



The 6 pillars of the ESG Policy

October 2012

Signatory of:



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Introduction

Keensight Capital has built a reputation on providing the highest levels of performance.

In order to maintain these high levels it is our policy to give proper and appropriate consideration to Environmental, Social and Governance (“ESG”) issues. This policy sets out our approach to ESG issues. The ESG criteria are taken into account within the analysis and decision process relating to investments. The principles set out below have been established in line with the UN Principles for Responsible Investment (“UN PRI”) which Keensight Capital has agreed to adhere to.

Principle 1

ESG criteria will be taken into account during the analysis and decision making processes for all investments by Keensight Capital including:

- Taking into account non-financial performance of target companies: governance, social, environment
- Consideration of whether the investment is ethical

Principle 2

Disseminate the UN PRI and ensure the application of these principles throughout the entities in which we invest including:

- Incorporate a voting policy in accordance with the AFIC (Association Française des Investisseurs pour la Croissance) code of ethics
- Request all entities in which we invest to communicate and promote ESG issues within their business
- Provide support to senior management in developing mid/long term activities within a sustainable and trustworthy partnership

Principle 3

Inform our investors of this ESG policy and provide them with information on our approach to ESG issues on a regular basis through:

- Adequate information in our annual report
- Provision of transparent and objective information
- Information traceability

Principle 4

Adopt a responsible and ethical approach to governance including:

- Remuneration of senior management and a policy on bonuses that is compliant with international standards
- Implementation of compliance policies and procedures and on-going monitoring of the groups systems and controls
- Implementation of rigorous risk controls throughout the business
- Consideration of our ethical obligations in all business conduct (anti-money laundering, anti-corruption, reputational due diligence)

Principle 5

Encourage a human resources policy which values and respects all employees through:

- Objective criteria to measure performance and competencies
- Support programs requiring senior management involvement in all employees career progression
- Equality across all staff irrespective of role, gender, race, age, religious belief or sexual orientation

Principle 6

Reduce the environmental impact of Keensight Capital’s activities:

- Reduction of energy and water consumption
- Use of TCF and eco-labelled paper coming from forests certified for sustainable development and 100% recyclable
- Encouragement to reduce paper use
- Waste recycling
- Preferential use of reusable objects
- Limitation of business trips
- Development of a responsible purchasing policy that induces our supplies to respect sustainable development criteria