



**Better, faster, and more
accessible healthcare.**

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1. Our purpose

GHO Capital Partners LLP (“**GHO**”, “**we**” or “**us**”) was founded with a purpose to invest in companies that drive efficiencies across the healthcare ecosystem to maximise returns and support positive societal outcomes, as further outlined herein, our Responsible Investment Policy (**this “Policy”**).

Our purpose of Better, Faster and More Accessible healthcare guides us to originate, select and manage companies with a Unique Selling Proposition (“**USP**”) that support delivery of these outcomes.

Our responsible investing approach is a key part of our overall investment approach. We believe that businesses that offer solutions to increase the efficiency of healthcare systems, while also optimising operational efficiencies related to material environmental, social and governance matters, are inherently better, more resilient and more valuable.

2. Achieving our purpose

In order to deliver on our purpose, we believe we need to both:

- i. actively target companies that have a USP that contributes to the delivering of Better, Faster and More Accessible Healthcare and evaluate and measure each investment’s potential to contribute to at least one of these three dimensions; and
- ii. optimise and enhance operational efficiencies related to the material environmental, social and governance matters of the businesses we invest in. Based on our most recent materiality assessment and driven by the sector in which we operate, these include the effectiveness of a business’ governance, the decarbonisation of its operations and the management of its talent.

We refer to the attainment of (i) as our “**Offence**” strategy and (ii) as our “**Defence**” strategy..

2.1 Our Responsible Investing Offence Strategy

We define “**Better, Faster and More Accessible**” as::

- **Better** – Where the quality of the product or service is better than the norm, or where there is a competitive advantage inherently designed into the business model;
- **Faster** – Where the product or service is enabling a speed efficiency in the marketplace against the norm through the skills of the people, by reengineering the process or by the business model; and
- **More Accessible** – Where the product or service reduces costs and/or demand to the healthcare system, thereby enabling greater access.

We refer to the fulfilment of our purpose and the furtherance of Better, Faster, More Accessible healthcare as our responsible investing Offence strategy.

To operationalise our Offence strategy, we have designed an Offence Framework which we use to select investments, consisting of a qualitative description of the criteria for a contribution to Better, Faster and More Accessible healthcare with reference to industry frameworks and standards such as the “**5 Dimensions of Impact**” as outlined by Impact Frontiers, the concept of “**theory of change**”, The sub sectors that our investment strategy contributes to are in line with those identified by the Global Impact Investing Network, OECD European Healthcare and US Department of Health and Human Services.

Throughout the life of the investment, we also aim to quantitatively measure an investment’s contribution to Better, Faster and More Accessible healthcare via a third-party platform using their comparable metrics.

Full definitions of each of these areas can be found in *Appendix 1 (Offence Framework)*.

2.2 Our Responsible Investing Defence Strategy

Portfolio companies face a series of interconnected environmental, social and governance risks and opportunities that have the potential to impact a portfolio company’s ability to create or preserve economic value and that may require active management.

By supporting our portfolio companies to optimise and enhance the operational efficiencies related to their material environmental, social and governance matters, we seek to work alongside them to embed better risk management and drive opportunities identification into their businesses.

We refer to the operational enhancement of material environmental, social and governance matters as our responsible investing Defence strategy.

We believe that businesses that both: (i) offer solutions to increase the efficiency of healthcare systems, and (ii) optimise and enhance operational efficiencies related to material environmental, social and governance matters are inherently better, more resilient and more valuable businesses.

We believe that one strategy cannot exist without the other, and at GHO we are uniquely set up to work with our portfolio companies to deliver and maximise on both.

3. Our commitments to stakeholders

At GHO, we are committed to maximise returns, support positive societal outcomes and act responsibly towards our investors in line with our fiduciary duties.

GHO have been a signatory of the United Nations Principles for Responsible Investment (“**UN PRI**”) since 2015¹. As such, we have committed to the UN PRI’s six core principles. These formed the basis upon which our responsible investment policy was created. Over time we have built on that initial policy, and this Policy now reflects both the original principles and our more fulsome Offence and Defence strategies.

