



ENVIRONMENTAL, SOCIAL AND GOVERNANCE POLICY

This policy details White Star Capital's commitment to Environmental, Social and Governance ("ESG" and the "ESG Policy").

White Star Capital is committed to ESG goals because we believe they shape outcomes, create lasting impact in the world while unlocking and protecting sustainable long-term value for its portfolio companies and generating competitive returns for White Star Capital's investors.

This ESG Policy covers all of White Star Capital's funds, portfolio companies, and all of White Star Capital's activities across all investment cycles. White Star Capital's ESG Policy recognizes that by actively advocating the integration of ESG factors, White Star Capital leads the way for our partners, investors and portfolio companies to position ourselves as having a significant and lasting impact on society, and on the environment.

A. WHITE STAR CAPITAL'S GUIDING PRINCIPLES

i. ENVIRONMENT

White Star Capital shall integrate environmental considerations in its investment decisions, as well as support the allocation of portfolio company resources in furtherance of environmentally friendly measures and policies. The environmental aspect of ESG is a measure of a portfolio company's impact on the natural environment and White Star Capital encourages the efficient use of natural resources and the reduction of a portfolio company's impact on the environment across its value chain.

ii. SOCIAL

White Star Capital believes that effective social policies are a key factor in creating value. White Star Capital focuses on ensuring that portfolio companies implement policies that promote diversity, equality, inclusion and compliant working conditions. This focus on the social aspect of policies seeks to measure how a portfolio company treats people such as employees, customers and the communities in which the portfolio companies operate.

iii. GOVERNANCE

White Star Capital believes that governance is a key driver to unlock sustainable long-term value. White Star Capital shall focus on key factors such as management structure, transparency and board diversity with a view to help investors and other stakeholders measure the performance and ensure accountability of its portfolio companies.

B. WHITE STAR CAPITAL'S INTEGRATION OF THE UN PRI

White Star Capital believes in the opportunity for value creation generated by actively providing guidance and monitoring portfolio companies' commitment to ESG factors. White Star Capital formally became a signatory of the UN Principles for Responsible Investment (the "UN PRI") in 2019, after having followed the principles in practice for many years.

White Star Capital's ESG Policy is structured around compliance with UN PRI's six Principles of Responsible Investment. As such, ESG issues are incorporated in the investment analysis and decision-making process and continue to be monitored well into White Star Capital's engagement with portfolio companies throughout the investment cycle.

White Star Capital applies the six Principles of Responsible Investment as follows:

- 1. White Star Capital incorporates environmental, social and corporate governance (ESG) issues into investment analysis and decision-making processes by:**
 - assessing potential target investments against relevant ESG criteria
 - a thorough due diligence investigation and inherent ESG risk analysis
 - the inclusion of ESG findings collected during due diligence in the investment committee memo and if identified ESG risks cannot be mitigated, no investment shall be made
- 2. White Star Capital is an active investor and incorporates ESG issues into ownership practices by:**
 - sharing ESG objectives, policies and practices with portfolio companies
 - supporting portfolio companies' efforts in improving their ESG performance
 - actively engaging with portfolio companies and offering support to help them reach and surpass ESG compliance efforts
- 3. White Star Capital seeks appropriate disclosures on ESG issues by our portfolio companies by:**
 - requiring reporting on ESG issues highlighted in the due diligence process
 - asking for information from companies regarding adoption of/adherence to relevant norms, standards, codes of conduct or international initiatives
 - supporting shareholder initiatives and resolutions promoting ESG compliance
- 4. White Star Capital promotes acceptance and implementation of the principles within the investment industry by:**
 - communicating ESG expectations to service providers and will reassess relationships with providers that do not adhere to ESG guidelines
 - aligning investment mandates, monitoring procedures and performance indicators
- 5. White Star Capital works to enhance its effectiveness in implementing the principles by:**
 - collaborating to address new issues and supporting initiatives by sharing information, tools and resources with other actors
 - collaborating with other venture capital funds to share best practices
- 6. White Star Capital shall report on activities and progress towards implementing the principles by:**
 - where possible, raising awareness of ESG principles among stakeholders
 - disclosing how ESG issues are integrated within investment practices

C. WHITE STAR CAPITAL AND THE UN SUSTAINABLE DEVELOPMENT GOALS

The United Nations' 17 Sustainable Development Goals (SDG) have universal appeal and although they were not originally developed with the investment community in mind, White Star Capital recognizes that they are easy to understand and remarkably effective in shaping an impactful sustainability agenda.

White Star Capital supports portfolio companies' decisions to allocate resources and deploy policies that serve the furtherance of SDG goals. White Star Capital closely monitors the United Nations Development Programme's SDG Impact, an initiative focused on eliminating barriers and driving integrity for SDG-enabling investment at scale and supports SDG Impact's vision of a world in which all capital flows advance the United Nations Sustainable Development Goals (SDGs).

D. OVERSIGHT OF WHITE STAR CAPITAL'S ESG POLICY

White Star Capital is committed to reviewing and, where necessary, updating this ESG Policy annually to reflect on-going efforts to improve its ESG approach, as well as the evolving expectations from our stakeholders, and evolving best practices.