

RESPONSIBLE INVESTMENT POLICY 2025

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1. Background

True North is a leading private equity Firm in India. Since 1999, our business model has focused on transforming mid-size, India-centric businesses into socially responsible enterprises which are universally admired. The focus sectors of our investments are Financial Services, Healthcare, Consumer, Technology Products and Services. Well-respected for its partnership approach in its investments, our commitment is to look much beyond our ownership period where our growth capital works responsibly in achieving long-term strategic business interests of our partner companies. This transformation enables our partner companies to become world-class industry leaders. Our investment approach focuses on driving tangible positive outcomes beyond profits with the aim of building a culture of excellence in each partner company, thereby securing long-term business sustainability and enhancing competitiveness.

1.1. Policy Scope and Coverage

This Responsible Investment Policy (this “Policy” or RI Policy) provides an outline of the Firm’s commitment to responsible investment and its approach towards integrating Environmental, Social, Governance (“ESG”) and Climate Change considerations, Diversity Equity & Inclusion practices and meaningful Sustainability Outcomes within its own operations, as well as across the investment lifecycle- both for equity as well as credit.

This Policy revision enshrines our evolving understanding of responsible investments and lays down our commitments on the expanded scope of our Responsible Investment framework.

Whilst we strive to embed responsible investment considerations into our investing activities, the approach and modalities vary depending on the asset class, the degree of ownership or control and the influence that we have in an investment. Our endeavour is to meaningfully integrate the policies and practices that make our investments responsible and empower them to respond strategically to the evolving sustainability landscape.

While we adopted ESG Policy and implementation Framework in 2018 from Fund VI investments, and RI Policy in 2021 after becoming signatories to UN PRI, our investment approach has been to promote responsible business practices since inception. Our responsible investment approach is aimed at creating socially responsible businesses which inter-alia means, they are not involved in activities

which are undesirable morally and socially, are compliant with all the extant ESG rules and regulations applicable to their respective businesses and importantly, they have policies and processes that fulfil environmental, social and governance expectations from our investments.

This Policy is reviewed annually (or more frequently if required).

1.2. Applicable Frameworks and Commitments

The following responsible investment guidelines, frameworks, standards and commitments enable us to identify and adopt sustainable business practices and establish a foundation for long-term success -

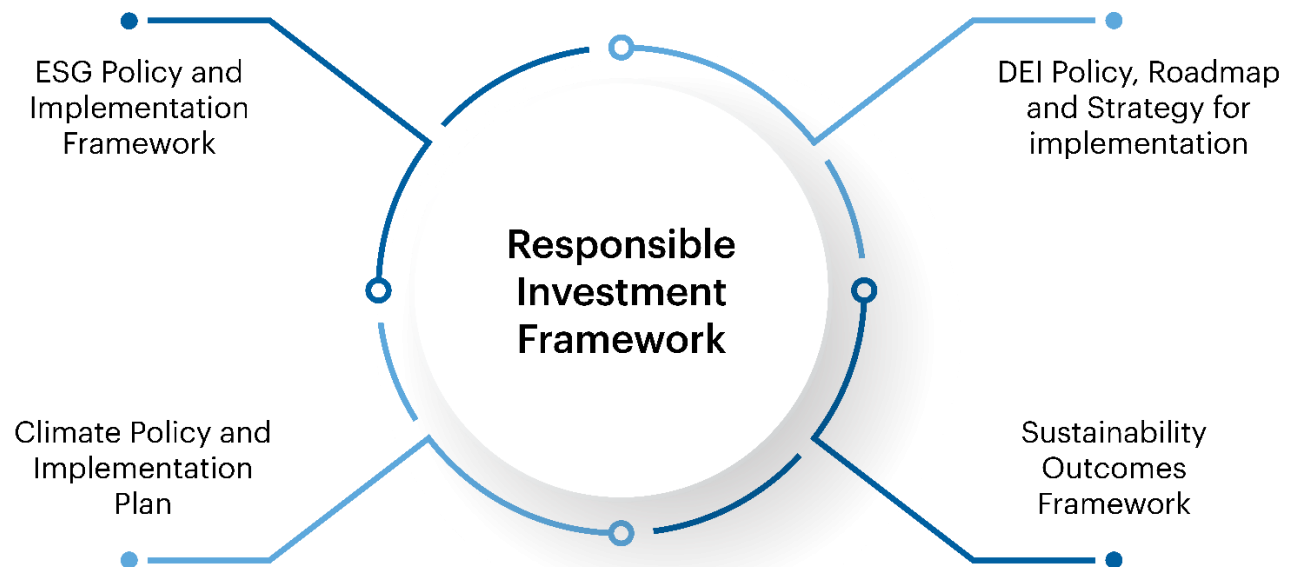
1. The Firm and its partner companies will comply with the applicable national laws and regulations and adhere to the National Guidelines for Responsible Business Conduct (“NGRBC”) of Government of India. The Policy, therefore, also aligns our commitments to the Business Responsibility and Sustainability Reporting (BRSR) Framework of the Securities and Exchange Board of India (SEBI).
2. Our responsible investment approach shall continue to be aligned with leading international conventions, standards and guidelines, such as those prescribed by the Asian Development Bank, the International Finance Corporation, British International (formerly the CDC Group plc, United Kingdom), Organization for Economic Co-operation and Development (‘OECD’) Principles of Corporate Governance, United Nations Global Compact, International Bill on Human Rights, and United Nations Guiding Principles on Business and Human Rights.
3. We are committed to performing our fiduciary duty towards our investors and other key stakeholders through a meaningful integration of responsible investment policies, processes and practices in our investments. Identification of ESG and climate risks in evaluating investment decisions and integrating other aspects of responsible investment principles during ownership period is crucial for enhancing risk adjusted returns for our investors.