4. Delivering on our commitments to stakeholders

Outlined below is how we are integrating our responsible investment strategy throughout each stage of the investment process to create and protect value for our investors and deliver on our commitment to the UN PRI.

4.1 Incorporating our Offence and Defence strategies into our investment analysis and decision-making processes

Origination and screening

4.1.1 First line of Defence:

Negative screening: excluded activities and geographies

We maintain a list of sectors, activities and geographies where we will not invest. These are set out in *Appendix 2 – Defence: Negative Screening List*.

All potential new investments are screened against this list of excluded sectors, activities and geographies, constituting our negative screening analysis. This analysis is conducted every time a new deal opportunity arises.

4.1.2 Offence:

Assessment of the potential for contribution to Better, Faster and More Accessible healthcare

GHO seeks to actively target and select companies that have at their core a mission to deliver Better, Faster and More Accessible healthcare, and positively screens investments to evaluate each investment’s potential to contribute to at least one of these three dimensions.

1. The UN PRI is an investor initiative and sets out six principles for responsible investment, offering a menu of possible actions for incorporating environmental, social and governance issues into investment practice. Signatories publicly commit to demonstrate their commitment to responsible investment by agreeing to implement the principles and prepare an annual report. For further information, see <https://www.unpri.org/>.

This assessment is an outside-in screening to determine whether the targeted investment qualitatively contributes to one or more of (i) Better, (ii) Faster and (iii) More Accessible healthcare for society (the “**Contribution Assessment**”).

4.1.3 Defence:

Environmental, Social and Governance Red Flag Screening

In the pre-investment phase, environmental, social and governance red flags of a given targeted investment are first analysed by the GHO Investment team from the outside-in (the “**Environmental, Social and Governance Red Flag Screening**”).

The conclusions of both (i) the Contribution Assessment, and (ii) the Environmental, Social and Governance Red Flag Screening, are presented at the initial investment discussion.

Due diligence and Deal execution

Due diligence is typically conducted by third party specialist providers on every GHO target investment.

4.1.4 Offence: Identifying Investments Aligned with Our Purpose

Our Offence framework, supported by an outside-in assessment using a third-party platform, a science-based impact-measurement platform that supports our assessment of actual or potential positive and negative effects of companies across the value chain on the basis of estimates and proxy data and enable us to identify where a business has the potential to make a contribution to Better, Faster and More Accessible healthcare, and where material risks may constrain that contribution. This framework guides our Commercial Due Diligence “**Commercial DD**” by addressing whether a target company is, or has the potential to, be **Better, Faster**, or able to deliver **More Access** to healthcare relative to the norm.

As part of the Commercial DD, we conduct a deep-dive analysis of the target company’s activities, products and services, testing and verifying its potential for contribution to GHO’s purpose of **Better, Faster and More Accessible healthcare**. This includes a deep-dive analysis of the activities, products and/or services of the target company, along with an assessment of certain metrics to measure such contribution as outlined in Appendix 1.

4.1.5 Defence: Risks, Opportunities and Adverse Impacts

Responsible Investing Due Diligence “**RI DD**” is also carried out on target companies to identify, and further scope out, material risks, opportunities and/or adverse impacts. The focus areas are informed by GHO’s Environmental, Social and Governance Red Flag Screening. A materiality approach is taken, drawing on leading sustainability standards and regulations as guidance. More on the areas we consider material can be found in ***Appendix 3: GHO’s Materiality Approach*** of this Policy.

As part of the scope of the RI DD, GHO also seeks to identify the target company’s material adverse impacts on people and planet and confirm that the target company follows good governance practices. If any material adverse impact is identified at the point of diligence, an assessment is made as to whether it can be mitigated.

We are committed to working with our portfolio companies to develop greater environmental, social and governance awareness and practices. Material environmental, social and governance risks and/or impacts may not restrict the likelihood of investment if we believe that there is opportunity for meaningful improvement.

