



# Impact and Environmental, Social, and Governance Policy

Effective Date: March 2022

## ESG and Impact Management

As venture investors, Braemar Energy Ventures (“BEV” or “Braemar”) are heavily focused on what transformative growth in our assets will mean for Environmental, Social and Governance (“ESG”) risk management over time. Given that ESG risks, and opportunities can look very different across periods of investment and divestment, it is through this lens that we train our investment teams on these issues and guide our outside advisors that may be employed to evaluate them. In addition to maximizing impact, we focus on opportunities where we believe we can improve ESG performance to produce meaningful outcomes and deliver double bottom-line (i.e., economical, and societal benefit). Our Investment Committee materials include a section on ESG risks and opportunities and our ESG due diligence informs the actions we take while working with acquired companies. We are committed to measuring and reporting the impact of our efforts in a manner that is transparent and leverages existing proven frameworks. Determination of materiality draws upon guidance from the Sustainability Accounting Standards Board (“SASB”) materiality map and industry standards, as well as consideration of the company’s sector and operating geography.

During due diligence, we assess ESG issues to identify both material risks and opportunities. This process can include key issues we expect all investments to assess for relevance (such as those related to antibribery and corruption risks, anti-money laundering procedures, environmental and health and safety issues, forced and child labor, modern slavery and other labor and human rights issues) as well as issues that are bespoke to certain sectors and business models. Following transaction closure, we integrate diligence findings into our investment management and monitoring processes (including integration post-close implementation planning). In general, our due diligence activities cover:

### Environmental factors

- Energy and resource management
- Hazardous waste management
- Air quality
- GHG emissions
- Ecological impacts of project development

### Social factors

- Employee wellness
- Product safety and customer welfare
- Employee diversity, equity, and inclusion
- Data privacy and security

## Governance factors

- Business Ethics
- Compliance with ESG related regulation

We invest in leading companies where financial performance and positive societal impact are aligned with three sustainability-related outcomes. By leaning into these themes, we believe that we can create value for our investors and meaningfully scale solutions to some of the world's biggest challenges as identified by the UN Sustainable Development Goals (“UN SDGs”).

## Sustainability-related outcomes, per UN SDGs

- SDG 7: Affordable and Clean Energy
- SDG 9: Industry, Innovation, and Infrastructure
- SDG 13: Climate Action

## ESG Exclusionary Guidelines

Our strategy is to invest in clean energy technology solutions and services. As such, we do not believe that it aligns either with our strategy or indeed our own interests (or those of our investors) to make investments in companies which derive revenue from antithetical pursuits, such as involvement in controversial weapons, civilian firearms, nuclear power, or fossil fuels, as well as those that have violations of labor rights, human rights, anticorruption, or environmental standards as defined by the U.N. Global Compact principles.\* In addition, where we identify any serious ESG issues during our due diligence process we will generally decline to invest, unless we believe that the issues have been or are capable of being remedied, and there is a plan in place to remedy the issues within a reasonable period of time.

*\*For more information, see United Nations Global Compact, 2020. The Ten Principles of the UN Global Compact at <https://unglobalcompact.org/what-is-gc/mission/principles%20%20>*

## Measuring Impact – Reporting and Disclosure

We expect our portfolio companies to regularly evaluate progress on and refine their ESG and impact objectives, as well as report on material ESG and impact issues periodically, both at the board level and to BEV. To facilitate this, we work with our portfolio companies to identify the key ESG and impact metrics to track and the most efficient method for tracking. We will, in turn, make regular reports on ESG and impact activities and strategies, results and progress, to our advisory committees and other stakeholders.

## Accountability, Transparency, and Continuous Improvement

BEV aims to create accountability within our organization and provide transparency to our clients regarding our approach to ESG and impact. Day to day implementation of our ESG and Impact program is led by our ESG and Impact Lead and Managing Partner, who review all aspects of the ESG and Impact program and are responsible for verifying internal compliance with our ESG and Impact policy. The ESG and Impact Lead is an executive leader of the firm,

sits on the investment committee, and plays an advisory role with BEV deal professionals if ever potential ethical conflicts arise in sourcing and diligence. Although ESG leadership sits with the ESG Lead, accountability for the implementation and success of the ESG and Impact program is shared by each of our investment partners.

## Update and Revision

This policy is effective from December 15, 2020, and we will seek to apply it to our activities from that date. The policy was last updated on March 31, 2022. It represents a statement of intent and is not intended to create legally enforceable obligations.

<b>Owner of Policy:</b>	Braemar ESG Lead
<b>Date of Last Review:</b>	March 2022
<b>Date of Next Review:</b>	March 2023