4. The Firm became a signatory to the United Nations-supported Principles for Responsible Investment (the “PRI”) in October 2020. We share the convictions and ambitions of this international initiative and are committed to fully implementing the PRI’s six founding principles in our business and throughout our investment life cycle. We have drawn extensively from the various PRI resources and guidelines for our significantly improved approach towards responsible investment and stewardship.
5. We commit to the Paris Agreement on Climate Change and are progressively working towards managing climate risks according to the International Financial Reporting Standards (IFRS), more specifically guidelines as laid down in IFRS S2 – Climate-related disclosures (since the Task Force on Climate related Financial Disclosures (“TCFD”) Framework has been subsumed in the IFRS guidelines).
6. We are committed to deliver positive societal impact by meaningfully integrating and mainstreaming sustainability outcomes in our investments and business management practices with UNPRI Framework on Sustainability Outcomes as also the UNSDGs as the guiding framework.
7. Our endeavour is to continually commit, uphold and implement human rights standards in our operations as well as in our investments. Our investing activities and stewardship shall also continue to ensure that our partner companies’ business and operations uphold human rights. This is also reflected in our Human Rights Policy.
8. We are committed to fostering our workplace and those of our investments that embrace diversity, equity, and inclusion (DEI), reflecting the distinct backgrounds and talents of team members.
9. We commit to work with policymakers, regulators, community of investors, leading national and global private equity and credit firms, and all other relevant stakeholders in a responsible and transparent manner to collaborate on initiatives related to ESG, climate action, DEI, and other systematic sustainability issues. All such consultations are and shall be done with prior approval of the ESG & CC Governance Committee.

2. Responsible Investment Approach and Framework

As we have evolved and matured in our understanding and implementation of responsible investment practices, we have since broadened our approach and created a Responsible Investment Framework

The Framework has four pillars –



2.1. ESG Considerations

Our definition of success goes beyond financial returns and embodies material ESG considerations.

These ESG considerations reflect focus areas for own operations and investments- while evaluating a potential investment, engaging with partner companies (where we have influence) during ownership and are also used to define our Firm-level priorities. During the materiality exercise, conducted in 2025, the undernoted ESG issues were determined to be material in own operations and those of our investments:

Environment

- **Climate Action**

Carbon Neutrality in own operations | Energy efficiency | GHG – measurement and reduction | Climate Risk Assessment – mitigation and adaptation | Renewable Energy adoption

- **Responsible Waste Management**

Social

- **Diversity, Equity and Inclusion**
- **Workplace health, safety, and well-being**
- **Human rights**
- **Employee engagement**
- **Learning and development**
- **Sustainable supply chain**
- **Customer centricity and trust**
- **Community relations and social responsibility**

Governance

- **Corporate governance**

Board-composition, independence, evaluation, ESG monitoring | Insider trading, related party transactions | Conflict of interest | Internal controls, monitoring and disclosures | Executive pay and succession planning

