ALIVE
Acumen LatAm Impact Ventures

RESPONSIBLE INVESTMENT POLICY

Acumen LatAm Impact Ventures

2025

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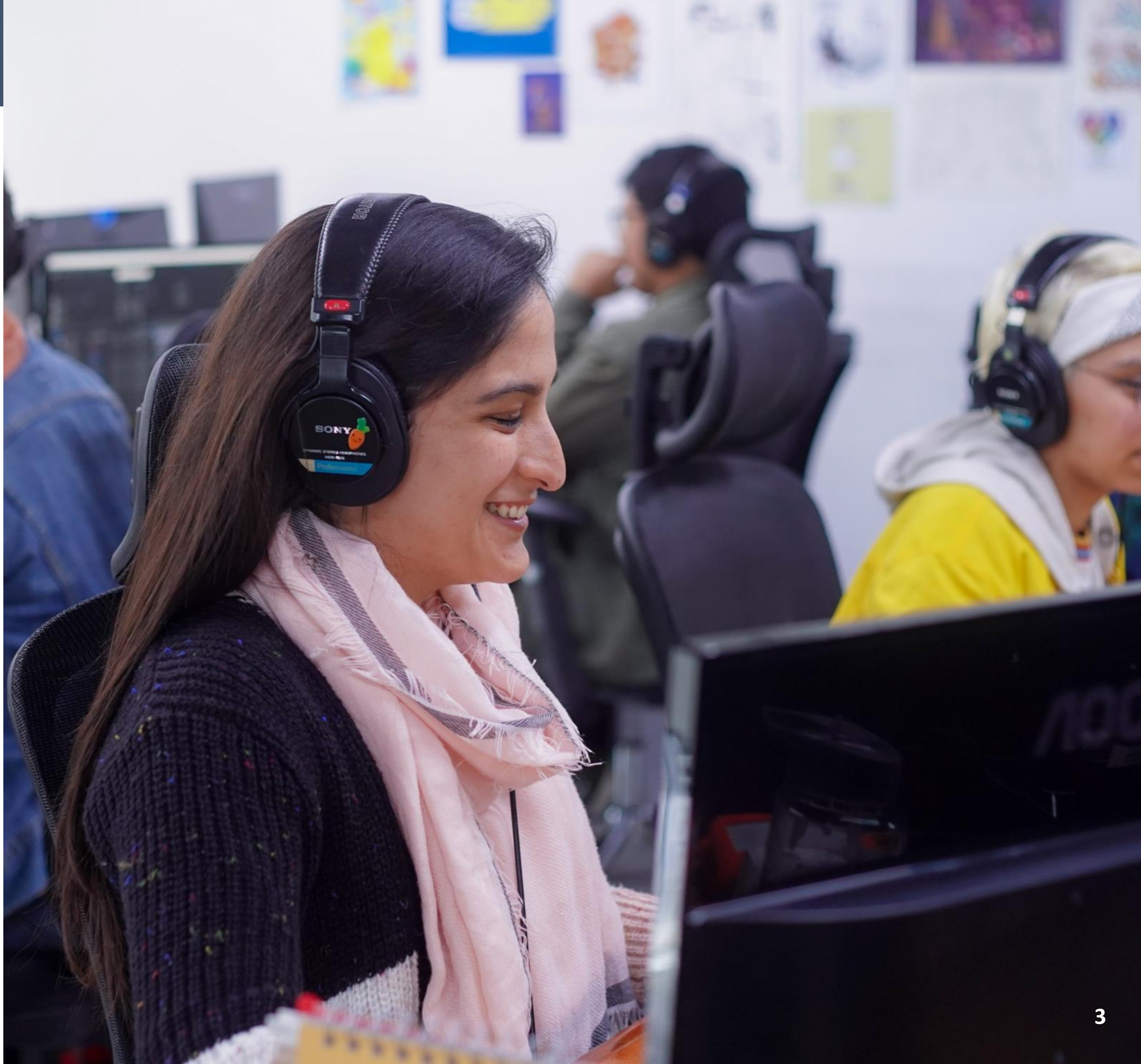
1. Purpose and Scope

