



Colchester<sup>®</sup>  
GLOBAL INVESTORS

# Principles for Service Providers

October 2022



## Introduction

The principles set out herein (the "**Principles**") are intended to enable Colchester Global Investors Limited and its wholly owned subsidiaries ("**Colchester**") to uphold its core values through its service provider relationships. The latest version of the Principles is available on Colchester's website at [www.colchesterglobal.com](http://www.colchesterglobal.com). Service Providers (as defined below) will be required to acknowledge and agree to comply with Principles at the time of engagement and at such other times as communicated by Colchester from time to time. Service Providers will also be deemed to acknowledge and agree to comply with the Principles every time they provide services to Colchester.

## Application

Colchester expects all service providers providing services to Colchester ("**Service Providers**") to do the following:

- Comply with all applicable laws relating to anti-slavery and human trafficking, human rights, environment, work health and safety, and anti-bribery laws, and take necessary steps to address and remediate any breaches.
- Maintain policies and procedures to address the requirements of the abovementioned laws and regulations.
- Notify Colchester of any modern slavery and/or human trafficking incidents occurring in its business or its own supply chains by sending a report to: [modernslaveryprinciples@colchesterglobal.com](mailto:modernslaveryprinciples@colchesterglobal.com).
- Be able to demonstrate compliance with the minimum requirements of the Principles on request.
- Communicate the Principles to their employees and sub-contractors.

## Principles for Service Providers

### 1. Business Conduct and Ethics

Colchester expects the highest standards of ethics and integrity from its employees and expects its Service Providers to conduct business on the same basis.

### 2. Bribery and Corruption

Service Providers must comply with all applicable anti-bribery and corruption laws and maintain procedures to report red flags and prevent persons associated with the Service Provider from engaging in bribery or corruption.

### 3. Conflicts of Interest

Service Providers are expected to identify, prevent or appropriately manage any actual or potential conflicts of interests arising that may have an adverse effect on the interests of Colchester or its clients.

### 4. Whistle-Blowing

Service Providers are expected to have whistle-blowing procedures in place which outline circumstances under which a person may raise genuine concerns in relation to improper conduct, the avenues for doing so, the protections that are available to those who report improper conduct.

## **5. Modern Slavery and Human Trafficking**

Service Providers must not use child labour, any form of forced or involuntary labour and must not engage in sub-contracting that engages child labour, forced or involuntary labour. Colchester supports the core international conventions and treaties on modern slavery, labour standards and child exploitation, including the 1957 ILO Convention on the Abolition of Forced Labour, the 1999 ILO Convention on the Worst Forms of Child Labour, and the 2000 UN Optional Protocol to the Convention on the Rights of the Child (Slavery and Prostitution), and expects its Service Providers to do the same.

## **6. Non-discrimination**

Colchester does not tolerate intimidation, bullying, harassment, or discrimination in any form under any circumstances. Service Providers must provide a working environment that promotes equal opportunities and diversity in employment. All employees must receive equal treatment regardless of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex, or sexual orientation.

## **7. Work Health and Safety**

Service Providers must comply with all applicable health and safety laws.

## **8. Environmental considerations**

Colchester is committed to operating sustainably and expects its Service Providers to do the same.

## **Assessment and Compliance**

Colchester reserves the right to carry out compliance audits or assessments as necessary to ensure compliance with the Principles and/or applicable laws and regulations.