

MIDDLEGROUND CAPITAL

ESG Policy

CONTENTS

Purpose	1
Scope.....	1
Principles & Standards	1
Roles and Responsibilities.....	2
ESG Integration	3
Pre-Acquisition.....	3
Stewardship – Monitoring & Portfolio Engagement.....	4
Post-Acquisition	4
Transparency & Stakeholder Engagement	7
Appendix	8

Purpose

As the Principles for Responsible Investment’s (PRI) first sub-billion industrial signatory, it is the practice of MiddleGround Capital to consider Environment Social and Governance (“ESG”) Factors in its portfolio operating procedures, portfolio company pre-acquisition due diligence, and post-acquisition management and monitoring of its portfolio companies as outlined in this policy. Considering material ESG information as part of our investment decisions is part of the fiduciary duty to our investors. By incorporating material ESG Factors into our investment decision making process, we are able to further assess the resilience of our portfolio companies for current and future risks and opportunities.

Scope

This ESG Policy applies to MiddleGround Capital’s portfolio investments and portfolio related firm operations. This policy is reviewed annually to reflect changes in the business and strategy. MiddleGround’s ability to influence and exercise control over ESG matters with respect to companies in which its business units invest will vary depending on the asset class, investment structure, and contractual rights.

Principles & Standards

MiddleGround operates by the motto, *“leave everything better than you found it”*, and we aim to show our commitment through leading by example and demonstrating our consideration for material ESG Factors, regulatory, and reputational considerations into our investment decision-making and management practices, where relevant. MiddleGround utilizes the PRI’s Six Principles as a foundation for this policy:

Six Principles for Responsible Investing

1. We will incorporate ESG issues into investment analysis and decision-making processes
2. We will be active owners and incorporate ESG issues into our ownership policies and practices
3. We will seek appropriate disclosure on ESG issues by the entities in which we invest
4. We will promote acceptance and implementation of the Principles within the investment industry
5. We will work together to enhance our effectiveness in implementing the Principles
6. We will each report on our activities and progress towards implementing the Principles

The Firm seeks to operate as a corporate role model for the companies in its portfolio. As such, MiddleGround expects to conduct its business, through the fund owned investments, with the following minimum standards:

- Communicating its ESG and responsible investment approach transparently to the public, MGC's fund investors, and other stakeholders.
- Integrating the Principles for Responsible Investing into our investment and business practices which could include considering key risks and opportunities during the diligence process.
- Fostering an environment where diverse talent is considered through equitable interview and recruiting process and celebrated through our diverse experiences and backgrounds of our teammates.
- Maintaining MGCs own internal governance and culture to ensure that MiddleGround acts as a good citizen in the communities in which we operate.
- Ensure compliance with applicable labor, health, and safety laws and standards
- Measuring, tracking, and improving environmental related performance resulting from our businesses and portfolio companies, where appropriate.
- Keeping MiddleGround employees apprised of material ESG Factors through regular communications and/or trainings, where appropriate.

Roles and Responsibilities

ESG Champion

John Stewart, the firm's founding partner, is the internal champion for ESG. MiddleGround's ESG policy and processes are based on John's belief that, *"the way to drive real change is to not wait for legislation but for everyone to take initiative and do their part."*

John Stewart holds ultimate responsibility for overseeing the MiddleGround Capital ESG Policy. Any exception to the ESG policy must be approved by the Managing Partner (John Stewart).

ESG Team

The ESG team consists of dedicated professionals responsible for providing expertise in the field of ESG as it relates to firm business, portfolio company management, and engagement our communities and stakeholders. To achieve goals related to our ESG commitments, the ESG team is responsible for:

- Overseeing collection and monitoring of ESG related metrics at our portfolio company investments and management company as described under [Stewardship – Monitoring and Portfolio Engagement](#)
- Supporting other MiddleGround business units in integrating ESG into their internal and external processes, as appropriate

- Reporting relevant metrics to key stakeholders and frameworks, as appropriate
- Actively participating in the stewardship of our portfolio companies by supporting the Board of Director (BOD) ESG Committee, supporting development of ESG related goals and applicable Key Performance Indicators (KPIs), as appropriate
- Coordinating training to keep relevant management company personnel apprised of current ESG information, as appropriate
- Developing longterm strategy at the firm level to drive ESG performance across the business and portfolio investments

ESG Committee

As outlined in the ESG Committee Charter (see [Appendix – F](#)), the ESG committee is a cross functional committee that is responsible for advising the MiddleGround Executive Leadership Team on relevant ESG Factors. Each member is responsible for maintaining awareness of ESG related topics as they relate to their individual department to provide a fulsome approach to ESG strategy implementation and execution.

