

Responsible Investment Policy

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1. Introduction

MERIDIA CAPITAL PARTNERS S.G.E.I.C, S.A. (hereinafter, the "Management Company" or "Meridia") is aware of the environmental, social and corporate governance (ESG) challenges that affect it. It is also conscious of the regulations, policies and objectives being increasingly promulgated by international authorities in relation to sustainability. They have a transversal impact through its business lines, and they represent an opportunity to improve the Management Company's positioning with respect to best market practices.

In this context, Meridia, by means of this "*Responsible Investment Policy*" (hereinafter, the "Policy"), is seeking to reaffirm its commitment to the integration of ESG risks in decision-making processes for investment products. This has a direct impact on the business strategy and objectives, on the corporate governance structure, as well as the provision of investment products.

One of the fundamental pillars of Meridia is its commitment to the transformation of the investments to achieve sustainable growth at every level and strength the local communities. In response to the sustainability challenges faced by society, it is interested in improving its market positioning by considering sustainability factors as one of the main elements to include in the analysis of and decision-making on its investment products and services.

1.1. Scope

The scope of this Policy considers Meridia's entire investment cycle, from the pre-investment to the exit phase, and includes all Meridia's business lines (Real Estate and Private Equity) and investment processes. While this Policy is applicable to all the firm's employees, Meridia also ensures that subcontractors are aligned with the same values.

Given that Meridia's investment strategy is more focused on the investment and transformation of real estate assets, the integration of ESG factors within the different business lines will be differently determined according to their relevance in each business line, and therefore separately presented within this Policy.

1.2. Related policies

This Policy is related to the following Management Company's policies:

- Remuneration Policy
- Risk Management Policy
- Compliance Manual
- Code of Ethics

1.3. General objectives of the Policy

In accordance with the requirements of Regulation (EU) 2019/2088 on disclosures, the consideration of sustainability factors in investment decision-making is relevant due to, not only the impact they have on the Management Company itself, but also for how they contribute to the development of the economy and financial stability.

With this Policy, the Management Company is pursuing the following objectives:

- To set out the responsible investment process integrating ESG factors and risks in decision-making.
- To contribute to global environmental, social and governance goals.
- To comply with current regulations and the supervisory expectations of authorities and leading bodies.
- To satisfy the needs and desires of the Group's investors, customers and shareholders.
- To increase transparency disclosed to the market and to customers and investors on how the Management Company integrates and manages sustainable risks in investment decision-making.

Furthermore, Meridia believes that the integration of sustainability factors into the Management Company's strategy, governance and business model is fundamental to achieve sustainable growth, by always seeking to strengthen the community.

2. Purpose and Values

Meridia is an established alternative investment fund manager investing in private markets in Spain, whose main business lines are in the Real Estate sector. In addition, the Management Company has other investment programmes such as Private Equity.

Meridia is committed to responsible investment decisions. Meridia firmly believes that it is necessary to support innovative measures focused on contribution to society and communities. This is why our actions are guided by the purpose to **"Invest to Transform"**. We share the view that investors can have a significant influence over many of society's challenges and that success can be achieved when activities yield a triple bottom-line: economic value, social success and environmental protection.

Meridia is dedicated to creating long-term value to our investors through best-in-class investment strategies designed to strengthen our communities. This purpose is grounded by four key values:

- Integrity: Investments are analysed and managed in accordance with the highest ethical values. Transparency is a must in everything we do in order to build trust amongst our stakeholders.
- Social Impact: Responsibility is embedded in our decision-making process. Careful management of ESG factors is of the utmost importance to the firm, along with investments and community.
- Entrepreneurship: The pursuit of innovation and evolution is constant. We foster creative thinking in order to find the best opportunities.
- Excellence: Set the greatest standards and aim to surpass them in all our actions, allowing us to achieve consistent returns across different market cycles.

Meridia recognises that investment decision-making and management can affect, both positively and negatively, ESG factors. Thus, the performance and value of investments can be affected by ESG risks, and investments' management can also generate impact on the environment and the community.

Therefore, Meridia works, on the one hand, to identify and manage, on an asset-by-asset basis, relevant ESG factors which may have the potential to materially impact its clients returns. Throughout its investment process, Meridia has integrated the consideration of ESG factors to ensure its decision-making occurs in a balanced manner that enhances creation of long-term value for investors. On the other hand, Meridia is focused on promoting ESG factors in its investments so as to contribute to enhance performance of ESG factors in the communities where it operates.

