

2023

CODE OF BUSINESS CONDUCT & ETHICS

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Statement From EOS IM Group CEO

We are a trusted partner of our clients, fund investors and corporate providers. Integral to our ethos is the building of this trust linked to the professional expertise of our individuals, who form the basis of the companies within the Group to deliver returns for investors. Aligned with the focus on environment, social and governance of our fund management services, we place a strong internal emphasis on the way EOS IM acts, the frameworks it puts in place and the adherence to laws, regulations and sound market practices. These shared values are pulled together and expressed at a high level through this Code of Business Conduct and Ethics for us, with individual entities also establishing additional requirements in accordance with their local needs.

Accordingly, this Code covers a wide range of business practices, policies and procedures. It will not cover every scenario that arises, however, by acting with integrity and good judgement we will address such matters on a case-by-case basis when they occur.

Our ethos and vision are spread across the EOS IM Group, to the benefit of our stakeholders.

We thank you for your support in protecting our excellent reputation.



Ciro Mongillo
Founder & CEO

Introduction

The EOS IM Group has established a Code which sets out both the purpose of EOS IM Group and summarises ethical responsibilities that are placed upon all its partners, employees, members, owners, principals, directors, and officers and, where applicable, consultants. These individuals are always expected to uphold the Code.

The Code sets the principles by which EOS IM Group operates and interacts with its clients and other parties. The delivery of the Code is built into the policies and procedures operated by the EOS IM Group.

The primary objective of the EOS IM Group being to derive growth for the Funds' it manages, for the benefit of the underlying investors. The Code is based on the fundamental understanding that no one at EOS IM Group should ever sacrifice integrity or give the impression that they have, even if they think it would help the EOS IM Group's business.

Purpose and Scope of the Code

EOS IM Group's purpose for existence is to provide its clients with independent investment management, advice and supporting services. The foremost objective being to enable the funds we manage and support to benefit directly from our expertise. This is to be delivered in accordance with the high level standards and approach set out in this Code.

This Code is to be read and applied in conjunction with the relevant policies, procedures and controls established by the EOS IM Group's entities. Individual entities within the EOS IM Group may also have individual Codes of Ethics, in addition to the applying this overarching Code. It is to be noted that a listing of entities within the EOS IM Group is included in this Code under Annex 1.

The Code applies to the whole EOS IM Group and its Personnel (including directors, employees, secondees, contractors and consultants). The addressees of this Code will adapt their actions and conduct to the principles, objectives and commitments laid down in the Code.

EOS IM Group - Code of Business Conduct and Ethics

1. Responsible Investing, Management and Operation

Responsible Investing

Through the approach to and the conduct of its services, EOS IM Group will always endeavour to facilitate investment in a responsible manner. A key element of implementing this objective is by actively considering, monitoring and assessing ESG factors. The objective of EOS IM Group's medium to long-term operating model for the funds it manages is to buy, build and improve businesses in a way that makes a positive impact. EOS IM Group both promotes and has embedded ESG into its investment process for the funds, to facilitate responsible investing.

EOS IM Group, through its fund management activities, is a signatory of the UN's PRI and applies and reports on international standards for sustainable investment activities. Where funds are categorised under the Regulation (EU) 2019/2088, also known as "EU SFDR" on sustainability related disclosure in the financial services sector, the responsible investing activities are aligned to the relevant requirements, providing investors with transparency and reassurance. It should be noted that, as part of the EOS IM Group promotion of environmental characteristics, the fund uses non-financial criteria alongside its commitment to the integration of sustainability risk and ESG factors into the investment decision-making process, as well as the consideration of exclusion criteria. Indeed, positive and negative screening strategies are in place as part of the framework, in order to include within the investments activities and economic factors that contribute to the environmental characteristics promoted by the funds and to exclude activities and factors that are deemed not to meet a set of environmental, social or economic standards. Among the latter, certain investment restrictions have been envisaged and are to be applied differently based on (i) sector, (ii) geographical and (iii) individual exclusions.

The sector based exclusion envisages among the controversial sectors, without being limited to, modern slavery, human trafficking, child and forced labour, product or activities deemed illegal, coal, tobacco, gambling, radioactive materials, pornography; the geographical based sector, provides for the prohibitions of the fund interactions with parties and conduct of activities in UN, EU and UK sanctioned jurisdictions whereas the individual based exclusion provides for the prohibitions of the fund interactions with individuals listed on the UN, EU and UK sanctions list.

