



LONGEVITY PARTNERS LTD CORPORATE SOCIAL RESPONSIBILITY POLICY

Longevity Partners Limited seeks to be a good corporate citizen in everything that the company does. Guided by this commitment, our existing operating principles are collated into one framework policy under the heading of Corporate Social Responsibility (CSR). The principles encompassed in this policy cover all areas of the firm's operations. They have been developed in accordance with relevant codes of corporate governance and international standards, including the United Nations (UN) Universal Declaration of Human Rights; the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work; the Guidelines for Multinational Enterprises established by the Organisation for Economic Cooperation and Development (OECD); the Rio Declaration on Environment and Development; and the UN Convention against Corruption. We continually review and update the principles in line with new developments in relevant standards.

The Longevity Partners Ltd Board of Directors supports the principles set out in the above codes and standards, and the aim of this policy is to ensure that the key messages of these are communicated to all employees of the firm.

Compliance, monitoring and reporting

Compliance with this policy will be continuously monitored and subject to review by the Board of Longevity Partners Ltd. Compliance is monitored by the Long Harbour Group Compliance Manager.

The Compliance manager shall ensure that it is communicated to, understood and observed by all employees.

Employees who reasonably suspect that there has been a breach of this policy must report it to their line manager, senior management, or through other mechanisms established by the firm to report such breaches to the compliance manager.

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SECTION 1

CODE OF BUSINESS ETHICS

This code applies to all of the operations of Longevity Partners Ltd and sets out the minimum standards which the Board of Longevity Partners Ltd expects from staff in their internal and external dealings with colleagues, customers, stakeholders and third parties.

1.1 Basic Standards of Conduct

- (a) We will conduct every aspect of our business with honesty, integrity and openness, respecting human rights and the interests of our employees, customers and third parties.
- (b) We will respect the legitimate interests of third parties with whom we have dealings in the course of our business.
- (c) We will maintain the highest standards of integrity – for example, we will not promise more than we can reasonably deliver or make commitments we cannot or do not intend to keep.

1.2 Employees

Longevity Partners Ltd:

- (a) Is committed to creating and maintaining a safe and healthy working environment for its employees.
- (b) Will strive to create a workplace in which there is mutual trust and respect and where every person feels responsible for the performance and reputation of the company.
- (c) Will respect the individual and each other's rights, customs and traditions including the right to freedom of association.
- (d) Will work towards achieving a diverse workforce; as well as recruiting, employing and promoting employees only on the basis of objective criteria and the qualifications and abilities needed for the job to be performed.
- (e) Will maintain good communications with employees through our information and consultation procedures.
- (f) Will assist employees in realising their potential.

1.3 Customers

- (a) Longevity Partners Ltd is committed to providing safe; value for money; high quality; and consistent, accessible and reliable services to its customers.

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1.4 Business Partners and Stakeholders

- (a) We aim to develop strong relationships with our suppliers, stakeholders and others with whom we have dealings, based on mutual trust, understanding and respect.
- (b) In those dealings, we expect our partners to adhere to business principles consistent with our own.
- (c) Longevity Partners Ltd will conduct its operations in accordance with the principles of fair competition and applicable regulations.

1.5 Compliance with the Law

- (a) All members of Longevity Partners will comply with the laws and regulations applicable wherever they do business. Appropriate training will be provided for employees as necessary.

1.6 Business Integrity

- (a) Longevity Partners Ltd shall not offer, give, seek or receive, either directly or indirectly, inducements or other improper advantages for business or financial gain. No employee may offer, give, seek or receive any gift or payment which is, or could be construed as, such. If an employee is in any doubt as to whether he or she may accept an offer, that employee should discuss the issue with his or her manager, compliance manager or managing director.
- (b) Longevity Partners Ltd accounting and other records and supporting documents must accurately describe and reflect the nature of the underlying transactions.
- (c) No undisclosed or unrecorded account, fund or asset will be established or maintained.
- (d) Longevity Partners Ltd will not facilitate, support, tolerate or condone any form of money laundering.

1.8 The Environment

- (a) Longevity Partners Ltd is committed to making continuous improvements in the management of its environmental impact.
- (b) We will work with our partners to promote environmental care and increased understanding of environmental issues, as well as disseminate good practice.

