Omnes Capital
Responsible Investment Policy

This document presents Omnes Capital's policy on responsible investment. The policy describes the governance, policies and processes regarding the activities of the company as of July 2026.

1. Introduction and scope

1.1 Omnes’ Approach to Sustainability

Omnes Capital SAS ("Omnes Capital", “Omnes”, or "the Firm") is a European private equity firm dedicated to the three interconnected global trends – electrification, security and sovereignty, and advanced technological innovation. Omnes acts as responsible stewards and believes in value creation for all – our investors, our entrepreneurs, people and the planet. This is done through four investment strategies: Energy Transition, Digital Infrastructure, Venture Capital Growth, and Co-investment.

At Omnes, our priority is to create value and deliver strong financial results for our clients. As an early signatory of the UN-supported Principles for Responsible Investment (PRI) since 2009, the Firm recognises that ESG factors can affect the long-term performance of investments and that integrating sustainability considerations into investment decisions supports both risk management and long-term value creation for investors.

Our approach to sustainability rests on the three pillars of value creation, value protection, and trust.

- **Create Value** by investing in high-growth entrepreneurial companies that address environmental and social challenges.
- **Protect Value** by integrating ESG into our investment cycle and helping portfolio companies implement sound management of their sustainability-related impacts, risks, and opportunities.
- **Earn and Maintain Trust** of our clients and investee entrepreneurs by investing in internal ESG and sustainability expertise and continuously improving sustainability performance at our management company.

This Responsible Investment Policy (the "Policy") sets out the framework through which Omnes Capital integrates environmental, social and governance ("ESG") considerations into its investment activities. The Policy concerns all investment strategies and funds managed by Omnes Capital.

1.2 Sustainability Governance within Omnes

Responsibility for ESG performance of Omnes Capital as a GP rests with the Chief Executive Officer. At the management level, the Managing Partner serves as Sponsor of Omnes ESG and Sustainability, and the Partner-level Deputy CFO holds direct responsibility for ESG integration into investment processes.

Our ESG Committee

The ESG Committee is composed of management representatives from each of the Firm’s investment strategy and operational functions, including one member of Omnes’ Executive Committee. Organised and led by the ESG & Sustainability team, the Committee meets every quarter to provide oversight of the integration of ESG across investment activities and promote continuous improvement of responsible investment practices at both portfolio and management company level.

Our ESG & Sustainability team

The ESG & Sustainability team is composed of dedicated specialists responsible for integrating sustainability and responsible investment principles across Omnes’ investment processes and firm operations, working in collaboration with other Omnes teams. The team leverages its expertise in ESG and sustainable finance to advise the Executive Committee, Management Committee, and ESG Committee; educate and guide investment teams and the middle office; support portfolio companies in enhancing their sustainability capabilities and performance; and maintain transparent non-financial reporting to investors across Omnes’ funds.

Our Investment Committees

A separate Investment Committee operates for each of the Firm's investment strategies. Each Investment Committee ensures that the mandatory ESG due diligence process is applied effectively and that investment decisions align with the relevant fund's ESG commitments and this Policy. The ESG & Sustainability team provides guidance in applying ESG due diligence across the decision-making process. As an independent function from the Investment Committee, the team retains the ability to recommend that an investment not proceed where it does not comply with Omnes' standards.

1.3 Internal Regulatory References

This Policy is suggested to be read together with our other policies and public disclosures:

- Policy on the integration of sustainability risks
- Exclusion Policy
- Remuneration Policy in line with SFDR Article 5
- Sustainable Finance Disclosures under SFDR
- Legal Mentions

2. ESG Integration in the investment process

The sections below set out the general framework governing Omnes' integration of ESG considerations, notably ESG risks and principal adverse impacts, across investment lifecycles. This framework is implemented by the ESG & Sustainability team in collaboration with investment teams and portfolio companies. However, this framework may not apply in full in certain cases, including:

- Investment vehicles used primarily for structuring purposes, where ESG governance is exercised at the fund level rather than the vehicle level.
- Older vintage funds which currently benefit from the support of the ESG & Sustainability team on an as-needed basis pending formalisation of processes, or which are in wind-down phase where the application of the full framework would yield limited added value.

2.1 Pre-investment

2.1.1 Exclusion policy

Omnes Capital applies an Exclusion Policy[1] as the first filter in its investment process, developed in line with applicable regulatory and international frameworks. Certain funds maintain supplementary investment restrictions reflecting their specific ESG commitments.

