

# Diversity, Equity, and Inclusion

"Managing Assets, Embracing Diversity"

# 1. Purpose

AltamarCAM (the "Firm") is committed to cultivating a workplace environment characterized by mutual respect, inclusivity, diversity, teamwork, effective communication, employee well-being and a healthy worklife balance. We aim to foster diversity at every level of our organization, ensuring that all our employees have opportunities to thrive in an environment that is meritocratic, objective, and inclusive; fostering a culture based on trust and emphasizing the values of safety, openness, and hospitality.

We place a fundamental emphasis on cultural diversity and team integration, and the multinational nature of the Firm allows AltamarCAM to benefit from the synergistic collaboration of fully-integrated international teams.

We also prioritize the professional growth of our employees, recognizing that their development within the Firm is determined solely by their contribution, performance and demonstrated abilities.

For the Firm diversity means respecting the differences among our employees, customers, partners, and communities. We are committed to equity, ensuring fair and equal access to opportunities and the creation of a safe and inclusive space where everyone can contribute and be recognized for their impact on the Firm. Inclusion is about creating a welcoming and supportive environment where everyone feels valued, heard, and empowered to contribute. Our comprehensive Diversity, Equity, and Inclusion Policy (hereinafter the "DEI Policy" or the "Policy") serves as a guide to fostering an inclusive and diverse workplace. Additionally, AltamarCAM is aligned with internationally recognized frameworks and standards, including the United Nations' Agenda 2030. Within this Agenda, AltamarCAM has identified the Sustainable Development Goal (SDG) No. 5, which focuses on Gender Equality, as a strategic objective for the Firm. We do this because we believe it is the fair way to deal with our team, but we are also convinced that this leads to better business outcome.

The principles described in this DEI Policy are already seamlessly integrated into all aspects of the organization's operations, encompassing hiring, promotion, retention, training, and decision-making processes.

# 2. Scope, approval, and revision of the Policy

The DEI Policy sets out the principles and requirements of how AltamarCAM will enhance diversity, equity, and inclusion throughout the organization, and is applicable to AltamarCAM Partners and all its subsidiaries. Therefore, all employees are under an obligation to familiarize themselves with, uphold, and actively contribute to the implementation of this Policy.

This Policy is framed within the group's sustainability policies, being complementary to the Environmental, Social, and Governance (ESG) Policy, as well as any other current applicable policies in talent matters (such as the Equality Plan, governed by the Directive 2006/54/EC, on the implementation of the principle of



equal opportunities and equal treatment of men and women in matters of employment and occupation, as well as all other relevant regulations applicable to AltamarCAM).

The oversight of DEI and human rights matters in our investments is not within the scope of this Policy. Instead, it is governed by both the ESG Policy, which addresses the integration of DEI criteria in investments and engagement with General Partners, and the Exclusion Policy, which pertains to the allocation of capital in assets that comply with legal requirements and that are aligned with international conventions concerning human rights (such as the UN Conventions and Declarations on Human Rights).

The DEI Policy will undergo regular reviews and necessary revisions to ensure its alignment with evolving circumstances, laws, and best practices. Any relevant amendments to the DEI Policy must be approved by the ESG Committee and will be later ratified by the Board of Directors of AltamarCAM Partners, S.L. Nevertheless, it is important to note that any changes that impact employees will also undergo validation by the Talent team and the Talent Management Commission (TMC).

#### 3. Responsibilities

The DEI Policy will be framed within the group's sustainability governance model, with the senior management of AltamarCAM having the ultimate responsibility for implementing an appropriate ESG approach, including diversity, equity, and inclusion matters. The primary responsibilities related to the implementation and advancement of diversity, equity, and inclusion are outlined as follows:

#### a. Board of Directors

The Board of Directors is ultimately responsible for all ESG matters, including the ratification of the approval, updating, and supervision of corporate DEI policies.

# b. ESG Committee and ESG Team:

The ESG Committee is entrusted with integrating diversity, equality, and inclusion considerations into the broader ESG framework, conducting periodic assessments to measure the current status of these matters and the effectiveness of related initiatives, working closely with the ESG Team to implement DEI-related actions, provide strategic advice on these matters and collaborate with other committees and stakeholders to ensure alignment between diversity efforts and broader organizational goals.

The ESG Team has among its responsibilities the collection and analysis of data pertaining to diversity practices, as well as the formulation of DEI-related policies and measures. The team works closely with the ESG Committee and the Talent Team to ensure that objectives related to diversity, inclusion, and equality are successfully achieved. In addition, the ESG Team will actively engage with external stakeholders to identify their needs and provide support for DEI initiatives.

# c. Talent Management Commission and Talent Team:

It is also the TMC's responsibility to foster a culture of diversity, equity, and inclusion, as the custodian of AltamarCAM's corporate mission regarding employees. This includes deciding on specific policies, strategies, and initiatives that improve the hiring, integration, and professional development of employees across the firm. The TMC must also guarantee the existence of equal opportunities for all, promoting respectful behavior within the work environment and all work-



related activities, and providing guidance and support to the Talent Team on diversity-related matters.

The Talent Team will assume the responsibility of overseeing the day-to-day execution of tasks defined within the scope of DEI (including the ones related to the recruitment, onboarding process, and development of employees during their time at the Firm). Additionally, they will analyze regulatory updates regarding DEI practices included in the labor and social security legislation applicable to AltamarCAM, as well as industry trends and best market practices to ensure their effective implementation within the Firm. They are also responsible for conducting DEI-related surveys when applicable.

#### d. Stakeholders engaged in a complete working alliance:

It is the responsibility of those stakeholders engaged in a complete working alliance (hereinafter "AltamarCAM's stakeholders") to adhere to and comply with this procedure, demonstrating their commitment to diversity, equity, and inclusion.

