
ENVIRONMENTAL, SOCIAL & GOVERNANCE POLICY



Introduction

Good stewardship of the environment in which we live and operate is integral to BluePeak's corporate values and purpose. BluePeak believes that environmental and social factors (E&S factors) not only contribute positively to investment performance, but they help to build a more stable, sustainable, and inclusive global economy.

Care for the environment and the communities within which we work is key to how BluePeak does business.

BluePeak has developed its ESMS, its corporate governance scorecard and associated procedures to support employees to implement this policy, and to enable the investment companies of BluePeak to do the same. Managing E&S risk is an integral part of BluePeak's sustainability credentials, and the investment framework is designed to ensure that the BluePeak Team applies a suitable level of due diligence to each transaction, and management throughout the investment process.



1. BluePeak's E&S Principles

BluePeak's investments should manage the E&S footprint and contribute positively to global environmental and social well-being as reflected in the UN Sustainable Development Goals (SDGs).

BluePeak will ensure that all potential investments are reviewed and evaluated against the Fund's policy commitments including the following E&S requirements:

- Applicable national and international laws, regulations and conventions on environment, labour, health, safety and social issues and any standards established therein;
- Fund's Exclusion list which is the European Development Financing Institutions' (EDFI) Harmonized Exclusion List published in September 2011, and the new Harmonized Fossil Fuel Exclusion list published in October 2020 and also the Fossil Fuel Policy of CDC published on 12 December 2020: (https://assets.cdcgroup.com/wp-content/uploads/2020/12/12150401/CDC-fossil-fuel-policy_December-2020_FINAL.pdf);
- IFC Performance Standards 2012 stated on IFC's website (www.ifc.org);
- World Bank's General EHS Guidelines, as well as any relevant associated Industry Sector Guidelines;
- International Labour Organization's (ILO) Fundamental Conventions;
- United Nations Universal Declaration of Human Rights; and
- United Nations Guiding Principles on Business and Human Rights.

2. Scope of the E&S Policy

The ESG policy (the "Policy") sets the following requirements and objectives:

- Incorporating E&S Risk considerations into all financing activities;
- Excluding financing of clients whose business activities do not meet BluePeak's E&S Principles;
- Committing to improving the overall E&S performance of BluePeak's portfolio through enhanced risk management;
- Complying with all relevant environmental legislations, regulations, and approved codes of practice in the countries where BluePeak operates;
- Financing companies who seek to maximize environmental and social benefits;
- Taking into account the environmental and social impacts of portfolio companies' operations in line with the above E&S requirements;
- Actively engaging with investee companies, through dialog with the board, management team, employees, customers and other stakeholders on E&S risks and opportunities, as well as other matters;

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- Implementing best practices to ensure that investee companies are operated in compliance with the policy commitments on an ongoing basis, during the life of the Fund's participation as an investee;
 - Ensuring that the management and the shareholders of the investee companies understand the Fund's ESG policy commitments and align their activities to those commitments as appropriate. Alignment to be achieved through the contractual obligations set out in the investment agreement signed between BluePeak and the investee companies where an Environmental & Social Action Plan (ESAP) and a set of covenants are described in detail, as necessary.
 - Reducing the direct E&S impact of BluePeak's operations through the application of the ESMS;
 - Reducing the indirect impact of BluePeak's commercial activities on the environment as laid out in our E&S Principles;
 - Committing to improving internal E&S capacity and training relevant BluePeak staff on their roles in implementing this policy (i.e., the identification and management of E&S risk). The Fund recognizes that additional external E&S expertise may be acquired where necessary; and
 - Ensuring transparency in all its activities. Sharing BluePeak's E&S credentials, risk management and performance with Stakeholders regularly.

3. Governance

The team responsible for governance at BluePeak is the E&S Partner and the E&S Officer. Also, BluePeak will set up an E&S Committee composed of BluePeak's E&S team and the E&S specialists of the Limited Partners (LPs) of any given fund, but it will be a voluntary decision from LPs.

4. Review and Reporting

This Policy is part of BluePeak's ESMS. It will be reviewed every two years and updated when necessary and immediately upon changes in legislation, emerging and evolving issues, and international best practices where relevant to the investment portfolio and in-house activities.

All updates of this Policy will be consulted firstly with LPs and E&S committee and then shared with all BluePeak employees and all stakeholders via BluePeak's communication channels (intranet, website, etc.).

BluePeak will report annually its E&S performance across the investment portfolio.

5. Exclusion/Prohibited List

As part of this Policy, BluePeak has adopted the ‘European Development Finance Institutions’ (EDFI) Harmonized Exclusion list published in September 2011. This list is derived from the IFC’s list of excluded activities and includes the additional exclusions of pornography and prostitution, cross-border trade in waste and waste products unless compliant with the Basel Convention and the underlying regulations, activities associated with the destruction of High Conservation value areas, racist or anti-democratic media. Supplemental to the Harmonized Exclusion List, BluePeak has adopted the EDFI Harmonized Fossil Fuel Exclusion list published in October 2020. These lists will be updated from time to time or when new sectors are added. BluePeak has also adopted the “CDC Fossil Fuel Policy” that was published on 12 December 2020 which makes several new areas ineligible for investment with CDC capital.

6. Effective Date

The first version of this policy was entered into agreement on 1st June 2020 and the second version was updated in January 2021.

This policy shall become effective **immediately**.

Walid Cherif
Managing Director