

## Supplier Code of Conduct

Impax Asset Management Group plc and its subsidiaries (“Impax”) recognises the importance of working with its Suppliers. Impax therefore encourages all of its contracted suppliers, third-party vendors and contractors (“Suppliers”) to adhere to this Supplier Code of Conduct and, in addition, encourages suppliers to apply these requirements to their own Suppliers, third-party vendors and contractors. Alternatively, if a supplier has its own Code of Conduct or equivalent, Impax expects them to adhere to such policy.

Operating with integrity governs Impax’s approach. Impax expects all of its Suppliers to share its commitments and values, particularly with respect to equity, diversity, inclusion, environmental impact and good corporate governance.

Impax’s mission statement and values can be found on its website.

The terms of this Supplier Code of Conduct are in addition to any other commercial or contractual terms agreed with Suppliers.

Impax recognises the importance of enabling Suppliers to raise concerns with respect to the conduct and activities of Impax and its staff, therefore Impax would encourage any Suppliers with such concerns to raise them via EthicsPoint - [EthicsPoint - Impax Asset Management](#). Reports to EthicsPoint are made anonymously and in confidence.

### Labour practices and standards

#### Health and safety working conditions

Impax is committed to the health and safety of all of its employees. Suppliers should provide a safe, healthy and clean environment for their workers.

#### Working hours

Suppliers must ensure working hours comply with national laws and standards and should not expect workers to work in excess of these hours unless they have chosen to opt out.

#### Wages and benefits

Suppliers must pay workers at least the living wage or equivalent required by local law and provide all legally mandated benefits without unauthorised deductions.

#### Discrimination, Grievance and Disciplinary Measures

Equity, diversity and inclusion are at the heart of Impax’s values. Impax expects that all of its Suppliers should take active steps to promote diversity and inclusion in line with best practice and comply with relevant employment laws, regulations and standards.

Impax encourages an inclusive and diverse working environment with equal opportunities for all workers. All Supplier employees must be treated fairly and not discriminated against in any form during their employment.

Suppliers must not discriminate against any employee based on race, age, gender, sexual orientation, union membership, ethnicity, disability, religion, political stance, national origin, veteran or military service status, or marital or pregnancy status during any recruitment or

Suppliers must commit to a workforce free of any harassment or threat of harassment. Any forms or threats of harassment must be prohibited, and Suppliers must have in place grievance and disciplinary measures for their workers.

### Freedom of Association

Suppliers shall respect the rights of employees to associate or not to associate with any group, as permitted by, and in accordance with, all applicable local and national laws and freedom of association and collective bargaining. Suppliers shall not interfere with or discriminate against employees choosing to belong to them.

### Human rights and modern-day slavery including forced labour

Impax is committed to ensuring the protection of human rights across the firm and throughout its supply chain, as further described in [Impax's Modern Slavery statement](#).

Impax is committed to acting ethically and with integrity in all its business relationships and to implementing and enforcing effective systems and controls which aim to ensure slavery and human trafficking is not taking place anywhere within the business. Impax does not tolerate underage or child labour, or any form of forced servitude, or any form of forced labour.

Suppliers are responsible for ensuring that slavery and human trafficking is not taking place anywhere within their businesses, and we expect Suppliers to also have appropriate policies and practices in place to ensure that this risk is appropriately managed.

All Suppliers must also follow all applicable legislation in the countries in which they operate and be committed to the value of, and respect for, all people in their supply chain. This includes adhering to anti-slavery and human trafficking laws (such as the UK Modern Slavery Act) and international standards.

## Environmental practices

Impax regards the following to be key elements of responsible environmental management practices. Impax expects Suppliers to consider their externalities on the environment and to adopt an effective management approach in line with the below.

- **Management systems** – Appropriate management systems, policies and processes (formal and informal), in key issue areas, such as efficient energy and water use, management of emissions, waste and pollutants, to provide the essential framework for effective management of material environmental risks.
- **Objectives and transparency** – Measuring, gathering and reporting critical data and KPIs and setting targets indicating management focus and intention to improve performance on key environmental issues.

## Other legal and regulatory considerations

### Laws and regulations

Suppliers must comply with all applicable laws, rules, regulations and requirements.

### Bribery and anti-corruption

Impax does not tolerate bribery or corruption in any form. Suppliers must comply with all anti-bribery and anti-corruption applicable laws and regulations, including the UK Bribery Act, and enforce effective policies and procedures in connection with anti-bribery and corruption.

### **Confidential information and data protection**

Any information that a Supplier receives from Impax must be held securely with appropriate technical and organizational security in place to ensure there is no disclosure of data to any other person without Impax permission. Suppliers shall comply with applicable data protection laws and regulations and shall not do or omit to do anything which would put Impax in breach of such laws and regulations.

### **Compliance**

Impax may wish to request evidence that this Supplier Code of Conduct, or the Supplier's own Code of Conduct, is being appropriately followed. Where a Supplier does not wish to follow this Code of Conduct, and does not have its own Code of Conduct or if Impax is aware of infringements of this Supplier Code of Conduct or of infringements or deficiencies of the Supplier's own equivalent policies and procedures, it may have a bearing on Impax's ongoing relationship with the Supplier, or its decision to appoint the Supplier.

For any questions or for copies of Impax's policies, please contact your Impax representative.