# Human Rights Policy



February 2024

This policy is applied by Tikehau Capital and its subsidiaries. The terms "Tikehau Capital" and the "Group" in this document refer to all these companies.

This policy applies to all employees, contractors and suppliers associated with the Group worldwide. It encompasses all aspects of our operations, including our offices, supply chains, and interactions with local communities.

This charter has been approved by Tikehau Capital Head of Human Capital and General Counsel in February 2024.

## Introduction

At Tikehau Capital, a global alternative asset management group (the "Group", or "Tikehau Capital"), we are committed to upholding and promoting human rights across our operations. We recognize that respect for human rights is essential to our business and aligns with our core values and principles. This Human Rights Policy outlines our commitment to conducting business in a manner that respects and supports human rights, as well as our expectations for employees, suppliers, and other stakeholders.

## Scope

This policy applies to all employees, contractors and suppliers associated with the Group worldwide. It encompasses all aspects of our operations, including our offices, investment activities, supply chains, and interactions with local communities.

#### **Policy Statement**

#### 1. Respect for Human Rights

Tikehau Capital commits to respecting and upholding internationally recognized human rights principles. Tikehau Capital is guided by international treaties and aims to act notably in accordance with:

- the International Bill of Human Rights,
- the UN Global Compact (UNGC),
- the International Labour Organization ("ILO") and
- the Principles and the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises,
- and other applicable laws and standards in each country where we operate.

Tikehau Capital considers and commits to respecting freedom of expression, freedom from discrimination, digital security/privacy, gender equality and women's rights, rights of association, rights of refugees and migrants and other rights, listed in the International Bill of Human Rights.

#### 2. Non-Discrimination

We prohibit discrimination in any form, including but not limited to colour, religion or belief, gender, national or ethnic origin, disability, age, nationality, family status, pregnancy or orientation. Tikehau Capital strives to create an inclusive and diverse work environment and provide equal opportunities for all employees. To achieve this goal, the Company organises and promotes inclusivity and anti-bias training, as well as regular seminars about diversity and inclusion. The Group Human Capital Department organises training for employees and raises awareness among all managers and employees involved in recruitment processes to prevent any unlawful discrimination. Specific training on unbiased recruitment is offered to all employees involved in the Group's recruitment processes.

The Group transparently reports on incidents of discrimination in its annual reports since 2022.

#### 3. Labor and Employment Rights

We respect the rights of workers and will not tolerate any form of forced or compulsory labour, child labour, or human trafficking. Tikehau Capital upholds fair labour practices, including freedom of association, collective bargaining rights, and safe working conditions. The Group transparently reports on the share of employees covered by collective bargaining agreements in its annual reports.

#### 4. Supply Chain Responsibility and Due Diligence

Tikehau Capital expects its suppliers and business partners to share its commitment to human rights and operate in compliance with applicable laws and regulations. We encourage them to promote responsible sourcing, transparency, and accountability within our supply chains.

The Group is vigilant in the selection of its suppliers and requires that they commit to its Responsible Purchasing Charter or, upon request, provide evidence that they comply with a code or charter at least equivalent to the standards set forth in Tikehau Capital's Responsible Purchasing Charter.

## 5. Human Rights Due Diligence in the Investment Activity

In its activity, Tikehau Capital carries out reasonable due diligence regarding the compliance with the provisions of the UN Global Compact including labour laws and human rights. Where relevant, the Group supports its portfolio companies in formally establishing a code of ethics.

## 6. Privacy and Data Protection

We are committed to safeguarding the privacy and personal data of our employees, clients, and other individuals we interact with. Tikehau Capital adheres to applicable data protection laws and maintains appropriate measures to protect personal information.

The Group has established a personal data protection policy, which is available on the Company's website. In accordance with the EU General Data Protection Regulation (GDPR), the purpose of this policy is to inform all individuals about how the Group collects and uses personal data, how to control this use, how the Group communicates such data to third parties when necessary, and how and under which conditions the confidentiality of personal data is protected.

The Group has set up an internal procedure to deal with requests from individuals regarding the exercise of their rights on the processing of their personal data (in particular, their rights of access, rectification, opposition, their right to portability, and the withdrawal of their consent) and any complaints they may have.

This system involves cooperation among the various departments involved in order to be able to analyse an incident involving personal data and, if necessary, to notify any such breaches both to the French Data Protection Authority (CNIL) and to the relevant individuals, in compliance with the terms of the GDPR and the applicable legal provisions.

## 7. Training and Awareness

We provide training and awareness programs, such as sustainable team performance, anti-bias training and training on fair recruitment practices or GDPR awareness to ensure our employees understand their responsibilities under this Human Rights Policy and have the knowledge and skills necessary to identify and address human rights issues.

#### 8. Reporting Mechanisms

Tikehau Capital has setup a secure third-party platform to provide a confidential and secure place for speaking up and whistleblowing. Reports may be made in accordance with the Group's policies and procedures and applicable laws and regulations covering whistleblowing, including but not limited to the French Anti-corruption toolset (Act No. 2016-1691 of 9 December 2016, known as "Sapin II Law").

This secure platform is accessible 24 hours a day to all personnel (internal, external and contract employees), as well as to any stakeholder of the Tikehau Capital entities identified on the platform.

We commit to investigating and addressing reported issues promptly and appropriately.

#### 9. Compliance and Continuous Improvement

We are committed to complying with applicable laws, regulations, and industry standards regarding human rights. Tikehau Capital will continuously monitor and improve its performance, taking into account evolving best practices and stakeholder expectations.

This Human Rights Policy reflects Tikehau Capital's commitment to conducting business ethically, responsibly, and in line with international human rights standards. By adhering to this policy, we demonstrate our dedication to respecting and promoting human rights in all aspects of our operations.