

ESG Policy

Hidden Harbor Capital Management, L.P. (“Hidden Harbor”) is committed to being responsible global citizens.

Hidden Harbor invests on behalf of institutional investors around the world, including retirement systems. As careful stewards of capital, Hidden Harbor strives to provide solutions that create lasting value for our investors, the companies in which it invests and society at large. It is well known that stronger, better-run companies generate jobs and strengthen economies. Hidden Harbor has helped make scores of companies stronger and more competitive, and in doing so, bolstered the communities in which their employees live and work. Hidden Harbor’s commitment to operate with the utmost integrity and publicly minded spirit is a central element of its culture and is reflected in the work that it does. By making companies stronger and better positioned for long-term growth, Hidden Harbor can help create good jobs, support local communities and, ultimately, secure the future of millions of people around the world.

Investing Responsibly

Hidden Harbor’s commitment to corporate responsibility is embedded into every investment decision it makes.

Fostering Growth

Fostering growth and creating great business of enduring value is a vital part of Hidden Harbor's commitment to being responsible corporate citizens.

Investing in Sustainability

Protecting the environment of the communities in which Hidden Harbor operates is critically important.

Hidden Harbor, takes seriously its fiduciary duties to its investors and seeks to act in their long-term interest. Hidden Harbor endeavors to maximize risk-adjusted returns for its investors and other stakeholders by investing responsibly. Hidden Harbor believes that companies with environmental, social and governance (“ESG”) standards are typically better run, have fewer business risks and ultimately deliver better value. Hidden Harbor seeks to integrate assessments of ESG into its investment analysis and decision-making as appropriate because it believes that may lead to successful, sustainable and replicable results. Hidden Harbor is an active investor that often has significant influence over the companies in which it invests. Hidden Harbor seeks to reasonably incorporate ESG into its portfolio companies’ policies and practices and endeavors

to use portfolio company governance structures to provide appropriate levels of oversight in the areas of audit and risk management. Hidden Harbor also seeks to implement compensation policies that seek to align the interests of owners and management.

In light of the above, Hidden Harbor has chosen the following actions to appropriately identify and manage ESG issues and opportunities in its investing activities:

1. Inform members of the Hidden Harbor investment staff of this ESG policy and periodically seek input from them on its implementation and effectiveness.
2. Review appropriate ESG factors, as determined by Hidden Harbor given the circumstances applicable to an investment opportunity, as part of the due diligence review of such investment opportunity prior to committing to such investment.
3. Work through appropriate governance structures (e.g., boards of directors) of portfolio companies to encourage attention to ESG factors identified in the diligence of such investment with the goal of improving performance and minimizing adverse impacts in these areas.
4. Encourage its portfolio companies to consider relevant ESG issues with the goal of improving performance, minimizing adverse impacts in these areas, and, ultimately, providing long-term sustainability for the benefit of multiple stakeholders.
5. Direct Hidden Harbor personnel who are members of portfolio company boards of directors to report to the firm on any material ESG issues that arise during oversight of a company's business and on plans to remediate them.
6. Seek to be accessible to, and be willing to engage with, relevant stakeholders either directly or through representatives of portfolio companies, as appropriate.
7. Seek to use governance structures that provide appropriate levels of oversight in the areas of audit, risk management and potential conflicts of interest and to implement compensation and other policies that align the interests of owners and management.
8. Remain committed to compliance with applicable national, state, and local labor laws; support the payment of competitive wages and benefits to employees; and seek to provide a safe and healthy workplace in conformance with national, state and local law.
9. Avoid investments in business that are known to utilize child or forced labor or maintain unlawful discriminatory employment policies.
10. Remain informed about ESG developments and best practices within the private equity industry and periodically consider changes and additions to this policy based on those developments.