

**TOWERBROOK CAPITAL PARTNERS L.P.
TOWERBROOK CAPITAL PARTNERS (U.K.) LLP
(collectively, “TowerBrook”)**

**HUMAN RIGHTS POLICY
May 2023**

1. About TowerBrook

TowerBrook is an investment management firm headquartered in New York and London. Our value creation strategy aims to transform the capabilities and the prospects of the businesses in which we invest. We invest through our Private Equity Funds, our Structured Opportunities Funds and our Impact Opportunities (“Delta”) Fund, allowing us to access a range of opportunities throughout the cycle.

- TowerBrook’s Private Equity (PE) strategy is based on the focused, proprietary sourcing of selected, control-oriented investment opportunities and on a proactive, value-added approach to improving businesses and positioning them for sustainable growth. TowerBrook’s Private Equity Funds invest in large and midsize companies in a range of sectors on both sides of the Atlantic. We focus on companies where we have identified scope for significant further improvement and value creation. We partner with management teams to implement an effective governance framework and support key initiatives, including strategic investments, business optimisation projects and add-on or transformative acquisitions.
- TowerBrook’s Structured Opportunities (TSO) strategy leverages our experience and expertise to complement and enhance our private equity investing activity. It allows us to identify and develop a broad array of opportunities, principally via structured asset and structured equity investments. TowerBrook’s Structured Opportunities Funds typically make minority investments in businesses where founders or shareholders are seeking not only capital but a partner who can add value to their business. As with our private equity investing, we seek to source proprietary opportunities where we can build the relationships that are integral to successful investment outcomes.
- TowerBrook’s Delta strategy makes control and non-control investments in North American and European businesses where our value-added approach can contribute to continued and sustainable growth while seeking to deliver positive and sustainable social or environmental impact. Building on our experience in delivering improved ESG performance across our PE and TSO portfolio, TowerBrook developed a rigorous impact measurement and management system to ensure the impact of our Delta investments can be quantified. As with our private equity and structured opportunities investing, we seek to source proprietary opportunities where we can build a partnership with founders and managers who themselves are seeking more than capital.

As a purpose-driven investment firm, TowerBrook is committed to Responsible Ownership. Responsible Ownership considerations are integrated into every stage of our investment process and drive the development of policies, action plans and metrics for our portfolio companies. We describe TowerBrook’s approach to responsible ownership in terms of five Ps: starting from a shared Purpose, we focus on People, Planet and Partnership, all of which contribute to delivering the fifth P: Performance. We hold

ourselves and our portfolio companies accountable to our investors, their beneficiaries and all our stakeholders. This requires a commitment to fundamental value and a highly disciplined approach to the assessment and management of our investments. We seek to make a lasting, positive contribution to the stakeholders in our business and to the communities and environments in which we operate. That means both doing the right thing by investing consistently in accordance with TowerBrook values, and holding ourselves and our portfolio companies accountable in how we operate.

TowerBrook is a signatory to the United Nations Principles for Responsible Investment and is the first mainstream private equity firm to become a Certified B Corporation, reflecting our deep commitment to Responsible Ownership.

2. Policy statement

This Human Rights Policy (this “Policy Statement”) sets out TowerBrook’s commitment to respect internationally recognized human rights. This includes, without limitation, those human rights expressed in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work. TowerBrook’s approach to human rights has been developed with reference to the United Nations Guiding Principles on Business and Human Rights.

Where national or local law and international human rights conflict, TowerBrook will adhere to national law, while seeking ways to respect international human rights to the extent possible.

TowerBrook is committed to conducting its business and investment activities with respect for human rights, which means we will:

- work to develop and implement proportionate human rights diligence and risk screening processes to identify material human rights risks in our investment process, in accordance with this Policy Statement
- support portfolio companies to implement policies, action plans and related procedures to identify and address material human rights risks in their activities and supply chains, including in the 200-day Plan and throughout ownership, as appropriate
- survey our portfolio companies annually on whether they have a human rights policy and whether they have a process to identify, prevent, mitigate and address adverse human rights impacts
- communicate publicly how we address human rights risks internally and externally in our annual Responsible Ownership publication

The means through which TowerBrook will meet its responsibility to respect human rights will be proportionate to, among other factors, its size, sector, operational context, ownership and structure.

To demonstrate its commitment to continuous improvement, this Policy Statement will be updated annually.

3. Oversight and Responsibilities

TowerBrook's Management Committee is responsible for the management and oversight of this Policy Statement, monitoring its use, ensuring its effectiveness is regularly reviewed, and addressing any inquiries concerning TowerBrook's human rights policies. This Policy Statement will be discussed with and approved by the board of TowerBrook Capital Partners Limited on at least an annual basis.

4. Reporting Concerns

TowerBrook encourages the reporting of suspected non-compliance with this Policy Statement so that any issues can be dealt with promptly and appropriately. TowerBrook is committed to protecting and supporting any employee or other stakeholder who raises a concern in good faith and in accordance with this Policy Statement against detrimental conduct.

TowerBrook maintains a hotline for employees to raise concerns of non-compliance with this Policy without fear of retaliation, including concerns relating to modern slavery and human trafficking. Any such reports would then be thoroughly investigated in accordance with TowerBrook's policies and procedures.