KYMA INVESTMENT PARTNERS

RESPONSIBLE INVESTMENT POLICY

Approved by the Board of Directors on March 5th, 2021

INTRODUCTION

For Kyma Investment Partners (Kyma), responsible investment means systematically integrating environmental, social, corporate governance, regulatory compliance, data safety and responsibility, and cultural and ethical ("ESG and interchangeably referred to as Sustainability") considerations across all stages of the investment lifecycle, from pre-investment activities through the post-investment holding period and exit.

Kyma believes that making sustainable investments and encouraging its portfolio companies to integrate sustainability into their corporate strategy, supported by impactful and measurable ESG objectives and targets, is an important responsibility for any long-term asset owner.
In particular, in line with its own investment strategy, Kyma will identify specific actions in each potential digital transformation of its portfolio companies that will deliver an exponential ESG benefit.

To this effect, in 2021, Kyma has become a signatory to the PRI and it's fully committed to applying its six Principles for Responsible Investment (www.unpri.org). Kyma will also become a signatory to the UN Global Compact (www.unglobalcompact.org) in 2021, and strives to implement the Ten Principles in the areas of human rights, labor, environment and anti-corruption through all its business activities.
As a company and as a team, Kyma acknowledges the Paris Agreement and we commit to evaluate in detail the climate change issues in our investment activities, keeping in mind and evaluating where it's possible also the TCFD (Task Force on Climate-related Financial Disclosures) recommendations.

This Responsible Investment Policy describes Kyma's commitment to sustainability in general and approach to addressing material sustainability aspects throughout the investment lifecycle.
It is designed to maximize stakeholder value by identifying material risks and opportunities associated with sustainability issues and to allocate the appropriate attention and resources needed to resolve any risk or capitalize on potential opportunities.

SCOPE

This Responsible Investment Policy applies to private equity investments (portfolio companies) made by funds managed or advised by Kyma Investment Partners (Kyma). Where Kyma is a minority investor, we may not necessarily be able to fully implement this Responsible Investment Policy. In such cases, Kyma will make reasonable efforts to encourage consideration of relevant ESG-related principles by the portfolio company.
Material sustainability aspects are those factors that have, or have the potential to have, a direct or indirect impact on an organization's ability to create, preserve or erode economic, environmental and social value for itself, its stakeholders and society at large.

ROLES AND RESPONSIBILITIES

The Head of Sustainability, as the 'Sustainability Officer', is the owner of this Responsible Investment Policy and is responsible for providing information on responsible investment to the Investment Committee and the Board of Kyma ('Board').
The manager and/or general partner of each Kyma fund engages its Investment Advisors, Kyma Partners, to support them in the evaluation and monitoring of sustainability aspects and sustainable practices. It is the Kyma's investment team's responsibility to make sure that sustainability is considered and assessed during investment screening and due diligence as well as continuously monitored during the ownership period.
The investment team is responsible, with the support of the Head of Sustainability, for annually reporting on compliance to the Responsible Investment Policy.
Implementation and monitoring of the application of the policy and procedures ultimately rests with the appropriate corporate governance body of each group company subject to it (portfolio companies).

PRE-INVESTMENT STAGE (FROM THE INITIAL SCREENING TO THE INVESTMENT DECISION)

Environmental, social, governance, compliance, data responsibility and security, cultural and ethical factors are an integral part of the investment analysis and decision-making process before making any investment.
Kyma has formal guidelines to exclude or limit investments in certain sectors. Sectors have been classified as either "Excluded", where Kyma will rule out making investments in companies active in that sector, or "Sensitive", where Kyma will minimize its exposure and will apply more stringent requirements prior to the making of investments and during the investment holding period.

Current excluded sectors are as follows:

