

Environmental, Social and Governance Policy Statement

GUIDING PRINCIPLES

As an investor, owner and operator in real assets, TGC believes that ESG factors are an essential part of the day-to-day management of its people, portfolio, and operations. As a leader in sustainable infrastructure investing, TGC believes that value creation, environmental stewardship and sustainable development are complementary goals. As an overarching principle, we invest in renewable power generation, making a zero-carbon footprint an implicit ESG goal of the Firm.

TGC's ESG considerations are founded on three core principles:

A. Environment: Mitigate the Impact of TGC's Operations on the Environment

- **Environmental Stewardship:** Strive to minimize the environmental impact of operations improving efficient use of resources over time; and, embed sustainability into our investment and asset management processes.
- **Ethics and Fairness:** Operate with high ethical standards by conducting business activities in compliance with applicable legal and regulatory requirements and TGC's Code of Business Conduct and Ethics.
- **Reporting:** Track metrics including equivalent metric tons of CO₂, tons of waste recycled, and disposal of hazardous products.

B. Social: Be Good Stewards in the Communities Where We Operate

- **Local Employment:** Strive to employ local talent. Almost 100% of our construction and operations personnel come from the communities where we operate providing local jobs and adding value to these economies.
- **Union and Veteran employment:** Work with local unions and consistently seek to maximize veteran participation. Our Fund III LADWP projects are a good case study of this policy.

- **Community Engagement:** Engage with community groups that might be affected by TGC's actions to ensure that their interests, safety and well-being are appropriately integrated into decision-making.
- **Philanthropy:** Empower employees to participate in—and use resources to give back to—the communities in which the Firm operates.

C. Governance: Ensure the Well-Being and Safety of Employees

- **Employee Well-Being:** Meet or exceed all applicable labor laws and standards in jurisdictions where the Firm operates, which include respecting human rights, offering competitive wages and implementing nondiscriminatory, fully inclusive hiring and personnel practices.
- **Living Wages:** TGC employs union and prevailing wage contractors for the majority of its projects, providing living wages for project participants. TGC works with institutional quality contractors and subcontractors who have passed a rigorous screening process and constantly monitors our sites to ensure fair treatment of workers and safety compliance.
- **Health & Safety:** Aim to have zero serious safety incidents within Distributed Asset Solutions ("DAS") – TGC's operations and maintenance subsidiary) by working towards the implementation of consistent health and safety principles across the organization. DAS is led by senior engineers and manufacturing operators who have a long track record of implementing Quality, Health, Safety, and Environmental policies in the large-scale manufacturing industry.
- **Transparency:** Through transparency, we strive to be accessible to investors and stakeholders and to be responsive to requests for information and timely in our communication.

Integration of ESG Considerations in the Investment & Execution Management Process

TGC has learned from experience that beyond legal agreements, licenses and permits, constructive relationships with local communities and stakeholders are fundamental to successful solar power plant development, construction and operations.

Due Diligence

During the initial due diligence phase, TGC utilizes its operating expertise to identify any material ESG risks and opportunities relevant to the potential investment. Given that TGC operates in highly regulated energy business any due diligence involves ensuring environmental, legal and other regulatory compliance.

Investment Committee Process

All investments made by TGC must be approved by its Investment Committee. To ensure that ESG considerations are fully integrated into the due diligence phase, our execution and due diligence team provide a detailed memorandum to the Investment Committee, outlining any material ESG issues and potential mitigation strategies, including permitting and legal risks as well as environmental and labor risks.

Post-Acquisition

For each acquisition, the investment and portfolio management team creates an operations and maintenance plan that, among other things, ensures that any ESG-related matters such as environmental permits are monitored and, if necessary, remediated. DAS has adopted common industry principles and shares best practices for addressing health and safety risks across the organization. Furthermore, we require third party service providers such as construction companies to adhere to such principles.

Responsibility

A designated staff member tracks environmental metrics. Panos Ninios leads the ESG policy for the Firm.

About TGC

Founded in 2011, True Green Capital Management LLC (“TGC”) is a specialized energy infrastructure asset management firm based in Westport, Connecticut with several private equity funds under management. As an operating solar company, TGC has invested into a distributed solar power generation portfolio across fourteen states including Vermont, Massachusetts, Rhode Island, Connecticut, New York, New Jersey, Delaware, South Carolina, Tennessee, Idaho, California, Maryland, Colorado, and Illinois. The firm is led by a team of investment professionals with a proven track record and a demonstrated capacity to originate, finance, construct, and operate distributed power generation projects.

TGC believes the continued increase of power prices and decreasing entry costs of distributed power generation technology will continue to lead to compelling investment opportunities that provide a stable cash flow stream with little to no correlation to the broader markets.

TGC is currently focused on the approximately \$2 trillion distributed power generation market with an emphasis on the sub-utility scale solar power segment. Thanks to rapid advancements in technology, the cost of distributed power generation, including solar, is now on par with traditional electricity generation sources. In many U.S. states it represents one of the few sources of new power generation infrastructure that can be added to the power network quickly, reliably and cost efficiently.

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True Green Capital Management, LLC

Signatory to the PRI