Management Committee

The Management Committee is responsible for ensuring ESG Factors are considered by their teams throughout applicable workstreams. The Management Committee is responsible for staying apprised of relevant regulatory changes, stakeholder pressures, and firm initiatives as they relate to ESG Factors, where appropriate.

Investment Committee

The Investment Committee is responsible for considering material ESG information when making investment decisions deemed appropriate during diligence.

All MiddleGround Business Units

All Employees at MiddleGround are responsible for adhering to relevant policies and practices as they relate to ESG. Specific groups may hold responsibility for oversight of Portfolio Company data collection, reporting, and resource allocation, communication to Limited Partners (LPs) and external stakeholders, and other responsibilities that directly or indirectly support or impact ESG strategies and initiatives.

ESG Integration

Pre-Acquisition

Deal Sourcing

MiddleGround will evaluate investments to identify environmental, social, and/or ethical exclusionary characteristics, which may include (but are not limited to) the following:

- Exploitation of labor, including child labor and modern slavery
- Illegal human or animal trafficking
- Illegal deforestation
- Participation in illegal activities
- Production, distribution, or selling of illegal products
- Production of unacceptable levels of pollutants that are deemed harmful to the environment

- Manufacture, distribution, or selling of arms or ammunition
- Manufacture, distribution, or selling of pornography
- Involvement with activities or products that are banned per global conventions or under United Nations sanctions

Due Diligence

During diligence the firm will make its best effort to identify and evaluate material ESG risks and opportunities. ESG Diligence may include, but is not limited to:

- questionnaires to gauge current relevant ESG policies and practices
- review of environmental permits, licenses, and certifications related to ESG Factors
- consideration of future climate related risks and the transition to a low-carbon economy
- review of wages, safety metrics, and diversity statistics
- review of existing Board of Directors, ESG oversight, and committees
- evaluation of other Environmental, Social, and/or Governance Factors and KPIs, as relevant

Key ESG risks and opportunities will be included in the underwriting memorandum and reviewed by the Investment Committee.

MiddleGround may retain advisors and/or specialized and independent external consultants, as necessary, to further evaluate specific risks. The team will report any relevant findings, along with relevant ESG KPIs, in its Investment Committee memorandum.

For funds that are Article 8 aligned (see [Appendix – D](#)) in accordance with Sustainable Finance Disclosure Regulation (SFDR), MiddleGround will recommend further analysis of Environmental and Social characteristics complementary of current KPIs in line with United Nation's Sustainable Development Goals (SDGs).

Stewardship – Monitoring & Portfolio Engagement

Post-Acquisition

Portfolio Company ESG Integration

MiddleGround prides itself on being an operationally focused firm and works directly with each portfolio company management team to support ESG initiatives and strategies, as applicable.

MiddleGround identifies relevant ESG KPIs for each portfolio company. Each portfolio company is expected to set meaningful ESG targets, develop policies and programs, and track progress towards the targets. Through the Board of Directors and ESG Committee, MiddleGround collaborates with its portfolio companies, discusses ESG-related Factors, best practices, monitoring, and reporting.

Each portfolio company is expected to have defined activities to support the improvement of their KPI's as part of its Hoshin Plan. These activities are established by the company, in conjunction with its ESG Committee, and approved by the Board of Directors.

Third party providers may be utilized to assess items, support plan development, and/or audit performance.

Monitoring

MiddleGround Capital monitors each portfolio investment by requesting ESG related data on a quarterly and annual reporting cadence. Participation in our survey and data collection is an expectation of all portfolio companies. The information collected may include, but is not limited to:

- Utility usage
- Greenhouse Gas Emissions and/or associated raw data
- Employee compensation related metrics
- Safety metrics
- Policy information
- Diversity information including Board of Directors
- ESG related certifications (e.g. ISO14001, etc.)

MiddleGround works with each portfolio company annually to recommend ESG related targets to maintain continuous improvement in our broader ESG efforts.