SECTOR	NOTES	CLASSIFICATION
ACTIVITIES CONTRAVENING THE "EU, USA AND/OR UN TRADE SANCTION LISTS"	The production of items, or the provision of services, to governments and organizations listed on the EU, US or UN Trade Sanctions Lists.	Excluded
ARMAMENTS	The production of weapons and directly related ancillary equipment used by combat and defense forces (including conventional, chemical, bacteriological and nuclear weapons), and the manufacture of strategic equipment (aircraft, missile warheads, rockets), of the systems required to launch and guide missiles, and of the defense electronics without which such military equipment cannot be operated. For the avoidance of doubt, excludes any product or component that is potentially suitable for use in the manufacture of anti-personnel mines, cluster bombs, nuclear weapons, chemical weapons, biological weapons or depleted uranium ammunition, however, the principal intended use of such product or component is for a purpose unrelated.	Excluded
ILLEGAL DRUGS	Illegal drugs which are considered in illegal in the particular jurisdiction in which such production or sale is intended to occur.	Excluded
PORNOGRAPHY AND PROSTITUTION SERVICES	The solicitation, advertising and sale of sexual services as well as the production of representations of sexually degrading acts that are an affront to human dignity and the active distribution of such material via channels such as the media, shops or the internet.	Excluded
ALCOHOL	The production, sale and distribution of alcoholic beverages or liquor; other than if part of the operation of a hotel, amusement park, leisure business or other hospitality business.	Excluded
TOBACCO	The production, sale and distribution of cigarettes, cigars or pipe tobacco, including firms whose primary activity is to trade in tobacco and/or to distribute unprocessed tobacco wholesale to cigarette manufacturers; other than if part of the operation of a hotel, amusement park, leisure business or other hospitality business	Excluded
GAMBLING AND RELATED PRODUCTS	All the business activities which includes: • Arcades, which may be for adults or families. • Gaming machines, such as fixed odds betting terminals and fruit machines. • Betting, which occurs online, at an event, or at bookmakers. • Bingo, which may be online or in a bingo hall. • Lotteries, which include tombolas, sweepstakes, raffles, etc. • Casinos, there are online as well as physical casinos that people enter.	Excluded
ELECTRONIC DATA	The research, development or technical applications relating to electronic data programs or solutions which are specifically intended to enable to illegally: - enter into electronic data networks; and/or - download electronic data.	Excluded
HUMAN CLONING	Companies engaged with artificial human cloning, which is the reproduction of human cells and tissue	Excluded
ADVERSE TO UN PRI PRINCIPLES	Companies whose business activity is not consistent with the UN PRI, based on the outcome of the ESG Due Diligence and where we can't identify an action plan to solve the related risks.	Excluded

Other sectors including but not limited to genetically modified agricultural products, oil and gas exploration, extraction, mining or power generation from fossil fuels, civil nuclear and animal testing are classed as sensitive and will undergo additional scrutiny during the decision-making process.

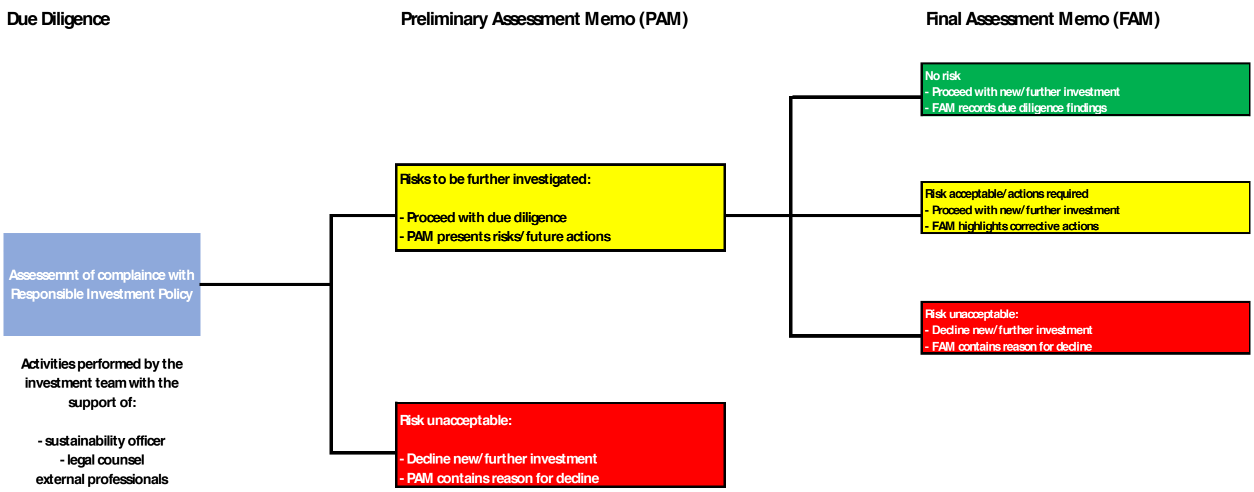
Furthermore, Kyma shall avoid investing in companies that:

- do not respect human rights;
- do not directly or indirectly through their supply chain respect standard labour conditions; apply discriminatory policies; and/or use child labour;
- do not comply with anti-corruption standards and best practice;
- do not comply with their industry standards and best practice;
- do not comply with current environmental, health and safety, ethics and social legislation;
- do not have proposals to address defined significant future legislation on ESG issues; including but not limited to climate-related transition or physical risks and
- do not have controls and recovery policies in place for cybersecurity,

unless resolving these issues is a specific part of the investment strategy.

Pre-investment, the Kyma investment team is expected to liaise with legal and sustainability advisors as well as any relevant external professionals (specialist consultants, industry advisors, lawyers, etc.) covering a range of topics and functions, when relevant, such as legal, financial, commercial, tax, cybersecurity, operations, labour and ESG. This is to confirm the viability and opportunity of target companies and to ensure compliance with current and proposed future legislation.
If the investment is not compliant with Kyma's Responsible Investment and ESG policies, the risks will be identified and the investment team, together with the legal and the head of sustainability, will determine the appropriate course of action.

