

Summary of Camco policies

The primary purpose of this document is to inform our stakeholders about certain key policies of Camco. These include:

- Anti-Money Laundering Policy;
- Anti-Bribery and Corruption Policy;
- Code of Conduct;
- Environmental and Social Safeguarding Policy and Environmental and Social Management Framework;
- E&S Disclosure, External Communication and Grievance Mechanism Policy;
- Equality and HR Policy;
- Risk Management Policy and Risk Management Framework;
- Whistleblowing Policy.

Anti-Money Laundering Policy

Camco requires compliance, in letter and spirit, with best practice and relevant laws to detect and prevent money laundering and to combat terrorist financing.

In the United Kingdom, the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulation implements the European Union (“EU”) Money Laundering Directive is the key legislation outlining the obligations of the Firm to implement appropriate policies and procedures to fight money laundering and terrorist financing. The primary legislation in the United Kingdom (“UK”) concerned with AML/Counter-Terrorist financing is the Proceeds of Crime Act 2002 (as amended by the Serious Organised Crime and Police Act 2005), which outlines the offences of Money Laundering.

The Terrorism Act 2000 (as amended by the Anti-terrorism, Crime and Security Act 2001) establishes offences related to involvement in facilitating, raising, possessing or using funds for terrorism purposes, failing to report, tipping off or prejudicing an investigation. The Act:

- Makes it a criminal offence for any person not to report the existence of terrorist property where there are reasonable grounds for knowing or suspecting the existence of terrorist property;
- Makes it a criminal offence for anyone to take any action likely to prejudice an investigation by informing (i.e. tipping off) the person who is the subject of a suspicion report, or anybody else, that a disclosure has been made to a MLRO or to the National Crime Agency (“NCA”, or that the police or customs authorities are carrying out or intending to carry out a terrorist financing investigation; and
- Grants a power to the law enforcement agencies to make an account monitoring order, similar in scope to that introduced under the Proceeds of Crime Act 2002 (“POCA.”)

All Camco team members are required and expected to comply with the requires of the Anti-Money Laundering Policy and related legislation.

Anti-Bribery and Corruption Policy

Camco requires compliance, in letter and spirit, with best practice and relevant laws to prevent corruption, money laundering and the financing of terrorism, including the UK Bribery Act 2010 and the UK Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017. Camco's Anti-Corruption and Integrity Policy stipulates that all those working for Camco (or as applicable, receiving funding from Camco) should take all appropriate measures to prevent and combat fraud and corruption, money-laundering and the financing of terrorism.

Camco uses all reasonable efforts to prevent fraud, including:

- Adopting appropriate administrative practices and institutional arrangements to ensure that Camco funds are only used for the purposes for which they were given, and that any fraud and corruption can be easily detected. These practices are fund-specific;
- Providing regular training on the company's Anti-Corruption and Integrity Policy and changes in relevant legislation to the staff of Camco; and,
- Having provisions in transaction documents with a counterparty as may be required to give full effect to the Anti-Corruption and Integrity Policy, including requirements to comply with relevant regional legal frameworks on anti-corruption.

All Camco team members are required and expected to adopt the highest standards of financial and ethical conduct, and all indications of inappropriate behaviour will be investigated thoroughly.

Code of Conduct Policy

Camco is committed to providing a safe working environment and ensuring fair employment practices in line with the company's core values and behaviours and all relevant employment legislation. In turn, Camco requires and expects all company staff (including contractors) to act and behave honestly, ethically and with integrity. The Code of Conduct provides information and guidance covering conflicts of interest, non-competition, confidentiality, honesty and sustainability.

Environmental and Social Safeguarding Policy and Environmental and Social Management Framework (ESMF)

Camco's Environmental and Social Safeguarding Policy and ESMF ensures that the environmental and social performance of the projects supported by the company are sustainable and of a bankable standard. The policy and framework incorporate environmental and social considerations into Camco's decision-making to avoid - and where avoidance is impossible, mitigate - adverse impacts to people and the planet within reasonable time, as well as give due consideration to vulnerable populations, groups and individuals.

All Investees supported by Camco are required to design and implement projects and programmes in a manner that will promote, protect and fulfil universal human rights. Furthermore, the design and implementation of activities must be guided by the rights and responsibilities set forth in the UN Declaration on the Rights of Indigenous Peoples. All Investees supported by Camco must avoid adverse impacts on indigenous peoples, support the full and effective participation of indigenous peoples, and obtain free, prior, and informed consent (FPIC) of the affected communities of indigenous peoples.

The policy also requires the establishment of a labour policy and occupational health and safety procedures in accordance with International Labour Organization (ILO) guidelines. All Camco-supported projects and/or developers are required to not only comply with host country legislation, but also with International Finance Corporation (IFC) Performance Standards for Environmental and Social sustainability and the sustainability principles advocated by the UN Global Compact, of which Camco is a signatory.

E&S Disclosure, External Communication and Grievance Mechanism Policy

The policy ensures transparency, accountability, and sustainability by facilitating the sharing of environmental and social information, program performance data, and communications between Camco and external stakeholders, including project-affected communities. It also establishes a Grievance Redress and Accountability Mechanism (GRAM) to receive, register, and acknowledge communications, including E&S-related grievances from external stakeholders.

Camco Equality and Human Resource Policies

Camco values the contribution all of its team members, being our employees and contractors, make to our success and is committed to their health and wellbeing. Camco's HR policies include:

- Equality Policy;
- Leave Policy, including parental leave and pay;
- Relocation Policy;
- Safeguarding Policy; and
- Working from Home Policy.

Risk Management Policy and Risk Management Framework

Camco's Risk Management Policy and Risk Management Framework ensure that the management of Camco's risks and those of the underlying funds which it manages is conducted with considered judgement and discipline. This includes all exposures to adverse events across all of Camco's services and business activities.

Camco manages its risk using an Enterprise Risk Management portfolio approach that recognises the trade-off between risk and return and ensures that Camco assumes appropriate levels of risk to ensure that it can still meet its strategic and business objectives.

The policy covers strategic risk, business risk, financial risk and operational risk.

Whistleblowing Policy

All Camco employees are required and expected to adopt the highest standards of financial and ethical conduct, and all indications of inappropriate behaviour will be investigated thoroughly.

Camco's Whistleblowing Policy concerns the reporting of suspected wrongdoing or dangers in relation to all Camco activities. This includes bribery, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations.

The policy covers all employees and stakeholders and provides information on how to raise concerns - internally, externally and anonymously - and the support and protection provided to whistleblowers.

Details of whistleblowing hotline are available at <https://www.camco.fm/complaints>.