

Abris Capital Partners Responsible Investment Policy



Date: April 26, 2018

1. Background

Abris Capital Partners ("Abris") recognizes that as an Investment Advisor it has a social responsibility. Abris will select investment opportunities not only in terms of the expected financial return; it will also consider environmental, social and governance (ESG) issues when contemplating investment opportunities. Abris recognizes that these principles are embodied in the United Nations Global Compact Ten Principles and in the UN Principles for Responsible Investment (PRI).

As a socially responsible investor, Abris aims to invest in companies that act responsibly in terms of environmental, ethical, governance and social issues. The objective reflects our values and culture, as well as the wishes of our investors and employees, and helps protect and enhance our reputation and creates value for our investors.

Abris, as an institutional investor, has a duty to act in the best long-term interests of its beneficiaries. In this fiduciary role, we believe that environmental, social, and corporate governance (ESG) issues can beneficially affect the performance of investment portfolios.

2. Our Commitment

In December of 2016, Abris became a Signatory of the Principles for Responsible Investment (PRI), the world's leading proponent of responsible investment in the financial community. PRI was developed by investors, for investors and through practicing the Principles, Abris contributes to developing a more sustainable global financial system.

We also recognize that applying the Six Principles for Responsible Investment may better align investors with the broader objectives of society. Therefore, where consistent with our fiduciary responsibilities, we commit to the following:

- Abris will incorporate ESG issues into its investment analysis and decision-making processes.
- Abris will be an active owner and incorporate ESG issues into its policies and practices.
- Abris will seek appropriate disclosure on ESG issues by the entities in which it invests.
- Abris will promote acceptance and implementation of the Principles within the investment industry.
- Abris will work together to enhance Abris' effectiveness in implementing the Principles.
- Abris will report on its ESG activities and progress towards implementing the Principles.

Abris applies the Responsible Investment Policy to the companies in which invests. Abris aims to align its activities with recognized international standards such as the United Nations Global Compact's Ten Principles.

3. Enforcement

Abris takes its commitment to responsible investment and thus ESG seriously.

The Investment Committee is responsible for ensuring Responsible Investment Principles are extended to Abris Investment Procedures and to Abris portfolio companies. Abris Investment Committee also provides guidance on a wide range of potential ethical, governance, social and environmental challenges.

Ms. Monika Nachyła is a Partner directly responsible for ESG integration who coordinates the Abris ESG efforts and leads ESG communication with Abris' Limited Partners.

Mr. Robert Sroka is an ESG Director responsible for developing and executing comprehensive Responsible Investment Policy and activities. The ESG Director co-operates with all Abris investment professionals and portfolio company managers in order to ensure ESG issues are properly monitored pre- and post-investment, and all incidents are logged, discussed and properly addressed.

The ESG Director is supported by Ms. Katarzyna Woźnicka and Ms. Oana Mihai the ESG Administrators who are responsible for monitoring the progress of resolving portfolio companies' ESG issues on a regular basis.

4. Our approach

Abris actively engages with its portfolio companies through the investment process and embeds ESG issues into all steps of the investment process.

Pre-investment due diligence

Abris formally incorporates ESG factors into its investment due diligence process. The Deal Leaders are responsible for reviewing all potential portfolio companies from a corporate responsibility perspective as part of the investment procedures in order to understand the ESG profile of potential portfolio company and highlight potential ESG risks.

Each potential portfolio company is checked against the Abris Exclusion List. Abris refrain from investment in companies on the Exclusion List.

Abris has developed a Categorization Guideline to ascertain the scope of ESG Due Diligence. Based on the adopted guidelines Abris refrains from investing in companies that do not:

- respect human rights;
- comply with current environmental, ethical and social legislation;
- have proposals to address defined future legislation; or
- seek to comply with their industry standards and best.

Abris required from the Deal Leaders ensuring completion of a designated ESG due diligence and highlighting all ESG issues to the Investment Committee.

Deal Leaders are expected to prepare a 100-day plan addressing all ESG issues and preparing an ESG Action Plan for the acquired company.

Post-investment management and monitoring

Abris is active owner in all its portfolio companies. Abris monitors the portfolio companies to address all ESG issues covered in the 100-day plan and, when necessary, implementing changes for continued compliance with corporate responsibility best practices.

Portfolio companies are required to report ESG concerns and improvements on a quarterly basis.

Abris conducts annual ESG monitoring visits.

The ESG Director and the ESG Administrators monitor the progress of resolving portfolio companies' ESG issues on a quarterly basis. CCO includes control of Abris portfolio ESG monitoring in the periodic Compliance Reports prepared for the Investment Committee.

5. Transparency

Abris discloses the ESG data in quarterly reports to LPs.

Any material ESG incidents during the quarter are reported in this disclosure and are open for discussion during LPAC meetings.

An extraordinary meeting is called to address the incident requires the immediate attention or action of the LPAC.

6. Review

This Policy will be reviewed and updated as required to reflect external and internal changes at least every three years.