

## HUMAN RIGHTS POLICY

De Lisle Partners affirms its commitment to respect all internationally recognised human rights, including those in the Universal Declaration of Human Rights, the International Labour Organisation's (ILO) core conventions and the UN Guiding Principles on Business and Human Rights (UNGPs).

This policy applies to all our investment activities and covers severe human rights abuses, modern slavery, child labour, and ongoing violations of indigenous rights. The Head of Research and ESG is ultimately responsible for human rights strategy, integration and monitoring. Our Investment Committee oversees a periodic policy review.

Human rights due diligence is integrated into all stages of our investment process, from pre-investment screening to ongoing monitoring. We will identify and prioritise salient human rights risks as part of our in-house ESG research into the companies in our portfolios, focusing on high-risk sectors and geographies. Companies are assessed for actual or potential human rights impacts, including those in their supply chains.

Where necessary, we will engage with investees to encourage the adoption of robust policies to prevent human rights abuses, promote responsible supply chain management and encourage the issuance of full and transparent reporting on human rights risks, mitigation practices, and outcomes.

Where an investee fails to address a serious material human rights risk, we will seek to disinvest. In less serious cases, we will collaborate with fellow investor initiatives and seek to make public the results of any such engagement.

This policy will be reviewed at least annually to incorporate new legal requirements, stakeholder feedback, and evolving best practices.

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Approved by: De Lisle Partners Investment Committee

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