
RESPONSIBLE INVESTMENT POLICY

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1. OUR MISSION

Maha Capital Partners (MCP) believes that responsible investment is essential to long-term value creation and business success. We have a fiduciary duty to act in the best long-term interests of our beneficiaries and we believe that careful consideration and management of environmental, social and governance (ESG) risks and opportunities better position MCP to structure stronger, more resilient and profitable investments, which generate long-term and sustainable returns for our investors.

MCP pursues a responsible investment strategy in the management and operations of the portfolio investments of our funds, as well as in our own business as a fund manager. This policy provides an overview of MCP's approach to integrating ESG considerations into our business operations, investment decisions and portfolio management processes.

2. OUR PHILOSOPHY

Our philosophy is to integrate ESG considerations into our business strategy, including analysis, decision-making, management and reporting practices. For the funds we manage, it means we incorporate ESG throughout the investment and management lifecycle across all MCP's fund and portfolio investments. This includes considering key risks and opportunities as part of due diligence process, as part of the investment committee decision-making, and then implementing governance and management frameworks for engaging with these issues at the portfolio companies, in accordance with the level of control and influence.

Where the portfolio company is controlled, we intend to work with the company to appropriately integrate and monitor progress on material ESG issues into the operation and management processes. Otherwise, MCP intends to influence good ESG implementation and governance through shareholder engagement and transparent reporting.

3. OUR COMMITMENT

MCP is committed to pursue ESG objectives and sustainable investing. While MCP acknowledges that ESG considerations are specific to each portfolio company investment, at a fund level and investment manager level, MCP maintains our ESG commitments and considers certain considerations as relevant for each investment, regardless of asset class, industry, geographic focus, location, etc.

Guided by international standards and industry best practice, MCP has developed a set of overarching ESG objectives and commitments which we aim to consistently apply across all our business activities.

- **Environmental** – We believe in the importance of developing and supporting climate action initiatives. We aspire to control and reduce emissions targeting net zero carbon emissions by 2050; we consider energy efficiency and the transition to alternative, renewable energy sources; and we consider how our business decisions impact on ecosystems and biodiversity.
- **Social** – We are convinced that commercial activities can have positive externalities in communities. As such, we align economic growth with social growth, we pay special attention to creating fair and safe employment conditions and encourage diversity, equality of opportunity and inclusion.
- **Governance** – We are determined to utilize our influence to develop and strengthen governance frameworks. We aim to demonstrate and encourage integrity in leadership; facilitate the creation of a strong compliance culture; and are committed to transparent reporting and regular audits.

ESG issues may be reviewed from time to time to ensure relevance (with evolving standards, techniques and implementation feedback). These overarching ESG objectives provide a framework for developing more specific ESG management and action plans at portfolio company level and acts as a basis for determining ESG materiality and setting relevant assessment and reporting metrics.

4. MATERIAL ESG ISSUES

To ensure effective execution of these ESG commitments in line with different fund strategies and specific portfolio investments, MCP tailors our ESG strategies accordingly. First, by applying international, regional and industry-specific ESG frameworks and standards to identify material ESG categories for that sector and location. MCP then applies internal benchmarks and risk measures to each specific investment in order to determine relevant material ESG issues that have, or the potential to have, a substantial impact on our ability to create, preserve, or erode value. As part of these considerations of value, we consider economic, as well as environmental and social value for us, our investors and other stakeholders connected to that investment project.

As part of materiality determinations, MCP considers industry specific categories, project risks and impacts on sustainability factors within each investment context and with respect to the investment mandate. We recognize that materiality differs for each investment, according to activity, sector and location and the materiality considerations need to be adjusted to different stakeholders.

The process in which we determine materiality will be reviewed regularly to ensure we reflect changing environments, industry standards and regulatory guidance.

5. INTERNATIONAL STANDARDS AND TRANSPARENT REPORTING

MCP endorses relevant industry guidelines for responsible investment. On August 9th, 2021 MCP publicly demonstrated this commitment and became a signatory to the United Nations-supported Principles for Responsible Investment (UN PRI). Where consistent with our fiduciary duties, we seek to implement the six (6) aspirational UN PRI Principles. As a signatory, MCP is required to annually report on our ESG-relevant investment activities and be subjected to the UN PRI grading framework.

In addition, we monitor and align with a number of other international standards where appropriate. MCP’s ESG risk assessment and disclosure standards incorporates the recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD). These recommendations on climate-related financial disclosures are widely adopted across sectors and jurisdictions and has helped MCP to implement core ESG considerations and governance controls into our decision-making processes around including material forward-looking information in our financial disclosures.

In developing our ESG strategy and overarching commitments, MCP is aligned with the United Nations Sustainable Development Goals (SDG). Of the 17 Goals, MCP has identified a number of areas where our actions can have impact. Where our fiduciary duties align, we aim to support and further these aspirational objectives.

For project-specific ESG considerations, MCP applies a materiality-based approach and intends to use applicable standards to identify, prioritize, manage, and communicate to investors financially material sustainability issues. In order to determine relevant material ESG issues, MCP references the sector-specific reporting framework set out by the Sustainability Accounting Standards Board (SASB), which sets out the subset of ESG issues materially likely to impact MCP’s own business decisions as well as portfolio company operations. For MCP’s own investment management activities, we use the SASB Asset Management & Custody Activities.