In this phase, in line with Kyma's investment strategy, the investment team with the support of the Digital and Operating partner will also investigate all the possible Digital Transformation Projects that will support and improve the adherence to the Responsible Investment Policy.



The results from the ESG assessments will be presented in both the preliminary assessment memo (PAM) and final assessment memo (FAM) which highlight the risks and mitigation measures as well as potential opportunities for remedying any non-compliance.

Last but not least, Kyma developed a specific procedure to be followed during the due diligence phase to cover all the possible negative sustainability outcomes based on the 10 principles of UN Global Compact:

Principles	Description of the Pre due diligence and Due diligence activities
Environmental	Review of all DD by third party advisors.
Labor, Welfare and safety	Review of any material finding related to labor rights, welfare and safety on-the-job. Adherence to the national labor contracts as agreed by the major trade unions, no late payments of welfare contributions or any other irregularity about welfare regulations. Adherence of the retribution policies to the national labor contracts applicable to the specific industry. No sign of child labour, compulsory labour or labour discrimination.

Ethical, Cultural and human rights	An in-depth organizational culture and ethical behavior review in which the investment team, legal advisor and sustainability officer work together to complete a thorough analysis and to conduct interviews with service providers and management to better assess and understand the culture and ethics of the company and how this may impact the value of the business. Special focus will be on the respect of human rights and their possible abuses.
Reputational Risk and anti-corruption analysis	Third party analysis of public information to determine ESG and business conduct risks related to the company and overall industry. Review of any material finding related to corruption in all its forms, including extortion and bribary.
Activity	**Description**
Summary of the potential risks	Considering all the different areas (Environmental, labour, Ethical and reputational), the investment team will present a summary of the actual risks both in the Pam and the FAM
Action Plan	The investment team and the sustainability officer develop a detailed action plan to mitigate all the potential risks identified during the due diligence phase.

POST-INVESTMENT STAGE

Material Responsible Investment issues or mitigation actions identified during the pre-investment due diligence, and subsequent mitigation measures or actions highlighted in the FAM will be incorporated into a 100-day plan. This will become the blueprint for action to create value once the deal is approved.

Post-investment, each portfolio company is required to identify an ESG representative with whom Kyma's Sustainability Officer collaborate on an ongoing basis. Starting with an on-boarding process, the portfolio company will be introduced to the recommended Kyma's sustainability approach, suggested actions and timings. Kyma will work closely together with the portfolio company from this point onwards, both on a formal basis (including quarterly calls and support to specific ESG projects) and more informally (for example providing ad hoc support with reporting or setting ESG objectives and targets), both in person and by phone or video conference.

Each portfolio company will endeavor to adopt Kyma's sustainability approach and integrate it into its own. This will typically take place over a three-year period, depending on the sophistication of each business and the maturity of their existing sustainability programs and initiatives.

Ultimately each portfolio company will endeavor to undertake the following steps:

Steps	Description
Vission, Mission, Strategy	Publish a CEO Statement and committment to sustainability
	Develop a Sustainibility Strategy focused on the company's material issues
	Develop company-specific ESG Objectives and Targets
Monitoring and Reporting	Monitor sustainability performance and report key ESG data metrics quarterly and annualy to Kyma
	Monitor and report progress in relation to company specific ESG Objectives and Targets
	Measure impact of sustainability initiatives to the business growth and profitability, reputation and risk reduction/business continuity
	Publish an Annual Sustainability/Progress Report
	Annual board meeting discussion of ESG Performances and review of the action plan
Governance, including ESG Policies, Board and Executive accountability, Committees, Key Staff	Code of Conduct / Ethics
	231 Model
	Anti-Bribery and Corruption (ABC) Policy
	Anti - Trust Policy
	Labor rights, Welfare and Safety Policy
	Whistleblowing Policy and Hotline
	Modern Slavery / Human Rights / Child Labour Policy
	Diversity / Equal opportunity Policy
	Environmental / ESG / Sustainability Policy
	Health & Safety Policy
	Responsible Purchasing Policy / Supplier Code of Conduct
	Business Cointinuity Plan
	GDPR Policy
	Sustainability / ESG / Environmental and Health & Safety Manager(s)
	Information Management / Data Protection and Security Officer

EXIT STAGE

When the management and advisory teams start to consider exit timing, the Sustainability Officer will be consulted and asked to compile and prepare vendor due diligence documentation and a report, to demonstrate that the key ESG and Sustainability milestones have been met or are near completion and to measure the value created or risks mitigated through sustainability at the portfolio company.

REVIEW

This policy reflects Kyma's current values and culture. It will be reviewed at least annually and revised as appropriate, with or without notice.
The policy was last updated in March 2021.