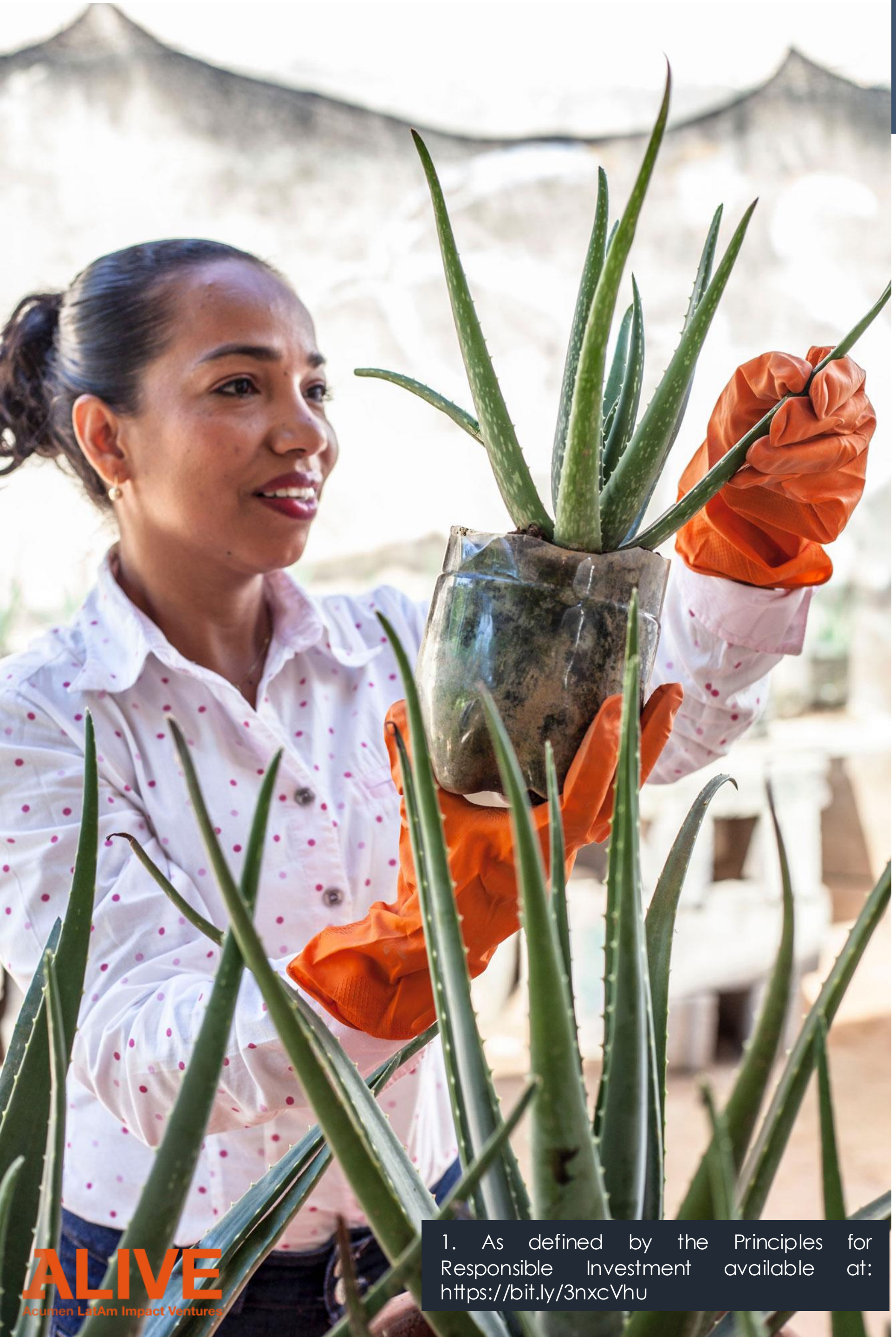
The purpose of the Responsible Investment Policy (“The Policy”) is to describe the framework governing ALIVE’s operations, its commitment to investing in companies benefitting low-income communities, and its approach to ESG (environmental, social & governance) and sustainability across its portfolio and activities.

ALIVE promotes compliance with this Policy and all its principles. This Policy is continuously communicated both internally and externally.

This policy applies to all of ALIVE’s investments and operations.

The Responsible Investment Policy is reviewed and updated as required and at least annually.





2. About Us

Acumen LatAm Impact Ventures – ALIVE – is
a *new* type of Latin American fund manager.

- A fund manager that places impact at centerstage, measuring impact using a data-driven approach to not only count lives but more importantly to understand how lives are being impacted.
- A fund manager that incorporates a gender lens investing every step of the way, from origination to post-investment management.
- A manager that has built a climate smart investment approach to help low-income communities prepare for, respond to, and recover from the effects of climate change.
- A fund manager that seeks to build a vibrant community of like-minded investors that truly care about impact and learning.
- A fund manager that seeks to grow the impact investing space in Latin America by collaborating and sharing knowledge broadly.
- And finally, but equally importantly, a fund manager that seeks to provide attractive risk-adjusted returns to its investors.

i) Our Purpose

The growing inequality in Latin America, coupled with the rise of high caliber mission-driven entrepreneurs that are addressing the needs of low-income populations by taking advantage of the region's key competitive market conditions, presents a substantial opportunity for investors to achieve both social and financial returns while making a lasting impact. These companies are an important engine of growth in the region and have the capacity to truly drive change. However, most of these enterprises struggle to obtain investment capital. ALIVE intends to provide critical capital and operational support to enable these businesses to scale their operations, maximize their impact, and reach long-term financial profitability.

ii) ESG Commitment

ALIVE understands responsible investment as a strategy and practice to incorporate Environmental, Social, and Governance (ESG) factors in investment decisions and active ownership[1]. ALIVE is convinced of the positive effect that implementing best ESG practices has in its portfolio companies and subsequently in the long-term performance of its investment portfolios. As a result, ALIVE commits to performing ESG assessments throughout its investment processes and proactively engaging all portfolio companies in the implementation of best ESG practices and to periodically measure these matters throughout the investment life.

As an asset manager, ALIVE has a duty to act in the best long-term interests of its investors. In this fiduciary role, we believe that ESG matters can have a positive effect on the performance of investment portfolios. We also recognize that applying the UNPRI Principles may better align investors with the broader objectives of society. In that sense, ALIVE will make its best possible efforts to maintain its status as a PRI signatory and adopt ESG good practices.

ALIVE will seek to maintain and continuously improve its ESG Management System (ESG MS) and act materially in accordance with the ESG Requirements and Principles outlined in this document. ALIVE will make its best efforts to materially comply with the ESG Requirements of its stakeholders and take all reasonable steps in anticipation of known or expected future changes to or obligations under the same.

Placing impact at the center of ALIVE's investment focus requires a strong ESG commitment. By performing a thorough analysis of ESG matters and implementing ESG best practices across its portfolio, ALIVE is ensuring its investment and social impact purpose is fulfilled. Responsible investment pushes ALIVE to achieve its goal of providing capital and support to companies addressing the needs of low-income populations.

1. As defined by the Principles for Responsible Investment available at: https://bit.ly/3nxcVhu

3. Our ESG and Impact Requirements and Principles (1/2)

As an impact fund manager, ALIVE is committed to the economic development of the region and reducing the social gaps that exist in our target countries. As a result, ALIVE seeks to invest only in companies that have social impact embedded in the DNA of their businesses.

