

Foresight Group Human Rights Policy

Effective: 31 March 2025



Foresight

For the purposes of this document:

- references to “Foresight”, “Group”, “Foresight Group”, “we” and “our” shall mean Foresight Group Holdings Limited, together with all its direct and indirect subsidiary undertakings;
- references to “human rights”, which is a broad term, shall include the areas listed in the Policy Standards section below.

Introduction

Human rights and labour issues, such as modern slavery and forced labour, are prevailing issues that businesses have a responsibility to tackle. Foresight Group acknowledges the role businesses can play in contributing to addressing these issues and aims to mitigate their impact through responsible and transparent business practices.

1 Purpose

To underpin its commitment to human rights, Foresight Group has adopted this Policy, which is based on the United Nations Guiding Principles (UNGPs) on Business and Human Rights and the Organisation for Economic Co-Operation and Development (OECD) Guidelines for Multinational Enterprises, which sets the minimum standard for the Group and all its employees. It also sets out Foresight Group's commitment to respect human rights and its expectations with regard to its suppliers, portfolio companies, investments and their suppliers, as well as key counterparties. It covers activities including:

- Investment process
- Supply chain
- Remedial actions
- Monitoring
- Reporting and communications
- Training
- Enforcement

2 Scope

This policy applies to all the Group's employees¹.

3 Policy

3.1 Policy Standards

Foresight Group shall develop and implement arrangements that aim to comply with the standards of the UNGPs, OECD Guidelines and local laws, covering areas such as:

- Labour rights (as defined within the UNGPs and OECD Guidelines)
- Modern slavery and forced labour
- Child labour

¹ References to "employee(s)" throughout this document shall mean all Foresight full and part-time employees (regardless of business area or location), partners, fixed term contractors and temporary staff.

- Decent work
- Community and land rights
- Freedom of association and labour relations
- Equity, inclusion, and diversity
- Safe and healthy working environment
- Bribery and corruption
- Consumer interests
- Environmental protection
- Disclosure and transparency

3.2 Due Diligence

The Group will take a risk-based approach in its endeavours to identify and mitigate human rights risks. In recognition that each business area has its own processes and stakeholders, the Group requires that appropriate due diligence is carried out on the parties with which they engage that is relevant to the nature of their activities. Parties may include investee companies, portfolio companies, key counterparties and suppliers.

The due diligence measures must identify human rights risks and have an escalation process to ensure that senior management are aware of the risks and that we can demonstrate that all reasonable efforts have been and will be taken to address and mitigate those risks.

3.3 Remediation

Foresight Group will make all reasonable efforts to remediate negative human rights impacts to the extent possible dependent on its level of operational control over an investment, or relationship where the impact has been identified. Employees must cooperate with key stakeholders involved and take all reasonable actions to achieve an acceptable outcome, including changes in the entity's operations and policies. Remediation in regard to matters raised via Foresight's whistleblowing channels will be undertaken in accordance with the relevant Whistleblowing policy.

We will investigate all concerns raised as regards human rights and take appropriate steps to remediate the issues found. If we have caused² or contributed³ to an adverse human rights impact, we will cooperate with relevant parties and authorities to remediate and mitigate the impact. Employees are encouraged to report any human rights grievances without fear of retaliation or retribution.

² A company may "cause" a sustainable sourcing issue where its activities on its own are sufficient to result in this issue occurring. For example, if it intentionally and knowingly purchases goods or services from a supplier which does not meet its standards.

³ A company may 'contribute' to a sustainable sourcing issue when its actions, either in combination with the activities of other companies or entities causes a sustainable sourcing issue, or if the activities of the company might cause, facilitate, or incentivise an investee company or Supplier to cause an issue. For contribution to exist, it must be substantial – it does not include minor or trivial contributions.

3.4 Reporting & Communications

The Group will publish reports and statements regarding our human rights-related commitments and efforts as part of our annual Sustainability Report and UNGC Communication on Progress, PRI submission (and associated transparency reports), as well as separately on our website (as appropriate). This Policy will be communicated to new employees who are required to read and understand it upon joining Foresight. Policy updates will also be made available to all employees. Line managers are responsible for ensuring that the policy has been read and understood by employees. A briefing session will be held for material changes to this Policy to make clear any updates to the content, which will be recorded and provided to all employees who must confirm they have received/listened to the briefing.

As part of Foresight's investment process, this Policy, along with other key policies (where appropriate), will be shared with counterparties with the expectation that they comply with the content of our key documentation, as part of the due diligence process. A copy of this Policy will also be published on the Group's website.

3.5 Training

Annual mandatory briefings will be provided to all employees by the Group Sustainability team on the policy and associated approach documents. More detailed, tailored training will be provided to employees whose roles have higher exposure to human rights on a frequency appropriate to their activities.

4 Policy Compliance

4.1 Exceptions

Compliance with this Policy is required of all employees falling within its scope. Any questions concerning the content of this Policy or compliance with it should be raised with the Group Sustainability Team.

4.2 Non-Compliance

An employee found to have violated this Policy may be subject to disciplinary action, up to and including termination of employment.

Glossary

Terms	Definition
Sustainability	<p>Foresight Group defines sustainability as alignment with the UN Global Compact; this means operating in ways that, at a minimum, meet fundamental responsibilities in the areas of human rights, labour, environment and anti-corruption. Doing so starts with a company's value system and a principles-based approach to doing business.</p> <p>Please note this excludes cases where a different definition of sustainability is required by jurisdictional-level regulatory requirements, whereby the legal definition would prevail.</p>
Sustainability Risks	<p>Is defined as a Sustainability matter that triggers or could reasonably be expected to trigger material financial effects on the Group. This is the case when a Sustainability matter generates risks or opportunities that have a material influence or could reasonably be expected to have a material influence, on the Group's development, financial position, financial performance, cash flows, access to finance or cost of capital over the short-, medium- or long-term.</p>
Adverse Sustainability Impacts	<p>Refers to actual or potential negative impacts on Sustainability factors, such as on people or the environment, over the short-, medium- or long-term which are caused by, contributed to, or directly linked to our business. These impacts include those connected with the undertaking's own operations and upstream and downstream value chain, including through its products and services, as well as through its business relationships. Business relationships include those in the undertaking's upstream and downstream value chain and are not limited to direct contractual relationships.</p>