- **Responsible Investment**

ESG integration in deal lifecycle | Effective stewardship – investees, policy consultations, regulators, community of investors | Accountability and transparency – periodic reports (ESG, climate, LP report, UN PRI) | ESG Governance

- **Business integrity, ethics, transparency and accountability**

Code of Conduct | Anti-bribery and Anti-corruption | Anti Money Laundering | Whistleblower

- Risk Management
- Cyber security, data protection and privacy

2.2. Our Commitment to Climate Action

We are committed to taking climate action to support the global transition to a low-carbon economy. Our climate strategy incorporates the UNPRI framework and adopts the IFRS S2 (Climate-related disclosures) Standard.

We are committed to remain carbon neutral and continuously work towards reducing our GHG footprint. We have incorporated Climate Change aspects in screening and diligence processes of all our potential investments. Our Climate Risk Assessment Tool, based on the TCFD framework, uses Shared Socio-economic Pathways (SSP) scenarios to assess climate risks in our portfolio. Our Climate Risk Assessment approach and tool has recently (2025) been updated using SSP 2 and SSP 5 with 2040- and 2060-time horizon. We also handhold our partner companies make their businesses climate risk resilient. We help them understand their carbon footprint and encourage them to measure, monitor and report their emissions and work towards emission reduction aligned with Science Based Targets

2.3. Diversity, Equity and Inclusion

In our commitment to conduct business and operations, including our investing activities, in the Right Way, embracing a collaborative, value-driven approach that promotes and fosters a diverse, equitable and inclusive culture is very important. We acknowledge the pivotal role diversity and inclusion play in creating socially responsible businesses. We strongly believe in and commit to building a diverse workforce inclusive of gender, age, religion, language, political opinion, citizenship, disability, and social origin across our activities.

2.4. Sustainability Outcomes Framework

Furthering our commitment to responsible investment, we have developed a Sustainability Outcomes (SO) Framework, aligned with the United Nations Sustainable Development Goals (UN SDGs). This Framework enhances our understanding of the positive and negative real-world impacts of our investments, providing a three-dimensional view of the direct and indirect outcomes we influence. Through this approach, we are mainstreaming sustainability outcomes as part of our investment approach, supporting long-

term value creation and business resilience for achieving consistent and target-oriented results. We adopted a value-based approach to identify relevant SDGs and set appropriate goals and targets for both existing and new investments. The Framework aligns our business objectives with SDG priorities and financial goal, translating them into tangible, measurable outcomes.



3. ESG Implementation Approach

3.1. ESG Integration in the Firm's Own Operations

We continue to implement policies and encourage initiatives to reduce our environmental impacts.

We ensure health, well-being, security, and safety of our employees at work. Employees are provided up-skilling and training periodically. We aim to create a diverse and inclusive workplace to bring out the best in our people.

We and our ecosystem uphold the highest standards of ethical conduct by implementing a robust governance framework with globally benchmarked policies such as the Code of Conduct, Whistle Blower Policy, Anti-bribery and