Furthermore, ALIVE is committed to incorporating Environmental, Social & Governance (ESG) issues into investment analysis and decision-making processes as well as to encouraging portfolio companies to adopt policies and practices that foster sustainability and social responsibility.

ALIVE has a core set of ***requirements*** that all portfolio companies are expected to meet. Additionally, ALIVE has a broader set of ***principles*** that portfolio companies should make best efforts to align with based on their ESG risks and opportunities. ALIVE applies both its requirements and principles to guide its own operations.

i) ALIVE's ESG and Impact Requirements

In addition to complying with ALIVE's Exclusion List and KYC checks[1,2], ALIVE asks that all portfolio companies align to the below ***requirements***.

Overall:

- Promptly report ESG incidents which may have a material adverse effect on the company.[3]

Environment:

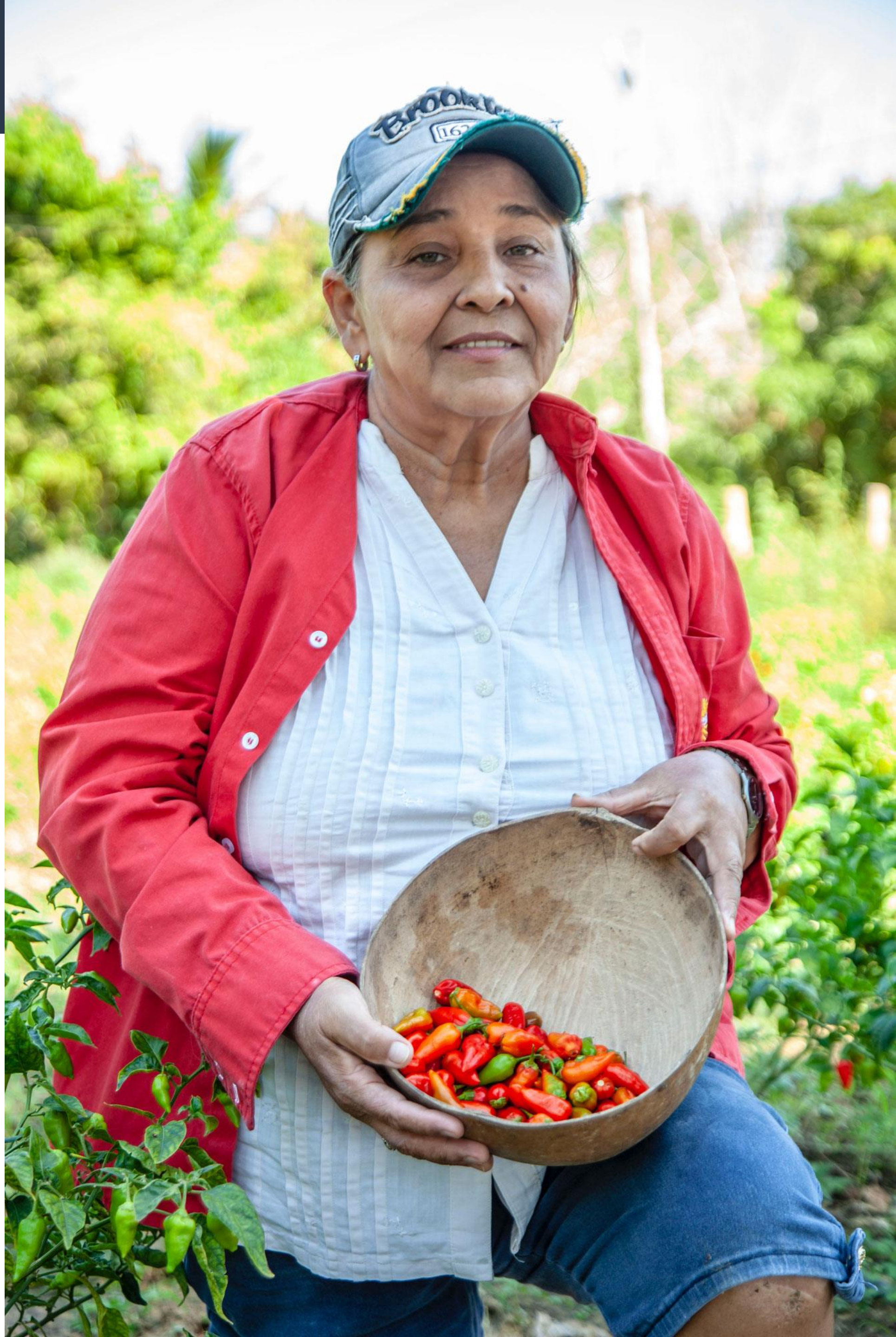
- Measure and report on the consumption of energy, renewable energy share, and production of Scope 1 and 2 GHG emissions (tCO2eq).

Social:

- Operate a robust grievance mechanism which stakeholders can use to express concerns and, where appropriate, engage in finding resolutions.
- Ensure that all employee positions comply with minimum wage requirements and decent work, non-exploitation, and anti-discrimination practices consistent with workers' Fundamental Principles and Rights at Work.[1]
- Ensure employees are protected from all types of harassment and abuse, including sexual harassment.
- Ensure compliance with Health and Safety best practices.
- Establish a robust data protection policy that complies with local and international laws and regulations.
- Become 2X Eligible or achieve more 2X criteria over time.[4]

Governance:

- Ensure compliance with Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT) best practices.
- Ensure compliance with Anti-Bribery and Anti-Corruption (ABC) best practices.
- Introduce formal Know Your Customer (KYC) processes for engaging with third parties.
- Be transparent and accurate in all information shared internally and externally, including information shared with Third Parties.