1.9 Community Involvement

- (a) Longevity Partners Ltd strives to be a good corporate citizen and to fulfil our responsibilities to the societies and communities in which we operate.

1.10 Conflicts of interest and confidentiality

- (a) Whilst Longevity Partners Ltd respects the privacy of its employees, all Longevity Partners Ltd employees are expected to avoid personal activities and financial interests, which could conflict with their responsibilities to Longevity Partners Ltd.

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(b) Longevity Partners Ltd employees and consultants must not seek gain for themselves or others through misuse of their positions or company property.

(c) All actual and potential conflicts (including those arising from the activities or interests of close relatives or partners) should be disclosed to and discussed with an employee's line manager.

(d) Information received by anyone in the course of his or her employment must not be used for personal gain or for any purpose other than that for which it was given.

(e) Where information is confidential, that confidentiality must be respected.

SECTION 2

SAFETY AND SECURITY

2.1 Safety

The health and safety of our employees and customers is our paramount concern. Safety underpins all our operations.

We have developed the following high-level health and safety policy, which underpins all of our operational health and safety policies:

(a) General Statement

The Board of Directors of Longevity Partners Ltd is committed to ensuring, so far as is reasonably practicable, the health, safety and welfare of all of its employees at work and also the safety of customers and others.

(b) This policy seeks continuous improvement and compliance with legislation, having proper regard to the protection of people, premises, property and the environment. It is based on the principles that:

- All injuries can be prevented
- The goal is zero injuries
- Safety is the responsibility of all employees
- Working safely is a condition of employment

The nine key safety principles with which all Longevity Partners Ltd employees are required to comply are set out below:

1. Do not endanger yourself or others. Report any hazardous condition or practice that may cause injury to people property or the environment.

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2. Obey all rules, signs and instructions. If you do not understand speak to your manager before you start work.
3. Keep your work area clean and tidy. Disorder causes accidents, wastes time, energy and materials.
4. Wear protective clothing and equipment as required. Keep it in good condition, wear it correctly and ask for a replacement if it becomes damaged or unfit for use.
5. All accidents, incidents and near misses must be reported to your manager. Seek immediate help and first aid (if necessary).
6. Do not adjust modify or repair any piece of work equipment unless you are competent and authorised to do so.
7. Use only the correct tools and equipment for the job. Check that they are in good condition before use and use them safely.
8. Before lifting, assess the load and your capability to move it. Make sure you get help with any heavy or awkward items, and follow approved techniques.
9. If you have any suggestions to improve safety in your workplace, tell your supervisor or manager.

We also require our contractors to comply with this policy whilst they are working on our behalf.

SECTION 3

EMPLOYMENT

In formulating its employment policies, Longevity Partners Ltd is guided by the framework established by the Organisation for Economic Co-operation and Development (OECD) in its Guidelines for Multinational Enterprises. These Guidelines encourage companies to foster openness, sustainability and respect for employee rights. Our employment policies cover all employees of Longevity Partners Ltd and its future subsidiaries.

3.1 Equal Opportunities and Diversity Policy

a) The Board of Directors of Longevity Partners Ltd is committed to equality of opportunity as an employer. This policy sets out Longevity Partners Ltd.'s commitment to treat its employees, customers, contractors and those who come into contact with the company equally and with fairness at all times.

(b) We are committed to seeking continuous improvement and compliance with legislation based on the following principles.

1. Everyone has the right to be treated with dignity and respect.

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2. We will not discriminate on the grounds of race, gender, disability, nationality, religion, philosophical belief, political belief, age, sexual orientation, family status, trade union activity or any other factor.
3. We will adopt fair and inclusive practices throughout our operations and will seek to eliminate all prejudice, discrimination, bullying and harassment.
4. All employees have a personal responsibility for the practical application of this policy in their day-to-day activities and must support this policy at all times.
5. Non-compliance with this policy will be treated seriously and will not be tolerated.

(c) The Board of Directors of Longevity Partners Ltd are required to ensure:

1. They create a productive and safe working environment, promoting diversity and inclusion in their workforce;
2. They develop new practices, as appropriate, to ensure all employees, contractors and customers are treated fairly; and
3. They can demonstrate continuous improvement in practices to promote diversity and equal opportunities for all.