MiddleGround may utilize a third-party provider to provide data analysis from source data gathered by each of the companies where applicable.

Portfolio Company Engagement

As part of MiddleGround's management of the fund's investments, there is frequent communication and interaction between the company, the BOD ESG Committee, the Portfolio Company ESG Coordinator, the Board of Directors and MiddleGround employees. During these scheduled and ad hoc engagements, a discussion of ESG Factors is regularly part of the agenda. Examples of this engagement may include, but are not limited to:

Portfolio Company Onboarding

ESG-related Factors are introduced to portfolio company employees during townhall sessions post-acquisition. It is emphasized to the CEO that ESG will be a core function of their role and that they will be responsible for oversight and delegation of ESG responsibilities, as appropriate. Designated members of the portfolio company's management team will participate in corporate governance training and more detailed ESG-related onboarding.

Daily Oversight

MiddleGround Operations team members are frequently onsite at portfolio company facilities. During these visits, reviews of company policies, ESG initiatives, and performance may take place, as appropriate.

Monthly Oversight

Portfolio companies are expected to report key ESG updates relative to active initiatives and KPIs on monthly Operations & Administration meetings (see Appendix – E). Active initiatives and supporting KPIs such as safety, turnover, and wages are discussed with supporting commentary on current state, next steps, and barriers to achievements.

Quarterly Board Meetings

The CEO of each portfolio company is appointed as the chairperson of the company's ESG committee, which is formed immediately post-acquisition. A member of MiddleGround's ESG Team serves as an

advisor to each Portfolio Company Board of Directors ESG Committee. This committee meets on a quarterly basis and topics for consideration may include but are not limited to items shown below in figure 1.

Topic	Cadence	Lead	Support
KPI performance	Quarterly	Portfolio	MiddleGround
ESG Projects & Initiatives	Quarterly	Portfolio	MiddleGround
Whistleblower reports	Quarterly	Portfolio	MiddleGround
Cybersecurity incidents	Quarterly	Portfolio	MiddleGround
Climate risk	Annually - Q1	MiddleGround	Malk Partners
Corporate governance	Annually - Q1	Portfolio	MiddleGround
Annual Sustainability Report	Annually - Q2	Portfolio	MiddleGround
Carbon footprint	Annually - Q3	Portfolio	Gravity Climate
Targets and Goal Setting	Annually - Q4	Portfolio	MiddleGround
Supply Chain risks	Ad hoc	MiddleGround	Malk Partners

Figure 1

The ESG Committee Chairperson is responsible for communicating outcomes of the ESG Committee to the Board of Directors.

Portfolio Company Governance

ESG Factors are an integral part of MiddleGround’s corporate governance in the management of the fund’s portfolio companies. Figure 2 outlines the structure of portfolio company ESG management.

