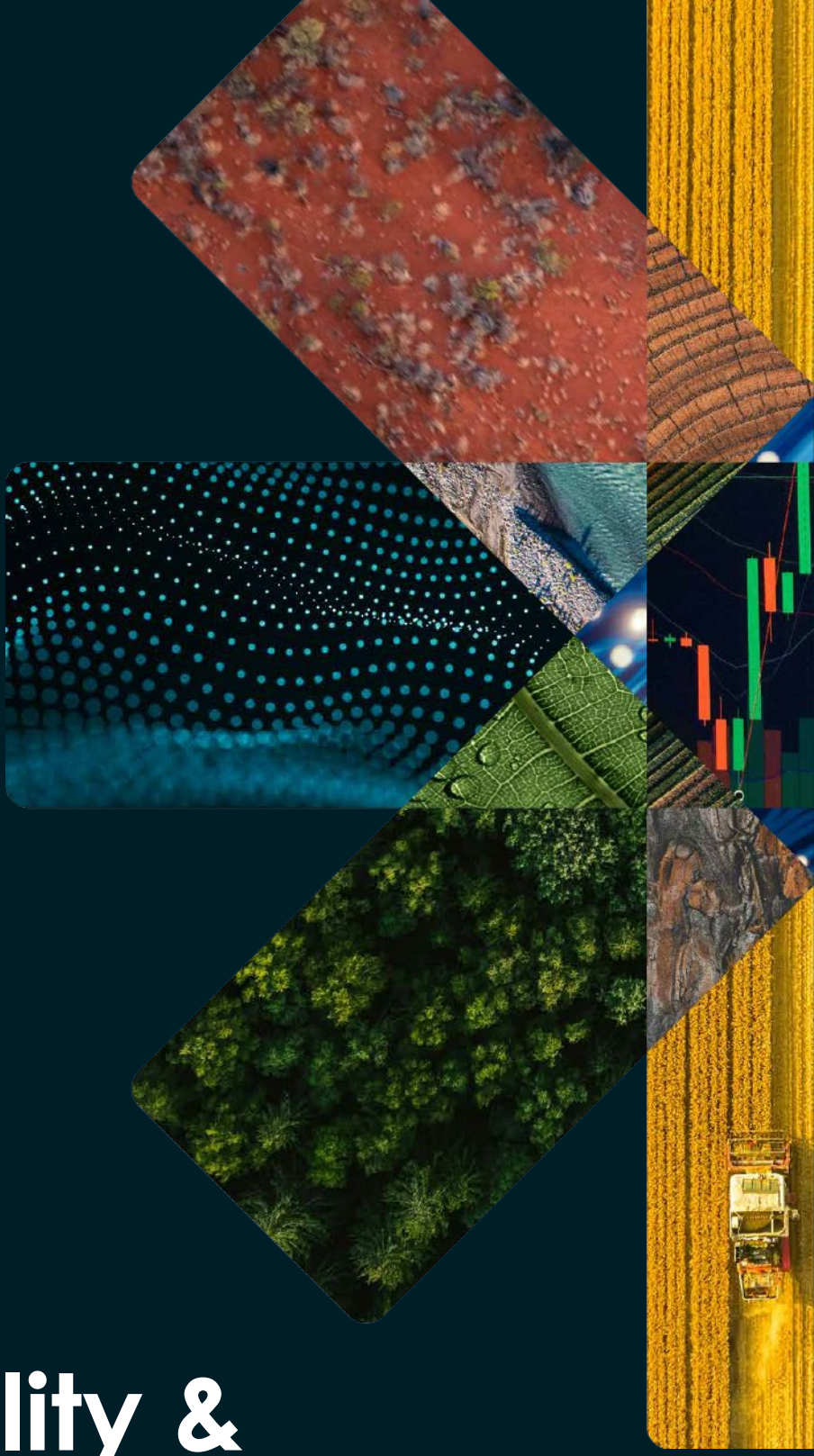
NEWFORESTS

*Natural Capital Investing. Advanced



Sustainability & Impact Policy

NF-P31

NEWFORESTS

Introduction

New Forests is a global investment manager of nature-based real assets and natural-capital strategies. New Forests' vision is to see investment in land use and forestry as central to the transition to a sustainable future.

