



Spear Capital

HUMAN RIGHTS POLICY

August 2022



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1 Human Rights Policy

Spear Capital (Spear) recognises that respect for human dignity and the rights of all people is critical for the sustainability of our company. Spear aims to identify, assess and minimise potential adverse human rights impacts that it may cause or contribute to, or that are linked to business activities, through on-going due diligence and appropriate management.

Spear commits to address both adverse human rights risks and impacts and to contribute positively to an enabling environment for human rights to be respected. Spear is also committed to paying special attention to the rights of potentially vulnerable groups.

1.1 Our Commitment

Our commitment includes:

- The right to freedom of association and collective bargaining;
- The right to equal remuneration for equal work;
- A zero tolerance approach to forced and bonded labour;
- A zero tolerance to child labour;
- A zero tolerance to unfair discrimination;
- The right to a healthy and safe working environment; and
- ensuring the safety and security of our employees encourages respect for human rights via any necessary interactions with both public and private security providers.

As part of Spear's commitment to respect human rights and to a comprehensive approach, Spear undertakes appropriate due diligence throughout the investment lifecycle. Where Spear has contributed to adverse human rights impacts, it will contribute to their remediation as appropriate. Spear will inform and engage appropriately with affected and potentially affected persons on risks, impacts and management measures.

1.2 Delivery and Implementation

Spear commits to embed this Policy into their corporate culture and practices. Efforts will include:

- Incorporating ongoing human rights due diligence into relevant business processes as appropriate;
- Engaging with relevant, potentially affected stakeholders in assessing and addressing impacts;
- Including human rights-related requirements within contractual arrangements with portfolio companies;
- Providing access to effective complaints and grievances procedures.



Compliance with this policy will be monitored. Any breach of, or non-compliance with this policy must be communicated to the policy owner.

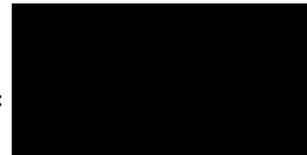
1.3 Going Forward

We continually evaluate and review how best to strengthen our approach to addressing human rights, including labour rights. This Human Rights Policy Statement consolidates our existing commitments.

Approved by:

Name: Martin Soderberg

Signature:



Position: Managing Partner

Date: 25 August 2022