Responsible Management and Operation

The EOS IM Group will govern and operate its own activities in a manner designed to be aligned with the principles and practice for Responsible Investment, regulatory and legal standards. It strives to maintain, enhance and promote sound ESG practices, in alignment with its approach to delivering responsible investing.



2. Corporate Governance & Control

Integrity

EOS IM Group will conduct all of its business activities and relationships with honesty and integrity. As such it will adhere to legal and regulatory requirements, as well as meeting sound market practice standards.

Clear responsibilities and full accountability

The relevant senior management of the entities within the EOS IM Group will govern, lead, and manage their firm, ensuring it operates in a controlled manner to high ethical standards, in accordance with this Code. EOS IM Group operates with clear responsibilities and requires full accountability for the governance and operation of the business, to be held by both the senior management and the team members.

Skill Care & Diligence

EOS IM Group conducts its business with due skill, care and diligence. Personnel will operate with a control orientated mentality. The EOS IM Group will deploy its resources to the benefit of its clients, leveraging the interdisciplinary skill sets. EOS IM Group will take reasonable care to organise and control its affairs responsibly and effectively, with adequate risk management systems. This includes the establishment and operation of frameworks, technical infrastructures, policies and procedures that enable the delivery of robust systems and controls. The transparency of information used and provided by the EOS IM Group being clear and fair, based on truth, accuracy and completeness.

Corporate Assets and Financial Prudence

EOS IM Group will act in a financially prudent manner and ensure that it maintains adequate finances. All Personnel are responsible for the EOS IM Group assets, both tangible and intangible.

Recordkeeping & Reporting

The EOS IM Group is subject to various laws, regulations, and other data retention requirements. Our systems are configured to retain records consistent with these requirements, and records should be retained and destroyed in accordance with our records retention policies.

Additionally, our Personnel should never destroy any documents relevant in the event of the occurrence of any pending, threatened, or anticipated litigation, regulatory investigation, or audit for any reason. Destroying or altering a document with intent to impair its integrity or availability for use in any potential official proceeding is a crime.

Challenge and Questioning

EOS IM Group will always encourage challenge and questioning which is designed to benefit the clients, strengthen EOS IM Group, and reflectively consider its actions. Personnel are encouraged to speak up and whistle blow, in the event that there are matters or behaviours which should be addressed.

Communicating with Regulators and Public Disclosures

Relationships with regulators, authorities and other public bodies are handled in an open manner. This will include cooperating and assisting such Bodies wherever possible. All dealings with such Bodies will be conducted in a professional manner, in accordance with the required standards of propriety and transparency. It is important for the communications to be coordinated, accurate, complete, and timely. Personnel should escalate any inquiry from a regulatory, governmental or other public bodies. EOS IM Ltd as UK regulated entity, has specific additional duties and responsibilities towards the UK's Financial Conduct Authority.



3. Corporate Integrity

Laws & Regulation

EOS IM Group has established and formulated its business model and operation in a way designed to ensure it behaves in accordance with applicable laws, regulations and sound practices. In particular to ensure it operates in a manner intended to prevent and avoid participation in matters associated with financial crime including but not limited to the prevention of the facilitation or participation in money laundering, interaction with sanctioned parties, bribery and corruption, as well as facilitation of tax evasion.

Anti-Bribery & Anti-Corruption

It is the EOS IM Group's policy to strictly comply with the anti-bribery laws and regulations in UK, Italy and Luxembourg, as well as other jurisdictions in which will do business. These specifically include but are not limited to the United Kingdom Bribery Act of 2010, the Italian Legislative Decree 31/2001 and the Luxembourg Law of January 15, 2001, which has introduced a certain number of articles in the Luxembourg Penal Code , subsequently amended by the law of 13 February 2011.

Our Personnel are prohibited from offering or receiving improper payments or promises to provide anything of value, which includes gifts, entertainment, certain travel expenses, political or charitable contributions, and other payments both direct and indirect (i.e., through agents or contractors), to influence a business decision in our favour, or with a view toward inducing a party to do or not do something. Should the unlikely situation arise where business gifts, hospitality, or entertainment might involve government officials this would require to be pre-approved by the Compliance function.