To achieve its vision, New Forests is committed to being a leader in sustainability and impact (Figure 1) by:

- Applying a sustainable investment[1] approach across its portfolio that supports integrated risk management and long-term value creation.
- Implementing corporate sustainability[2] throughout its business operations.
- Delivering impact[3] through its sustainable investment and corporate sustainability programs to deliver positive real-world positive outcomes.

This Sustainability & Impact Policy (the **Policy**), which applies to the New Forests Group (i.e., all related entities, operations, and activities), summarises the company's commitments to sustainability and impact.[4] New Forests has a fiduciary duty to its clients; therefore, this Sustainability & Impact Policy and its implementation must align with the investment objectives and any associated requirements defined for New Forests' investment products.

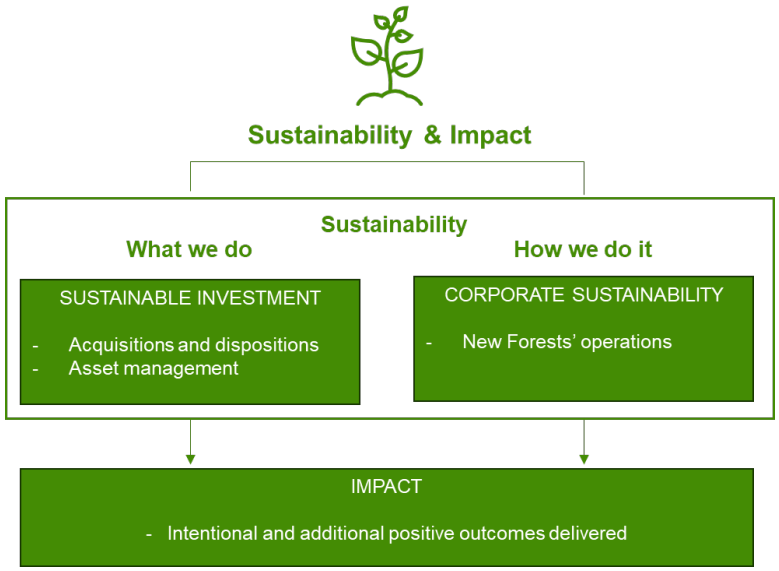
[1] New Forests defines sustainable investment as the "strategy and practice to incorporate environmental, social and governance (ESG) factors in investment and asset management processes and decisions" (Principles for Responsible Investment). For the purposes of this Policy, sustainable investment includes acquisitions, asset management (or ownership), and dispositions processes.

[2] New Forests defines corporate sustainability as "an approach to conducting business that creates sustainable, long-term stakeholder value in financial, environmental, social, and ethical terms" (adapted from the United Nations Global Compact).

[3] New Forests defines impact as investments made with the intention to generate positive, measurable social and/or environmental impact alongside a financial return (based on definitions form the Global Impact Investment Network).

[4] New Forests first developed a Responsible Investment Policy in 2015, which was revised in 2021. This Sustainability and Impact Policy represents the third iteration of the Policy. New Forests does not have other, standalone investment-related policies.

Figure 1 - New Forests' sustainability and impact approach



Sustainability and Impact Commitments[5]

At the Group level, New Forests commits to:

1. Establish, implement, and maintain the Sustainability & Impact Management System (**SIMS**, page 6) aligned with the International Organisation for Standardisation 14001:2015 *Environmental management systems – Requirements with guidance for use* (**ISO 14001:2015**).
2. Define, document, and communicate sustainability and impact–related responsibilities for all personnel under New Forests' control including employees, contractors, suppliers, third-party property managers, and portfolio companies.
3. Meet sustainability and impact compliance obligations, including legal requirements.
4. Undertake engagement and consultation with stakeholders on the implementation and continual improvement of the SIMS.
5. Provide personnel with information, training, and support to understand their role in achieving sustainability and impact objectives and targets, meeting their responsibilities, and fulfilling compliance obligations.

[5] The commitments defined in this Policy are informed by New Forests' materiality assessment, participation in sustainability and impact investment initiatives, and dedication to demonstrate sustainability and impact leadership.