For new investments, investment teams conduct systematic screening against both the Exclusion Policy and any applicable fund-level restrictions to identify and avoid opportunities falling within excluded sectors and/or activities prior to further assessment. Compliance is verified by the Compliance and Risk team and reviewed by the Investment Committee before investment decisions are made.

Please refer to the Omnes Capital Exclusion Policy for the details on the excluded sectors and activities.

2.1.2 Climate and Biodiversity Risk Assessment

As part of its pre-investment process for infrastructure assets, the investment teams, with the support of the ESG & Sustainability team, conduct climate and biodiversity risk assessments to identify and evaluate material risks associated with climate change and biodiversity loss.

[1] omnes-exclusion-policy-2026.pdf

2.1.3 ESG due diligence

For new investments where Omnes Capital holds a majority stake, investment teams conduct an ESG analysis to identify material risks and opportunities associated with a prospective investment, as well as potential levers for value creation during the holding period. This analysis is conducted using proprietary ESG analysis grids developed jointly by the investment teams and the ESG & Sustainability team, tailored to each investment strategy.

The ESG analysis grids cover a range of criteria across environmental (e.g. climate strategy, energy, biodiversity, waste and water use), social (e.g. human capital management, health and safety, human rights), and governance (e.g. corporate governance, business ethics, transparency) dimensions, with minor variations across strategies to reflect their respective characteristics. The grids take into consideration the sector and maturity level of the prospective investment.

The analysis results in an overall risk profile for the investment, and is, where relevant, accompanied by short- to medium-term corrective action plans. The results of the analysis are subsequently monitored on a periodic basis through annual ESG questionnaires and ongoing engagement with portfolio companies throughout the holding period.

For co-investment opportunities where Omnes Capital does not hold a majority stake, investment teams conduct a dual assessment covering both the lead sponsor and the target company. The sponsor assessment draws on GP-specific ESG criteria where information is available.

2.1.4 Investment Decision

The results of the screening against the Exclusion Policy, the ESG due diligence — including the climate and biodiversity risk assessment and the ESG analysis output — are systematically presented in the investment memorandum submitted to the Investment Committee. Where material ESG risks are identified during due diligence, these may result in additional conditions being attached to the investment, including post-investment ESG action plans or ESG-related clauses in the shareholder agreement.

2.2 Holding period

2.2.1 ESG monitoring and KPI tracking

During the holding period, Omnes ESG & Sustainability team monitors the ESG performance of portfolio companies on an ongoing basis through an annual ESG reporting campaign, in which portfolio companies complete ESG questionnaires covering key performance indicators relevant to their sector and fund mandate. Data is collected and managed via a dedicated SaaS platform and other Excel-based tools and reviewed by the ESG & Sustainability team for quality and consistency. Omnes collects and reports ESG data in alignment with recognized industry frameworks, including but not limited to EDCI, France Invest, and Invest Europe guidance[2].

The ESG & Sustainability team conducts regular reviews of portfolio company ESG performance in coordination with investment teams, drawing on the data collected through the reporting campaign to identify priority areas for improvement. Where relevant, action plans are developed to support portfolio companies in addressing identified gaps and are updated on a regular basis to reflect the evolution of each company's broader strategy and operational context. Investment teams maintain ongoing contact with portfolio company management, which further supports continued monitoring and engagement on ESG matters throughout the holding period.

2.2.2 Engagement and Stewardship

Omnes Capital engages with its portfolio companies throughout the investment cycle as part of its responsible investment approach. For companies in which Omnes Capital holds majority stakes, we actively support them in embedding sustainability by leveraging our expertise, networks, and deploying toolkits and training. The investment teams, with support from the

[2] This practice is generally not applicable to minority investments, where Omnes has limited influence over portfolio company ESG matters and restricted access to ESG-related information and reporting.

ESG & Sustainability team, engage directly with company management and operational teams to initiate changes where required to achieve the pre-defined action plans.

Where Omnes Capital invests as a minority shareholder or through a joint venture, it recognises that its ability to influence the implementation of its ESG framework is inherently limited. To mitigate this, Omnes Capital ensures that the target company is aligned with the majority of its ESG commitments during the investment process. Where possible, Omnes Capital also coordinates with co-investors to strengthen collective leverage and promote sound sustainability practices in situations where its individual influence may be more constrained.

