TOWERBROOK

Human Rights Policy

June 2026

About TowerBrook

TowerBrook is an investment management firm co-headquartered in New York and London. We are modern value investors focused primarily on transforming services businesses across four sectors in Europe and North America: business services, consumer products and services, financial services and healthcare. We champion founders, entrepreneurs and management teams as they grow and transform their companies, helping them to become long-lasting leaders in their industries. We invest through our Private Equity strategy, our Structured Opportunities strategy, and our impact Delta strategy, as well as bespoke private investment mandates for select institutional and strategic investors, allowing us to access a range of opportunities throughout the cycle.

- TowerBrook's Private Equity (PE) strategy makes majority investments in large and midsize companies headquartered in North America and Europe. Based on a clear thesis for value creation, we support management teams with the transformational capital, skills and resources required to build excellent businesses.
- TowerBrook's Structured Opportunities (TSO) strategy makes minority investments where our capital, experience, and portfolio group can energize and enable businesses. TSO supports management teams looking to accelerate business growth and market impact outside of a traditional buyout.
- TowerBrook's Delta strategy (Delta) partners with founders and management teams of purpose-driven companies that have a proven commitment to impact and a business model that directly addresses one or more of the UN Sustainable Development Goals. Delta invests in growing, profitable companies with durable competitive advantages whose products or services create positive measurable outcomes for people or planet.

As a purpose-driven investment firm, TowerBrook is committed to responsible ownership. Responsible ownership considerations are integrated throughout 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 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.

TowerBrook carries out business in the UK through its UK-based affiliate, TowerBrook Capital Partners (U.K.) LLP, which acts as a sub-advisor to affiliated funds under management in relation to investments in the UK and Europe. TowerBrook Capital Partners (U.K.) LLP is authorized and regulated by the UK Financial Conduct Authority, and has its principal place of business in London.

Policy Statement

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

TowerBrook recognizes that respect for human rights includes, without limitation, considerations related to worker welfare, fair wages, freedom of association, collective bargaining, right to privacy, freedom of expression, and equal opportunity and non-discrimination, and the right to safe and healthy working conditions. 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.

Consistent with our five Ps framework, 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;

- encourage portfolio companies to establish policies and action plans to identify and address material human rights risks in their activities and supply chains, which may include risks related to forced labor, child labor and unsafe working conditions, and to develop, where appropriate, monitoring processes proportionate to their sector and operational footprint;

- 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; and

- 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, products/services, operational context, ownership and structure.

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

Oversight and Responsibilities

TowerBrook's Operating 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. Where material human rights risks are identified, such risks will be escalated through TowerBrook's governance processes and addressed in line with this Policy Statement.

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 an anonymous hotline through Safecall for stakeholders to raise concerns of non-compliance with this Policy Statement 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. A report to Safecall may be made by telephone (+1-866-901-3295 / +44 (0)800 915 1571), through the internet (www.safecall.co.uk/report) or by email (towerbrook@safecall.co.uk).