6. Monitor compliance with the SIMS and performance against sustainability and impact objectives and targets.
7. Report to stakeholders on sustainability and impact compliance and performance against related objectives and targets.

1.1.1 Sustainability and Impact Investment Commitments

To support sustainability and impact in relation to our investment process and assets under management, New Forests commits to:

8. Integrate sustainable and impact investment into investment processes aligned with the company's fiduciary duty to support improved risk management and long-term value creation.
9. Align with best practice sustainable and impact investment standards, including those in Appendix A.[6]
10. Seek to continually improve the effectiveness of the company's sustainable and impact investment practices through established review and performance evaluation processes aligned with the Plan, Do, Check, Act process of ISO 14001:2015.
11. Assess assets' ability to meet New Forests' sustainability and impact requirements during due diligence, including compliance with New Forests' Excluded Activities.
12. Establish, implement, and maintain processes and procedures for assets under management to:[7]
    a. Protect and enhance the environment in which New Forests' assets under management operate, including the climate, nature and biodiversity, and water and marine resources by:
        i. Aligning to a net zero by 2050 pathway.[8]
        ii. Demonstrating contributions to Nature Positive by avoiding nature loss, having zero tolerance for deforestation or conversion of primary or old growth forests[9] or High Conservation Value areas, and promoting activities that restore and regenerate ecosystems through 2050 and promote and enhance biodiversity.
        iii. Promoting animal welfare, including antibiotic stewardship.
        iv. Minimising pollution[10] and waste.

[6] As determined by New Forests. The company reserves the right to update what standards are considered best practice as sustainable and impact investment evolves.

[7] Note that the commitments listed under point 12 may not be relevant for all assets (for example, animal welfare is only relevant to assets with livestock). New Forests will engage with assets to support compliance with all relevant sustainability and impact commitments within the time frames specified in the relevant investment vehicle SIMS Declaration Document, noting that delays may occur where assets are less advanced.

[8] As defined in New Forests' Net Zero Asset Managers Initiative interim net zero targets.

[9] As defined by the Food and Agriculture Organisation of the United Nations.

[10] Refers to the emission or discharge of pollutants into the environment.

v. Reducing natural resource[11] and chemical use.

b. Support the communities in which New Forests' assets operate.

c. Uphold human and labour rights, including the rights of Indigenous Peoples (Appendix B).

d. Support a culture of workplace health and safety.

e. Ensure supply chain traceability and accountability.

f. Contribute to the circular bioeconomy.

g. Uphold robust governance practices on topics including anti-bribery, anti-corruption, conflicts of interest, and political engagement.

1.1.2 Corporate Sustainability and Impact Commitments

To support sustainability and impact in relation to our corporate operations, New Forests commits to:

13. Integrate sustainability, and where possible, impact, into its corporate operations.
14. Establish, implement, and maintain processes and procedures for corporate operations to:
    a. Promote equal employment opportunities that foster inclusion and fairness; embrace diversity; uphold employee health, safety, and wellness; and support employee training and development.
    b. Reduce the environmental impact of corporate operations, including maintaining climate neutrality and striving to achieve net zero by 2050.
    c. Uphold fundamental human rights, including the rights of Indigenous Peoples and the right to a clean, healthy, and sustainable environment (Appendix B).
    d. Create a positive impact on the environment, New Forests' employees, and the communities connected with the company's global offices.
    e. Aim to partner with suppliers and contractors that align with the company's mission and vision and this Policy.

2. Sustainability and Impact Approach

2.1 Governance

New Forests has robust sustainability and impact governance structures and processes in place to ensure New Forests delivers on its sustainability and impact commitments. For example, sustainability and impact is integrated into New Forests' strategic goals, including in employee performance reviews, and linked to employee remuneration.

[11] Refers to nature resource inputs (e.g., water and raw materials). Does not refer to natural resource outputs delivered under asset management (e.g., forest and agriculture products).

The governing Board of New Forests Pty Ltd has ultimate responsibility for sustainability and impact, while New Forests is responsible:

- As manager, for ensuring sustainability and impact is integrated throughout investment and asset management activities.
- For delivering on its corporate sustainability commitments.