3. Frameworks, implementation processes & commitments

Meridia’s paramount fiduciary duty to its clients and investors is to maximise their investment returns and minimise their risk. The consideration of ESG factors and issues therefore occurs against this backdrop such that the costs of ESG related activities are considered and balanced against the expected long-term benefits to investors of such activities.

Meridia seeks to ensure investee assets comply with all applicable national, supranational and local laws and regulations and its responsible investment practice is guided by institutional global standards, benchmarks, and certifications.

- Meridia is a longstanding supporter and is using the United Nation’s Sustainable Development Goals as a basis to build its purpose and its investment strategy. Especially focusing on three Goals where it can best deliver opportunities and minimize risks through its activities and corporate strategy:



Make cities and human settlements inclusive, safe, resilient and sustainable.



Take urgent action to combat climate change and its impacts.



Achieve gender equality and empower all women and girls.

- Meridia publicly supports the Task Force on Climate-Related Financial Disclosures (TCFD) and is working to approach climate challenges incorporating TCFD’s recommendations in management and reporting processes.
- Meridia’s ESG actions are following the December 2015 Paris Agreement, whose aim is to strengthen the global response to the threat of climate change by keeping a global temperature rise this century well below 2°C above pre-industrial levels and to pursue efforts to limit the temperature increase even further to 1.5°C.

- We became signatories to the United Nations Principles for Responsible Investment (UN PRI) in 2018.
- Meridia completed the GRESB real estate assessment for the first time in 2021. Meridia aims to improve the overall ESG performance by continuously improving GRESB rating.
- Aligned with the UN Global Compact's Ten Principles of Corporate Governance, the Management Company operates in ways that, at a minimum, meet fundamental responsibilities in the areas of human rights, labour, environment and anti-corruption.
- Meridia follows the standards and best practices of the Organisation for Economic Cooperation and Development (OECD) Guidelines of Human Rights for Multinational Companies, and the UN Guiding Principles on Business and Human Rights, as well as the fundamental conventions of the International Labour Organization (ILO).
- We support the Universal Declaration of Human Rights, based on equality and non-discrimination principles, as well as Meridia supports the UN Convention Against Corruption and the OECD Anti-Bribery Convention.
- Meridia, as a financial market participant, is subject to Regulation 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector, also known as Sustainable Finance Disclosure Regulation (SFDR). Regulation (EU) 2019/2088 conveys the need to provide and disclose the sustainability information necessary to enable end customers and investors to make informed investment decisions, considering sustainability risks and ESG factors in investment decision-making.
- The use of Regulation (EU) 2020/052, of 18 June, on the establishment of a framework to facilitate sustainable investment ("Taxonomy Regulation"). This Regulation establishes the criteria for determining whether an economic activity qualifies as environmentally sustainable for the purpose of establishing the degree to which an investment is environmentally sustainable.

4. Governance structure and management model

Meridia has implemented its ESG policy and principles within its funds management activities and internal corporate operations. For the integration of ESG factors in its operations, Meridia has established the following governance structure and processes:

4.1. ESG Committee

Meridia has a designated ESG Committee, led by the Chairman & CEO and coordinated by Meridia's Sustainability Manager, that meets at least once a quarter with the aim to have sustainability perfectly integrated in all Meridia's business lines. The Committee is made up of:

- Chairman & CEO
- Responsible Partner for Real Estate business line;

- A representative of the Real Estate Project Management team;
- A representative of the Meridia Glamping Program;
- Meridia's Sustainability Manager;
- the Head of Legal & Compliance and
- CFO and Risk Management representative

The ESG Committee reports biannually to the Board of Directors, which ultimately supervises all ESG decisions, oversees the implementation of all actions and is therefore directly accountable for the implementation of the ESG strategy.

The ESG Committee has several functions:

- Preparing and updating the Responsible Investment Policy.
- Creating and reviewing the corporate ESG strategy and its embedment in the different business lines and investment programs.
- Defining processes and measures to integrate responsible investment practices in the different business lines and investment programs and reviewing their constant update and improvement.

In addition, the ESG Committee supervises the accomplishment of the Management Company's commitments in terms of environmental, social and community issues. For example, the calculation and reduction of Meridia's environmental footprint and impacts; implementation of employees' policies and measures (such as equality and diversity, talent retention, corporate volunteering, etc.) and organization of an annual ESG training for all Meridia employees, with the aim of providing them skills to integrate ESG risks and create long-term value in investments.