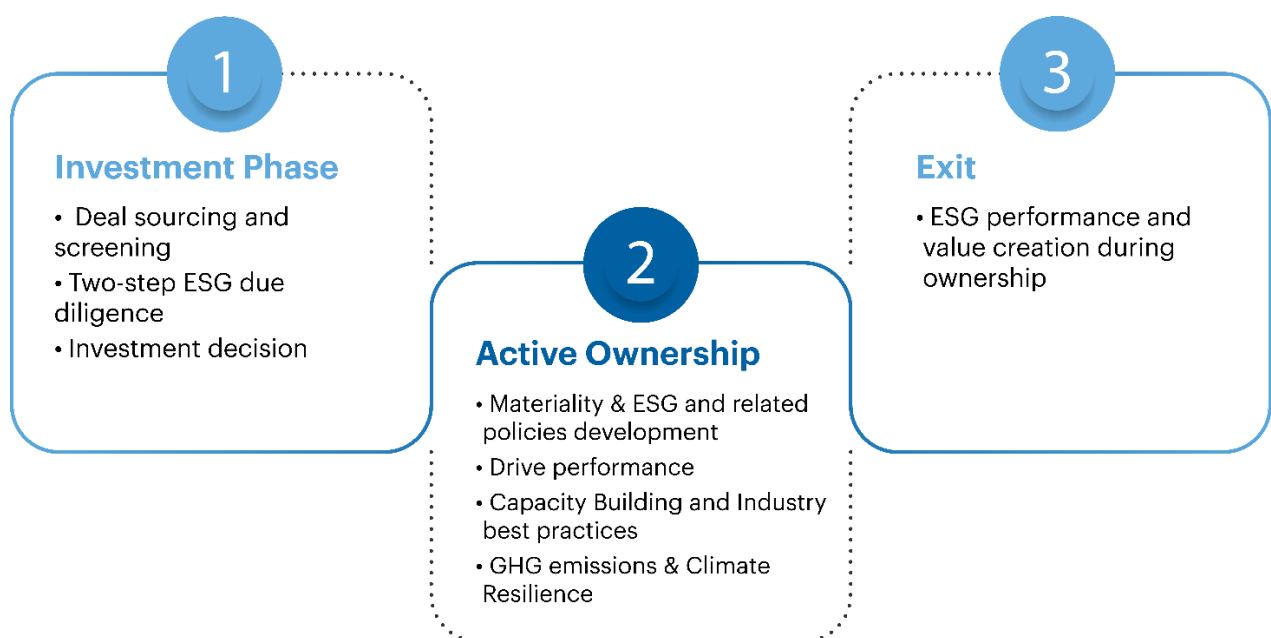
Anti-corruption Policy, Personal Security Trading (PST) Policy, Cyber Security and Data Protection Policy (ies), Human Rights Policy, and Supplier Code of Conduct.

We commit to climate action and carbon neutrality in our own operations and support our partner companies to remain climate responsive and resilient.

3.2. ESG Integration Across the Lifecycle of Equity Investments

Our ESG integration approach is to be applied throughout the deal lifecycle. While there could be differentiated approach based on the asset class or on the influence that we may have, our intention is always to maximize the integration of ESG and other responsible investment aspects into our investment process.

An overview of how ESG is integrated in our deal lifecycle is shown below:



3.3. ESG Integration in Private Credit

Our Private Credit investments aims to build the credit business across the performing credit area. The process of integrating ESG is aided by our proprietary ESG Private Credit Risk & Maturity Tool. It reviews critical ESG aspects during the evaluation / screening phase and evaluates the ESG risks of business and collateral provided. It provides a final ESG assessment consisting of non-compliance flags, policy score, and risk rating to assist in investment / lending decision making.



4. Our approach to Stewardship

Our understanding of stewardship responsibilities have evolved after becoming signatories to UN PRI. We understand that as a responsible Firm, our stewardship responsibilities are much wider and accordingly, we have developed our stewardship commitment to fulfil those responsibilities.

Our approach and commitment to our different stakeholders are as follows:

Investee stewardship

We work closely with the partner companies to build awareness, help them identify material ESG issues and present value creation opportunities. We aim to look beyond our ownership period and help our partners build ESG vision, policy, strategy and implementation framework that is aimed at serving long term business sustainability needs. We collaborate with our partner companies in putting together appropriate governance framework. Our endeavor is to empower our partner companies' Boards with knowledge and tools that enable them to periodically review ESG & CC progress and provide strategic direction and oversight. A structured ESG Assessment Framework has been developed to assess, monitor and engage our partner companies during the ownership phase. It reflects our ESG priorities and responsible investing philosophy drawing guidance from industry leading frameworks. We have enhanced our stewardship practices with our investees by including areas such as DEI and collaborating for mapping and integrating goals and targets aimed at sustainability outcomes.

Our role in policy consultations and development

With an aim to help develop a responsible investment ecosystem that serves the expectations of different stakeholders, we commit to actively participate in policy consultations and development. With our deep understanding of policies and practices and also our approach in active ownership which looks beyond our holding period, our contribution in policy development may bring significant value to the sustainability ecosystem.

Stewardship with other stakeholders

As we actively work for and serve different stakeholders like the global community of investors, our peers – Indian and global, and the alliances and associations formed to further responsibility in business, we commit to contribute to understanding and development of global benchmarks through our investment and stewardship experiences. We have joined various national and global associations and alliances such as Initiative Climat International (iCI), ESG Data Convergence Initiative (EDCI), United Nations Principles for Responsible Investment (UN PRI), and Indian Private Equity and Venture Capital Association (IVCA).