1. See Annex C for ALIVE's Exclusion List (including the definition of Fundamental Principles and Rights at Work)
2. See Annex H for an overview of ALIVE's KYC process
3. See Annex E for an overview of ESG incidents
4. [2X Challenge, 2X Criteria, 2024]

3. Our ESG and Impact Requirements and Principles (2/2)

ii) ALIVE's ESG and Impact Principles

ALIVE also encourages and supports portfolio companies to align with the below ***principles***.

Portfolio companies make best efforts to complete an ESG project in hand with ALIVE within one year of investment. Within this, portfolio companies establish or strengthen an ESG management system.[1] This enables companies to assess ESG risks and opportunities and, therefore, prioritize which of the below ***principles*** to address through ESG management programs.

Where portfolio companies face specific ESG risks and opportunities not covered by the ***principles***, further elements may be added in line with international standards and best practice.

ALIVE also encourages portfolio companies to advance ESG best practices within their value chains.

Overall:

- Establish or strengthen a robust ESG management system.[1]
- Promote the implementation of ESG best practices across the company's value chain and when engaging with key stakeholders, particularly when working with Third Parties.

Environment:

- Assess company-level exposure and vulnerability to climate risks and develop mitigation strategies (for companies in highly exposed sectors)
- Minimize the impact of company operations on loss of habitat, environmental loss, or over-exploitation of resources.
- Measure and report on the consumption of key resources (e.g., water) and the production of damaging outputs (e.g., hazardous waste).
- Evaluate the environmental impact caused by company operations and across the company's value chain. This includes measuring and reporting Scope 3 emissions (tCO2eq) where relevant (i.e., there is a high risk of material emissions) and feasible.
- Minimize the production of emissions, toxic pollution, and any harm that could result from its operations and investments.

Social:

- Ensure that all full-time employees are formally hired, according to local regulation.
- Protect local communities and mitigate all negative impacts that could stem from its operations.
- Defend and preserve both the cultural heritage and the indigenous communities that may be impacted by or benefit from its operations.
- Support the resilience of key stakeholders, including employees, end beneficiaries, and local communities, to the impacts of climate change.
- Ensure the adoption of Diversity, Equity, and Inclusion (DEI) best practices.
- Promote equity in opportunities between employees across race, color, sex, religion, political opinion, national extraction, or social origin, including within hiring practices, salary setting, career development and advancement, and Board and leadership representation.

Governance:

- Develop codes of ethics and conduct which reference legal ethical guidelines appropriate to the company's industry and include considerations of external stakeholders.

1. See Annex F for components of a robust ESG management system

4. Our Investment and Impact Strategy (1/3)

i) Investment Strategy

ALIVE invests in impact-driven early growth companies in Latin America that have profitable business models and require capital to grow, with a focus on Colombia and Peru. ALIVE provides investees with equity or mezzanine financing to achieve their growth objectives.

ALIVE investees bring to market innovative solutions that tackle the challenges of low-income communities in the following four areas:

Education and pathways to quality jobs

ALIVE invests in companies that provide vulnerable populations with high quality, cost effective and pertinent education and training, and connects them with the formal job market. Within this strategy, ALIVE will focus on companies in sectors such as, but not limited to:

- Edtech
- Workforce development
- HRtech

Sustainable income generation opportunities

ALIVE invests in companies that provide services that allow SMEs and small-scale entrepreneurs – including farmers – to thrive. Within this strategy, ALIVE will focus on companies in sectors such as, but not limited to:

- Fintech
- Agribusiness/Agtech
- Tech platforms that support small businesses

Access to critical goods and services

ALIVE invests in companies that provide vulnerable communities with critical goods and services, such as access to energy, telecommunications, and access to health. Within this strategy, ALIVE will focus on companies in sectors such as, but not limited to:

- Access to renewable energy
- Access to connectivity/internet
- Healthtech

Solutions for climate resilience

ALIVE will invest in companies that provide solutions which improve the ability of vulnerable communities to prepare for, recover from, and adapt to climate related risks. Within this strategy, ALIVE will focus on companies in sectors such as, but not limited to:

- Foodtech
- Resilient supply chains
- Climate-data and early warning systems

In many cases, the companies which ALIVE supports within the three investment verticals outside of the climate vertical will also have a significant impact on the climate resilience of end clients or beneficiaries. ALIVE seeks to identify, measure, and strengthen the resilience impact of investments across other verticals in the same way as it does for investments which fall in the climate vertical.

ii) Impact Strategy

As defined by ALIVE's investment strategy, ALIVE is focused on investing in high-growth companies that leverage technology and/or other game-changing innovations to serve low-income communities, with a focus in Colombia and Peru. ALIVE seeks to invest only in companies that have impact embedded in their DNA and, therefore, have a positive relationship between commercial success and impact.

4. Our Investment and Impact Strategy (2/3)

For ALIVE, impact measurement is not just a reporting activity or only about counting people. The firm truly believes the impact its companies have across their respective value chains represents a unique competitive advantage. For ALIVE, measuring impact is similar and equally important to measuring financial and operational performance.

ALIVE guides its impact measurement processes using the widely adopted Impact Management Project (IMP) framework. ALIVE has developed an Impact Tool (see Annex I) to assess portfolio company impact performance against each of the IMP's five dimensions of impact:

- **What:** Tells us what outcome the enterprise is contributing to, whether it is positive or negative, and how important the outcome is to stakeholders.
- **Who:** Tells us which stakeholders are experiencing the outcome and how underserved they are in relation to the outcome.
- **How Much:** Tells us how many stakeholders experienced the outcome, what degree of change they experienced, and how long they experienced the outcome for.
- **Contribution:** Tells us whether an enterprise's and/or investor's efforts resulted in outcomes that were likely better than what would have occurred otherwise.
- **Risk:** Tells us the likelihood that impact will be different than expected.

ii) Our Gender Lens Approach

To counteract the pervasive discrimination and power dynamics that limit opportunities for women in Latin America, ALIVE applies a robust gender lens to its investing activities, from initial due diligence to exit.

