

# ***Firetrail***

INVESTMENTS

**Human Rights Policy**



## Document Control

### Version Control / Revision History

This document has been through the following revisions:

| Version | Date of approval | Remarks / Key changes / Reason for update |
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### Authorisation

This document requires the following approvals:

| Authorisation   | Name  |
|-----------------|-------|
| Initial Version | Board |

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## Introduction

Human rights refer to the basic standards of treatment that all people are entitled to receive, and presupposes that economic, social and cultural rights<sup>1</sup>, as well as civil and political rights<sup>2</sup> can be enjoyed by all.

This Policy outlines Firetrail Investments' (**Firetrail**) commitments and responsibilities to upholding human rights in all aspects of our business and investment operations. Our commitment to operating safely, ethically, and in line with all applicable laws and regulations serves as the base of our business, and informs our dealings with employees, clients, suppliers, and peers.

Firetrail is committed to respecting and protecting the fundamental human rights expressed, and supporting the principles contained, within the International Bill of Human Rights, the International Labour Organisation's (**'ILO'**) Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises.

We believe that universally, every individual is entitled to fundamental human rights including, but not limited to:

- the right to freedom from slavery or forced labour;
- the right to non-discrimination;
- the right to health;
- the right to an adequate standard of living;
- freedom of expression;
- the right to privacy;
- the right to a living wage;

irrespective of nationality, place of residence, sex, national or ethnic origin, colour, religion, language, or any other status. This Policy ensures Firetrail manages risk and promotes these internationally recognised principles within its business and investment operations.

## Benefits

This Policy should be read in conjunction with the following company policies:

- Firetrail Code of Conduct
- Firetrail ESG Policy
- Modern Slavery Statement
- Firetrail Supplier Code of Conduct
- Diversity and Inclusion Policy

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<sup>1</sup> <https://www.ohchr.org/en/professionalinterest/pages/cescr.aspx>, International Covenant on Economic, Social and Cultural Rights

<sup>2</sup> <https://www.ohchr.org/en/professionalinterest/pages/ccpr.aspx>, International Covenant on Civil and Political Rights

## Our People

Firetrail employs a diverse and skilled workforce who are appointed on merit – regardless of gender, gender identity, age, race, disability, nationality, marital status, family status, socio-economic background, sexual orientation, religious belief, and ethnicity.

Firetrail commits to having a safe and inclusive work environment encouraging employees to bring their whole self to work. We also follow the UN Conventions on Rights of Persons with Disabilities to ensure equal opportunities for people with disabilities as well as facilities and services which are accessible for all.

Firetrail is committed to addressing human rights grievances and providing appropriate avenues for affected individuals to speak up without fear of retaliation. We employ a grievance resolution procedure and confidential counselling services are available to all employees.

## Our Investments

Firetrail believe Environmental, Social and Governance ('ESG') factors can affect the value of investments. Therefore, ESG issues are a key component of the Firetrail investment process.

There are three key components to Firetrail's integration of ESG from an investment perspective:

1. Own it - each analyst owns ESG under their industry coverage. Analysts are the experts.
2. Measure it - ESG issues are investment issues. They must be measured.
3. Engage on it - Firetrail actively engages to address key ESG concerns. We do not screen out companies with high ESG risk.

Please see the Firetrail ESG Policy for further information.

Regarding Human Rights, we engage with companies to ensure that they are operating under the standards set by the ILO Conventions. We strive to ensure that all people affected by their operations have their fundamental human rights. This also applies to the UN Declaration on the Rights of Indigenous Peoples. We are committed to engaging in meaningful conversations to ensure our investee companies are collaborating with Indigenous communities – respecting their lands, territories, and resources.

In conjunction with our Modern Slavery Statement, we abide by the UN Conventions of Rights of the Child and UN Convention for the suppression of the Traffic in Persons. Modern Slavery emerged as a key human rights issue in Australia following the ratification of the Commonwealth Modern Slavery Act (2018). The Australian Act followed similar legislation in the United Kingdom and California and established mandatory reporting requirements for Australian corporates. The majority of our investments are based in Australia and have an obligation to report on modern slavery risk. We engage with all our investee companies to ensure they meet their local regulatory requirements, and strive for best practice where regulation is lacking. Firetrail carries out risk assessments identifying high risk countries and sectors to manage exposure and engage with company management to identify and remediate modern slavery risks. Firetrail has zero tolerance for child labour, human trafficking, and modern slavery.

Firetrail is a signatory to the United Nations Principles for Responsible Investment and therefore follow their Framework and guidance in our investment strategy. We acknowledge our three-part responsibility to respect human rights by publishing a policy commitment, having due diligence processes and enabling or providing access to remedy. Firetrail commits to communicate to clients, beneficiaries, stakeholders and publicly about outcomes and actions taken.

## Our Supply Chain

Firetrail conducts due diligence on material suppliers in accordance with the Firetrail Outsourcing Policy to assess and identify potential risks (including modern slavery, bribery and corruption and supply chain risks) that may arise from dealings with such service providers. Material Suppliers are monitored in line with the Firetrail's Outsourcing Policy, annually.

Firetrail's Supplier Code of Conduct (Code) sets forth the basic requirements that we ask our Suppliers to respect and adhere to when conducting business with Firetrail. The Code requires Suppliers to provide an adequate Modern Slavery Statement, if applicable. Otherwise, Suppliers may be requested to complete a human rights risk assessment, annually, to assess our supply chain's exposure to potential human rights violations.

If Firetrail has concerns about a product or service being linked to human rights violations via a Supplier relationship, Firetrail will look to engage with the Supplier on a progressive escalation basis to understand their remediation processes. In cases where a Supplier is not willing or able to change its behaviour, we will terminate the relationship.

## Continuous Improvement

In following our Human Rights Policy, Firetrail commits to:

- Avoiding causing or contributing to adverse human rights impacts through our own activities, and address such impacts when they occur; and
- Seeking to prevent or mitigate adverse human rights impacts that are directly related to our investment operations.

To do this, Firetrail will continue to operate under OECD Guidelines for Multinational enterprises & UN Global Compact to promote responsible business conduct and respect human rights. We will continue to work with our stakeholders and suppliers to drive positive change.

Firetrail acknowledges that human rights issues are ever evolving and subject to change. Therefore, policies and procedures outlined need to be reviewed and updated periodically to ensure new issues are not overlooked.