

## Grow Schools

### Responsible Investing Policy

**Effective Date: October 6, 2023**

Charter School Capital, LLC dba. Grow Schools (“Grow Schools”) has adopted a Responsible Investment Policy (“Responsible Investment”) to formalize our longstanding view of considering all stakeholders in our investment and management decisions. We hold ourselves to the highest business and ethical practices.

#### **I. Purpose**

The purpose of Grow Schools’s responsible investment policy is to outline a framework that integrates Environmental, Social, and Governance (“ESG”) considerations into investment decision-making. The primary objectives of this policy are to enhance long-term financial performance, mitigate risks, and promote sustainable development within our Grow Schools investment activities.

#### **II. Compliance with Applicable Laws and Regulations**

Grow Schools commits to comply with all relevant laws, regulations, and guidelines related to responsible investing, including those specific to real estate investments.

#### **III. Integration of ESG Factors:**

Within the context and constraints of its fiduciary responsibilities, Grow Schools integrates ESG factors into its investment decisions. This includes assessing the environmental risks of properties and evaluating social and governance opportunities, as defined in our Investment Committee Criteria.

#### **IV. Environmental Considerations:**

- i. 3<sup>rd</sup> Party Assessments: Grow Schools undergoes a Phase I Environmental Assessment on all acquisitions, conducted by a 3<sup>rd</sup> party.
- ii. Zero-tolerance: Grow Schools removes or remediates all underground storage tank issues identified. Should “friable asbestos” be identified, Grow Schools will require the seller to mitigate the asbestos issues identified prior to close.
- iii. Climate Resilience: Grow Schools assesses and manages climate risks associated with properties, considering factors such as flood zones, storm resilience, fire, and rising sea levels.

#### **V. Social Considerations:**

- i. Grow Schools seeks to enhance the role and impact of educational facilities in their local communities

#### **VI. Governance Considerations:**

- i. Transparency and Ethics: Grow Schools works with public educational institutions, which are held to high standards of transparency, integrity, and ethical conduct. Grow Schools is committed to these same values, as stated in our Anti-Bribery & Anti-Corruption Policy.
- ii. Board Diversity: Grow Schools encourages diversity in its Board, recognizing the benefits of diverse perspectives and inclusive decision-making.

- iii. Risk Management: Grow Schools integrates risk management practices into its investment strategy, ensuring that potential risks related to governance issues are identified and mitigated.

**VII. Exclusions:**

**VIII. Grow Schools only invests in assets intended for use by educational institutions. Stakeholder**

**Engagement:**

- i. Grow Schools engages with stakeholders, including investors, tenants, employees, and communities, to understand their concerns, gather feedback, and foster transparency and accountability.

**IX. Policy Review**

- i. This policy will be reviewed and updated, as necessary, regularly at Grow Schools's Executive Team and, or Board of Director meetings.

**This responsible investment policy aims to guide API's investment decisions toward responsible business practices and the long-term creation of value while considering the broader impacts of its investments on the environment and society.**