Gifts and Business Entertainment

The appropriate purpose of any business gift or entertainment should be to create goodwill or strengthen business relationships. This does not envisage the objective of establishing situations of undue influence. It is recognised that giving and receiving gifts and entertainment may give rise to a conflict of interest or undue influence. Gifts and entertainment should never influence or give the appearance of influencing a party's ability to make impartial decisions. Business gifts and entertainment, whether offered or received, should never be lavish, unusual, or extravagant in the eyes of a third party.

Anti-Money Laundering, Sanctions & Terrorist Financing

It is our policy to strictly comply with all applicable laws and regulations designed to combat financial crime, including money laundering, dealing with parties subject to sanctions and terrorist financing. EOS IM Group does not do business with sanctioned persons, businesses, or countries. Our objective is to form business relationships and engage in transactions only with legitimate, law-abiding counterparties, partners and service providers. To ensure compliance with this policy, we use the "know your customer" process to verify the identity of relevant parties as part of establishing a financial relationship. Additionally, our Personnel are expected to identify and report any unusual or potentially suspicious activity that could be unlawful including money laundering or terrorist financing. Common generic causes of suspicion include activities that have no apparent business or lawful purpose, or may involve questionable sources of cash funds and assets.

Facilitation of Tax Evasion

It is the EOS IM Group's policy to strictly comply with all laws and regulations designed to counteract tax evasion and the criminal facilitation of tax evasion (including, but not limited to the UK Criminal Finances Act 2017, Italian Legislative Decree 231/2001, and the Lux Law of August 8, 2022) in the jurisdictions in which the EOS IM Group does business.

Business Relationships, Fair Competition and Appropriate Dealings

It is a duty of our Personnel to pursue and promote the goals of EOS IM Group with integrity, through legitimate actions. As an integral part of the delivery of this duty the EOS IM Group's policy requires our Personnel to deal fairly and act honestly in all business relationships, whether with clients, fellow service providers to the funds, suppliers, competitors, or other fellow Personnel. This includes the policy to compete solely based on our superior services and products, to avoid improper actions that violate competition/antitrust rules and regulations, are anti-competitive, or unreasonably restrain trade.

Our Personnel should not take advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other illegal practice. No one should ever use any illegal or deceitful method to gather competitive information. Stealing or possessing proprietary information or trade secret information that was obtained without consent or inducing such disclosures by past or present employees of other companies, is prohibited. Information about the EOS IM Group's suppliers, customers, competitors, employees, and other Personnel must always be used in compliance with the law.

Personnel should not use their position, contacts, or information for personal gain for themselves, family members, or friends. In addition, subject to the EOS IM Group entities governing and business documents, our Personnel may take these to compete against the EOS IM Group or its clients, taking for themselves opportunities they learn of through their work or through the use of the property, information, or position, without the consent.

Health and Safety Environment

The EOS IM Group will maintain working conditions that respect individual dignity, with safe and healthy working environments, in full compliance with current legislation designed to protect individuals and prevent risks arising. In alignment with this corporate approach, Personnel will act in a responsible and diligent manner to combat such risks.

Relations with Suppliers & Service Providers

The EOS IM Group will maintain relationships with suppliers and service providers to the Group and the funds, in a professional manner abiding by the appropriate agreements, requirements and procedures. This will include maintaining open an dialogue and operating in a manner designed to secure a quality service with competitive terms and conditions.

Relations with Supervisory Authorities, Other Public Bodies and Auditors (“Bodies”)

EOS IM Group, with EOS Investment Management Ltd, as a regulated entity, will maintain an open relationship with Bodies. This will include cooperating and assisting such Bodies wherever possible. All dealings with such Bodies will be conducted in a professional manner, in accordance with the required standards of propriety and transparency.



4. Avoiding Conflicts of Interest

EOS IM Group will conduct all of its business activities and relationships with honesty, integrity and transparency. In all business activities there is a potential for conflicts of interest to arise. Good business is about how you deal with this. As such EOS IM Group will always seek to prevent, identify, avoid, manage and/or mitigate potential conflicts, placing the fair treatment and interests of its clients first, while abiding by laws, regulations and sound practices. It is the obligation of Personnel to behave in an appropriate manner, always acting in the interests of the clients and the funds.