Wherever applicable, Omnes Capital exercises voting rights at general meetings of portfolio companies, guided by financial, strategic and sustainability considerations — including alignment with ESG improvement plans defined at the time of investment.

2.3 Exit

At exit, Omnes Capital documents the ESG progress achieved by the portfolio company over the holding period in the divestment memorandum for majority investments, capturing the ESG commitments followed by the company and the trajectory of improvement relative to the baseline established at entry. This information may be made available to prospective buyers in accordance with their requirements. Where appropriate, ESG information is provided upon request by prospective buyers.

2.4 Internal Control

The internal controls on ESG processes are set up as follows:

First-Level Control:

The investment teams across all business units are responsible for ensuring the proper implementation of ESG due diligence throughout the investment process. This includes identifying ESG-related risks and opportunities during the assessment phase and ensuring that these findings are duly communicated and factored into the decision-making process.

The investment teams carry out this responsibility with the support of the ESG & Sustainability team, which provides methodological guidance, tools, and expertise. The ESG & Sustainability team further ensures that ESG criteria are monitored on a regular basis throughout the investment cycle, leveraging dedicated tools such as the ESG monitoring questionnaire and the ESG scoring grids, which are reviewed and updated periodically.

Together, the investment teams and the ESG & Sustainability team ensure that portfolio companies remain on track with both Omnes Capital's overarching ESG commitments and any fund-specific sustainability objectives.

Second-Level Control:

The Compliance and Risk team conducts two distinct annual post-investment controls on ESG matters:

- ESG Framework Review — This control assesses the adequacy and accuracy of Omnes Capital's ESG framework and governance arrangements. It verifies that the requisite policies are in place and properly implemented, that Omnes Capital's external communications are complete and accurate with respect to mandatory disclosure requirements, and that all regulatory and mandatory ESG reports have been duly produced.
- Operational ESG Control — This control examines how ESG processes are conducted and monitored at the portfolio company level. It assesses whether ESG commitments are being effectively followed through in practice and whether each fund complies with the specific commitments made to its Limited Partners (LPs).

Third-Level Control:

An audit is conducted on the ESG processes of Omnes Capital on a triennial basis, providing an independent and in-depth review of the overall effectiveness of the responsible investment framework.

3. ESG Training and Capacity Building

Omnes Capital recognises that effective ESG integration depends on the knowledge and engagement of its teams, portfolio companies, and broader stakeholders.

Internally, the Firm delivers mandatory ESG training to all employees, covering key ESG concepts, applicable regulatory frameworks, and Omnes' internal processes and tools. Training sessions are conducted periodically and are complemented by recorded materials to ensure accessibility across the organisation. The ESG & Sustainability team also provides ongoing, tailored guidance to investment teams throughout the investment cycle to support the practical application of ESG considerations in their daily activities.

4. Reporting and transparency

Omnes Capital is committed to transparent and regular reporting on ESG matters. As a signatory of the UN PRI, Omnes Capital reports annually on its responsible investment practices and is committed to continuous improvement in line with the UN PRI assessment framework.

At the entity level, the Firm publishes its Principal Adverse Impact statement and other sustainability-related disclosures on its website in accordance with applicable regulatory frameworks, including the EU Sustainable Finance Disclosure Regulation and the Article 29 of the French Energy and Climate Law. Omnes Capital also publishes an annual Sustainability Report setting out its sustainability commitments, governance, strategy, and performance, complemented by its Commitments page.

At the fund level, sustainability information is made available to investors through annual reports accessible via the investor portal, as well as through ongoing dialogue with limited partners.

5. Industry Engagement and Adherence to International Standards

In conducting its activities, Omnes Capital aligns with internationally recognised principles and standards for responsible business conduct, including the UN Global Compact Principles, the OECD Guidelines for Multinational Enterprises, and the ILO Declaration on Fundamental Principles and Rights at Work. The Firm is also involved in a number of sustainability-related industry initiatives and actively participates in industry organisations to promote and exchange best practices in responsible investment. Further information on the Firm's memberships and commitments can be found on the Commitments page of the Omnes Capital website.

6. Policy Review and Update

This Policy is reviewed annually by the ESG & Sustainability team to reflect regulatory developments, evolving market best practice, and changes to Omnes Capital's investment activities.