

Responsible Investment Policy

July 2026

GA Entity	Effective Date	Version	Owner/Responsible Party	Last Updated
General Atlantic Service Company, L.P. and its subsidiaries and affiliates	January 2018	1	Global Head of ESG, Global Head of Transactions and Portfolio Management, and Chairman of the Investment Committee	November 2021
General Atlantic Service Company, L.P. and its subsidiaries and affiliates	March 2023	2	Global Head of ESG, Global Head of Transactions and Portfolio Management, and Chairman of the Investment Committee	
General Atlantic Service Company, L.P. and its subsidiaries and affiliates	June 2023	2.1	Global Head of ESG, Global Head of Transactions and Portfolio Management, and Chairman of the Investment Committee	June 2023 (revised GA credit section, non-material changes)
General Atlantic Partners, L.P. and its	February 2025	3	Global Head of Sustainability, members of the	

subsidiaries and affiliates, including investment funds advised by General Atlantic Service Company, L.P. and its relying advisers in relation to Growth Equity, Climate and Credit strategies			Executive Committee	
General Atlantic Partners, L.P. and its subsidiaries and affiliates, including investment funds advised by General Atlantic Service Company, L.P. and its relying advisers	July 2026	4	Global Head of Sustainability, members of the Executive Committee	



Responsible Investment Policy for General Atlantic

Effective as of July 2026

Background & Objectives

General Atlantic Partners, L.P. (together with its subsidiaries and affiliates, “General Atlantic” or “Firm” or “GA”) has developed this Responsible Investment Policy (the “Policy”) to set forth General Atlantic’s positions and beliefs with respect to responsible investing for its Global Growth Equity and Liquidity Solutions, Energy Transition, and Credit strategies.

General Atlantic believes that focusing on the incorporation of sustainability, environmental, social and governance (“ESG”) risks and opportunities considerations (“ESG Considerations”) in its investment process helps mitigate the risks of a material negative impact on the financial value of an investment, enhance business resilience and may create value-add opportunities. GA may apply a range of processes and tools to evaluate and manage ESG risks to the business and the company’s stakeholders, at its sole discretion.

The Firm equally understands that key stakeholders, including investors, regulators, employees, and portfolio companies, expect General Atlantic to consider the risks and opportunities posed by ESG Considerations. This Policy has been developed in accordance with the UN-supported Principles for Responsible Investment (“PRI”), of which General Atlantic became a signatory in July 2022.

The Firm seeks to assess ESG Considerations in the operation of the Firm’s business, the investment process, and its portfolio engagement efforts. General Atlantic defines this as factors that it determines to have (or are reasonably likely to have) a direct and substantial impact on a Firm’s ability to create or maintain economic value, and/or which may materially impact the reputation of the GA or its stakeholders.

Sustainability Approach

General Atlantic’s dedicated Sustainability team leads GA’s work on Sustainability & ESG matters. The Sustainability team has oversight from the Co-President and Head of Global Growth Equity, Chairman of the IC; the Co-President, Head of EMEA and Global Head of Infrastructure and Energy Transition Investing, and the Head of Global Due Diligence and Portfolio Management. The Sustainability team is further supported by GA’s Executive Committee and GA’s Climate Committee. The Executive Committee is composed of Chairman and CEO; Co-President, Head



of Global Growth Equity, Chairman of the IC; Co-President, Global Head of Infrastructure and Energy Transition Investing; Global Head of Credit; Head of Energy Infrastructure at Actis; Global Head of Capital Solutions; Chief Financial Officer; Chief Legal Officer, General Counsel; and Global Head of Human Capital. The GA Climate Committee is a dedicated committee supporting the Executive Committee in providing governance over climate-related risks and opportunities across General Atlantic's investment strategies. The GA Climate Committee is composed of Global Head of Sustainability; Vice Chairman; Global Head of Infrastructure and Energy Transition Investing; Chief Accounting Officer and Global Controller; Actis Head of Sustainability; a Senior Advisor¹; and Managing Director, Capital Solutions.

The Sustainability team works in collaboration with GA investment professionals and investment support functions, including but not limited to, Portfolio Management, Compliance/Legal, Growth Acceleration, Human Capital, and Marketing & Corporate Affairs.

As an IFRS Sustainability Alliance Member, General Atlantic professionals have access to the Sustainability Accounting Standards Board ("SASB") framework, managed by the International Financial Reporting Standards ("IFRS") Foundation. GA's Sustainability team may at its discretion use the SASB framework or other tools in determining the materiality of ESG risks and opportunities during our due diligence process and onboarding our portfolio companies.

The Firm recognizes that the investment risks and opportunities posed by ESG Considerations can vary greatly depending on a range of factors including, but not limited to, asset class, sector, geography, business model, size of ownership, and/or investment type. Except as set forth in the governing documents of a particular investment fund, client or investor, the Firm does not apply a formal exclusion policy to investments, but rather seeks to evaluate the materiality of ESG Considerations on an individual investment basis.