In our business capacities, we may act as fiduciaries and will be subject to legal and/or regulatory obligations, thus owing a series of duties to our clients, including a general duty to act in their best interest and avoid or appropriately manage actual and apparent conflicts of interest. Integral to this requirement, Personnel are prohibited from engaging in any activity, practice, or act which conflicts with, or appears to

conflict with, the interests of the EOS IM Group and/or clients (including the Funds for which it provides services). The EOS IM Group operates policies, procedures and controls designed to prevent, minimise and manage potential conflicts of interest.

To protect the EOS IM Group, our clients, and our Personnel, it is essential that any conduct or transactions potentially raising conflict of interest concerns are assessed and considered, with appropriate actions taken.

Personal Trading & Personal Private Investments

Personal investment related activities should always be conducted in compliance with all applicable laws and regulations, with the EOS IM Group's reputation in fully mind.

It is always possible, although unlikely, that in the course of ordinary business activities, our Personnel may become aware of non-public information regarding the business, operations or financial instruments/securities of a company, the funds or other parties, that would be potentially material to a decision to buy, sell, or hold securities/financial instruments. Such material non-public information ("**Inside information**") is information that is not yet fully or appropriately disclosed to the public and where there is a substantial likelihood that a reasonable investor would consider it important in making a decision to buy, sell or hold a security/financial instrument or where the fact is likely to have an impact on the market price of the securities/financial instrument. Using such information for financial or other personal benefit or conveying this information to others is prohibited. Trading in securities/financial instruments while aware of Inside Information, or tipping others to trade, is both unethical and illegal (subject to legally permitted exceptions).

Outside Interests & Activities

A conflict of interest may arise from involvement in outside interests or activities that may either conflict with a duty to be conducted on behalf of or to the EOS IM Group, may adversely affect Personnel(s) judgment in the performance of their responsibilities or provide an actual or potential undue personal benefit. The benefit may be direct or indirect, financial or nonfinancial, through family connections, personal associations, or otherwise. Personnel should avoid any activity, investment, or relationship that may raise a potential personal conflict of interest, including avoiding business transactions with the EOS IM Group.

The EOS IM Group's policy is that all our Personnel must conduct the business affairs of the Group in such a manner to avoid such conflicts of interest, whether actual or potential. Any outside activities our Personnel undertake should not reflect adversely on the relevant entity within the Group or give rise to a real or apparent conflict of interest with their duties to that entity of the Group. Generically in fund management groups and businesses there is a potential for conflicts to arise, which may include matters such as the following:

- Holding an equity or other interest in a company supplying services to EOS IM Group or the funds; and
- Accepting or giving to benefits third parties including suppliers, resulting in an undue benefit and/or disadvantage to EOS IM, its clients or the funds.

For example, employees may not act on behalf of the Group in any transaction or undisclosed or unvetted business relationship involving themselves, members of their family, or other persons or organisations with which they, their family, or friends have had any significant personal connection or financial interest. Our Personnel may not accept or solicit any material personal or corporate benefit from a client, investor, other

persons who have a relationship with the Group, or a related party of the Group that is not generally available to other persons or is made available to them due to their position without prior approval from the Compliance function.

Full time employees are expected to devote substantially all of their business time, energy, and skill to the performance of their duties for the Group. Outside activities must not interfere with job performance or effectiveness.

Political Contributions & Activities

We respect the right of our Personnel to participate in the democratic political process and to engage in political activities of their choosing, as long as that support is in compliance with laws, rules, and regulations that govern our business, and do not impact upon or interfere with their duties and obligations arising from their role. Personnel involved in personal and civic affairs must make clear at all times that their views and actions are their own, and not those of the Group.

The EOS IM Group does not make political donations, nor engage in actions designed to unduly influence political decisions.

The Group may occasionally express its views on local and national issues that affect its operations. In such cases, Group funds and resources may be used, but only when permitted by law, with due internal consideration and formal senior management and Compliance function approval.