In order for the GHO investment committees to make informed investment decisions, taking material Offence and Defence factors into account, the key findings of the Commercial DD and RI DD are presented at the investment committee meetings.

4.2 Being active owners, incorporating our Offence and Defence strategies into our policies and practices

Portfolio Management

GHO takes an active role in managing and overseeing the companies in which it invests. GHO aims to acquire majority stakes, and in the event where minority stakes are acquired, GHO seeks to acquire similar rights to larger investors, by way of board representation and a list of reserved matters, to ensure we retain joint control over the target company. Involvement at the highest level allows us to address environmental, social and governance risks and opportunities directly with our portfolio companies and initiate change where required.

With all new investments, the results of the Commercial DD and RI DD are used to highlight areas of existing excellence and best practice, as well as areas for progress. The latter are included in the post-completion 180-day action plan designed by GHO which guides the initial period of our investment (“**180-day plan**”). Following the 180-day post-completion period, implementation and progress on both our Offence and Defence strategies is then monitored on an ongoing basis and formally measured annually.

4.2.1 Offence: Measuring the contribution to Better, Faster, More Accessible healthcare

The 180-day plan includes a roadmap for how the company's contribution to **Better, Faster and/or More Accessible healthcare** will be qualitatively assessed and reported. The ongoing portfolio-management assessment of its contribution to **Better, Faster and More Accessible healthcare and associated risks** will be guided by a third-party platform and measured **annually**, with the intention of monitoring progress and informing engagement throughout the ownership period. Further details on this can be found in Appendix 1.

4.2.2 Defence: Accelerating Environmental, Social and Governance excellence

The 180-day plan contains a roadmap relating to the material environmental, social and governance focus areas for that company, which it is required to measure, monitor and report on, and is tailored to each portfolio company's baseline as established in RI DD. The 180-day plan will also map out a framework for the company's governance policies. This is based on GHO's analysis of the company's existing governance policies against GHO's framework of good governance standards.

Ongoing management of material environmental, social and governance matters is integrated into portfolio operational and value creation planning. The RI team and deal team, alongside the portfolio company management teams, work together to develop annual Defence action plans to manage risks, deliver tangible performance improvements, and capture opportunities.

Exit preparation

When nearing the exit phase of an investment, the relevant GHO deal team assesses the portfolio company's progress since acquisition, using the entry Commercial DD and **RI DD** as a benchmark.

Where appropriate, vendor RI DD is completed by third-party providers to assess the impacts of environmental, social and governance factors on the portfolio company's financials. Where relevant, this assessment is guided by a third-party platform and may also comment on (and quantify where possible) value creation, including the investment's contribution to **Better, Faster, More Accessible healthcare**. This information is incorporated into exit documentation to demonstrate the value of our **Offence and Defence strategies** to prospective buyers.

