



ANTI-CORRUPTION POLICY

Second Horizon Capital is committed to doing business with integrity and to earning the trust of our employees, communities, partners, vendors, and others across our value chain.

The purpose of this Policy is to outline Second Horizon's responsibilities to anti-corruption and to provide guidance to internal and external stakeholders on how to deal with corruption issues should they arise.

Second Horizon Capital policy prohibits engaging in any form of corruption. Actions and behaviors that violate this Policy and will not be tolerated. Such actions or behaviors include:

- Giving payments, undue advantage, or excessive gifts and hospitality to secure an advantage or to influence business or public authority decisions;
- Seeking competitive advantage through unethical or illegal business practices;
- Engaging in a secret understanding between two or more persons to gain something illegally, influence an illegal outcome or defraud someone's rights;
- Receiving a bribe in exchange for confidential information;
- Misappropriating anything of value that was entrusted to someone because of their position;
- Concealing bribes within fees, commission payments, or any other financial transaction and/or contract;
- Favoring a person for opportunities or contracts, not because they are doing the best job (or have the potential to) but rather because of some extraneous feature (e.g., nepotism, cronyism);
- Making, offering to make, or authorizing payment to a third-party (e.g., broker, business associate, consultant or any intermediary) with reason to know, or suspect that all or part of the payment will be offered or given to anyone, including a government official, to secure an improper advantage, or to obtain or retain business; and
- Violating any applicable anti-corruption laws and regulations.

Each Second Horizon Capital employee, partner, and vendor must comply with this Policy within relevant areas of responsibility and guide their teams, partners, and suppliers to do so as well. The Company shall take disciplinary, corrective, or preventative action as it deems appropriate to address any actual or potential violation of this Policy. Breaches of this Policy may lead to disciplinary and other actions up to and including termination of employment or contract.

Any questions or concerns about violations of this Policy may be reported in confidence to the Managing Partner(s) and/or Vice President of Impact by direct outreach or by contacting compliance@secondhorizon.com. This Policy prohibits retaliation against any individual who complains of, or reports an instance of, violation of this Policy or participates in an investigation of a complaint.

This Anti-Corruption Policy was approved and made effective on July 12, 2023.