



ENVIRONMENTAL, SOCIAL & GOVERNANCE POLICY

TriWest believes that the consideration of environmental, social and governance (“ESG”) factors is an important part of a responsible fund manager’s asset management activities. TriWest recognizes that the generation of long-term sustainable returns is influenced by the proactive management of ESG factors. This ESG Policy sets out TriWest’s principles for responsible investing. TriWest seeks to adhere to the following principles when making portfolio investments on behalf of its managed investment funds:

- Comply with all applicable laws and regulations;
- Conduct our business with the highest level of honesty, integrity, fairness and respect;
- Incorporate ESG factors (both the risks and the opportunities) into our pre-acquisition due diligence and investment decision-making process; and
- Incorporate ESG factors (both the risks and the opportunities) into our ongoing ownership practices and portfolio board responsibilities.

TriWest has appointed an ESG Officer who shall have primary responsibility for oversight of this policy. The Chief Operating Officer is the current ESG Officer of TriWest. The ESG Officer will ensure that such actions are taken to implement the principles above as may be relevant and practicable, taking into account the nature of the investment, the nature of the investment process, the degree of control TriWest has over a portfolio company investment, and the applicable fund’s best interests. The ESG Officer will also ensure that this Policy is distributed to and known by all employees.

ESG factors which will be considered as part of portfolio company pre-acquisition due diligence, investment decision-making and/or our ownership period include the following:

Environmental

- Adopt best practices to lower the environmental footprint of each portfolio company and its customers
- Monitor and manage environmental sustainability and impact of activities on the environment generally
- Commission environmental assessments for all material real property (owned and leased) of a portfolio company, and action any recommendations in these assessments

Social

- Comply with all applicable laws and regulations (including labour laws) in each jurisdiction where we invest or where a portfolio company has operations
- Treat employees fairly and support the payment of competitive wages and benefits
- Maintain safe and healthy work environments, including the prevention of workplace violence and harassment
- Adhere to all applicable occupational health and safety best practices
- Respect and support communities in which we live and work
- Support charitable organizations through the donation of our time and resources
- Respect indigenous rights and heritage

Governance

- Establish solid foundations for management and oversight of portfolio company investments
- Work to implement best governance practices and promote high standards of business integrity with ethical and responsible decision making
- Comply with all applicable laws and regulations and make timely and balanced disclosures
- Use governance structures that provide appropriate levels of oversight in audit, risk management (including anti-bribery and corruption, anti-money laundering and tax evasion) and potential conflicts of interest
- Respect the rights of all stakeholders, including employees, customers, suppliers, communities, regulators, creditors and investors
- Implement compensation and equity ownership policies that align the interests of owners and management

In this Policy, the term “TriWest” is intended mean TriWest Capital Partners Management Inc. and the general partner of all current and future funds managed by TriWest Capital Partners.

The ESG Officer shall review and assess the adequacy of this Policy from time to time and recommend to the Board of TriWest Capital Partners Management Inc. any changes it deems appropriate. Any change to this Policy must be approved by the Board of TriWest Capital Partners Management Inc.