General Atlantic's approach to ESG Considerations is tailored by strategy, as detailed below.

Global Growth Equity (including GAGE) and Liquidity Solutions (Core Program, Companion Funds and Continuation Vehicles, excluding GA Growth Secondaries)

Investment Analysis

¹ A Senior Advisor is an independent contractor who advises General Atlantic and its portfolio companies. Senior Advisors are not employees nor affiliates of General Atlantic entities.



The General Atlantic Sustainability Team works alongside investment teams to complete an initial ESG risks and opportunities assessment. Third party ESG due diligence may be conducted on a case-by-case basis for Emerging Growth and Pre-Revenue, and new company formations. For other new investments that are approved for continued diligence spend by the Investment Committee, a third-party ESG advisor is engaged to conduct independent ESG due diligence. Findings from the initial ESG assessment and, where applicable, independent ESG due diligence are typically summarized in materials presented to the Investment Committee for final approval as part of the investment decision-making process.

If the initial investment in a portfolio company was made prior to March 1, 2023, the same level of investment analysis may not be conducted for subsequent follow-on investments in that company. The same is true for any investments made by Continuation Funds if GA's original investment in the portfolio company (via the Core Program) was made prior to March 1, 2023. In those scenarios, the Sustainability Team may work with the respective GA investment teams to determine whether any material ESG Considerations were present at the time of GA's original investment, or have developed over the life of the investment, and determine whether, in its sole discretion, further analysis is warranted.

Where appropriate, a Sustainability Value Creation Roadmap is developed for new investments (excluding follow-on investments) within the Core Program. The Sustainability Value Creation Roadmap is intended to highlight the key findings of the ESG due diligence report, focusing on any key ESG risks and opportunities identified in diligence and (where relevant based on due diligence) suggesting potential quick wins and high-priority actions to potentially undertake as part of GA's engagement. The Sustainability Value Creation Roadmap may be shared with portfolio companies within the first 100 days of an investment closing.

Engagement

In the event material ESG risks and/or value creation opportunities are identified during the due diligence phase, such matters may at GA's discretion be 1) incorporated into value creation planning, where feasible, 2) monitored by the investment teams, and 3) reported to the Portfolio Committee. GA may monitor ESG Considerations as part of General Atlantic's portfolio review and management process, which is subject to oversight by the Portfolio Committee. GA's ability to execute on sustainability & value creation opportunities will depend on a range of different factors, including but not limited to, General Atlantic's ownership, board composition, and whether there are other significant value creation priorities that GA believes may drive greater value. General Atlantic recognizes that one of the most effective methods for engagement is to collaborate with other investors and/or stakeholders. As such we may prioritize such collaborative engagements where possible and where we consider the engagement is likely to be more effective in managing ESG risks, ESG Considerations and/or value creation opportunities on an ongoing basis as a result.



The Sustainability Team offers support to portfolio companies with Sustainability & ESG-related matters, both directly and by helping them source external support. Areas of focus include: developing sustainability strategy and governance, building data capabilities for reporting and actionable insights, identifying and preparing for regulatory changes, and enhancing exit and initial public offering readiness. In addition, ongoing ESG-related education is offered to portfolio companies through knowledge sharing, ESG-related forums, and Firm-hosted events.

Reporting

General Atlantic does not currently issue standalone sustainability reports to its investors. Sustainability & ESG findings and key developments, when relevant, may be included in standard reporting materials, such as investment closing memos, Annual and Mid-Year portfolio company reviews, or as part of the Firm's annual investor meeting materials. For Growth Equity, General Atlantic collects ESG data from a subset of portfolio companies, and, where such information is available, may share this information on request to investors. This information may include carbon emission data, human capital data and governance insights, where available.

As of January 2025, General Atlantic implemented an ESG incident reporting process where it intends to report material ESG incidents in its investment portfolio. Where material ESG incidents are flagged, these are classified in three levels of severity which will inform General Atlantic's response and any follow-up to the given incident. Information related to ESG incidents may be shared with investors upon request on a case-by-case basis.

GA Energy Transition (GA BnZ or BeyondNetZero)

GA BnZ, General Atlantic's energy transition-dedicated strategy, invests in companies that, at the time of investment therein, are focused on developing and/or implementing Energy Transition solutions or whose business has the potential to help combat climate change ("GA BnZ Investments"). The GA BnZ funds invest alongside the Core Program in GA BnZ Investments. The GA BnZ funds based in Luxembourg operate as Article 9 funds under the EU Sustainable Finance Disclosure Regulation ("SFDR"), and as Article 9 funds, they are required to set a Sustainable Investment Objective, measurable sustainability indicators and set binding elements of their investment strategy. Additional information about GA BnZ's responsible investing approach can be found in the BeyondNetZero Climate Approach Guidelines for General Atlantic BeyondNetZero Companion Fund I, L.P. (together with its parallel funds).



