

BluePeak ESG Policy

1. 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, social, and governance factors (ESG 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 **Sustainability Framework** and associated procedures to encourage and support employees to implement this policy and to enable our investment companies to do the same. Managing ESG risk is an integral part of BluePeak's sustainability credentials, and our risk management framework is designed to ensure we apply a suitable level of due diligence to each transaction, and management throughout the period of investment.

2. BluePeak's E&S Principles

We consider that our activities should manage our environmental & social footprint and contribute positively to global environmental and social well-being as reflected in the **UN Sustainable Development Goals** (SDGs).

We will aim to ensure that all potential investments are reviewed and evaluated against BluePeak's **General Requirements** which include the following E&S requirements:

- Applicable national and international laws, regulations, and conventions on environment, labor, health, safety and social issues and any standards established therein;
- **IFC Performance Standards**

- **World Bank's** General EHS Guidelines, as well as any relevant associated Industry Sector Guidelines;
- **The European Development Financing Institutions'** ("EDFI") Harmonized EDFI Fossil Fuel Exclusion List;
- **United Nations Principles for Responsible Investment** (signatory status)
- **The 2X Challenge**;
- **The Operating Principles for Impact Management** (signatory status)
- **International Labor Organization's** (ILO) Fundamental Conventions;
- ILO Declaration of Fundamental Principles and Rights at Work and ILO Basic Terms and Conditions of Employment meaning:
 - ILO #1: Hours of Work
 - ILO #26, #131: Minimum Wage
 - ILO #155: Occupational Safety and Health (OSH)
- **United Nations** Universal Declaration of Human Rights; and
- The Minimum Safeguards as defined by **the EU Sustainable Finance Disclosure Regulation "SFDR"**.

In addition to the General Requirements listed above, specific requirements ("**Specific Requirements**") will be applied when applicable and depending on the fund or vehicle being managed by BluePeak. These include:

- **British International Investment** Fossil Fuel Policy
- **African Development Bank Group** Integrated Safeguards System

3. Scope of the ESG Policy

The ESG policy sets the following requirements and objectives:

- Incorporating **ESG Risk** considerations into all financing activities.
- Excluding financing of clients whose business activities do not meet **BluePeak's ESG principles**.
- Committing to improving the overall ESG performance of BluePeak's portfolio through enhanced risk management.
- Support resilience and adaptation toward climate change in our Portfolio Companies including raising our ambition throughout the investment

lifecycle.

- Complying with all relevant environmental legislation, regulations, and approved codes of practice in the countries where BluePeak operates.
- Complying with **SFDR Minimum Safeguards** (when applicable, depending on the fund managed by BluePeak)
- Regularly measuring greenhouse gas emissions arising from its operational activities and setting targets to minimize emissions as much as possible.
- 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 relevant IFC Performance Standards, **World Bank Group EHS Guidelines**, and national laws.
- Safeguarding against Gender-Based Violence and Sexual Exploitation, Abuse, and Harassment.
- Actively engaging with investee companies, through dialog with the board, management team, employees, customers, and other stakeholders on ESG risks and opportunities, as well as other matters.
- Making best efforts 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 is to be achieved through the investment agreement signed between BluePeak and the Investee companies where an **Environmental & Social Action Plan** (ESAP) and **Corporate Governance Action Plan** (CGAP) and a set of covenants are described in detail as appropriate.
- Reducing the direct E&S impact of BluePeak's operations through the application of the Sustainability Framework.
- Reducing the indirect impact of BluePeak's commercial activities on the environment as laid out in our ESG 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 ESG risk). BluePeak recognizes that additional external ESG expertise may be acquired where necessary.

4. Governance

ESG assessment throughout the investment cycle requires the involvement of the investment team, Head of SSE¹, E&S Officer, and E&S Partner. BluePeak may decide to establish an E&S advisory body as it sees fit, where it involves some of its stakeholders and investors to participate.

5. Review and Reporting

This Policy is derived from **BluePeak's Sustainability Framework**. 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 shared with all BluePeak employees and all stakeholders via BluePeak's communication channels (intranet, website, etc.).

For external stakeholders, we will report annually on our E&S impact across the investment portfolio. Our ESG impact will be mapped against key performance indicators that will be unique to each investment but aligned with applicable UN Sustainable Development Goals.

¹ Sustainability & Stakeholders' Engagement.