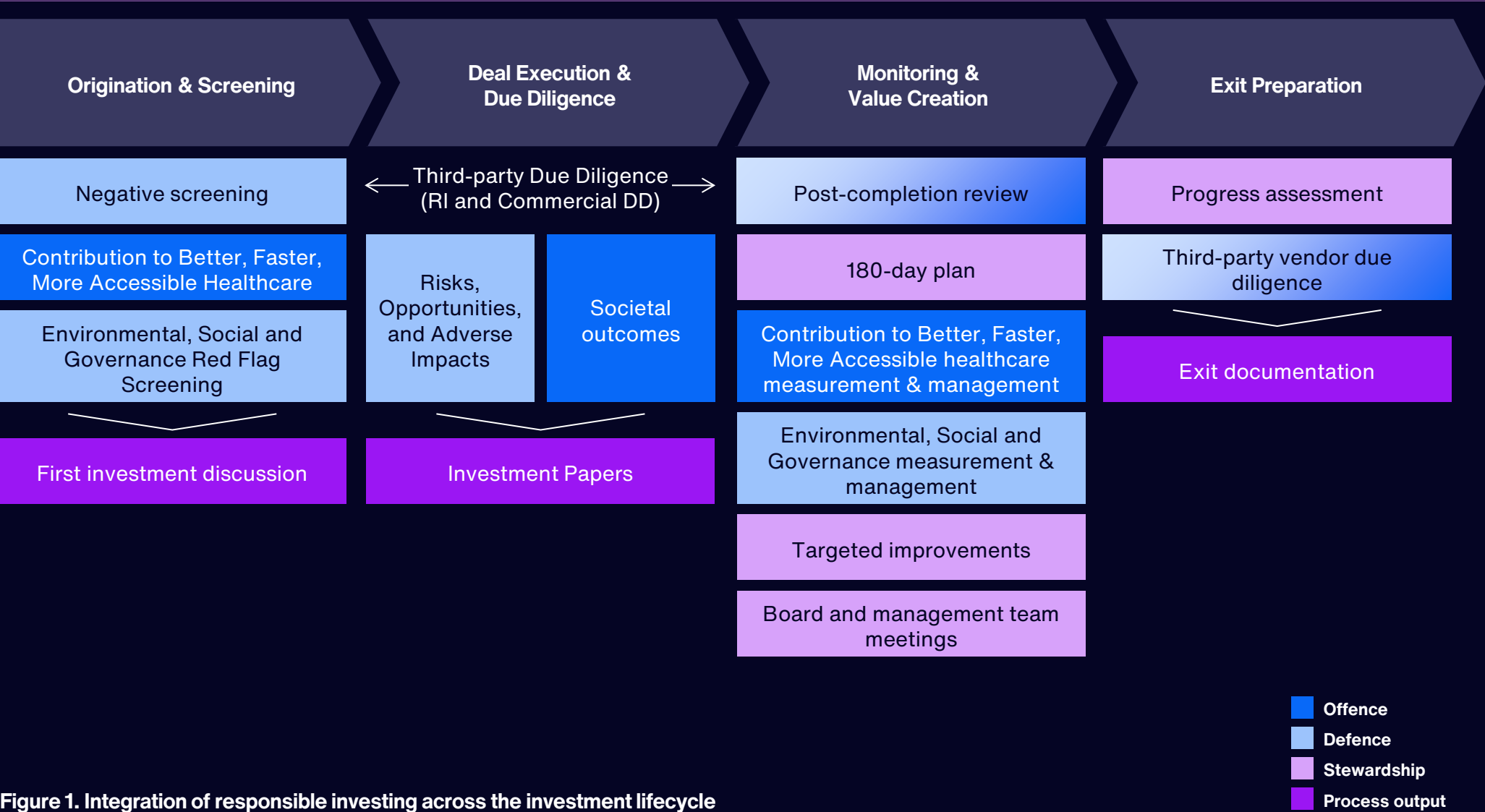


Figure 1. Integration of responsible investing across the investment lifecycle

4.3 Seeking appropriate disclosure by the entities in which we invest

To further both our Offence and Defence strategy, GHO has established a reporting framework to collect several key indicators from all portfolio companies across the majority of our funds.

These consist of:

- i. a set of indicators demonstrating contribution to our purpose as outlined and illustrated in Appendix 1; and
- ii. a set of metrics related to the topics of environment, social and governance;

which are used to standardise reporting for our portfolio, track progress on key value metrics, and enhance transparency.

The metrics are informed by global frameworks, including the UN Global Compact², Global Reporting Initiative³, Sustainable Finance Disclosure Regulation⁴ (“SFDR”) and ESG Data Convergence Initiative (EDCI)⁵ among others.

The list of indicators is issued to all portfolio companies shortly after the closing of the investment. The data is then collected periodically and reported on annually.

We continue to review and update this reporting framework regularly to ensure it includes relevant metrics, as well as to incorporate outputs and outcomes measures.

4.4 Promoting the UN PRI within the investment industry

GHO actively engages with investors, co-investors and other market participants on the rationale for responsible investing and the development of good practices. In addition, we have also communicated this Policy and its expectations to other relevant stakeholders (including employees, portfolio companies and our advisor community). We continuously encourage and welcome external reviews and challenge on our Policy, strategy and approach.