Stewardship in Listed Equity

For all our listed equity investments, our Stewardship Code lays down the guidance of our voting in line with our responsible investment commitment, more importantly, protecting our stakeholder's interests. We uphold our environmental, social and governance commitments while deciding on a resolution. To ensure transparency, we make our voting decisions and its rationale public.

5. Identification and resolution of conflict of interest

It is our endeavour to follow all our responsible investment commitments and principles in all the investments. However, in the exceptional cases, where business considerations are in conflict with the responsibility commitments, the ESG & CC Governance Committee shall be empowered to take decision whether to take up the investment or not, and their decision shall be final.

We ensure that there is no conflict of interest while conducting stewardship activities with various stakeholders. We ensure that such engagements are in line with our responsible investment commitments.

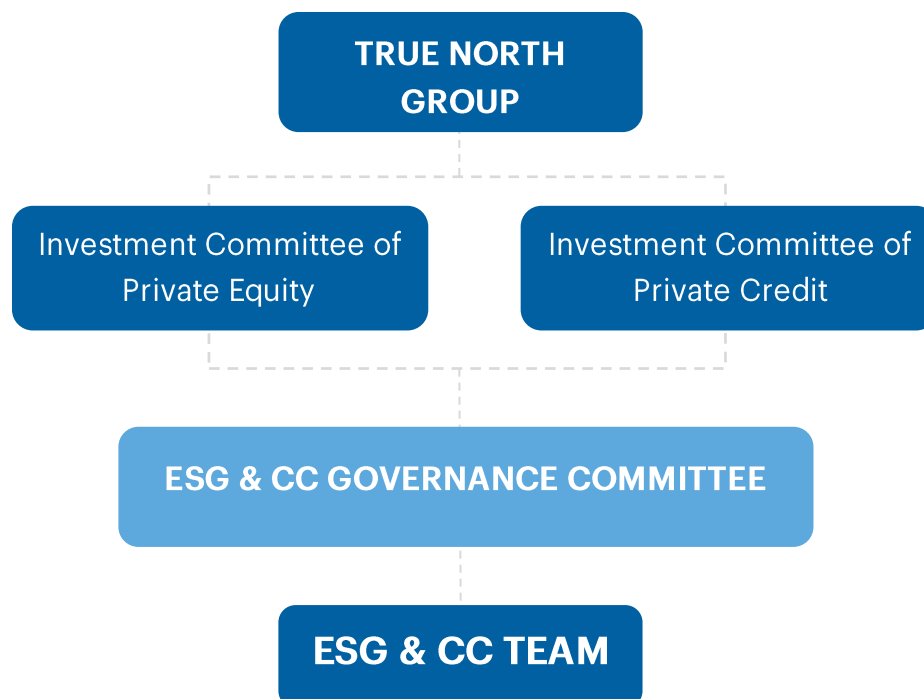
6. Governance

Our top leadership is entrusted with the responsibility of embedding all our responsible investment commitments in our own operations and in our investing activities. Several individuals and/or functions have a role and chain of command.

The accountability framework has been clearly defined to effectively embrace all the responsible investment policies and processes.

Our responsible investment governance framework comprises of a Firm level ESG and CC Governance Committee headed by the Managing Partner with senior leadership as its members and a dedicated ESG and Climate Change Team. The ESG and CC Committee reviews progress and performance and is responsible for providing strategic oversight and direction, while the ESG and CC team focuses on operationalizing True North's responsible investment policies, which includes managing the organization's own operations and that of our investments.

True North's Partnership has the overall responsibility of supervision, review, and strategic direction.



7. Awareness and Capacity Building

In order to ensure adequate awareness and effective implementation of responsible investment framework, policies, and processes, the Firm conducts periodic training and capacity building sessions internally, or by engaging external consultants/ experts.

8. Reporting and Disclosure

The Firm publicly discloses its progress against responsible investment commitments annually. This includes:

- ✓ ESG Report
- ✓ Disclosure on the UNPRI platform (Transparency Report)
- ✓ Fund-wise reports on ESG & Climate Change performance to our Limited Partners
- ✓ TCFD Report
- ✓ Carbon Neutrality Report

In order to ensure transparency, we regularly update the Responsibility page of the website.