In addition, MCP intends to use appropriate elements of other international benchmarks, such as the International Financial Corporation’s (IFC’s) Performance Standard and the World Bank Group Environmental, Health and Safety (EHS) Guidelines, United Nations Guiding Principles, Global Reporting Initiative (GRI) Standards, etc, to help us to standardize, quantify and measure the ESG costs and benefits derived from different portfolio company operating activities.

MCP will seek to be transparent in its approach to incorporating ESG considerations into its investment process by regularly reporting (semi-annually) on its progress and outcomes at the consolidated fund and firm level. The format of this reporting may vary between written public reports, informal verbal updates or confidential fund- or asset-level reports to MCP fund investors. MCP also regularly reviews developments in international and industry standards to ensure we keep up with best practices.

6. ESG INTEGRATION IN THE INVESTMENT LIFECYCLE

MCP implements our ESG strategies in the processes described in the table below throughout the investment and management lifecycle.

Pre-screening	Initial Due Diligence	IC Approval	Post-Acquisition Management (Depending on control structure)	Divestment
<ul style="list-style-type: none"> Negative Exclusion – MCP determines whether any ESG issues prevent investment. 	<ul style="list-style-type: none"> High level assessment of business-relevant material ESG risks and opportunities. Material ESG issues are issues 	<ul style="list-style-type: none"> MCP may conduct onsite visits, seek input from third party subject matter experts ESG Impact Assessments 	<ul style="list-style-type: none"> MCP to engage with portfolio companies to implement governance, management and reporting frameworks. 	<ul style="list-style-type: none"> ESG progress to be included as part of the performance and valuation of the investment at exit.

<ul style="list-style-type: none"> ESG value creation – determine ESG opportunities to support sustainability and generate value. 	<p>that MCP considers will have a significant impact on our ability to create, preserve or erode value in line with the investment mandate, where value includes not only economic value but also social, environmental and measured by qualitative metrics.</p>	<p>analyzed and evaluated with respect to the investment as a whole (legal, financial, commercial viability) as well as against other investment opportunities and the investment mandate and fund parameters.</p> <ul style="list-style-type: none"> ESG Action and Management Plans developed and approved for implementation 	<ul style="list-style-type: none"> Require timely and transparent reporting (at least semi-annually with regular updates) and biennial audit MCP to monitor and manage ESG issues, measure progress and address evolution of ESG risks. Incident management will require MCP to be involved in assessing severity and developing remedial action. 	<ul style="list-style-type: none"> Identify opportunities (e.g. buyers who have the credentials and track record) to continue and progress the ESG strategy.
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7. ESG GOVERNANCE AND REPORTING

MCP monitors and reviews implementation of our ESG strategies through the following organizational structures, which supports the investment and management lifecycle processes described above.

Execution Team: responsible for including ESG in the due diligence analysis and valuation, identifying and engaging with material ESG issues; developing and integrating ESG management plans into post-acquisition portfolio management; and setting and tracking ESG KPIs.

ESG Officer: responsible for coordinating ESG activities, developing and updating policies and oversight of implementation of MCP’s ESG strategy, to ensure consistency across different business activities. The ESG Officer works closely with the Execution Team as part of ESG engagement and is responsible for monitoring and reporting to Senior Management as well as investors and other stakeholders.

Investment Committee: responsible for the supervision, review and adjustment of the implementation of MCP’s ESG strategy with respect to portfolio investments according to fund strategy and mandate. As the decision-making body on portfolio investments, management and exits, the Investment Committee is required to consider ESG and sustainability matters along with all other material considerations (financial, operational, strategic, risk, etc) in evaluating investments.

ESG & Risk Committee: responsible for oversight and review of all ESG-related matters and decisions. The Board sub-committee, subject to Board intervention and approval, is the primary governing body that provides guidance and stewardship on company level ESG objectives and strategy and is charged with ensuring operational implementation

are in line with policies and supported with regular and transparent reporting to stakeholders.

External Experts: MCP engages third-party subject matter experts as needed. Among others, we retain technical experts Environmental and Social Impact Assessments and auditors to review our governance oversight and reporting arrangements.

8. ESG AT MCP

MCP has integrated ESG into its corporate operations and duly reflect our ESG commitments as part of our internal arrangements.

MCP believes in the importance of supporting climate action initiatives and we are committed to implementing decarbonization plans to achieve net zero carbon emissions by 2050 at the firm level. In addition, we aim to promote energy efficiency and transition to renewable sources and are aiming to source more than 50% energy from renewables.

MCP is committed to creating a safe, inclusive and supportive workplace that fosters a culture of non-discrimination and equality of opportunity. We are a relatively small team of multicultural professionals with extensive cross-disciplinary experience. We tend to collaborate across functions where employees have the opportunity for skill and knowledge transfer, sometimes across disciplines, to ensure we all grow and develop together.

Another internal ESG category is cybersecurity and data privacy. MCP maintains its own proprietary servers to ensure data security and integrity. We have implemented strict data privacy policies and processes to ensure we appropriately maintain the security of personal information of our investors and counterparties, while meeting regulatory screening and KYC requirements.

Moreover, MCP is committed to high standards of corporate governance that comply with local regulations, adopts strong frameworks for conflicts of interest and promotes a strong compliance culture.