2. The UN Global Compact is a voluntary initiative of the United Nations based on CEO-level commitments to implement sustainability principles and take steps to support the goals of the United Nations. Participants commit to implementing the “Ten Principles” of the UNGC in relation to human rights, labour, environment and anti-corruption, each of which are derived from relevant international instruments and to supporting the advancement of the United Nations Sustainable Development Goals. Participants are required to provide the UNGC Office with an annual “communication on progress” or “CoPs”. For further information, see <https://unglobalcompact.org/about>.

3. The Global Reporting Initiative is an independent not-for-profit organization that leads a global multi-stakeholder process to develop and refine sustainability reporting. For further information, see <https://www.globalreporting.org/>.

4. Regulation (EU) 2019/2088.

5. The EDCI is a global private markets initiative to drive convergence around meaningful, comparable sustainability metrics. For further information, see <https://www.esgdc.org/>.

4.5 Working with other investors to implement the UN PRI

GHO is an active member of the UN PRI community, regularly attending and participating in the organisation's events, conferences, workshops, and webinars.

We also engage with peers to promote the widespread adoption of responsible investment strategies through various industry groups, such as A Blueprint for Better Business⁶ and the British Private Equity & Venture Capital Association⁷.

4.6 Reporting on our progress towards implementing the UN PRI

Each portfolio company reports certain relevant data to GHO on a regular basis which feeds into public reporting at an aggregate level in our annual Responsible Investing Report, as well as disclosed on a portfolio company level to investors upon request. Our Responsible Investment Report, published annually since 2021, describes our progress towards implementing the UN PRI as well as the sustainability-related performance of our portfolio companies.

In addition, GHO provides a quarterly update to investors on responsible investing, and at our Annual Investors Meeting. More urgent environmental, social and governance-related incidents are directly communicated to relevant stakeholders as they arise.

5. Incorporating climate-related financial risks and opportunities into our processes

GHO recognises that climate change is a global challenge and acknowledges the United Nations' Paris Agreement to limit global temperature increase to 1.5°C.

We recognise the potential impact that our portfolio companies may have on climate change, as well as the potential financial implications that our portfolio companies may be exposed to as a result of climate change. Addressing climate change risks can also be a source of opportunity. Consideration of climate-related financial risks is therefore integrated into our responsible investing approach.

6. A Blueprint for Better Business is an independent charity that works with businesses to help inspire and guide a purpose that benefits society and respects people and planet. For more information see <https://www.blueprintforbusiness.org/>.

7. The British Private Equity & Venture Capital Association is the industry body and public policy advocate for the private equity and venture capital industry in the UK. For more information see <https://www.bvca.co.uk/about-us.html>.

We model our climate-related risk and opportunity identification, assessment, and management approach on the International Sustainability Standard Board (“ISSB”) and Task Force for Climate-related Disclosures (“TCFD”) four pillars of Governance, Strategy, Risk Management, and Metrics & Targets.

GHO’s portfolio climate strategy is integrated into our investment approach. As part of portfolio management, we work alongside each portfolio company to enhance their awareness and management of climate-related transition and physical risks. For instance, we support portfolio companies to baseline carbon emissions, set targets where appropriate, develop emissions reduction roadmaps and secure investment to ensure our portfolio meets climate-related regulatory and customer requirements. Further detail can be found in our **Climate and Environment Policy**.

6. Incorporating people and inclusion into our processes

GHO believes that that unique perspectives and experiences drive innovation, effective decision making and long-term success.

We work with our portfolio management teams to ensure they create environments that underpin these values and are united by a shared commitment to build teams that reflect the world we live in.

We engage with our portfolio companies and monitor their people and inclusion progress on a regular basis, including by collecting data on turnover, employee engagement, development spend, board gender diversity and gender pay-gap, among others.

We define diversity as inclusive of, but not limited to, race, sex, gender identity, parental status, religion, disability, age, sexual orientation, marital or civil partnership status, religious or philosophical belief or any other status protected by law.

