

CapMan’s Human Rights Commitment

Contents

- 1. Our Commitment..... 2
- 2. Scope 2
- 3. Our responsibility in practice 2
- 4. Expectations for our employees and suppliers 3
- 5. Raising concerns 3
- 6. Governance and accountability 3
- 7. Continuous improvement..... 3

1. Our Commitment

CapMan is committed to respecting and promoting all internationally recognised human rights as set out in the International Bill of Human Rights and the International Labour Organization's Core Conventions. Our responsibility to respect and promote human rights follows the principles of the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises.

CapMan recognises that our investment decisions and business activities can impact people directly and indirectly. Respect for human rights is therefore integral to how we invest, manage assets and investments, and conduct our own operations.

2. Scope

This commitment applies to CapMan Plc, all employees, and to all of our real estate assets, infrastructure assets, natural capital assets, infrastructure and private equity held portfolio companies and other investments (assets and investments). Further, the commitment applies to companies and/or individuals which supply goods, materials or services (Suppliers) to CapMan as well as personnel employed by or engaged to provide services to such Suppliers.

3. Our responsibility in practice

CapMan seeks to avoid causing or contributing to adverse human rights impacts within the scope of this commitment.

To do so, we seek to:

- prioritise salient human rights risks based on severity and likelihood of potential harm;
- conduct human rights due diligence (HRDD) as part of our investment and asset management processes to identify, prevent, and mitigate risks to people;
- integrate findings into decision-making, deal documentation, and post-acquisition value creation plans;
- set out expectations on Suppliers through CapMan's Supplier Code of Conduct;
- monitor and report on our progress and on how we address identified impacts;
- enable and cooperate in remediation where CapMan has caused harm through our operations.

4. Expectations for our employees and suppliers

CapMan expects our employees, assets and investments, Suppliers, as well as personnel employed by or engaged to provide services to such Suppliers to respect human rights in their own operations and value chains. We encourage them to establish due diligence processes, ensure fair working conditions, understand salient human rights risks and provide whistleblowing channels accessible to workers and communities. These expectations are reflected in our Code of Conduct, Supplier Code of Conduct, Sustainable Investment Policy and Restriction List.

5. Raising concerns

CapMan supports the right of individuals and communities to raise concerns or complaints related to our activities or those of our assets and investments. We maintain internal and external whistleblowing channels that allow for legitimate, transparent, and timely resolution.

6. Governance and accountability

Day-to-day implementation is led by our Sustainability team in collaboration with Investment and CapMan Platform teams. Progress is reviewed annually and disclosed in our sustainability reporting.

7. Continuous improvement

CapMan recognises that human rights due diligence is an ongoing process. We will continue to review and strengthen our approach in line with evolving international standards, regulatory developments, and stakeholder expectations. The contents of this commitment are subject to annual review.