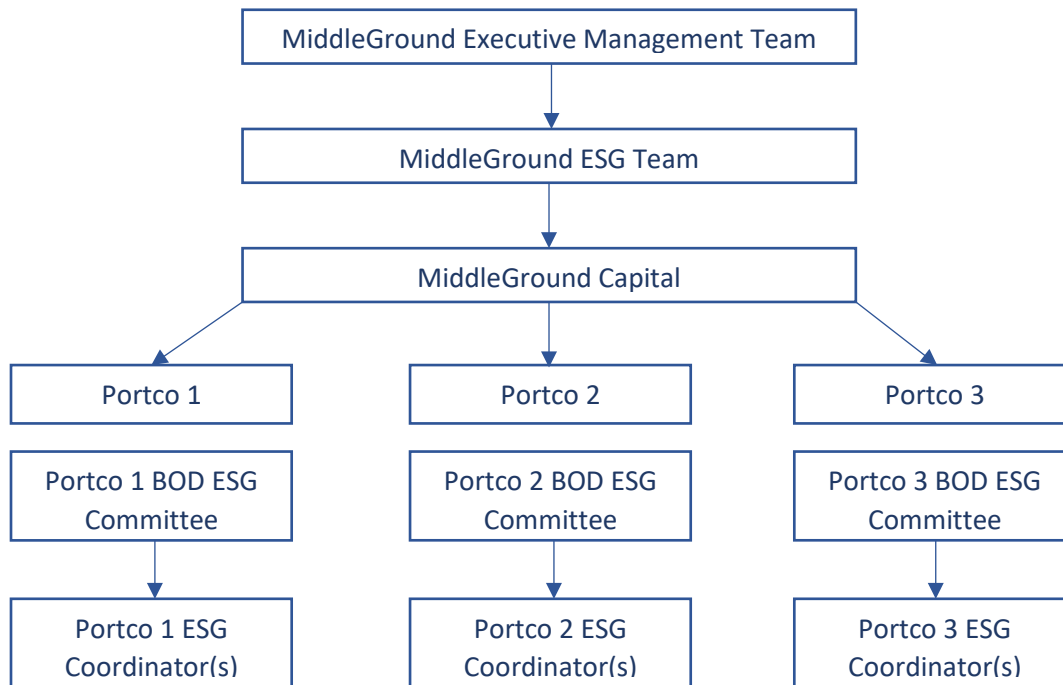


Figure 2

Transparency & Stakeholder Engagement

Annual Sustainability Report

MiddleGround is committed to being transparent with our investors and stakeholders about our initiatives, successes, and goals. Our Annual Sustainability Report provides updates regarding our ESG program on an annual basis, and we regularly provide updates via external platforms when requested.

Limited Partner Transparency and Engagement

We engage with our limited partners, investors, and stakeholders on ESG matters. As applicable, ESG matters are discussed at our annual general meeting.

External Transparency

MiddleGround firmly believes that the consideration of ESG Factors is required for success today and in the future. As such, we are committed to supporting other investment owners, investment managers, and other financial institutions in their ESG journeys. We maintain a commitment to transparency and helping others on their journey in ESG.

Appendix

Appendix A – Definitions

- **Environmental Factors** – Relates to how a company or organization manages its impact on the environment. This includes issues such as climate change, greenhouse gas emissions, resource depletion, waste management, pollution, and deforestation.
- **Social Factors** – Relates to the ways in which a company manages the rights, well-being and interests of people and communities. This includes issues such as Human Rights, Modern Slavery, Child Labor, Working Conditions, Employee Relations, Worker Health and Safety.
- **Governance Factors** – Refers to the systems and structures by which a company is directed and controlled. This includes issues such as board composition and effectiveness, executive compensation, shareholder rights, audit practices, anti-corruption measures, and adherence to legal and regulatory standards.
- **Material (IASB IFRS)** – Information is material if omitting, misstating, or obscuring it could reasonably be expected to influence decisions that primary users of financial statements (hereafter, investors) make on the basis of those financial statements.
- **Key Performance Indicator**– KPIs are measurable values that demonstrate how effectively an organization is achieving key business objectives.
- **Principles for Responsible Investors** – PRI is a voluntary framework that encourages investors to incorporate environmental, social, and governance (ESG) Factors into their investment decision-making and ownership practices.
- **Sustainable Finance Disclosure Regulation** – SFDR is a regulation in the European Union (EU) aimed at standardizing the disclosure of sustainability-related information by financial market participants and financial advisors. SFDR aims to ensure transparency in how financial products consider environmental, social, and governance (ESG) Factors.
 - **Article 8** – Covers financial products that have sustainable investment as their objective but do not promote environmental or social characteristics explicitly. These products integrate environmental, social, and governance (ESG) Factors into their investment process and seek to contribute to sustainable development.
 - **Taxonomy** – Establishes clear criteria and definitions for what constitutes environmentally sustainable economic activities. It aims to provide clarity and transparency to investors, businesses, and other stakeholders regarding the sustainability credentials of economic activities and investments.
 - **Principal Adverse Impacts** – PAIs refer to the negative effects that investment decisions may have on environmental, social, and governance (ESG) Factors. These impacts can include, but are not limited to, greenhouse gas emissions, deforestation, human rights violations, and corruption.
- **Sustainable Development Goals** – SDGs are a set of 17 global goals adopted by all United Nations Member States in 2015 as part of the 2030 Agenda for Sustainable Development. The SDGs are designed to address various global challenges and aim to achieve a better and more sustainable future for all people and the planet by 2030.

