Halberd Capital Partners

Responsible Investing & ESG Framework - 2026

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Approved by the Operations Committee 2026-01-21.
Reviewed by Compliance and the General Counsel.
Annual update cycle.

1. Purpose

Halberd Capital Partners believes that systematic attention to environmental, social, and governance considerations is consistent with our duty to deliver risk-adjusted returns to our limited partners and to act as responsible owners of the businesses in which we invest. This framework codifies how we apply that belief in practice.

We are a signatory to the United Nations Principles for Responsible Investment and a member of the relevant national and international industry bodies. We report annually under the PRI framework and publish a stand-alone Stewardship Report.

2. Scope

This framework applies to all investment activity managed by Halberd, across funds, vintages, and co-investment arrangements. It applies through the investment lifecycle: sourcing, diligence, ownership, and exit. It does not modify our investment mandate or our fiduciary obligations to limited partners.

3. Exclusions

We do not knowingly invest in businesses whose principal activity is: the manufacture or distribution of controversial weapons; the production of tobacco products; the operation of businesses substantively engaged in adult entertainment; thermal coal extraction; or the extraction of unconventional oil and gas resources.

Targeted exclusions are reviewed annually and may be tightened in response to evolving investor expectations and regulatory developments.

4. Diligence Process

Every prospective investment is subject to a structured ESG diligence overlay. The depth of diligence is calibrated to the materiality of the most relevant ESG risks for the sector, geography, and business model. We work with specialist ESG advisors on diligence for complex sectors and where ESG is a material part of the investment thesis or a material risk.

Diligence outputs are recorded in the IC pack ESG section and are referenced in the post-IC 100-day plan where applicable.

5. Material Issue Mapping

We use the Sustainability Accounting Standards Board (SASB) industry-specific materiality maps as a starting reference for identifying which issues are most likely to be financially material for a given business. We supplement SASB with sector-specific judgment and with our portfolio operating teams' direct experience.

We do not apply a single ESG score; scoring methodologies in our experience tend to obscure more than they reveal at the company level.

6. Ownership

During ownership, ESG performance is monitored as part of the standard portfolio operating review. Each portfolio company has an annual ESG review with the deal team and the ESG Stewardship lead. Where material issues arise, the Operating Partner with the relevant remit (Operations or Commercial) is engaged.

We engage with portfolio company management on health and safety performance, workforce engagement and turnover, customer outcomes, environmental compliance, supply chain resilience, and governance practices. We support portfolio companies in upgrading their ESG data systems where necessary.

7. Climate & Decarbonization

Halberd reports its scope-1, scope-2, and scope-3 (category 15: investments) emissions annually via our Stewardship Report, in line with the PCAF methodology. Portfolio company carbon footprints are estimated where primary data is unavailable and refined as primary data becomes available.

We do not, at present, set a fund-level decarbonization target. We expect this position to evolve and are tracking PRI and IIGCC guidance for sponsor-backed managers.

8. Workforce & Human Capital

We expect our portfolio companies to maintain workforce policies consistent with applicable law and with industry leading practice in their sectors. We review workforce health and safety, engagement and retention metrics, leadership development, and succession planning at the annual ESG review.

We support portfolio company reporting on workforce diversity where consistent with local law and where the data is reliable. We do not impose firm-level diversity targets on portfolio companies.

9. Reporting & Engagement

We report annually to our limited partners on the firm's ESG approach via the Stewardship Report, the LPAC engagement, and quarterly LP communications. We engage bilaterally with LPs on specific ESG topics where requested.

Where a limited partner has specific reporting requirements (notably under SFDR and equivalent regimes), we provide the requested data within commercially reasonable timelines.

10. Governance of This Framework

This framework is owned by the Head of Investor Relations & ESG and overseen by the Operations Committee. Material updates are reviewed by the LPAC. Implementation issues are raised and resolved at the monthly Operations Committee.

Appendix A - Reporting Standards Tracked

PRI - Principles for Responsible Investment. PCAF - Partnership for Carbon Accounting Financials. SASB - Sustainability Accounting Standards Board. TCFD - Task Force on Climate-related Financial Disclosures. SFDR - Sustainable Finance Disclosure Regulation. IIGCC - Institutional Investors Group on Climate Change.

Appendix B - Issue-Specific Guidance Notes (List)

- Health & Safety in Industrial Portfolio Companies (G-HS-001).
- Workforce Engagement in Service Portfolio Companies (G-WE-002).
- Cyber Security Across Portfolio (G-CY-003).
- Sourcing Modern Slavery Diligence (G-MS-004).
- Customer Outcomes in Regulated Markets (G-CO-005).
- Environmental Compliance in Coatings & Chemicals (G-EC-006).
- Animal Welfare in Animal-Health-Related Portfolio (G-AW-007) - note: relevant to vet diagnostics, food adjacencies. We do not currently set firm-wide animal welfare standards applicable across protein supply chains; that is a 2026 review item.