We also recognise that good governance is fundamental to creating lasting financial value at our portfolio companies. Sound governance, in our view, starts with an effective board comprised of directors with the requisite mix of skills and experiences relevant to overseeing strategy and risk. Where appropriate, we appoint non-executive directors to both (i) ensure an element of independence and (ii) broaden the range of perspective at the boardroom table. When setting up a board of directors following the acquisition of a portfolio company, we give consideration to the competencies required for the board, its business nature as well as its strategies, and seek to select from a pool of diverse candidates.

7. Responsible investment governance

GHO's Managing Partners have ultimate oversight and accountability for our responsible investment strategy and oversight of its implementation.

GHO's Responsible Investing team is responsible for setting and communicating the responsible investment strategy and managing its day-to-day implementation across all relevant activities.

The Responsible Investing team works closely with GHO's investment professionals across the investment lifecycle to ensure there is appropriate expertise, best practice, input and challenge on material topics. The team also coordinates training on this Policy, relevant environmental, social and governance factors, best practices and accompanying sustainability tools on a regular basis to support the investment team's sustainability knowledge.

GHO's investment professionals work in collaboration with the Responsible Investing team and are responsible for ensuring adherence to and execution of this Policy with regards to the acquisition, ownership and realisation of investments. They are also responsible for supporting GHO's portfolio companies enhancing management of material sustainability risks and identify material sustainability opportunities as they arise.

GHO's Purpose Advisory Council, established in 2023, provides an external review and fresh perspectives on how GHO's investments contribute to Better, Faster, and More Accessible healthcare. The Purpose Advisory Council supports the relevant GHO deal teams in the implementation of the Policy during the ownership phase of an investment and makes recommendations for continuous improvements across the investment lifecycle.

This Policy is reviewed annually to reflect on-going efforts to improve our responsible investing approach, as well as emerging requirements from stakeholders, evolving good practices and legal, regulatory or market changes related to environmental, social and governance topics.

Appendix 1 – Offence Framework

In respect of every investment, a **qualitative description of its contribution to Better, Faster, and More Accessible healthcare** will be prepared, structured according to the **five dimensions of impact**:

- + **WHAT** – the products, services, or interventions the company delivers
- + **WHO** – the beneficiaries, including patients, healthcare systems, and other stakeholders
- + **HOW MUCH** – the scale, reach, or intensity of the company's impact
- + **CONTRIBUTION** – the company's specific role in delivering positive outcomes relative to other actors
- + **RISK** – potential negative effects or unintended consequences

The qualitative assessment will cover the **inputs, key activities, outputs, and outcomes** of the business, including:

- + **Inputs** – resources, personnel, and infrastructure deployed to generate impact
- + **Activities** – core processes, interventions, and operational steps taken by the company
- + **Key Outputs** – tangible products, services, or deliverables created
- + **Key Outcomes for Customers** – improvements in speed, efficiency, accessibility, or quality of care for customers
- + **Key Outcomes for Patients and Healthcare Systems** – measurable enhancements in health outcomes, treatment accessibility, or system-level efficiency

Ongoing measurement of the portfolio company's contribution to **Better, Faster and More Accessible healthcare and risks** will be guided by a third-party platform, which provides quantitative metrics to complement this qualitative description.

Key quantitative measures, provided by a third-party platform include:

Impact Value Creation per Year:

- + A company's net impact value creation in any given year is calculated as follows: = (societal benefits of \$ from products sold – societal costs of each \$ from product sold) x annual revenues.

Net Impact Ratio

- + Reflects the balance of positive and negative impacts, ranging theoretically up to 100% for no negative impacts, with no lower bound (typically observed from -200% to +70%).

Appendix 1 — Offence Framework (cont'd)

Net Impact Value Creation per USD Revenue

- + Captures the rate at which the company generates societal impact per unit of revenue, allowing comparison across investments and alignment with our purpose of **Better, Faster, More Accessible healthcare**.

