



## Sustainability Stewardship Policy

### Introduction

STAR Capital Partnership LLP (“**STAR**”) is a mid-market private equity fund manager focused on investing in businesses characterised by strategic qualities that provide strong downside protection. We work in partnership with management teams of portfolio companies to increase shareholder value by seeking to enhance the long-term stable cash flow characteristics of these businesses.

### What does Stewardship mean to STAR?

Stewardship is the way that STAR seeks to engage with portfolio companies of funds under its management during the fund’s ownership period.

The funds managed by STAR typically acquire majority control positions in private, unlisted portfolio companies.

STAR aims to take a proactive approach to stewardship in sustainability by exercising its shareholder (and related board appointment rights) rights in accordance with its sustainability principles, including:

- To optimise positive impacts and minimise or negate potential adverse impacts;
- To promote the highest standards of business integrity and compliance;
- To consider the interests and perspectives of all stakeholders in making strategic decisions; and
- To undertake timely and transparent reporting in relation to material ESG matters.

### Stewardship Strategy

The principal transaction partner is typically appointed to the board of directors of each portfolio company once acquired by the fund, often in addition to a member of the portfolio management team. A representative of STAR may also be appointed to ESG committees (where appropriate).

For each portfolio company to be acquired:

- in advance of completion, a 100-day plan is developed which includes any required or recommended actions resulting from the ESG-related due diligence undertaken in the investment evaluation process;

- governance procedures are strengthened (for example, by enhancing policies where required, and by constituting committees of the board of directors (including an ESG Committee) where appropriate);
- monitoring practices are put in place to drive and promote sustainable practices and outcomes across our portfolio companies, which include:
  - Creating plans together with management to address the most material ESG risks and opportunities identified during due diligence, and offering support where appropriate;
  - collecting KPI data (on a range of ESG topics including carbon footprint) from each portfolio company on an annual basis to document progress, identify any new issues and opportunities and report to investors in the Funds; and
  - using the collected data to inform the portfolio company's overall sustainability strategy (for example, the data collected regarding carbon emissions is used to help portfolio companies set achievable climate targets);
- regular reporting practices are put in place for the benefit of the relevant board of directors and also of investors in the Funds; and
- STAR commits to use its influence to support incremental improvements by setting targets/KPIs relevant to the portfolio company and to demonstrate continuous ESG evolution over the Fund's ownership period.

#### Ownership of Policy

The Executive Board of STAR is committed to continuous improvement in sustainability and to proactive implementation of this policy.

STAR's Sustainability and ESG Manager will take a lead role in engagement with portfolio companies on sustainability matters.

The Executive Board will review this policy on an annual basis.

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