4.2. Sustainability Manager

The Management Company's Sustainability Manager is responsible for the implementation and evaluation of the Responsible Investment Policy, for the implementation and coordination of environmental initiatives and certifications within the organization, including preparation of the UN PRI Transparency Report and the GRESB Real Estate Assessment Reports, as well as annual reports for investors, as required. The Sustainability Manager monitors and implements the ESG and responsible investment strategy in all business divisions and is the responsible figure for, in general, the management and implementation of ESG-related actions within the organization.

4.3. Compliance Unit

Our Compliance Unit regularly reviews the procedures to prevent, detect, rectify and minimise risks of sanctions, material financial loss or reputational loss as a result of violating any laws and regulations or breaching the Code of Conduct. Lastly, our Internal Audit Unit, as the last line of defence, is responsible for designing and implementing an annual supervision plan to review the effectiveness of our internal controls system and our compliance and risk management units.

Meridia has a Head of Compliance, who is the ultimate responsible for reviewing procedures to prevent, detect, correct, and minimize risks of suffering sanctions, material financial loss or reputation as a result of violating the regulation, internal

processes or the code of conduct. Head of Compliance reports annually to the Board of Directors.

4.4. Performance Evaluation

The involvement in ESG issues of Meridia's employees is evaluated annually in their performance evaluation. The variable remuneration is aligned with and depends on the results, and an element that is also assessed is the integration of sustainability risks into employees' investment analysis and decision-making tasks. Meridia links its remuneration policy to risk-adjusted performance with explicit consideration of sustainability risks.

4.5. External advisors

Meridia also secures the services of external specialised advisors for specific matters, when necessary. In order to incorporate the best practices at the time of designing policies and procedures of ESG and in the measuring and auditing ESG KPIs, among others.

5. Integration of ESG factors in the investment process

Meridia, as an institutional investor, has the duty to act in the best long-term interests of the beneficiaries. In this fiduciary role, Meridia believes that environmental, social and corporate governance (ESG) issues can affect the performance of investment portfolios. Meridia, as signatory of the UN PRI, recognises that applying these Principles may better align investors with society broader objectives. Therefore, where consistent with the fiduciary responsibilities, Meridia commits to the following Principles:

- Principle 1: Incorporate ESG issues into investment analysis and decision-making processes.
- Principle 2: Be active owners and incorporate ESG issues in the exercise of our ownership practices and policies.
- Principle 3: Seek appropriate disclosure on ESG issues by the investee's entities.
- Principle 4: Promote acceptance and implementation of the Principles within the investment industry.
- Principle 5: Work together to enhance our effectiveness in implementing the Principles.
- Principle 6: Report on our activities and progress towards implementing the Principles.

5.1. Real Estate

As part of Meridia's active ownership strategy, ESG aspects are entirely integrated into the investment life of their projects so as to achieve long-term value creation. Our Responsible Investment Policy covers 100% of Meridia's assets under management and is integrated into all investment phases.

5.1.1. Origination:

Meridia follows the exclusion list of the World Bank's International Finance Corporation and that of the European Investment Bank.

As a step prior to the analysis of any investment, the investment teams verify that the company or project in question does not engage in any of the excluded activities.

Meridia will not invest in any commercial activity that entails any kind of illegal economic operation. In this sense, we review that potential investments are not on the country-based exclusions lists or UN Security Council's and EU's sanction lists.

Additionally, Meridia does not invest with stakeholders that are not likeminded, in particular those related to the following illegal or controversial activities, which are excluded from the universe of potential investments:

- The production or distribution of tobacco and tobacco-related products.
- Companies related with controversial weapons (anti-personnel mines, Biological and chemical weapons or Cluster Munitions).
- Gambling.
- Any resulting in the limitation of the individual rights or freedoms of individuals, or Human rights violations.
- Stakeholders not in compliance with UN Global Compact principles and that do not consider legally required elements.

In our investments in products of article 8 and 9, as they are considered sustainable funds, in addition to the list of exclusions previously mentioned, in order to be eligible projects, must promote environmental and/or social characteristics. For this, their investment focus shall be focused the transformation of traditional camping business into open-air, modern and sophisticated accommodation businesses, with an avant-garde design, and integrating ESG factors (such as energy efficiency, sustainable materials, integration of local communities, etc.).

5.1.2. Materiality Analysis & Due Diligence:

Meridia works with external service providers and industry experts to review, test and critique the relevant information to ultimately reach valuation and investment decisions. All material ESG factors, sustainability risks and adverse sustainability impacts, as well as those likely to be material, are identified and considered as part of its investment decision making framework.