- **Climate Risk** – Risks referring to the potential adverse effects of climate change on organizations, sectors, economies, societies, and the environment. It encompasses both physical risks and transition risks associated with climate change impacts and the transition to a low-carbon economy.
- **Corporate Governance** – Refers to the system of policies, practices, and processes by which a company is directed and controlled. It encompasses the relationships among stakeholders such as shareholders, management, employees, customers, suppliers, and the community at large.

Appendix B – Portfolio Company ESG KPIs

- Energy usage and intensity
- Water usage and intensity
- Carbon footprint (if conducted, otherwise estimated based on provided information),
- ISO14001 certifications
- Total Recordable Incident Rate
- Turnover Rate
- Gender Diversity
- Racial Diversity (where available)
- CEO to median pay ratio
- Employee Wages –
 - Employees earning less than \$15/hr. (or comparable prevailing wage in non-US regions)
 - Employees earning less than \$25/hr. (or comparable prevailing wage in non-US regions)
- Established Board of Director committees (Audit, Compensation, ESG)
- # Independent members of the board
- Board Diversity – gender, racial, and total
- Established corporate policies –
 - code of conduct/ethics
 - whistleblower
 - cyber security
 - conflict of interest
 - anti-bribery/anti-corruption

Appendix C - SFDR

The following funds are classified as Article 8 funds. Or funds that promote Environmental and Social (E/S) characteristics and demonstrate good governance.

- MiddleGround Partners III (Fund III)
- Mobility Opportunity Fund II (MOF II)

The following information applies to Article 8 aligned funds.

MiddleGround is **not** making sustainable investments. MiddleGround is **not** taxonomy aligned nor considering Principle Adverse Indications (PAIs).

These Funds will utilize the United Nation’s Sustainable Development Goals as a guide to map business indicators to E/S characteristics. MiddleGround’s E/S characteristics and indicators may include, but not limited to:

Environmental Characteristics	Indicator
SDG 6: Clean Water and Sanitation	<p>The portfolio company targets water reduction/efficiency by:</p> <p>A.</p> <p>(i) having an annual water reduction/efficiency program or target in place; and</p> <p>(ii) achieving a minimum rate of reduction of 1% per annum;</p> <p>OR</p> <p>B. achieving a minimum 5% water reduction/efficiency.</p> <ul style="list-style-type: none"> • Water use will be measured utilizing utility bills and converted to gallons; and • Reduction measurements will be measured against the baseline year and achieved by documenting a 1% reduction per annum or 5% overall reductions or efficiencies by reference to relevant process adjustments as measured against the baseline year, <p>in each case as applicable.</p>
SDG 7: Affordable and Clean Energy	<p>The portfolio company targets annual energy reduction/efficiency, by:</p> <p>A.</p> <p>(i) having an annual energy reduction / efficiency project; and</p> <p>(ii) achieving a minimum 2% reduction in energy per annum;</p> <p>OR</p> <p>B. achieving a minimum 10% reduction in energy usage;</p> <p>OR</p> <p>C. having a minimum rate of renewable energy use of 10% of annual consumption;</p> <p>OR</p> <p>D. having at least 10% of its gross revenue come from products that support fossil fuel consumption reduction;</p> <p>OR</p>

	<p>E. having at least 10% of its gross revenue come from products that support the transition to hybrid or electric vehicles.</p> <ul style="list-style-type: none"> • Electricity consumption will be measured utilizing utility bills and converted to kWh. Natural gas will be measured and converted to CCF (cubic feet); • Renewable energy will be calculated as a percentage of energy based on utility bills; and • Reduction measurements will be measured against the baseline year and achieved by documenting 2% per annum or 10% overall reductions or efficiencies by reference to relevant process adjustments as measured against the baseline year, <p>in each case as applicable.</p>
<p>SDG 12: Responsible Consumption and Production</p>	<p>The portfolio company:</p> <p>A.</p> <p>(i) has a hazardous waste reduction plan in place; and</p> <p>(ii) achieves a minimum 1% reduction per annum;</p> <p>OR</p> <p>B.</p> <p>achieves a minimum 5% reduction in hazardous waste;</p> <p>OR</p> <p>C.</p> <p>(i) has a plan to reduce waste sent to landfill; and</p> <p>(ii) achieves a minimum reduction of 2% per annum;</p> <p>OR</p> <p>D.</p> <p>achieves a minimum 10% reduction in waste sent to landfill;</p> <p>OR</p> <p>E.</p> <p>(i) has a plan to reduce scrap; and</p> <p>(ii) achieves a minimum reduction of 2% per annum;</p>