Legislation and Codes of Practice

(d) We will comply with and, where possible, exceed current national and international legislation and relevant codes of practice in the countries where we operate. We will monitor our compliance with this policy and the requirements of relevant underpinning legislation as appropriate.

Partner Organisations

(e) We are committed to actively working with partner organisations to ensure our policies, procedures and practices are in line with best practice. In the United Kingdom, Longevity Partners Ltd is a member of Business in the Community.

Access to Information

(f) We will seek to ensure that information is made available to our customers and employees in alternative formats as required.

Recruitment

(g) All recruitment will be carried out with regard to fairness, equality and consistency for all candidates at all times. Recruitment practices will be inclusive and we will endeavour to ensure there are no barriers to employment of suitable candidates.

Staff Training

(h) We will provide our staff with the necessary guidance and training to ensure the effective implementation of this policy and to ensure we are an inclusive employer and service provider.

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Complaints

(i) Any employee who feels that he or she has grounds for complaint in relation to bullying, discrimination, harassment or victimisation has the right to pursue the complaint through our grievance procedures. Customers who feel they have grounds for complaint may pursue these through our operating company customer complaints procedures. We will ensure our complaints/feedback procedures can be accessed and used by everyone.

3.2 Human Rights

Longevity Partners Ltd supports the principles of the United Nations Universal Declaration of Human Rights and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work. We will adhere to the following principles in respect of our staff.

- a) We will treat all employees fairly and honestly, regardless of where they work. All staff will have agreed terms and conditions in accordance with local law or practice and will be given appropriate job skills training.
- b) We will pay a fair and adjusted minimum living wage reflecting local markets and conditions. We will always meet any national minimum wage.
- c) Working hours shall not be excessive. They shall comply with industry guidelines and national standards where they exist.
- d) We will not employ, nor purchase goods or services that result from illegal child labour, forced or bonded labour or forced overtime practices.
- e) We will abide by the non-discrimination laws in every country where we operate.
- f) We will not use or condone the use of corporal punishment, mental or physical coercion or verbal abuse. We have disciplinary procedures for any member of staff whose conduct falls below the required standard.
- g) All staff will be given reasonable access to bathroom and rest facilities.

3.3 Data Protection

(a) We will comply with the relevant principles governing data protection in each country in which we operate.

SECTION 4

4.1 Ethical Purchasing Policy

(a) We purchase a wide range of goods and services required in the operation of our business and we also rely heavily on a number of key suppliers for the delivery of our core services. Good working relationships with our suppliers are therefore central to the success of our business. For this reason, we clearly communicate this CSR Policy to our suppliers.

(b) We are committed to obtaining and retaining competitive goods and services while at the same time ensuring they are from sources which have not jeopardised human rights, safety or the environment.

(c) We aim to develop strong relationships with our suppliers, based on mutual trust, understanding and respect.

(d) More specifically, we expect our suppliers to:

1. Adhere to business principles consistent with our own.
2. Ensure that their products and services are produced and delivered to comply with all legislation relevant to their business.
3. Seek to maintain continuous improvement in their supply chain relationship with us.
4. Ensure they adopt and implement acceptable safety, environmental, product quality, product stewardship, labour, human rights, social and legal standards in line with our own code and to ensure these issues are acceptably managed within the supply chain for any products supplied to us.

(e) We will seek to work with our key suppliers to:

- Develop long-term meaningful relations to the benefit of both parties.
- Improve the quality, environmental performance and sustainability of goods and services where this can be achieved to the benefit of both parties.

SECTION 5

ENVIRONMENT

5.1 Environmental Policy

We are committed to driving sustainable value through the energy and sustainability projects we deliver to our customers through our core business activities. At the same time we recognise the environmental impacts arising from our own business activities and are committed to reducing these through effective environmental management.

Our policy is to strive to achieve continual improvement in environmental performance.

We are committed to:

1. Preventing pollution and reducing the overall impact of our operations on the environment;
2. Complying with, and where possible exceeding applicable legal and other requirements relating to the organisation;
3. Monitoring our environmental performance and setting objectives and targets for improvement (energy, water and waste monitoring); and
4. Providing appropriate training and awareness programmes for our staff who are all sustainability experts.

We recognise the key role we have to play in both reducing and contributing to greenhouse gas emissions. Our commitment in this area is set out in our Climate Change Policy.

Etienne Cadestin

Managing Director

Longevity Partners Limited