This allows the firm to support investees in achieving greater gender equality and ensure that women have the same opportunities as employees, customers, and suppliers of ALIVE's investees. While ALIVE does not screen out companies that are not owned or managed by women in its selection process, the firm only invests in companies that are committed to working towards gender equality. In this regard, ALIVE works closely with the companies to develop specific plans and dedicate resources to support gender equality implementation projects with external specialists throughout the portfolio.

iii) Our Climate Lens Approach

ALIVE recognizes that the low-income communities we aim to serve are and will continue to be disproportionately impacted by the effects of climate change. To mitigate the contribution of its portfolio to climate change and increase the climate resilience of low-income communities, ALIVE applies a climate lens to all investments throughout its investment process. Additionally, ALIVE actively identifies and supports companies providing climate resilience solutions through our climate verticals.

ALIVE's climate lens includes assessing climate risks and opportunities for companies and their end clients or beneficiaries to understand the climate resilience of each respectively and measuring companies' Scope 1 and 2 GHG emissions to understand their contribution to climate change.

Further, ALIVE actively seeks investments which will improve community climate resilience through its climate investment vertical. For these investments and for investments in other verticals which could also support resilience, ALIVE seeks to measure the impact of the company on the climate resilience of their end clients or beneficiaries and, where appropriate, strengthen this impact through business development projects with climate-focused technical advisory.

4. Our Investment and Impact Strategy (3/3)

ALIVE's Impact Framework Summary

IMPACT FRAMEWORK

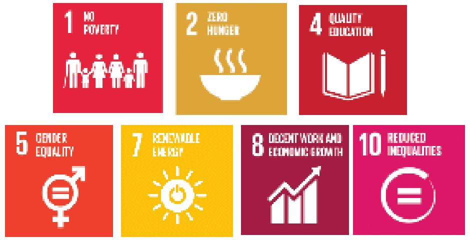
ALIVE tracks **industry-specific impact metrics** and has developed an **Impact Tool** (see Annex I) aligned to the widely recognized Impact Management Project (IMP) to measure portfolio companies' impact performance.

IMPACT MANAGEMENT PROJECT

- WHAT
- WHO
- HOW MUCH
- CONTRIBUTION
- RISK

THE GLOBAL GOALS
For Sustainable Development

The firm, **through its investments** in high-impact companies, will track its contribution to the **attainment of the SDGs** in its target countries.



PRI Principles for Responsible Investment

More broadly, ALIVE will reference its **alignment** with the UN-backed **Principles for Responsible Investing**,

Recognize the responsibility of asset owners, managers, and advisors to include ESG considerations in every phase of the investment cycle

GENDER LENS APPROACH

ALIVE implements a **gender lens approach** throughout all its investment processes and will help companies **track and improve** their gender metrics.

ALIVE was a **2XGLOBAL founding member**

CLIMATE LENS APPROACH

ALIVE applies a **climate lens approach** to all its investments and actively identifies and supports companies providing **solutions which strengthen climate resilience** in low-income communities.

TCFD TASK FORCE ON CLIMATE-RELATED FINANCIAL DISCLOSURES

ALIVE has adapted its approach based on the **TCFD recommendations** and goes further by actively investing to strengthen climate resilience.

5. ESG and Impact within the Investment Process

i) Initial Due Diligence

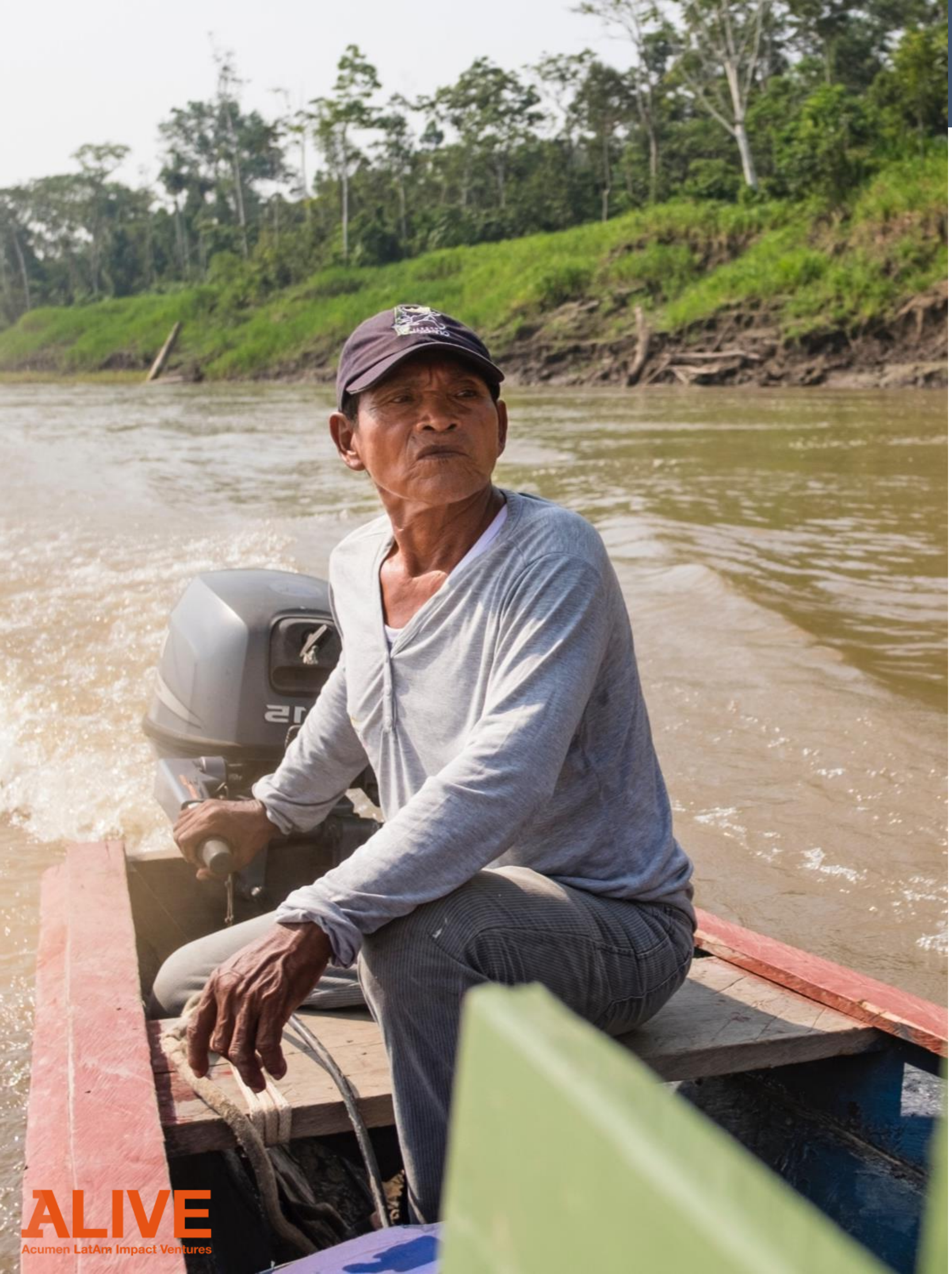
Once the Investment Team agrees on an opportunity, they initiate light due diligence, including discussions with the promoter, business analysis, and market assessment. They conduct KYC checks on key stakeholders to mitigate ML/FT risks and assess ESG risks. The team also conducts an initial review of ESG risks and classifies the company's risk level. This includes identifying whether any key climate-related risks are significant. The team ensures alignment with ALIVE's Exclusion List and evaluates compliance with labor rights. They also assess the company's social impact thesis, conducting an initial impact scoring of the company and identifying whether the company has a potential climate resilience impact which needs to be analyzed at later due diligence stages. Finally, the team review management's commitment to gender equality using preliminary gender metrics.