	<p>OR</p> <p>F. achieves at minimum a 10% reduction in scrap;</p> <p>OR</p> <p>G. has a minimum of 10% recycled manufacturing inputs;</p> <p>OR</p> <p>H. achieves at minimum a 10% reduction in use of packaging material;</p> <ul style="list-style-type: none"> • Waste, Scrap, Inputs will be measured by weight; • <i>In relation to <u>hazardous waste</u></i>, reduction measurements will be measured against the baseline year and achieved by documenting 1% per annum or 5% overall reductions or efficiencies from process adjustments measured against the baseline year; and • <i>In relation to <u>waste sent to landfill and scrap</u></i>, reduction measurements will be measured against the baseline year and achieved by documenting 2% per annum or 10% overall reductions or efficiencies by reference to relevant process adjustments as measured against the baseline year, <p>in each case as applicable.</p>
SDG 13: Climate Action	<p>The portfolio company:</p> <p>A.</p> <p>(i) measures its carbon footprint annually; and</p> <p>(ii) develops a carbon footprint reduction plan; and</p> <p>(iii) achieves a minimum 1% reduction per annum in its carbon footprint;</p> <p>OR</p> <p>B.</p> <p>(i) established a path to carbon neutral (Scope 1 and 2 greenhouse gas emissions); and</p> <p>(ii) shows progress of a minimum of 1% per annum towards such objective;</p> <p>OR</p>

	<p>C.</p> <p>(i) conducts climate scenario analysis (i.e., analysis on climate events and how such events may impact the portfolio company); and</p> <p>(ii) implements a plan to deal with such climate scenarios in a timely manner.</p> <ul style="list-style-type: none"> • Carbon footprint will be measured utilizing the greenhouse gas protocol; and • Reduction measurements will be measured against the baseline year and achieved by documenting 1% per annum reductions or efficiencies by reference to relevant process adjustments as measured against the baseline year, <p>in each case as applicable.</p>
<p>Social Characteristics:</p>	<p>Indicator</p>
<p>SDG 1: No Poverty</p>	<p>The portfolio company maintains a minimum wage at least 25% above the national poverty line. Generally speaking the national poverty line will be measured as half of the of the median disposable income defined by the Organization for Economic Co-Operation and Development (OECD), unless the Manager believes that another measurement is more appropriate given the jurisdiction of the relevant portfolio company, in which case an alternative measurement common in the relevant market may be used.</p>
<p>SDG 3: Good Health and Wellbeing</p>	<p>The portfolio company* provides full time employees with:</p> <p>(i) health care; and</p> <p>(ii) a parental leave policy.</p> <p>*Indicator will only be used for portfolio companies operating in jurisdiction where such policies are not required as a matter of law.</p>
<p>SDG 4: Quality Education</p>	<p>The portfolio company has in place an education/reimbursement program for full time employees providing tuition assistance of a minimum of \$4,500 per annum.</p>
<p>SDG 5: Gender Equality</p>	<p>The portfolio company:</p> <p>A. exceeds industry average gender diversity in its workforce by 5%;</p>

	<p>OR</p> <p>B. exceeds industry average gender diversity on its board of directors or within its senior management.</p> <p>Gender diversity will be measured as a percentage of the total workforce. The industry average will be collected from the Bureau of Labor Statistics or country equivalent.</p>
<p>SDG 8: Decent Work and Economic Growth</p>	<p>The portfolio company:</p> <ul style="list-style-type: none"> (i) Exceeds industry average total recordable incident rate (TRIR) by 5%; <p>OR</p> <ul style="list-style-type: none"> (ii) Exceeds industry average voluntary turnover rate by 5%. <ul style="list-style-type: none"> • TRIR is calculated using the following calculation: <div style="background-color: #334d5d; color: white; padding: 10px; margin: 10px 0;"> $\frac{\text{(Number of recordable injuries and illnesses x 200,000)}}{\text{Employee total hours worked}}$ </div> <ul style="list-style-type: none"> • Voluntary turnover is calculated using the following calculation: <div style="background-color: #0099cc; color: white; padding: 10px; margin: 10px 0;"> $\text{Voluntary Turnover Rate} = \frac{\text{\# of employees who left voluntarily in a given period}}{\text{\# of employees in the same given period}} \times 100$ </div> <p>The industry average will be collected from the Bureau of Labor Statistics or country equivalent.</p>