AltamarCAM's stakeholders are expected to foster an inclusive environment that is devoid of discrimination, bullying, and harassment, contributing to a supportive and inclusive atmosphere. At AltamarCAM, stakeholders are encouraged to actively participate in promoting diversity, taking inspiration from the Firm's culture.

# 4. Integration of Diversity, Equity, and Inclusion in internal procedures

#### a. Recruitment and Hiring:

At AltamarCAM, we believe that diversity enriches and complements our perspectives, enhances our creativity and innovation, and strengthens our performance and outcomes. The Firm has implemented strategies and practices that ensure fairness and inclusivity in recruitment and hiring processes, with the goal of attracting a diverse pool of candidates, reducing bias in selection criteria, implementing objective interviewing practices, and providing equal opportunities for all candidates.

All candidates are evaluated during the interview process, based on their professional background, previous experience, knowledge, and skills to perform the job that is being assessed, and overall fit to our main values and AltamarCAM's culture. AltamarCAM considers the hiring-process a critical function, as it is the key moment to address whether a person has the right capabilities and cultural fit for the Firm. The Firm is committed to providing equal consideration and opportunities to all applicants, irrespective of their background and beliefs. To promote the inclusion of young talents and encourage generational diversity, we proactively incorporate the hiring of young professionals into our recruitment strategies, by liaising with different universities to publish job openings or new vacancies and openly advertise the opportunities on our corporate LinkedIn profile.

No discrimination of any type will be tolerated in the selection of interview profiles, as we strongly encourage to consider different type of candidates in the processes. Finally, as part of our ongoing commitment to this matter, we regularly review our selection process to progressively align ourselves with best market practices.



#### b. Training and Skills development:

The Firm is committed to attracting, selecting, and retaining the best professionals for our needs, and therefore ensures that all interviewers and/or employees involved in an interview process have meaningful training on how to conduct behavioral-based interviews.

AltamarCAM firmly believes that by providing training, employees can acquire the necessary knowledge and skills to actively foster inclusivity in the workplace. This approach helps cultivate a culture that appreciates diversity and embraces individual differences.

#### c. Workplace Culture and Environment:

The Firm promotes a culture of belonging founded on enduring shared values, fostering trust and long-lasting relationships with clients, staff, and society. At AltamarCAM, our employees deeply understand the significance of nurturing an inclusive and respectful workplace culture that is free from discrimination, harassment, or bias. Aligned with the Firm's Code of Ethics, AltamarCAM actively promotes the creation of safe spaces, open communication, and enthusiastic engagement in internal activities. The Firm will sponsor activities that allow the team to strengthen this culture.

#### d. Equal Opportunities and Advancement:

At AltamarCAM, our core value lies in the development of our people, ensuring continuous growth and valuable contributions to their professional careers. We are fully committed to providing equal opportunities for career advancement and growth. The professional development of our employees takes precedence, and their progression within the Firm is solely based on abilities and performance, given the right business circumstances and needs.

To maintain transparency and meritocracy in the context of performance management, our yearly appraisal and promotion processes are based on input provided by direct managers, as well as Partners of each business line and/or department. This feedback is later calibrated and contrasted with all Partners during a Talent Review process. Promotions within the Firm are analyzed in depth and are granted to those who have not only shown exceptional performance but also demonstrate the right skills to add on more complexity and decision-making capabilities.

In alignment with our commitment to diversity, equity, and inclusion, our remuneration policy ensures equitable compensation that recognizes and values the contributions of all individuals, aligned to their department and level of responsibility within the Firm. This approach fosters the expression of diverse employee perspectives and cultivates an innovative and dynamic culture.

We firmly believe that by prioritizing professional development, maintaining fairness, and promoting diversity, we can nurture a thriving environment that encourages growth, innovation, and inclusivity.

#### e. Accommodations and Accessibility:

AltamarCAM provides reasonable accommodations for individuals with disabilities and ensuring accessibility in the workplace, fully aligned with the requirements set forth by the applicable local laws.



#### f. Work-life balance and Flexibility:

The Firm stresses the importance of a work-life balance and recognizes how it enhances the wellbeing of employees and their families. We are committed to fostering a supportive and flexible work environment that is compatible with employees' personal lives, striving to improve their overall quality of life. To facilitate work-life integration, AltamarCAM fosters a culture of trust and accountability, by having implemented a remote working scheme, providing overall flexibility with working-hours and the weekly schedule, and actively encouraging employees to fully utilize maternity and paternity leave options, ensuring they have the necessary time and support during significant life events.

#### 5. Commitment to promote Diversity, Equity, and Inclusion in the Financial Sector

Driven by our commitment to promoting diversity, equity, and inclusion in the financial sector, AltamarCAM firmly acknowledges the historical underrepresentation of women in this industry, while recognizing the gradual progress being made. From the outset, AltamarCAM has recognized the immense value that female talent brings to the table. As part of our dedication to promote women in private markets, we are proud members of Level20, a strategic alliance that enables us to contribute to the global objective of inspiring and empowering women to thrive in the Private Equity industry. Through Level20, we create valuable opportunities for women to connect, exchange ideas, and learn from the experiences of others, advancing the collective commitment to gender equality in finance.

#### 6. Reporting and compliance

The Firm upholds its commitment to transparency by actively monitoring and regularly disclosing metrics on diversity, equity, and inclusion. Furthermore, any targets established in these areas will be communicated in a transparent manner, promoting accountability and progress towards our DEI goals.

In terms of compliance, the Firm has a zero-tolerance policy towards any violations of the DEI Policy. Employees are encouraged to use the anonymous <u>Whistleblowing Channel</u> to report any observed breaches of the DEI Policy.

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