5. Safeguarding Information & Using EOS IM Group Assets

We expect our Personnel to apply their sound judgment when using the EOS IM Group resources. Our assets should be protected and may never be used for illegal or improper purposes. EOS IM Group assets include not only financial assets, such as cash and securities, and physical assets, such as furnishings, equipment, and supplies, but also information. Such information may be proprietary to the EOS IM Group, connected to client relationships, fund investors related parties, systems and Personnel.

All property created, obtained, or compiled by or on behalf of the EOS IM Group belongs to the Group.

Confidential, Proprietary, and Material Non-Public Information

The EOS IM Group respects and protects the confidentiality information and the privacy for individuals. The EOS IM Group will operate and protect data on both a corporate and individual level in a manner designed to ensure adherence to privacy laws, corporate agreements and sound practices on confidentiality. Data will be processed and communicated for the appropriate, necessary and legitimate purposes. Confidential, market sensitive and Inside Information is not to be used for personal or corporate gain, illegal purposes or to disadvantage other parties.

Confidential information includes all information that Personnel obtain during the course of their role within the Group that is non-public. This includes all non-public information that might be harmful to clients or the supplier of the information if inappropriately disclosed.

Access to confidential information should only be provided internally to those who have a valid business purpose and need to know this information. Such information should not be stored and transmitted outside of the EOS IM Group systems. It should not be forwarded to personal e-mail accounts or other unauthorised external systems, including via social media or messaging systems.

The obligation is to preserve confidential information to use proprietary information only for legitimate business purposes continue even after employees, officers and directors leave the EOS IM Group.

Privacy & Data Protection

The EOS IM Group respects and protects the confidentiality information and the privacy for individuals. While conducting EOS IM Group business, we may receive personally identifiable or sensitive information. Such information may be entrusted to us by various parties including our clients, investors, fund portfolio companies and prospective portfolio companies.

The EOS IM Group will operate and protect data on both a corporate and individual level in a manner designed to ensure adherence to relevant jurisdictional privacy laws, corporate agreements and sound practices on confidentiality. Data will be processed and communicated for the appropriate, necessary and legitimate purposes. Our Personnel must also exercise appropriate care to prevent unauthorised disclosure and use of such information.

Appropriate Use of Technology

Subject to applicable laws and regulations, the Group reserves the right to monitor, review and disclose electronic communications and information created, stored, or transmitted via systems as it deems appropriate for its legitimate purposes without further notice or consent. The Group may monitor systems and electronic communications. Personal e-mail and messaging systems, including social networking applications and websites, should not be used for business-related electronic communications.

Information held by the EOS IM Group is subject to the records retention requirements, including for legal, regulatory and tax purposes.

Communicating Responsibly

Communications are to be true, fair and not misleading. Personnel should exercise integrity and good judgment, acting with the Group's reputation in mind, regarding all internal and external communications. This includes open communications with authorities and regulators, as and when required.

The systems are to be used in a professional and respectful manner, at all times. It is unacceptable to include discriminatory remarks, harassment, and threats of violence or similar inappropriate or unlawful conduct in communications. This applies to communications of all kinds, including e-mail, instant messaging, voice mail messages, text messages, video recordings, and informal notes.

External Third Party Communications

The Group frequently receives requests for information from various third-parties, including the media. To manage this process EOS IM Group has representatives who will speak to the media, if required. Personnel should not give the impression that they are speaking on behalf of the EOS IM Group in personal communications, including social media accounts of any kind, user forums, blogs or bulletin boards.

6. Our Personnel

The EOS IM Group fosters an entrepreneurial growth mindset and empowers our Personnel to succeed. The EOS IM Group believes that both it and the wider environment benefits from the application of diversity, equity and inclusion. We embrace innovation, challenge convention, and lead responsibly to drive our industry and our impact forward. We operate as one overall team, with an unwavering commitment to our shared core principles. Our Personnel come first, and our culture continues to evolve to offering flexibility and the support they need to succeed in delivering for the funds and clients.

Whether Personnel are new or already part of the Group, continuing and growing our success depends on these individuals. The Group is committed to creating a dynamic, diverse, and collegial workplace where Personnel can collaborate, learn, and develop.

EOS IM Group expects all of its Personnel to behave in a professional and respectful manner. A key objective is to ensure that the EOS IM Group individuals can operate in a safe and secure work environment, where they are encouraged to grow and develop. All relationships with individuals within the EOS IM Group are to be under fair agreement and/or contract. The EOS IM Group will engage with its individuals, providing appropriate information, including strategy and objectives.