During the investment due diligence process, which follows the guidelines of the UN-supported Principles of Responsible Investment, Meridia ensures disclosure on a variety of issues, which may include key ESG factors. In the due diligence process, prior to the selection of assets, the Management Company will analyse and consider the environmental and social impact of the assets in which it may invest. The Management Company will carry out or commission ESG materiality analysis to identify key sustainability problems, risks and opportunities that

potential assets subject to investment may present. To inform materiality analyses, we use SASB Standards and the climate risk disclosures made by the potential investments analysed.

With the use of a mix of templates, checklists and internal trainings, Meridia ensures that the investment process and team are prepared and able to accurately identify ESG risks, adverse sustainability impacts and opportunities on ESG factors which may impact on an asset's long-term performance or risk-revenue profile. The Management Company may take into consideration ESG indicators that are material or potentially material for the analysed sector of the potential investments, which will also be subject to monitoring and follow-up in case the investments materialize.

Apart from the ordinary legal, economical, tax and technical due diligence, a specific ESG Due Diligence will be carried out. The ESG Due Diligence for new acquisitions for prospective assets will be aligned with Meridia's Responsible Investment Policy and may include:

- Analysis of performance on key issues and indicators related to biodiversity and habitat; building safety; compliance with regulatory requirements; contaminated land; energy efficiency; flooding; GHG emissions; indoor environmental quality; natural hazards; transportation; waste management; water efficiency; energy; renewable energy; gas; community impact; shareholder relationship; diversity and inclusion; governance structure. Their alignment with Meridia's ESG & Net Zero targets will also be assessed.
- Identification of actions and capex plans to improve on selected indicators.
- Determine monitoring plan of key indicators.
- Identification of cost effective environmental improvements to future proof the value of assets.

In the process of investment and asset selection, Meridia will also:

- Ensure asset complies with all material applicable national, supranational, local laws and regulations including urbanism, environmental matters and the alignment with SDGs.

Additionally, governance risks and good governance practices will be considered in the due diligence phase for each new investment opportunity, using specialized external resources where necessary.

If the scenario arises where the decision is made to invest in Real Estate assets certified with sustainable certifications, national and/or international, such as LEED BREAM, WELL or similar certificates, it will be positively valued.

Additionally in products of article 8 and 9, the Management Company will consider some indicators of the principal adverse incidents (PAIs) as one more method to measure the adverse impact that investments may have on sustainability factors and will review these indicators in the specific ESG Due Diligence process.

5.1.3. Investment decision & Contract Formalization:

With regards to assets:

The Investment Committee relies on key results of the previously ESG materiality analysis and due diligence, which are integrated in the Investment Memorandum, and ensures alignment with Meridia's Responsible Investment Policy. It positively weighs good ESG scorings, without

refusing investments only for its suboptimal ESG scorings. The last are considered when defining the ESG roadmap to quickly improve such suboptimal scores during the holding period.

Once the investment has been done, Meridia will also:

- Contractually require information from sellers and letting and leasing agents on sustainability characteristics of new acquisitions.

With regards to tenants:

Meridia acknowledges the need to engage their tenants in order to manage the broader environmental and social impacts of their business operations. Therefore, the lease agreements include as of 2023 green lease clauses as a mean to drive improvement among our tenants, while adapting to serve their needs and sustainability priorities. The clauses included cover the following topics:

- Protection of environmental risk: measures relating to the protection of the environment.
- Management and Reciprocal Information on Energy Consumption: improving the energy and environmental performance of assets and guaranteeing the provision of data and information on their consumptions and/or emissions.
- Waste Separation: improving waste recycling and reduction measures and commitments.
- Waste Reduction: reducing waste by avoiding single use and plastic packaging and prioritizing fresh food.
- Sustainable public services: installation of low- and zero-carbon technology and alternative energy sources.
- Biodiversity: enhancing the biodiversity of the assets and their surroundings.
- Raw materials: elaborating menus preferably with fresh, seasonal, and proximity food.
- Social Value: commitment with society.

It also contains some clauses regarding the commitment of the tenants to report indicators or data adapted to the reporting requirements under Meridia's reporting framework and applicable regulation (i.e., SFDR).

Tenants also commit to include relevant ESG issues that may affect the operation and development of the investments in the quarterly and annual reviews performed by Meridia.

With regards to construction companies:

When selecting construction companies, ensure that they share the values and practices of Meridia's Responsible Investment Policy and that they consider the relevant sustainability issues in real estate assets.