2.1.1 Risk Management

New Forests operates a Risk Management Framework (**RMF**) that encompasses the identification and assessment of sustainability and impact risks and opportunities as part of its broader risk remit. The RMF applies to all New Forests assets under management and its corporate operations. To progress the commitments outlined in this Policy, sustainability and impact risks are considered during asset acquisitions, management, and dispositions, as well as corporate processes and decision making.

To support the RMF, New Forests has a suite of policies, including but not limited to those related to Anti-Bribery and Corruption, Managing Conflicts of Interest, and Whistleblowing, which ensure credible practices across assets under management and its corporate operations.

2.1.2 Management System

To ensure the commitments set out in this Policy are met, New Forests uses a fit for purpose management system. New Forests' SIMS is aligned with ISO 14001:2015 and supported by documented processes that comply with relevant legislation, regulation, policies, standards, and guidelines. The SIMS ensures that sustainability and impact are integrated across New Forests' operations; for example, requiring that:

- A SIMS Declaration Document is developed for every investment vehicle and establishes the vehicle's sustainability and impact requirements.
- Sustainability and impact due diligence is completed for every acquisition and incorporated into the acquisition processes and recommendations and summarised in the Investment Committee paper.
- During ownership, consideration of sustainability and impact risks and opportunities are factored into all management processes and decision making. Sustainability and impact performance of New Forests' assets, including compliance with the commitments defined in this Policy, is measured and monitored through regular data collection and material sustainability and impact matters are reported to stakeholders including the Manager Board and investors.
- Sustainability and impact considerations are integrated into dispositions processes, including communicating the value of sustainability and impact with potential buyers.
- Corporate operations comply with the sustainability and impact commitments defined in this Policy.

2.2 Engagement[12]

New Forests can only achieve its mission by working together with a growing ecosystem of stakeholders. The company engages with stakeholders through a variety of mechanisms, depending on what is best suited for the engagement.

To comply with the commitments of this Sustainability & Impact Policy, New Forests engages with those directly involved in its assets under management and corporate operations, including third-party property managers and portfolio companies, as well as other stakeholders within relevant supply chains.

New Forests also participates in a variety of membership groups and collaborative initiatives and engages with policy makers on relevant topics.

3. Monitoring and Reporting

Progress against the commitments outlined in this Policy is monitored through regular collection of data and analysis at the corporate and asset levels, as well as New Forests' SIMS Management Review and internal audits.

New Forests is committed to regular reporting to stakeholders; this includes private reporting (i.e., to clients) and public reporting (i.e., the company's Sustainability & Impact Report). New Forests also completes reporting as required by membership groups.

4. Continual Improvement

New Forests is committed to continual improvement of its sustainability and impact approach. This Sustainability & Impact Policy will be reviewed as part of New Forests' SIMS Management Review at least biennially or whenever a significant change in the business or operating environment occurs. Stakeholder feedback received will be considered as part of this Review.

This Policy has been approved by New Forests' Chief Executive Officer and the Chair of New Forests Pty Ltd Board of Directors.



Mark Rogers

Chief Executive Officer, New Forests

3 June 2025



David Brand

Chair of New Forests Pty Ltd Board of Directors

3 June 2025

[12] New Forests notes that engagement is frequently referred to as "stewardship." As a manager of real assets, engagement is more appropriate to the scope of our activities.

Appendix A

- OECD Guidance for Multinational Enterprises, including its guidance for Responsible Business Conduct for Institutional Investors.
- United Nations (**UN**) Guiding Principles on Business and Human Rights.
- UN Global Compact.
- International Labour Organization and its Core Standards, as applicable and where locally ratified.
- Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries, and Forests.
- UN Principles for Responsible Investment.

Appendix B

New Forests commits to uphold human rights, including alignment with the following frameworks:

- International Bill of Human Rights (comprising the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social, and Cultural Rights).
- International Labour Organisation through the core conventions and the Declaration on Fundamental Principles and Rights at Work.
- United Nations Declaration on the Rights of Indigenous Peoples.
- United Nations General Assembly Resolution (A/RES/76/300).

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