

ENVIRONMENTAL, SOCIAL AND GOVERNANCE (ESG)

WMP has adopted the following policy that is publicly available on its website reflecting Environmental, Social and Governance well-being (ESG) to reflect its commitment to creating value for all of its stakeholders and adhering to the highest responsible investing standards in the lifecycle of each investment.

The DC will review the ESG policy to evaluate and test compliance from time to time. In the event noncompliance is found by the DC or if Supervised Persons become aware of changes in companies with business dealings with WMP, whose products and services initially satisfied the ESG criteria but no longer satisfy the criteria, said persons must report the issue to the CCO or CIO to further investigate and determine appropriate resolution of the issue, which can include seeking rectification to conform to ESG compliance or if not possible or feasible a termination of the business relationship.

WMP will endeavor to integrate ESG considerations into various aspects of our business, including our own operations, our investment decisions and the advice we provide to the Private Funds, and our input into the operations and conduct of portfolio companies of the Private Funds.

1. Goals

Where consistent with our fiduciary obligations, it is our goal to:

1. Consider ESG issues and strive to incorporate these issues into our diligence and investment analysis and decision-making process where possible.
2. Seek to be accessible to, and engage with, relevant stakeholders either directly or through representatives of our portfolio companies, as appropriate.
3. Incorporate where possible ESG issues into our ownership practices and our participation in, and input into, the governance and operations of portfolio companies.
4. In seeking to grow and improve our portfolio companies, consider long-term sustainability and the impact on multiple stakeholders with respect to ESG issues. We will, through the appropriate governance mechanisms of those companies, strive to improve performance and minimize adverse impacts in these areas. In transactions where the Private Funds do not acquire a controlling position, we will seek to make our co-investors aware of ESG issues and promote the advancement of these principles.
5. Seek to use governance structures in our investments that provide appropriate levels of oversight in the areas of audit, risk management and potential conflicts of interest and to implement compensation and other policies that align the interests of owners and management.
6. Remain committed to compliance with applicable national, state, and local labor laws in the countries in which the Private Funds invest; support the payment of relatively competitive wages and benefits to employees; provide a safe and healthy workplace in conformance with national and local law; and, consistent with applicable law, respect the rights of employees to decide whether or not to join a union and engage in collective bargaining.
7. Maintain strict policies that prohibit bribery and other improper payments to public officials consistent with the Foreign Corrupt Practices Act, similar laws in other countries, and the OECD Anti-Bribery Convention.

8. Respect the human rights of those affected by our investment activities and seek to confirm that investments by the Private Funds do not flow to companies that utilize child or forced labor or maintain discriminatory policies.

9. Provide timely information to the limited partners of the Private Funds on ESG matters, and work to foster transparency about our activities in this area.

10. Encourage the management teams of portfolio companies to advance these same principles in a way that is consistent with their fiduciary duties and their own operating and business imperatives.

11. Strive to incorporate ESG considerations into our own operations, including management of firm personnel and resources, hiring and retention of service providers and our own governance and decision-making.

2. Integration

WMP will seek to integrate the consideration and thoughtful management of ESG-related issues throughout the investment cycle.

- Pre-investment:

Undertake ESG due diligence: As appropriate, WMP will seek to assess ESG value creation opportunities or risks for potential private equity investments considered through the Investment Committee process. When material ESG issues are identified, they may in certain circumstances be included in discussions with the Investment Committee, and external advisors may be engaged to carry out additional ESG-related due diligence as needed. Where management of, or performance on, a material issue is considered by WMP to need improvement, WMP will work with company management to support the development of a corrective action plan.

- Post-investment:

Management & Monitoring: Where there are curable material ESG issues identified during the diligence process, include the management of these issues in a 100-day plan post close, or otherwise monitor ongoing progress on ESG-related issues, as applicable. WMP will encourage the management teams of portfolio companies to identify and raise material ESG issues to the relevant decision-makers, including where appropriate, board-level individuals. Where appropriate, WMP will also strive to assist portfolio companies in the development of corrective action plans to adequately address the identified ESG related risks and opportunities. Finally, WMP will also strive to support its portfolio companies' efforts to report externally and internally on their ESG approach and performance as related to material ESG issues, where appropriate and reasonable.

3. Materiality

WMP will determine the materiality of ESG issues in its sole discretion. Factors that may be included in WMP's determination is whether there is potential to have a direct, substantial impact on an organization's ability to create, preserve or erode economic value, as well as environmental and social value for itself and its stakeholders in the context of the Health & Wellness industry and the countries in which the portfolio companies operate.

4. Performance

Depending on the target acquired and materiality of ESG issues, we expect to establish company specific ESG key performance indicators (“KPIs”) after completion of the 100-day post-acquisition plan. The number of ESG KPIs, if any, is likely to vary by company, depending on the geography and size and the quality of the company’s ESG management system.

WMP intends to follow a three-step process for setting and tracking ESG-related KPIs:

1. First, to establish a baseline of issues for discussions, WMP will determine the materiality of ESG issues (as discussed above) for each portfolio company targeted by a Private Fund, will consult with WMP’s management team about the materiality of issues, and, if necessary, will engage external consultants to identify issues specific to the portfolio company.

2. Next, depending on the materiality of ESG issues as determined in the first step, WMP’s management team may formulate company specific ESG metrics that are relevant and meaningful for each individual company and monitor those metrics as desirable.

3. Finally, as applicable WMP will strive to periodically update existing firm-level ESG KPI reporting templates to highlight its material ESG challenges and opportunities across Private Funds.

5. Reporting & Transparency

WMP will seek to be transparent in its approach to incorporating ESG considerations in its private equity investments by periodically reporting on its progress and outcomes to the WMP management team. The format of this reporting may vary among written or verbal reports, or confidential fund or asset-level reports to investors in Private Funds.