ii) Formal Due Diligence

During formal due diligence, ALIVE rigorously evaluates investments across six key areas: social and environmental impact, financial sustainability, scalability, innovation, management, and corporate governance. The Investment Team conducts in-depth industry and regulatory analyses, agrees on an investment structure, and develops a due diligence work plan approved by the MPs. This process includes reviewing company data, conducting site visits, and engaging with key stakeholders, including clients and industry experts. The team assesses ESG risks using IFC Performance Standards, including assessing key climate-related risks such as maladaptation risks, company exposure and vulnerability to climate risks, and emissions risks. The team evaluates social impact alignment with SDGs and updates the impact score. If the company has been identified as having a potential climate resilience impact, the team analyses whether this impact is compelling given the climate context of end clients or beneficiaries. A gender integration assessment is also performed to assess alignment with 2X criteria. Finally, the team collaborates with the company to define performance indicators and a data collection plan for ongoing ESG and impact tracking.

iii) Post-investment ESG Management

ALIVE differentiates itself further through active portfolio management, offering tailored support in strategy, finance, recruitment, ESG, impact measurement, and market access. The team closely monitors portfolio companies, leveraging board positions to track financial, operational, and social performance. With expertise in gender integration and climate resilience, ALIVE provides technical assistance in those areas as well as conducts a series of deep impact studies to measure and enhance portfolio impact. ESG support is integral, with companies required to develop ESG Management Systems and report on ESG risks and incidents. ALIVE aims to conduct ESG-focused technical assistance projects with all of its portfolio companies, not only to improve ESG practices but to help develop portfolio team capacity to continue implementing robust ESG management systems. Ultimately, ALIVE ensures companies align with its ESG and impact principles, offering remediation measures when necessary.



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6. ALIVE's Exclusion List (1/3)

ALIVE will not invest in enterprises involved in the production, trade, or use of the products, substances or activities listed below:

- Non-compliance with workers' Fundamental Principles and Rights at Work[1]
- Activities or materials deemed illegal under host country laws or regulations or international conventions and agreements, or subject to international phase-outs or bans, such as:
  - Ozone depleting substances, PCB's (Polychlorinated Biphenyls) and other specific, hazardous pharmaceuticals, pesticides/herbicides or chemicals
  - Wildlife or products regulated under the Convention on International Trade in Endangered Species or Wild Fauna and Flora (CITES)[2]
  - Unsustainable fishing methods (*e.g.*, blast fishing and drift net fishing in the marine environment using nets in excess of 2.5 km in length)
- Cross-border trade in waste and waste products, unless compliant with the Basel Convention and the underlying regulations
- Destruction[3] of High Conservation Value areas[4]
- Radioactive materials[5] and unbounded asbestos fibers[6]
- Pornography and/or prostitution
- Racist and/or anti-democratic media
- Finance any entity for whom its main business activity is related to the following:
  - Alcoholic Beverages (except beer and wine)
  - Tobacco
  - Weapons and munitions
  - Gambling, casinos and equivalent enterprises

[1] Fundamental Principles and Rights at Work means (i) freedom of association and the effective recognition of the right to collective bargaining; (ii) prohibition of all forms of forced or compulsory labor (*i.e.*, all work or service, not voluntarily performed, that is extracted from an individual under threat of force or penalty as defined by ILO conventions); (iii) prohibition of child labor, including without limitation (A) that persons may only be employed if they are at least 14 years old, as defined in the ILO Fundamental Human Rights Conventions (Minimum Age Convention C138, Art. 2), unless local legislation specifies compulsory school attendance or the minimum age for working, in which cases the higher age shall apply, (B) that persons under 18 be found fit to work via medical examination, and (C) the prohibition of persons under 18 from working in hazardous conditions (which includes construction activities) or from working at night; (iv) elimination of discrimination in respect of employment and occupation, where discrimination is defined as any distinction, exclusion or preference based on race, color, sex, religion, political opinion, national extraction, or social origin. (International Labor Organization: www.ilo.org).