It will also be ensured compliance with labour legislation and inclusion of decent labour practices, work conditions, and respect for human rights principles.

With regards to property or facility managers:

When selecting property or facility managers, Meridia will seek the service agreements to include clear and detailed expectations for incorporating ESG and climate risk factors and the process for monitoring ESG and climate risk implementation and performance. The asset, property or facility manager may be required to:

- Have dedicated procedures in all relevant asset and property management phases: asset acquisition, management, operation, upgrade, rental, planning and manager selection, which are impacted by ESG and climate risk strategy.
- Monitor portfolio and underlying real estate assets performance in carbon, energy and natural resource intensity (e.g.: portfolio level and individual asset case studies), and social impacts such as community engagement and contribution to local communities.
- Have an Environmental Management System (EMS) that applies to the entity level.
- Use relevant Real Estate sustainability benchmarks to monitor and compare performance against market peers.
- Have clear reporting requirements including narrative and quantitative reporting against targets.

When accepting a property or facility manager, an evaluation is made to see if the company is efficient and has an ISO. Meridia doesn't work with suppliers that have had environmental issues in the past or present. When doing the internal compliance process of acceptance/rejection of a supplier, a red flag arises if there has been any environmental issue with such company. Meridia always prefers to collaborate with social enterprises suppliers.

5.1.4. Portfolio Management:

Meridia will undertake periodic monitoring of relevant ESG metrics at an asset and Fund portfolio level. The selected indicators reflect the main ESG matters relevant to the investment activities, previously identified.

Through the introduction of green lease clauses and ESG reporting clauses in contracts with tenants and/or property or facility managers, Meridia monitors and influences where appropriate the tenants' and property or facility managers' teams both around ESG factors and other important issues.

Through its equity positions in its investments, Meridia seeks to use Board representation to ensure appropriate consideration of ESG factors and engagement in ESG related activities which are aligned with Meridia's policy. Generally speaking, Meridia holds complete ownership of the Special Purpose Vehicle (SPV) that possess its assets, thereby exercising full control over the governing practices. Consequently, the Management Company is empowered to implement commendable governance practices. The Management Company, through its controlling positions in the share capital of the assets in which it invests, will ensure proper consideration of ESG factors in the activity carried out by the businesses of the assets being invested in, and will strive for alignment with the Asset Management Company's Responsible Investment Policy.

The incorporation of ESG factors in the management of the assets is carried out in a structured manner through the application of an action plan containing a calendar of actions to be implemented during the investment period, around environmental, social and communitarian issues.

To ensure integration of ESG factors across all assets and the consecutions of sustainability targets, as part of our active ownership, we engage with real estate tenants on energy, water consumption and/or waste production, among others, to ensure ongoing improvement of the data collected and at the same time guaranteeing duly disclosure for investors on such topics.

Monitoring and reporting of the relevant ESG KPIs is done at least on a quarterly basis by property or facility managers and/or tenants, Meridia gives constant support to those in order to collect quantitative and qualitative data to measure and assess the ESG performance of assets.

In general, we engage with our real estate property or facility managers by identifying collaboration opportunities that support targets related to material ESG factors, through Meridia’s asset management teams.

We also work with the property or facility managers in order to organize ESG events focused on increasing tenants sustainability awareness.

In case of funds classified as article 8 and 9 under SFDR, Meridia monitors ESG factors and indicators of adverse sustainability impacts during the full duration of the asset’s ownership.

Environmental Strategy

As Real Estate investors, we aim to maintain a portfolio that remains resilient under the constant threat of climate change, and at the same time maximizes efficient use of resources with minimal environmental impact. To do so, we follow a strict environmental due diligence process to ensure through understanding of the environmental risks of any potential acquisitions; whilst identifying new opportunities that could further enhance the environmental performance of our assets in operation.

A sustainability action plan is prepared and adapted to each project, in which the different measures that will be carried out are detailed. It is also important to incorporate it into the operational and management processes of our properties, considering the needs of our tenants, our stakeholders and society that surrounds our assets.

