reasonable effort to identify, assess and mitigate any environmental risks occurring during the course of operations performed for or on behalf of Curlew. Service providers must answer the “Sustainability Self-Assessment” form provided by Curlew.

## **RESPONSIBLE SOURCING**

We expect all our suppliers, contractors and service providers to adhere to our “Sustainable Sourcing Policy”.

## **HUMAN CAPITAL**

Our Service Providers must comply with all laws and regulations regarding employment, including but not limited to: minimum wage, maximum working hours, minimum working age and Health & Safety.

Service Providers shall never engage in, or facilitate forced or involuntary labour, slavery or human trafficking. Only workers with the legal right to work in the country in which the work is taking place should be employed.

No Service Providers shall discriminate in hiring on the basis of race, national origin, gender, age, sexual orientation, gender reassignment, disability, Religion or belief, marriage & civil partnership, pregnancy and maternity.

Service Providers must tackle all forms of hate crime and harassment and promote safety and security.

Service Providers shall uphold the right of all staff, including the staff of their own service providers, to be treated with dignity and respect by fostering an environment free from ridicule, bullying, intimidation and victimization.

Service Providers must provide and maintain a safe and sanitary workplace that include appropriate protective equipment, and is in compliance with all environmental, health & safety laws, rules and regulations.

## **ACKNOWLEDGEMENT**

I have received and read the Curlew Student Trust's *Service Provider Code of Conduct* and acknowledge that *{Company Name}* will abide by the Code.

For and on behalf of *{Company Name}*

***NAME***

***POSITION***

***DATE***

***SIGNATURE***

*Please sign and return this form to your point of contact at CST or Curlew Capital.*

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