[2] www.cites.org.

[3] Destruction means the (1) elimination or severe diminution of the integrity of an area caused by a major, long-term change in land or water use or (2) modification of a habitat in such a way that the area's ability to maintain its role is lost.

[4] High Conservation Value (HCV) areas are defined as natural habitats where these values are considered to be of outstanding significance or critical importance (See http://www.hcvnetwork.org).

[5] This does not apply to the purchase of medical equipment, quality control (measurement) equipment or any other equipment where the radioactive source is understood to be trivial and/or adequately shielded.

[6] Excluding the purchase and use of bonded asbestos cement sheeting where the asbestos content is <20%.

6. ALIVE's Exclusion List (2/3)

- Forestry projects or operations that are not consistent with the Inter-American Development Bank's Environment and Safeguards Compliance Policy (GN-2208-20)
- Persistent Organic Pollutants (POPs)[1]
- Drugs other than those used for medical purposes
- Coal prospection, exploration, mining or processing
- Oil exploration or production
- Standalone fossil gas exploration and/or production[2]
- Transport and related infrastructure primarily[3] used for coal for power generation
- Crude Oil Pipelines
- Oil Refineries
- Construction of new or refurbishment of any existing coal-fired power plant (including dual)
- Construction of new or refurbishment of any existing HFO-only or diesel-only power plant[4] producing energy for the public grid and leading to an increase of absolute CO_2 emissions[5]
- Any business with planned expansion of captive coal used for power and/or heat generation[6]
- Manufacture and marketing of products for direct abortions; manufacture of pharmaceutical agents whose sole purpose is their use as an abortifacient or for the destruction and/or cryopreservation of human embryos; or participation in the funding of embryonic stem cell research.
- North American or Australian real estate investment trusts
- Supply, production, sale or distribution of contraceptive or sterilization agents or devices for men or women
- Commercial logging operations with raw materials from the primary tropical humid forest or the primary tropical dry forest
- Production or trade in wood or other forest products that do not come from sustainably managed forests

[1] Defined by the International Convention on the reduction and elimination of persistent organic pollutants (POPs) (September 1999) and presently include the pesticides aldrin, chlordane, dieldrin, endrin, heptachlor, mirex, and toxaphene, as well as the industrial chemical chlorobenzene (www.pops.int).
[2] Gas extraction from limnically active lakes is excepted from this exclusion.
[3] "Primarily" means more than 50% of the infrastructure's handled tonnage.
[4] Investments (up to a maximum of 20% of the fund) in new or existing HFO-only or diesel-only power plants are allowed in countries that face challenges in terms of access to energy and under the condition that there is no economically and technically viable gas or renewable energy alternative.
[5] I.e. where energy efficiency measures do not compensate any capacity or load factor increase.
[6] This does not apply to coal used to initiate chemical reactions (*e.g.*, metallurgical coal mixed with iron ore to produce iron and steel) or as an ingredient mixed with other materials, given the lack of feasible and commercially viable alternatives.

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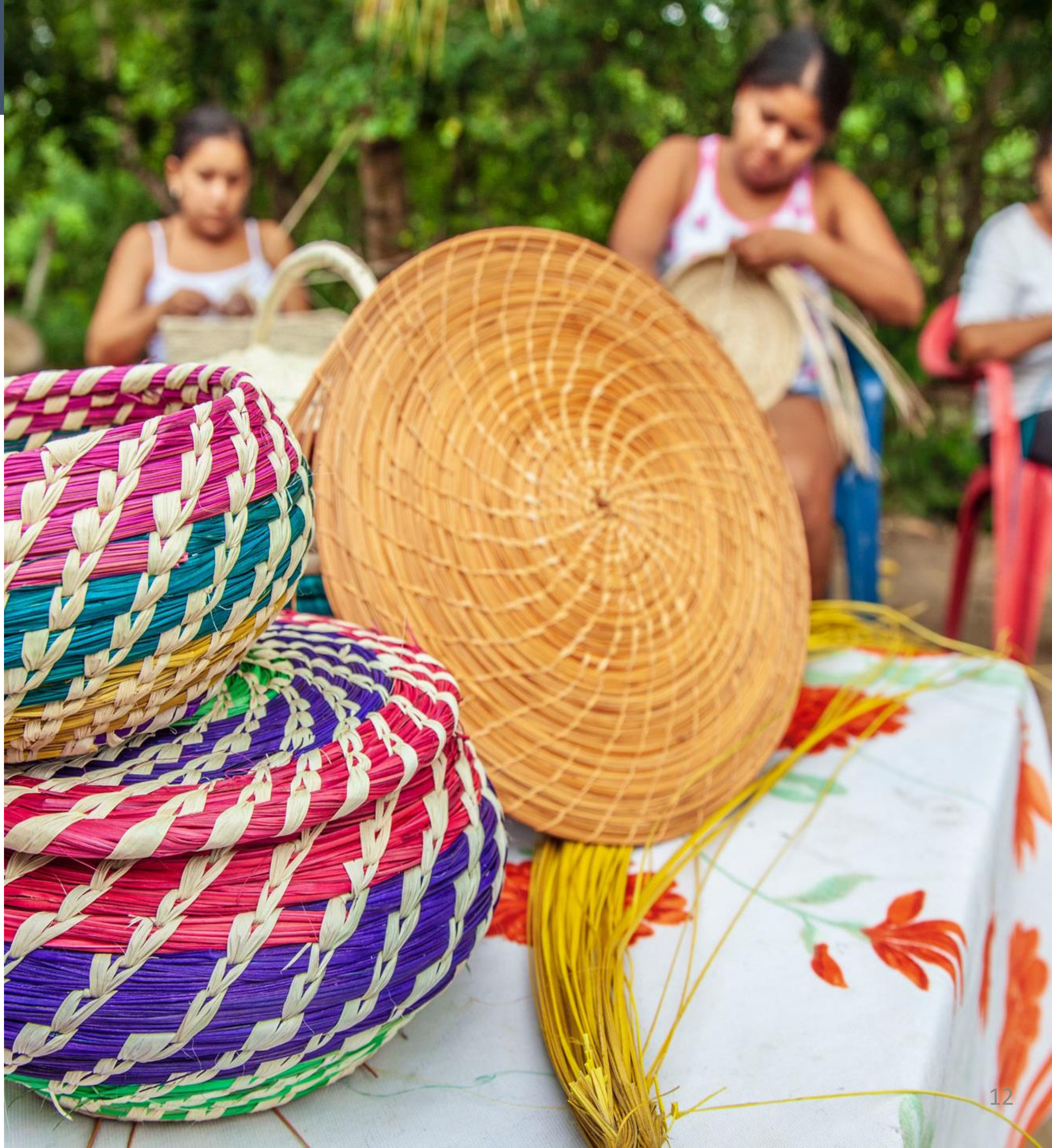