When deploying Meridia’s environmental strategy in asset management, the following criteria shall be considered, without excluding any that may be additionally considered:

<u>Energy and Resources Efficiency</u>	<u>Environmental footprint & Climate Change</u>	<u>Green Buildings Certifications</u>	<u>Construction, Renovation & Refurbishment</u>
<p>Several lines of action are deployed to favour energy and resources efficiency:</p> <ul style="list-style-type: none"> Promote the use of 	<p>Meridia performs a through measurement of its overall CO₂ emissions, including those of the assets and buildings it invests in, in order</p>	<ul style="list-style-type: none"> To integrate and promote sustainable practices into building operation, the aim of Meridia is to expand the green building portfolio 	<p>In the case of construction and major renovations, Meridia has the following sustainability requirements in place:</p>

<p>renewable energy.</p> <ul style="list-style-type: none"> • Increase the percentage of recycled waste. • Reduce the percentage of landfill waste. <p>To do this, Meridia promotes the implementation of different measures:</p> <ul style="list-style-type: none"> • Implementation of energy efficiency solutions, including LED lightings and retrofit of aged chillers with VRF systems. • Expansion of the share of renewable energy sources. • Reduction of water consumption and replacement of inefficient water fixtures. • Reduction and recycling of waste measures. 	<p>to set up a decarbonisation plan aligned with real estate practices on this topic, based on the next commitments:</p> <ul style="list-style-type: none"> • Reduce carbon intensity of portfolios. • Reduce exposure to assets with significant climate transition risks. • Invest in low-carbon, energy-efficient climate adaptation opportunities in different asset classes. <p>Additionally, due to the relevance of climate change impacts on the real estate sector, Meridia is committed to identifying the risks and opportunities arising from climate change for its assets.</p>	<p>by obtaining internationally recognised assets certificates, such as LEED, BREEAM and WELL. Thus, we require that the buildings are able to obtain a recognised green building certification.</p> <ul style="list-style-type: none"> • Additionally, Meridia will seek the obtention of good performance evaluations according to GRESB framework for the projects/assets particularly in which it invests in. • Environmental risk assessment is performed in our investments, which will inform action plans to be developed in relation to each asset. 	<ul style="list-style-type: none"> • Management of waste by diverting reusable vegetation, rocks, soil construction and demolition materials from disposal. • Minimisation of light and noise pollution. • Protection of the air quality, restoration of the habitat and soils during construction. • Protection of surface, ground water and aquatic ecosystems. • Maintain and use development and refurbishment guides with minimum ESG and climate risk requirements. • Building documentation (building files / passports) is issued within project development and refurbishment projects. • Contractors and refurbishment teams with experience in reducing ESG and climate building footprints. • Produce and use sustainable fit-out guides for tenants, favouring the use of
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			sustainable materials.
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Social Strategy

As real estate investor, Meridia has the opportunity to design more inclusive, efficient and sustainable buildings, contributing to create better communities. Through our asset investment strategy our focus is to reduce environmental impact and support the local economy and the cities we invest in.

A sustainability action plan is prepared and adapted to each project, in which the different measures that will be carried out are detailed. To integrate social factors within its real estate investments, the following criteria shall be considered, without excluding any that may be additionally considered:

<p><u>Human resource management</u></p> <ul style="list-style-type: none"> • Health and safety standards: to prevent and address accidents affecting the environmental and human health. • Consideration and promotion of human rights aspects. • Anti-trafficking and slavery policy, not allowed in our businesses or supply chains, and respect for labour standards and fair working conditions. • Assets' health and safety systems, to guarantee a safe environment for work. • Diversity, Equality and Inclusion: to promote equality and diversity, treat all stakeholders fairly and with respect. 	<p><u>Community relationships</u></p> <ul style="list-style-type: none"> • Community development: in terms of design, education and cooperation with local authorities. • Health and safety standards in relation to tenants and constructors. • Stakeholder's relationships: promote equality and diversity, treat all stakeholders fairly and with respect. • Stakeholders' satisfaction, through measures to promote our tenants' happiness.
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Governance Strategy

In order to promote the adoption of good governance policies among SPVs, the Management Company will encourage SPV align their policies with the OECD Guidelines for Multinational Companies and with the United Nations Guiding Principles on Business and Human Rights, including que principles and rights set forth in the eight fundamental conventions identified in the International Labour Organization's Declaration on fundamental Principles and Rights at Work and the International Bill of Human Rights.

Through the capital positions in the assets in which Meridia invests, the consideration of ESG factors in the activity carried out by the assets is guaranteed and seeks its alignment with

Meridia's Responsible Investment Policy. To integrate governance factors within the real estate investments, Meridia considers the following criteria, without excluding any that may be additionally considered:

- Promote human rights throughout the entire value-chain.
- Ensure fair, transparent, and tailored negotiations that consider the reality and circumstances of each party involved, helps to maintain a high level of ethical standards, which is crucial in our efforts to foster a culture of integrity and responsibility throughout the organization.
- Guarantee data protection and privacy, in relation to access to stakeholder data, and in compliance with applicable regulations.
- Promote an ethical business environment, to act in accordance with the ethical standards set by the Management Company.

