SIRIS

Environmental, Social and Governance Policy
Summary

1. Purpose

Siris Capital Group, LLC ("Siris" or the "firm") seeks to invest responsibly and to incorporate the consideration of material environmental, social and governance ("ESG") factors into the firm's investment, portfolio company oversight, and risk management processes. Siris aims to achieve financial returns for its investors through the integration of both financial and operational expertise. In doing so, Siris seeks to understand the evolving risks that affect its ability to achieve this goal. Siris believes that appropriate examination and management of material ESG risk factors can, depending on the circumstances, potentially influence investment considerations such as financing, customer loyalty, human capital, reputation, and overall company performance and valuation.

In developing its ESG policy ("Policy"), Siris reviewed documents from leading nonprofit organizations focused on advancing responsible investment, including the Principles for Responsible Investment ("PRI"), the Sustainability Accounting Standards Board ("SASB"), and Business for Social Responsibility ("BSR"). Siris believes that appropriate consideration of material ESG risk factors when making investments and overseeing the management of its portfolio companies can support value preservation, and, in certain circumstances, value creation in its investment portfolio.

2. ESG Guidelines

Material ESG risk factors vary among companies, depending on industry, geography, and constituents. Siris seeks to focus on ESG factors that it believes can present high levels of risk and would be most important to the returns of its investment(s) under the circumstances. Consistent with Siris' desire to invest responsibly, Siris incorporates material ESG risk factors into its investment decisions as well as its ownership policies and practices. Siris also strives to appropriately disclose and report on the ESG issues and activities of its portfolio companies.

Siris has chosen the following guidelines to help identify and manage material ESG risks in its investing activities:

- Siris typically does not invest in commonly excluded industries (such as the production of controversial weapons, tobacco and alcohol, and the production of fossil fuels) by virtue of its focus on technology and technology-related companies. Additionally, Siris generally avoids exposure to certain investments that present high levels of ESG risk, such as businesses that it knows to operate in a predatory, discriminatory or otherwise exploitative manner.

- While the specifics can be expected to vary on an investment-by-investment basis, Siris typically takes into consideration material ESG risk factors that it believes to be relevant and material for the technology sector.

- As part of its pre-investment due diligence process, Siris generally reviews material ESG risks that it considers appropriate under the circumstances. In doing so, Siris may reference SASB's Materiality Map.

- Siris is committed to compliance with applicable national, state and local labor laws, and encourages its portfolio companies to provide a safe and healthy workplace in conformance with national, state and local law.

- Siris includes in its compliance program appropriate coverage of the prohibitions of the Foreign Corrupt Practices Act and the importance of compliance by Siris personnel and portfolio companies doing business outside of the United States.

- Siris' representatives on its portfolio company boards of directors are generally accessible to, and willing to engage with, relevant portfolio company stakeholders with respect to ESG matters, either directly or through representatives of the portfolio companies, as Siris considers to be appropriate under the circumstances.

- Siris endeavors to foster transparency with its limited partners as it pertains to Siris' ESG initiatives, including by delivering an annual ESG Report.

- The Policy is accessible to Siris professionals, limited partners, portfolio company management teams, and other key stakeholders.

3. Approach to ESG in the Investment Process

Siris intends to integrate the thoughtful consideration of ESG risks both pre- and post- investment.

<u>Pre-Investment</u>
Siris' Investment professionals are expected to review relevant ESG considerations and assess whether a target company adheres to the ESG Guidelines outlined in the *ESG Guidelines* section.

<u>Portfolio Company Engagement</u>
Siris believes it is important to be good stewards of its portfolio companies. In this context, Siris views stewardship to include active engagement with its portfolio company management teams on material ESG risk factors. Siris believes that appropriate examination and management of ESG risk factors can, depending on the circumstances, potentially influence investment considerations such as financing, customer loyalty, human capital, reputation, and overall company performance and valuation.

<u>Portfolio Metrics</u>
When Siris moves forward with the acquisition of a target company, it typically utilizes material ESG risk factors identified in the due diligence process to help inform the development of appropriate ESG metrics that Siris will monitor during ownership. Where appropriate, the input

of a portfolio company’s management team is also considered. Siris’ Investment professionals support and encourage portfolio companies to report on a set of ESG metrics, where applicable, to the boards of directors periodically. Some of these metrics are applicable to all Siris portfolio companies, and others are customized based on the company’s industry and unique operations.

Sample ESG Risk Factors

The list below includes examples of some of the potential risk factors that Siris may consider in its investment due diligence process and/or may monitor in its portfolio companies. These are examples only, and not intended to be representative of any particular investment or investment opportunity.

Environmental:
- Electricity and energy consumption
- GHG emissions
- Water usage
- Physical risks from climate change
- Transition risks related to climate change

Social:
- Supply chain management
- Diversity, equity and inclusion
- Employee engagement
- Health and safety
- Labor practices and human rights
- Charitable activities

Governance:
- Business ethics
- Service disruptions
- Anti-bribery and anti-corruption practices
- Customer privacy
- Data security

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