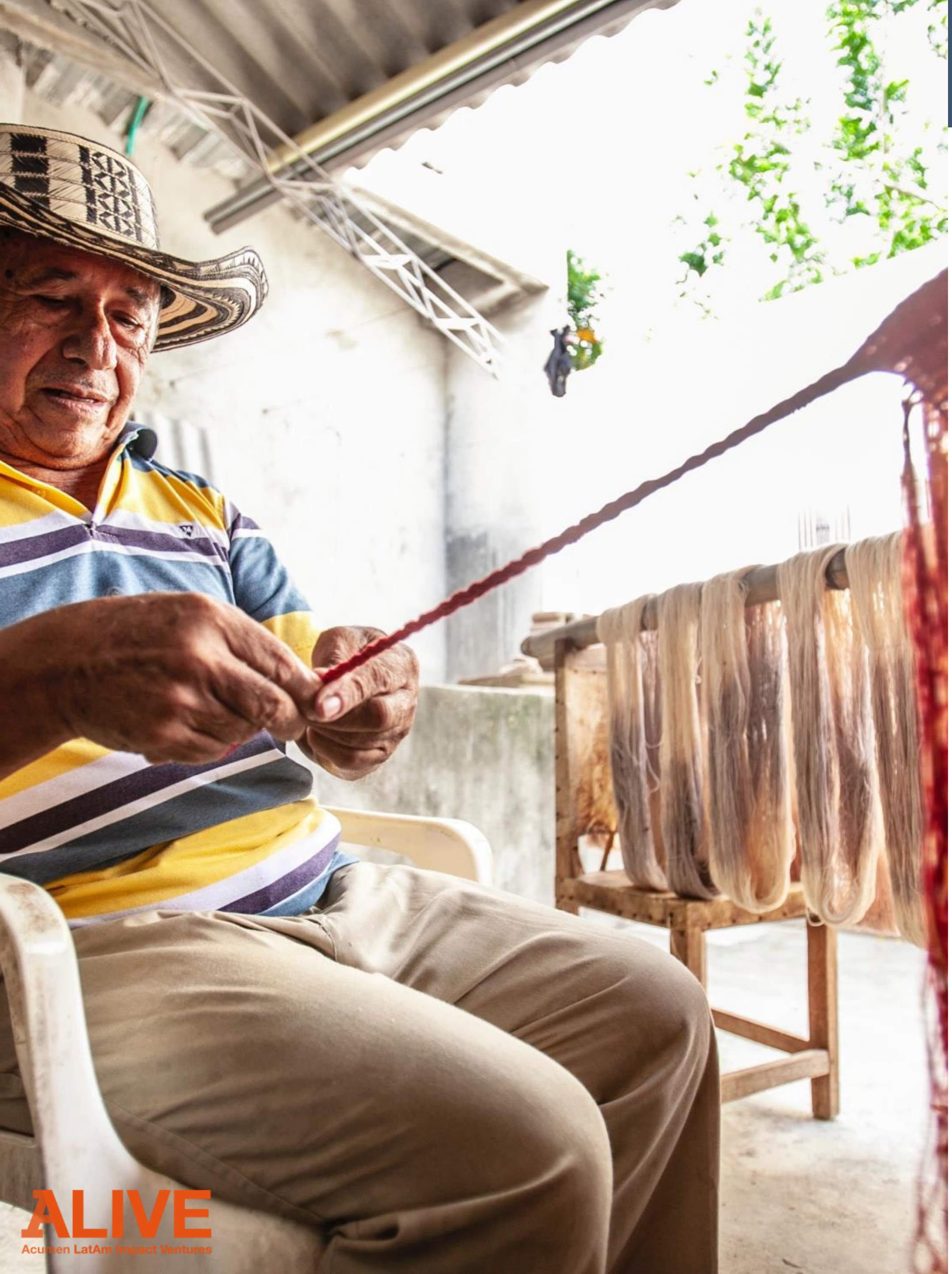

6. ALIVE's Exclusion List (3/3)

- Production or activities that affect the ownership of territory or land belonging to indigenous peoples, or claimed by them for adjudication, without the full documented consent of said peoples
- Operations in protected areas with special legislation when the operation has the potential to jeopardize the purpose for which the protected area was created.
- Activities that involve the introduction of exotic species and/ or genetically modified organisms (GMOs) without having the corresponding technical studies and authorization to enter the country by the pertinent regulatory institutions.
- Political activities
- Hostile takeovers
- Crypto assets and/or cryptocurrencies

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Thank you