While we must adapt to business customs and practices in global markets, our Personnel should adhere to applicable local laws and regulations, as well as the laws, cultures, and customs of the countries in which they work.

Diversity & Inclusion

The EOS IM Group is committed to promoting diversity, equity, and inclusion and recognises the value of diversity in achieving our corporate objectives. Diversity within the Group means where possible establishing a blend of different experiences, perspectives, skills, which comes from areas such as different genders, ages, ethnicities, and cultural and social backgrounds across all levels. To this end, the Group aims to promote and implement diversity strategies:

- in our employment practices, including recruiting the right employees from a diverse pool of talented candidates and using selection criteria that allows for a diversity of candidates while continuing to focus on the necessary skills and experience;
- across all components of the EOS IM Group's business practices, including our anti-discrimination policies and work practices, so that our policies, procedures, and culture enable and support a diversity of employees; and
- in our development and training programs, including through our education programs and community and corporate social responsibility initiatives.

We aim to provide equal opportunities to our workforce, while facilitating a corporate culture that values diversity.

Discrimination & Harassment

The EOS IM Group provides equal employment opportunities and specifically prohibits unlawful discrimination to all employees and applicants. This encompasses providing opportunities without regard to and prohibiting discrimination concerning areas including race, colour, religion, sex, sexual orientation, ethnic or national origin, age, disability, marriage /partnership status, pregnancy, personal beliefs and

religion, trade union membership/activities/strikes, gender identity/expression/assignment, or any other impermissible criterion or circumstance protected by applicable law, ordinance, or regulation. Such protected characteristics include whether an individual belongs to or does not belong to a characteristic type. This policy is applied to all existing Personnel and potential Personnel.

Harassment Prohibited

The Group is committed to providing a workplace that is free of all forms of harassment. Under this policy, “harassment” is defined as verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of an individual’s race, colour, religion, sex, sexual orientation, national origin, age, disability, gender or any other impermissible criterion or circumstance protected by applicable law, ordinance or regulation, and that: (i) has the purpose or effect of creating an intimidating, hostile, or offensive work environment; (ii) has the purpose or effect of unreasonably interfering with an individual’s work performance; or (iii) otherwise adversely affects an individual’s employment opportunities. Harassment is a form of prohibited Personnel misconduct. Any Personnel found to have engaged in any form of harassment will be subject to discipline, up to and including termination.



7. Human Rights

Respect for human rights is a fundamental value of the EOS IM Group. We strive to respect and promote human rights in our business activities and relationships, beyond our Personnel, in accordance with the UN Guiding Principles on Business and Human Rights in our relationships. This includes with associated persons, without being limited to, business partners, service providers, suppliers and/or other third parties contracted by EOS IM Group entities. The EOS IM Group also expects such relevant external parties it interacts with to uphold these principles and urges them to adopt similar policies within their own businesses.

We consider and assess to identify and prevent human rights risks to Personnel in our business, as well as people in the value and supply chain. Our objective, is to avoid scenarios which are adverse in relation to human rights. This includes but is not limited to the prevention of human trafficking, forced and child labour.



8. Training and awareness

Training programmes have been established which are designed to encompass the Code, ESG issues and policies established by the EOS IM Group. This is intended to ensure full understanding of the requirements placed upon the entities within the EOS IM Group and its Personnel.





9. Revisions and Approval of this Code of Business Conduct and Ethics

This Code is subject to annual review, revision and the approval.

List of the EOS IM Group Entities

Listed below are the operating entities within the EOS IM Group to which this overarching Code applies.

- EOS Investment Management Ltd | Alternative Investment Fund Manager
- EOS Energy Partners Ltd | Investment Advisor
- EOS Private Equity Partners Srl | Investment Advisor
- EOS Capital Partners Srl | Investment Advisor
- Manage Your Energy S.r.l. | Operational Asset Manager

It is to be noted that the following Luxembourg General Partners relating to the management of the funds have established their own standalone code of business conduct and ethics which are broadly aligned with this overarching Code.

- *Fysis Specialized Asset Management GP S.à.r.l.*
- *EOS ReNewable Infrastructure GP S.à.r.l.*