5.1.5. Exit:

Meridia recognises the importance of long-term value creation, since the investment life doesn't end with our exit from assets or investments. That is why we want to make a difference by developing and repositioning investments so as to guarantee that they do not become obsolete over the long term, and willing to leave improved assets and surroundings.

5.2. Others: Private Equity

At Meridia, apart from our main business line in Real Estate, we also have Private Equity investment programs, which we carry out independently or with strategic partners.

To ensure the integration of sustainability risks in this investment program, Meridia is responsible for implementing the following minimum processes, which may be complemented by additional ESG procedures executed by or agreed with our strategic partners.

5.2.1. Pre-Investment

Meridia follows the exclusion list of the World Bank's International Finance Corporation and that of the European Investment Bank.

As a step prior to the analysis of any investment, the investment teams verify that the company or project in question does not engage in any of the excluded activities.

Meridia will not invest in any commercial activity that entails any kind of illegal economic operation. In this sense, Meridia reviews that potential investments are not on the country-based exclusions lists or UN Security Council's and EU's sanction lists.

Additionally, Meridia does not invest or partner with stakeholders that are not likeminded, in particular, those related to the following illegal or controversial activities, which are excluded from the universe of potential investments:

- The production or distribution of tobacco and tobacco-related products.
- Companies related with controversial weapons (anti-personnel mines, Biological and chemical weapons or Cluster Munitions).
- Gambling.

- Any resulting in the limitation of the individual rights or freedoms of individuals, or Human rights violations.
- Stakeholders not in compliance with UN Global Compact principles and that do not consider legally required elements.

5.2.2. Post-Investment

In general, ESG materiality analysis will be done in order to identify key issues, risks and opportunities to be able to set up an action plan with clear objectives to improve assets' ESG performance and to allow consecution of ESG long-term targets.

Meridia or its strategic partners will undertake frequent monitoring of relevant ESG metrics at an investee and Fund portfolio level. The selected indicators reflect the main ESG matters relevant to the investment activities, previously identified.

Through its equity positions in its investments, Meridia monitors and influences where appropriate the behaviours of its portfolio company management teams both around ESG factors and other important issues. Meridia seeks to use Board representation and interaction with management teams to ensure appropriate consideration of ESG factors and engagement in ESG-related activities which are aligned with Meridia's policy.

The incorporation of ESG factors in the management of the investees, is carried out in a structured manner through the application of an action plan containing a calendar of actions to be implemented during the investment period.

Contracts signed with buyers will seek to include ESG nature clauses, based on recommendations and best-efforts.

6. ESG Implementation in Meridia - Corporate Level

6.1. Environmental sustainability

Meridia will manage and minimize its corporate environmental footprint by engaging in activities and initiatives which are environmentally responsible. Meridia will build environmental awareness internally and with its external stakeholders and will encourage positive behavior changes that benefit the environment. Meridia has actioned several initiatives which are in support of its environmental principles:

- Continuous internal recycling programs and minimisation of paper product usage.
- Promotion of a plastic-free environment.
- Development of energy efficiency operations.
- Promotion of green transportation measures among employees.
- Calculation of Meridia's corporate operations footprint.

As far as possible, Meridia does not work with suppliers that have had environmental issues in the past or present. During the internal compliance process of accepting or rejecting a supplier, a red flag arises if there has been any environmental issue with such company. Meridia always prefers to collaborate with social enterprise suppliers, to the extent possible.

6.2. Social Responsibility

Meridia will support a high level of socially acceptable and equitable standards in its internal operations and will promote respect for and protection of human rights and safe and healthy work conditions. Meridia will support ownership in and deployment of resources to investments which are positive for the community.

Meridia understands that diversity brings broad perspectives that lead to better decision-making, and hence they select partners and employees according to their skills and potential, irrespective of their gender, ethnicity or any other minorities, that is why Meridia has a high commitment with diversity and inclusion.

Meridia recognizes that employees are the most important asset and resource in advancing innovation and will create new opportunities for them to contribute to their efforts. To do so, Meridia provides internal ESG training from PRI Academy to all employees, which is tailored on a continuous basis, based on the annual assessment of the capabilities and needs of our professionals.