GA Credit (Atlantic Park III, Senior Direct Lending)²

General Atlantic's credit funds are primarily invested in debt securities and as such, the Firm will generally have less access, influence and/or control over an issuer's approach to ESG Considerations than for other investment strategies. Sustainability & ESG matters are coordinated by Principal, Portfolio Management, working with the Credit investment team and Sustainability team to assess material ESG Considerations for such investments where practical.

Investment Analysis

The GA Credit investment team incorporates considerations of financially material ESG risks and opportunities into its broader investment analysis process, with support from the Sustainability team. As of January 2026, a third-party ESG advisor is engaged to conduct independent ESG due diligence. For investments in public companies, GA may leverage alternative third-party ESG resources, as appropriate to the investment. Findings from ESG due diligence, including the ESG Scorecard, are typically summarized in materials presented to the Investment Committee for final approval as part of the investment decision-making process. If any ESG Considerations arise that may be material to the financial value of a prospective investment, the GA Credit investment team may engage the Sustainability Team and a third-party ESG advisor to conduct a more detailed assessment for further discussion and review.

Monitoring

The GA Credit investment team does not engage in standardized ESG monitoring across portfolio companies. Nevertheless, where ESG-related matters may be identified in the course of periodic portfolio company engagement, the GA Credit investment team may document and consider these throughout the hold period. Where deemed to meet an appropriate threshold of materiality, relevant ESG matters may be escalated to the Sustainability Team for further review. In addition, the Sustainability Team may collect and assess publicly available ESG-related information on portfolio companies, in line with GA's broader data collection efforts.

Engagement

Where a GA Credit fund makes passive investments in corporate debt, the investment teams have limited access to or influence over the management teams of the companies the fund has invested in. The GA Credit team may, at its own discretion, support the direct engagement with management teams to discuss ESG matters, where requested by the portfolio company or its private equity sponsor (if applicable), or where material to the overall financial performance of the portfolio company during the holding period. In those cases, the GA Credit team and/or Sustainability Team may recommend third-party advisors or consultants to the extent necessary to support in

² As of January 2026.



addressing material ESG matters that may arise. In addition, GA Credit portfolio companies may also access resources and support from the Sustainability Team, including ESG-related guidance, tools, and knowledge-sharing initiatives developed across the Firm's broader portfolio engagement efforts.

Reporting

GA Credit does not currently issue sustainability reports to its investors. Sustainability & ESG findings, when relevant, may be included in standard reporting materials, such as investment closing memos, Annual and Mid-Year portfolio company reviews, or as part of the Firm's annual investor meeting materials. GA Credit does not collect ESG KPIs directly from portfolio companies on a regular basis. However, for certain funds (Atlantic Park III and Senior Direct Lending, as of January 2026), GA Credit may seek to collect available ESG-related information at the time of due diligence. Additional sustainability information may be considered over time on a case-by-case basis where deemed material and reasonably available.

GA Sustainable Infrastructure (Actis)

The Responsible Investment & Sustainability Policy, which governs investment funds managed and advised by Actis LLP and its affiliates (i.e., GA Sustainable Infrastructure, "Actis"), can be found through this [link](#). Responsibility for the Responsible Investment & Sustainability Policy for Actis resides with the Head of Actis Sustainability.

GA Growth Secondaries (Wavebreak)

The Wavebreak Secondaries Fund ("[Wavebreak](#)") is established pursuant to a joint venture between Clipway Limited ("[Clipway](#)") and General Atlantic, and is jointly advised by Clipway and General Atlantic Service Company, L.P. ("[GASC](#)"). The Wavebreak ESG Policy, which governs the integration of sustainability considerations into Wavebreak's investment process and the promotion of environmental and social characteristics by Wavebreak, is jointly maintained by Clipway and GASC. The Wavebreak ESG Policy is reviewed and, if necessary, updated annually by GASC and Clipway.

Policy Governance & Oversight

The responsibility for the development, implementation, and monitoring of this Policy resides with the Global Head of Sustainability and members of the Executive Committee. The Global Head of Sustainability is ultimately responsible for reviewing and updating this Policy as necessary, with a final review and approval conducted by the Executive Committee. The Global Head of Sustainability, or their designee(s), will:



- Distribute this Policy and related ESG information and guidelines to applicable employees.
- Provide periodic training to investment professionals on the identification and management of ESG risks and provide them with appropriate support and assistance.
- Regard implementation of this Policy as an ongoing project.
- Encourage dialogue on how General Atlantic can accommodate Sustainability & ESG Considerations relevant to financial value in a way that is consistent with its investors and other stakeholders' initiatives in these areas.

The Policy is subject to change and will be reviewed and amended periodically, as appropriate, and supersedes and replaces any prior General Atlantic Responsible Investment Policy.

Version History:

- *Version 1: January 2018*
- *Version 2: March 2023*
- *Version 3: February 2025*
- *Version 4: July 2026*