MiddleGround evaluates good governance by reviewing four key pillars including Board and/or Management Structure & Composition, Compensation, Audit Risk & Transparency, & Policies and Practices. MiddleGround’s good governance review criteria may include, but not limited to:

- Review of Board/Management Team
 - Length of time in position, Experience, Effectiveness
- Review of permits, licenses, and certifications
- Review of employee practices
 - I-9 Reviews, No Minors Employed, Union Relations
- Review of historic financials

At least 30% of each Article 8 aligned fund must meet at least 1 E/S characteristic. Alignment is weighted by Net Asset Value (NAV) of the investment in the overall fund.

Monitoring of the characteristics will be conducted periodically, and at least annually, through onsite visits, regular reporting against ESG KPIs, quarterly board meetings and annual setting of ESG-related targets. If it is identified that a portfolio company is not achieving the relevant Indicators, MiddleGround will engage the management team through its monitoring mechanisms / regular onsite visits, data and reporting requests and regular board meetings / ESG committee meetings.

During the diligence phase, MiddleGround assess whether an investment aligns with these characteristics and indicators as defined above. MiddleGround may retain advisors and/or specialized and independent external consultants, as necessary, to further evaluate specific risks and ESG KPIs. Key ESG risks and opportunities, as well as information regarding these characteristics which the relevant portfolio company may promote and the applicable Indicators will be included in the underwriting memorandum and reviewed by the Investment Committee.

[Appendix D – Portfolio Onboarding](#)

Following a new acquisition, MiddleGround will conduct a series of introductory meetings beginning with an all-employee town hall. During these townhall sessions, MiddleGround will provide a high-level overview of our commitment to ESG.

Following town hall sessions, MiddleGround will conduct a series of focused sessions with the respective groups such as portfolio management teams. MiddleGround will host a dedicated ESG onboarding session with the portfolio company executive team. The agenda of the ESG onboarding session may include but is not limited to:

- Overview of ESG
- ESG at MiddleGround
- ESG at portfolio companies
- Review of ESG diligence finding
- ESG target setting and key initiatives
- Overview of SFDR

In the event of hiring new portfolio personnel with direct oversight or involvement in ESG such as new executive team personnel, MiddleGround will recommend additional ESG onboarding sessions. These sessions will closely follow the ESG onboarding sessions as shown above and may be further tailored to adjust for new personnel position, portfolio progress, etc.

[Appendix E – Data Reporting](#)

MiddleGround's approach to portfolio monitoring of ESG data includes quarterly and annual surveys comprised of data to track Key Performance Indicators and secondary metrics, where applicable. MiddleGround utilizes 3rd party software as a services (SaaS) providers to maintain the intake of data, generate supporting visualizations to identify trends, and incorporate external 3rd party validation, where necessary.

Data collected during the ESG data reporting process, highlighted in Post-Acquisition Monitoring, may be incorporated into conversation across MiddleGround's operations. Meetings and corresponding metrics discussed may include but not limited to:

- Operations/Administration Monthly Meetings
 - Safety Metrics
 - Wage Metrics
 - Turnover Metrics
- Quarterly ESG Committee Meetings
 - Environmental KPI's
 - Environmental initiatives & focus areas
 - Social KPI's
 - Social initiatives & focus areas
 - Governance KPI's
 - Governance initiatives & focus areas
- Board of Directors Meetings
 - ESG KPIs Performance
 - Key ESG Initiative Performance

Appendix F – Documents Available Upon Request

- Transaction Roadmap



Transaction
Roadmap.pdf

- ESG Committee Charter Example



ESG Committee
Charter Example.pdf

- ESG Committee Chairperson Responsibilities



ESG Committee
Chairperson Respor

- ESG Committee Quarterly Template



ESG Committee
Quarterly Template.i

- Ops&Admin Monthly ESG Template



Ops&Admin
Monthly ESG Templ

- ESG Diligence Executive Summary & KPI template



ESG Diligence
Executive Summary &

- ESG Diligence SFDR Questionnaire



ESG Diigence SFDR
Questionnaire.pdf