To foster consideration of ESG factors and practices across all our operations and among all our employees, Meridia includes ESG factors in annual performance targets for employees, as defined in our Remuneration Policy, thus increasing the entity's capacity to improve ESG performance.

Meridia prioritizes health and wellbeing at workplace. That is why the implementation of multiple initiatives to support the physical and mental wellbeing of the employees is made. Some activities that Meridia promotes to improve the wellbeing of their employees are related with health, engagement programs and corporative volunteering.

Meridia commits to engage with various organizations to promote social impact and work towards the reduction of inequalities, either through corporate volunteering activities as well as economic donations and collaborations with different institutions.

7. Governance Framework

Meridia is committed to adhering to the highest standards, principles, and safeguards of transparency throughout its activities. The company is dedicated to maintaining ethical performance and integrity in its decision-making and management processes.

Meridia will operate within a robust corporate governance framework and will advocate responsible management throughout its senior leadership and its wider team. The next initiatives that Meridia has actioned are in support of its Governance principles:

- Actively supports the United Nations Global Compact and is a member of UN PRI, and annually reports against both initiatives reporting frameworks.
- Meridia commits to releasing an annual ESG report that adheres to international standards. This report will detail the economic, environmental, and social performance of the company and transparently communicate actions taken to fulfill commitments outlined in the company's policy.
- Prevents any kind of unethical practice by stakeholders as declared in the Anti-fraud policy.

- Meridia contributes to the UN Convention Against Corruption and the OECD Anti-Bribery Convention Bribery and corruption and has implemented anti-bribery and corruption policies to ensure that their activities are carried out in an ethical and legal manner.
- The Management Company implements an engagement program in relation with shareholders rights, providing clear and transparent information on common matters, establishing fair and equitable voting systems and promoting diversity in the board of directors.
- Meridia ensures that all employees are aware of and comply with the company's codes, policies, and other internal regulatory documents. Also, the Management Company respects the privacy of employees' data guarded by the company.
- Additionally, Meridia does not tolerate:
 - Violations and abuse of human rights.
 - Discrimination based on race, gender, sexual orientation, religion or age.
 - Business practices considered generally unethical and unacceptable.

8. Transparency & Communication

Meridia views disclosure and accountability as key parts of its governance framework. Our commitment to transparency is aligned with the Principles of Responsible Investment (PRI) and the SFDR. Thus, we annually elaborate the UN PRI Transparency Report and publish an annual ESG Report at an entity level, in which we disclose Meridia's treatment of sustainability risks and integration of ESG factors throughout the whole investment process.

Thus, we assume a commitment with our investors and society in general to inform them of ESG progress through this Policy and ESG Report posted and updated annually on the website, where the ESG progress made in each of the investment programs is explained in detail.

Additionally, an ESG Report for each of our sustainable-labelled Funds is elaborated on an annual basis, as required by the SFDR disclosure requirements. Information on the material principal adverse impacts on sustainability factors of investments is made available through such periodic reports.

Meridia also supports various internationally recognized sustainability-themed frameworks to benchmark their ESG performance, in this way the level of transparency in the Management Company is improved. Thus, we participate in the transparency exercise of GRESB, an internationally accepted standard, designed to capture information related to ESG performance and sustainability for the Real Estate and Infrastructure portfolios, globally.

9. Document governance: monitoring, review, and approval

The Responsible Investment Policy is approved by Meridia's Board of Directors, which is also responsible for adopting the measures required for its effective implementation.

This Policy is effective on the date of its approval by the Board of Directors and shall be reviewed periodically at least once a year. Furthermore, it shall be reviewed and revised or updated as and when circumstances or events arise that require it, such as:

- Amendments to the regulatory framework, recommendation, requirements and/or methodologies that the relevant authorities may approve.
- Changes to the Management Company's organisational structure affecting this Policy.
- Changes to the business model or objectives set by the Management Company.
- Amendments to the processes affected by and developed in this Policy.

The ESG Committee, with the support of the Sustainability Manager, is responsible for drawing up and reviewing this Policy, which is ultimately submitted to the Board of Directors for its approval. However, any department involved in the integration of ESG risks into investment decisions and the Head of Compliance may propose amendments to this Policy.

The content of this Policy constitutes a process of continuous improvement that shall be reflected in the successive periodic revisions of the document.

With regards to disclosure, this Policy approved by the Board of Directors on June 27th, 2023 shall be published on the Management Company's corporate website (<https://www.meridiacapital.com/en/>), alongside an extract thereof.