



ACCORD GROUP HOLDINGS – RESPONSIBLE INVESTORS

Environmental, Social and Governance (“ESG”) Policy

Revised September 13, 2021

Overview

As an investor and advisor, Accord Group Holdings LLC (“Accord”) recognizes its power to impact the world. We believe that ESG considerations affect the value of our investments, and sound ESG practices lead to better decision-making and outcomes. Accord is committed to understanding and improving its impact on the environment, both physical and social, and strives to incorporate governance practices that facilitates transparency and disclosure with our investors. Active engagement with our investee companies is a key element of this practice.

Accord views climate change as a systemic risk and pledges to work towards a net zero-carbon future by 2050; by following a decarbonization pathway, focusing on social initiatives and emphasizing active dialogue, we will work with our investee companies, stakeholders and partners to work towards a similar goal.

Accord believes that giving opportunity and a voice to a diversity of individuals and groups helps bring about better outcomes, both financially and for society, as a whole. Within Accord and alongside our various investee companies, stakeholders and partners, we promote diversity, inclusion and equity.

Responsible Investment-Making

Accord is dedicated to working with our investors and investee companies to accommodate the many aspects of responsible investing and believes that research and methodology is at the heart of manager selection and the investment process.

We are a signatory to the United Nations Principles for Responsible Investment, which provides the framework used by Accord in this ESG Policy:

UN Principles of Responsible Investment

- *We will incorporate ESG issues into investment analysis and decision-making processes*
- *We will be active owners and incorporate ESG issues into our ownership policies and practices*
- *We will seek appropriate disclosure on ESG issues by the entities in which we invest*
- *We will promote acceptance and implementation of the principles within the investment industry*
- *We will work together to enhance our effectiveness in implementing the principles*
- *We will each report on our activities and progress towards implementing the principles*

Given these Principles, in our investment efforts and in accordance with our fiduciary responsibility to stakeholders, Accord commits to emphasizing ESG considerations in our investment and monitoring processes. This is achieved by:

- 1) Identifying ESG issues throughout our investment due diligence process.
- 2) Refusing to invest with an organization or in a project that willfully disadvantages underserved or underprivileged communities and/or creates significant damage to society. Diligence considers the macroeconomic environment required for potential investments to succeed and whether that aligns with Accord’s and its stakeholders’ values.

- 3) Seeking to grow and improve investee companies while benefiting multiple stakeholders. Accord will work with investee companies on environmental, health, safety, climate change (including exposure to increasingly severe or unpredictable weather events), social and governance issues, and regulatory risk, with the goal of improving performance and minimizing adverse impacts. Accord will consider how these factors could impact its investments.
- 4) Developing and maintaining the resources to achieve implementation of Accord's ESG initiatives, which is overseen by an ESG Officer and an ESG Steering Committee.
- 5) Making ESG integration an ongoing endeavor. Accord's ESG Steering Committee will meet to review the firm's efforts quarterly.
- 6) Adhering to the highest standards of conduct to avoid even the appearance of negligent, unfair or improper practices. This includes maintaining a baseline: proactively complying with applicable national, state and local labor laws in the countries in which we invest; supporting the payment of competitive wages and benefits to employees; providing a safe and healthy workplace in conformance with national and local law; and, consistent with applicable law, respecting the rights of employees to decide whether or not to join a union and engage in collective bargaining. Where possible, Accord will seek to exceed minimum legal requirements.
- 7) Respecting the human rights of those affected by our investment activities and seek to confirm that our investments do not support companies that utilize child or forced labor or maintain discriminatory policies. Accord will support diversity and inclusion initiatives within our investee organizations and within investment projects.
- 8) Ensuring all Accord employees and senior advisors are aware of the firm's culture of social responsibility and encourage them to strengthen that culture. Accord will provide ESG training for employees and encourage firm professionals to engage in non-profit giving and socially responsible volunteer activities.
- 9) Encouraging dialogue with our investors and other stakeholders regarding how we can manage ESG issues in a way that is consistent with their initiatives. We will work with our investors to foster transparency in all aspects of Accord's activities, including our ESG performance.
- 10) Distributing this policy and related ESG information to all appropriate employees of our investee companies to encourage and support their adherence.

Accord has created an ESG Questionnaire to be completed by prospective investee companies as part of the underwriting and due diligence of investment opportunities.

Diversity and Inclusion

Accord is committed to fostering growth through an inclusive and diverse firm culture and ensuring its employees, investee companies (and their employees), other stakeholders and partners are all treated equally and accorded the same level of respect. In addition, Accord believes that support for diversity and inclusion must include considerations of equity and accountability. The firm's philosophy, commitments and initiatives regarding diversity and inclusion are documented in its *Inclusion, Diversity, Equity and Accountability Statement* (last updated December 2020).

Commitment for the Future

We will work with an independent and expert ESG consultant to create a roadmap to minimize our carbon

footprint; this roadmap will also be used to guide our investee companies' reporting of estimated carbon emissions and aim to align their pathway to a net zero-carbon future.

Each year, we will review Accord's progress against the UN PRI, as well as investee company performance related to ESG goals. ESG metrics will be discussed at quarterly asset management meetings and detailed annual assessments will be conducted on investee companies. Accord believes in an integrated approach to ESG; to execute our vision in challenging the status quo and keep up with rapidly evolving ESG trends, we have created a separate and detailed ESG Process Handbook, which will be reviewed semi-annually and updated, as appropriate.