



HUMAN RIGHTS POLICY
OF
GREEN ARROW CAPITAL GROUP



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1. INTRODUCTION

Green Arrow Capital S.p.A. Società Benefit and all its affiliates¹ (“**GAC**” or the “**Group**”) is an independent financial group specialized in alternative investments across Europe.

GAC represents a one of a kind platform that aims to connect the financial system with the real economy by actively investing and managing funds of clean energy & infrastructure, private equity and private credit.

Founded in 2012, GAC grew rapidly to establish itself as a sustainable return specialist, bringing to market investment strategies designed to protect invested capital and generate sustainable returns, both financial and in terms of ESG goals.

GAC is committed to value creation for its investors and stakeholders. Within its value proposition lies an important consideration for responsible investments in its business philosophy.

The objective of this human rights policy (the “**Policy**”) is to communicate and disclose GAC’s commitment to respect human rights throughout the activities of the Group in the context of internationally approved human rights standards.

2. SCOPE

This Policy applies to the Group.

This Policy also concerns all the direct and indirect investment classes in which GAC is currently involved and in which it will be involved in the future.

Principles and procedures aimed at protecting the human rights of internal and external stakeholders in the context of the Group-wide approach.

3. ACTIONS AND COMMITMENTS

GAC consistently upholds its commitment to human rights throughout all its business operations, both domestic and international, by adhering to the principles of the UN Global Compact and actively monitoring compliance to ensure the absence of any direct or indirect forms of exploitation or abuse.

The purpose of this Policy is to make respect for human rights an essential requirement in the conduct of operations of Green Arrow Capital.

In particular:

- **Freedom of Association and recognition of collective bargaining**

All employees have the full right to freedom of association and recognition of collective bargaining. The Group promotes dialogue and helps parties involved understand their respective needs and find solutions to existing problems if any.

¹ For the purpose of this Policy, the term “affiliates” refers to:

- Green Arrow Capital SGR S.p.A.;
- Green Arrow Asset Selection SARL;
- Green Arrow Infrastructure of the Future SARL;

and any other company controlled by GAC S.p.A. Società Benefit.



This approach allows the Group to guarantee workers' freedom to form and join unions and organizations and grants neutrality during the hiring, promoting, and dismissing processes.

- **Elimination of all forms of forced and compulsory labour**

All activities related or potentially related to forced and/or compulsory labour are systematically excluded from the business of the Group.

Any violation that can be traced back to forced and compulsory labour is not tolerated. This principle is extended to all the stakeholders of the Group.

- **Effective elimination of child labour**

The Group explicitly prohibits the use of child labour in accordance with ILO Conventions².

The Group's mission is to abolish child labour through the exclusion and early detection of circumstances that may refer to any form of this phenomenon permeating all activities that make up the business. The hiring of minors for any form of collaboration where the age of said minors is below the minimum legal age allowed in each state is firmly prohibited.

This principle is extended to all the Group suppliers.

- **Elimination of all forms of discrimination in employment and occupation**

The Group promotes the elimination of all forms of discrimination.

By the term discrimination, the Group means all hostile behaviours with respect to religion, age, gender, sexual orientation, gender identity, origin, race, language, disability, political opinion, and social status. This principle shall be respected by both the Group's internal resources and stakeholders. GAC confirms its commitment against each form of discrimination through its Diversity Policy, encouraging career development and internal progression based on merit and professionalism.

The Group is committed to safeguarding the physical and mental and physical health of employees with the utmost care. All discriminatory behaviours that violate the commitments the Group has made through its policy system and its code of ethics are condemned and brought under the disciplinary code.

- **Privacy**

The Group considers privacy as a fundamental human right generally understood to be the right to control who has access to information about oneself. The right to privacy is recognized by The International Covenant on Civil and Political Rights which states "no one shall be subjected to arbitrary or unlawful interference with his privacy, family, home or correspondence".

4. REFERENCES

External References

In defining its management system human rights theme, the Group is inspired by the main international references and standards including:

- The Declaration on Fundamental Principles and Rights at Work and the Fundamental Conventions of the International Labour Organization (ILO);

² ILO: organization which brings together governments, employers and workers of 187 States, to set labour standards, develop policies and devise programmes promoting decent work for all women and men.



- The Universal Declaration of Human Rights on Civil and Political Rights and Economic, Social and Cultural Rights;
- The United Nations Conventions on the Rights of Women, Elimination of All Forms of Racial Discrimination, the Rights of the Child, and the Rights of Persons with Disabilities;
- Agenda 2030.

Internal References

- Diversity Policy

5. POLICY DISSEMINATION AND UPDATING

All those involved in the Group's administration, all those linked to it by an employment relationship are committed to the principles and rights enshrined in the Policy.

GAC also seeks to disseminate these principles externally, including entities working on its behalf as business partners and suppliers.

The Policy is made available to everyone both at the beginning of the employment relationship and on the Group's website. All parties involved will always be kept informed of any updates to the Policy in the face of any changes in regulations rather than national and international standards.