This combined **qualitative and quantitative assessment** enables comparability across the portfolio, informs portfolio management and engagement, and provides investors with a transparent view of the **value created for customers, patients, and healthcare systems** on an annual basis.

Appendix 2 – Negative Screening List

GHO refrains from investing in companies and geographies based upon: (i) compliance with laws and regulations; (ii) standards of business practice; and (iii) GHO's values and philosophy.

i) Compliance with laws and regulations

No investment will be made in companies that are known to GHO to be engaged in tax evasion, fraud, corruption, coercion, collusion, obstruction, money laundering, financing of terrorism, organised crime, forced or harmful child labour, or any other activity which is prohibited by the laws or regulations to which the company is subject.

No investment will be made in companies or with associated individuals that are known to be subject to international sanctions, including those imposed by the US, UK, EU, UN, or other relevant authorities.

No investment will be made in companies headquartered or deriving the majority of their revenues from any nation which: (i) appears in the United Nations Security Council Consolidated Sanctions List; (ii) appears on the US Treasury Department's Office of Foreign Asset Control list of sanctioned nations; or (iii) is subject to an embargo imposed by the European Union.

ii) Standards of business practice






No investment will be made in companies that are known to GHO to have materially breached:

- + Human rights laws adopted in accordance with international standards such as the Universal Declaration of Human Rights by the United Nations; and
- + Working conditions in accordance with the European Union's Occupational Safety and Health Directives or similar regulation applicable in the jurisdictions in which the company is operating.






ii) GHO's values and philosophy

No direct investment will be made in companies which generate revenue from or directly in connection with the following activities:



“Sin industries”:

Gambling, gaming casinos or equivalent	
Tobacco or tobacco related products	
Pornography or prostitution	
Weapons and munitions for military purposes	
Distilled alcoholic beverages	

Environment-related:

Ozone depleting substances	
Unbonded asbestos fibres or radioactive materials	
Extraction, production and distribution of fossil fuels (coal, oil and gas)	
Nuclear power	
Endangered or protected wildlife or wildlife products	

Healthcare-related:

The operation of animal testing facilities	
Elective, non-essential aesthetics plastic surgery	

Appendix 3 — GHO's materiality approach

Topics we consider material to our portfolio include:

Environmental

- + Climate risk (physical and transition)
- + Pollution
- + Biodiversity

Social

- + Health and safety
- + Product safety and product quality
- + Patient safety
- + Employee and workforce management
- + Human capital development
- + Diversity and inclusion
- + Community engagement

Governance

- + Corporate governance
- + Regulatory compliance
- + Ethical practices and policies
- + Data privacy and cybersecurity

For each investment, we refine and order the list of material factors considering risks posed to a company's business as well as value creation opportunities.

Disclaimer

The specific, binding environmental, social and governance or sustainability-related goals, targets, commitments, incentives, initiatives or outcomes for funds advised by GHO for the purposes of Regulation (EU) 2019/2088 on Sustainability-related Disclosures in the financial services sector ("SFDR") are those stated in the relevant Fund documentation and regulatory disclosures made pursuant to the SFDR. Investors should refer to these materials for further information on how environmental, social and governance activities are incorporated into investment strategies, screening, decision making, stewardship and engagement.

Calculation methodologies and data collection practices are evolving, and other asset managers may be implementing different frameworks, methodologies, and tracking tools to those which we propose in our Offence and Defence strategies, including in relation to social and environmental risks and opportunities. The selection of such different but acceptable measurement techniques can result in materially different measurements.

Although GHO views the consideration of environmental, social and governance matters to be an opportunity to enhance or protect the performance of its investments over the long-term, GHO cannot guarantee that its responsible investment program, which depends in part on qualitative judgments, will positively impact the performance of any individual investment or any fund as a whole. Additionally, there can be no assurance that GHO or its investments will be able to achieve any environmental, social and governance- or sustainability-related objectives, that their actions will not result in outcomes that could be viewed as having a negative sustainability effect, or that any historical trends will continue to occur. Actual results may be significantly different from the forward-looking statements herein.

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