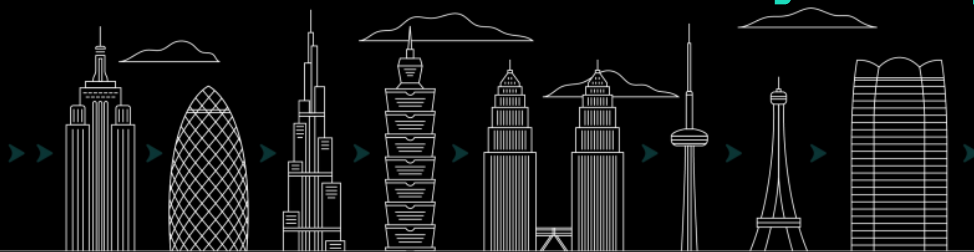


Human Rights and Modern Slavery Policy

VIALTO
PARTNERS

Globally
connected



Introduction

Vialto Partners, Inc. (Vialto) serves clients and communities around the world, working to achieve our purpose: to spark growth and create meaningful impact for individuals, businesses and communities across the globe. That's why we seek to act in accordance with internationally-recognised human rights and standards, including the International Bill of Human Rights, the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work and the United Nations Guiding Principles on Business and Human Rights, making them integral to the way we operate. We're working to guard against being complicit in human rights violations and to uphold the human rights of our people and any other individuals that we're in contact with, either directly or indirectly.

Scope

Our Human Rights Policy applies to all Vialto employees and Partners. We also expect our suppliers to respect and adhere to this policy, which is addressed in our Global Third Party Code of Conduct.

Principles

We will:

- Seek to avoid causing or contributing to adverse human rights impacts through our own activities and address such impacts, if they do occur, in a timely and appropriate manner.
- Seek to prevent or mitigate adverse human rights impacts that are directly related to our operations, products and services through our business relationships.
- Provide for or cooperate in their remediation through legitimate processes, if we identify that we have caused or contributed to adverse human rights impacts.
- Continue to look for ways to support the promotion of human rights within our operations and our sphere of influence.

Policy

This sets out our position with respect to human rights and modern slavery and sits alongside our Code of Conduct, Health and Safety Policy, and the Global Third Party Code of Conduct.

Our statements below draw upon the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work:

- Child Labour:** Vialto will not use child labour and will comply with all relevant laws in this regard. We do, however, support legitimate workplace apprenticeships, internships and other similar programmes that comply with the applicable laws and regulations.
- Modern slavery:** Vialto will not use forced, bonded or involuntary labour, and workers are not required to lodge 'deposits' or identity papers with the Company and can leave after giving reasonable notice, with all wages owed to be paid. We have a zero-tolerance approach towards human trafficking.
- Health, Safety and Hygiene:** All Vialto employees will work in an environment that is both safe and healthy, in line with our global Health and Safety Policies.
- Discipline:** Vialto prohibits physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation. Disciplinary and grievance procedures are clearly documented and communicated to all employees. All disciplinary measures of a serious nature are recorded and actioned.
- Freedom of Association and Employee Representation:** Vialto recognises that all its employees have the right to form and join organisations of their own choosing if this does not contravene Vialto's External Employment or Appointments policy. Vialto takes active measures to seek employees' views about the Company, respects employees' rights to belong to trade unions and fully complies with our legal obligations to inform and consult employees.
- Working Hours:** Vialto will ensure that working hours are reasonable and comply with the law and industry standards.
- Equality of Treatment:** Vialto is fully committed to eliminating discrimination in recruitment, training and working conditions, on grounds of race, colour, sex, age, religion, political opinion, national extraction, sexual orientation, disability or social origin and to promoting equality of opportunity and treatment.

- viii. **Employment terms:** Vialto will provide written and clear contracts which detail the terms and conditions of its employee's employment. We will ensure that work performed by employees is based on recognised employment law and practice.
- ix. **Remuneration:** Vialto will, at a minimum, provide wages and benefits that meet national standards. We will provide employees with clear written information on their pay and conditions. Vialto prohibits deductions from employees' wages as a disciplinary measure. Vialto is committed to equal pay and benefits for men and women for work of equal value.

Grievance and remediation

Where a human rights violation is identified, we'll work with all parties involved to seek access to remedy, compensation and justice for the victim. We'll also investigate the root cause so that we can take appropriate steps to prevent such a violation reoccurring.

Our Ethics helpline is available to all employees who come across unethical behaviour that can't be resolved locally or for which the normal consultation process isn't suitable. Anyone raising a genuine concern which is in the public interest will be protected from victimisation. Third parties (including suppliers) can also telephone the helpline. Local telephone numbers are available at vialtopartners.ethicspoint.com.

Implementation

Our Human Resources and Risk and Compliance teams will review the policy on an annual basis with respect to its relevance and effectiveness and will make improvements as necessary. Our Human Rights Policy and our Modern Slavery Statement are both accessible to our employees and partners via the Vialto Intranet, and to other interested parties via our website (www.vialto.com), or on request.