

ESG and Responsible Investment Policy

30 September 2025

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Index

1	Foreword	3
2	Objective and scope of the Policy	4
3	ESG Commitment.....	4
4	Investment process and ESG integration	6
5	ESG Guidelines	9
6	Transparency and Disclosures.....	11
7	Stewardship Guidelines	11
8	ESG Roles and Responsibilities.....	12
9	Policy Availability and Update	12

1 Foreword

Consilium SGR S.p.A. (hereafter “**Consilium**” or “**SGR**”) is an independent alternative investment fund manager, established in 2005, specializing in equity investments in Italian small to medium-sized companies (SMEs) operating in sectors of national excellence, with a focus on buy-out and development capital strategies aimed at generating long-term value.

Consilium views the integration of Environmental, Social and Governance (ESG) factors into its investment strategy as a fundamental lever for long-term value creation. Driven by this philosophy, since March 2020 Consilium is a signatory of the Principles for Responsible Investments (“**PRI**”)¹ sponsored by the United Nations.

As a PRI signatory, Consilium is committed to implementing the Principles for Responsible Investment, a set of six voluntary and aspirational principles developed by investors for investors, providing a framework of recommended actions to integrate ESG considerations into investment practices.

In particular, Consilium undertakes to:

1. Incorporate ESG issues into investment analysis and decision-making processes;
2. Be an active owner and incorporate ESG issues into its ownership policies and practices;
3. Seek ESG-related disclosure from its portfolio companies;
4. Promote the acceptance and implementation of the Principles within the investment industry;
5. Collaborate to improve effectiveness in implementing the Principles;
6. Report on its activities and progress towards implementing the Principles.

Consilium also commits to submitting the PRI Transparency Report on an annual basis, which is publicly available on the PRI website.

Consilium believes that integrating the Principles for Responsible Investment drives long-term value creation and enhances financial returns while generating a positive environmental and social impact, thereby aligning the interests of investors and portfolio companies with the broader objectives of society.

Therefore, recognizing its ability to influence the sustainable development of its investee companies, Consilium has developed an investment strategy that systematically embeds ESG factors into all stages of its decision-making process.

Through its approach toward sustainability and responsible investment, Consilium aims also to contribute to the United Nations Sustainable Development Goals (SDGs)², paying particular attention to the following goals:

- SDG 7 – Affordable and clean energy: ensure access to affordable, reliable, sustainable and modern energy for all;
- SDG 8 – Decent work and economic growth: promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all;
- SDG 10 – Reduced inequalities: reduce inequality within and among countries;
- SDG 12 – Responsible consumption and production: ensure sustainable consumption and production patterns;
- SDG 13 – Climate Action: take urgent action to combat climate change and its impacts.

¹ The Principles for Responsible Investment (PRI) is an international network of investors supported by the United Nations that works to promote sustainable investments through the incorporation of environmental, social and governance aspects into investment decision-making. The six Principles for Responsible Investment offer a menu of possible actions for incorporating ESG issues into investment practice. (<https://www.unpri.org/>).

² The Sustainable Development Goals (SDGs), also known as the Global Goals, are the 17 sustainability goals adopted by the United Nations in 2015 as a universal call to action to end poverty, protect the planet and ensure that by 2030 all people enjoy peace and prosperity (<https://sdgs.un.org/goals>).

Building on these objectives, Consilium implements a tailored approach within each portfolio company, supporting them in the development of an ESG Action Plan comprised of short- and medium-term objectives designed to enhance their sustainability profile and generate a positive impact for the society and the planet.

Consilium recognizes the importance of leading through action and, accordingly, embeds sustainability not only in its investment strategy but also across its corporate operations. In implementing its sustainability strategy, both at the SGR level and across its investments, Consilium may rely on specialized external advisors to strengthen ESG expertise and ensure effective execution.

2 Objective and scope of the Policy

This Policy constitutes Consilium's formal commitment to apply the principles of sustainability both to the SGR, through the promotion of an ethical work environment, transparent corporate governance and environmentally responsible behaviors, and to the portfolio, by integrating Environmental, Social, and Governance ("ESG") factors throughout the investment life cycle (investment, holding period and divestment). In particular, the development of a long-term sustainable strategy for the companies Consilium invests in (hereafter referred to as "portfolio companies") requires the integration of ESG aspects into all phases of its investment life-cycle.

By formalizing its commitment through this ESG and Responsible Investment Policy, the SGR aims to:

- Communicate to all stakeholders, including employees, portfolio companies and investors, its approach to responsible investment and to corporate social responsibility;
- Set out the principles guiding the integration of ESG considerations into its operation;
- Outline the ESG roles and responsibilities defined within the SGR to ensure proper application of ESG criteria and adherence to responsible investment principles.

This policy applies, at the SGR level, to all Consilium's employees, who are expected to incorporate sustainability aspects in their activities, and, at the portfolio level, to all the assets in which Consilium invests.³

Consilium applies the policy consistent with the fiduciary mandate and the responsibilities given by its investors.

In addition, being an AIFM regulated under the AIFM Directive, Consilium undertakes to comply with all the obligations pertaining to its role as asset manager and related to the sustainability financial disclosures, as provided under Regulation EU 2019/2088 and Delegated Regulation 2022/1288, and in this sense undertakes, *inter alia*, to publish (and update) the relevant information on its website as provided by the legislation in force.

3 ESG Commitment

Consilium embeds sustainability across all its SGR-level operations, fostering the potential and well-being of its people, adopting practices aimed at minimizing environmental impact, and implementing policies, procedures, and frameworks that ensure sound governance and full compliance with anti-corruption laws and regulations.

Commitment to the Environment

Consilium SGR, as an asset management company, acknowledges that its environmental footprint is primarily shaped by the activities of its portfolio companies, while its direct operational impact is limited. Nevertheless,

³ Investments completed before the approval of the policy (end of 2019) were not subject to the activities related to the investment phase. The monitoring activity, however, is performed following the same criteria of new investments.

Consilium recognizes the importance of leading by example, integrating environmental responsibility into its own operations while actively encouraging portfolio companies to adopt responsible practices and set measurable targets to enhance their environmental performance.

Building on this approach, Consilium is committed at the SGR level to:

- Acting in compliance with environmental laws and regulations;
- Reducing greenhouse gas emissions by:
 - Using certified renewable energy;
 - Deploying energy-efficient computers and other electronic devices;
 - Favoring remote meetings whenever possible;
 - Encouraging employees, through specific initiatives, to use public transportation (e.g. trains) instead of private cars;
 - Allowing remote working when necessary;
- Promoting the use of materials for stationery that are sustainable for the environment;
- Disposing of waste according to current regulations, ensuring separate waste collection in offices and proper management of hazardous waste (e.g., toners);
- Reducing, with the ultimate goal of eliminating, the use of plastic in the office by providing staff with company water bottles, introducing water purifiers and using compostable materials for dispensing beverages.

Commitment to People

Consilium aims to create a stimulating and harmonious working environment, where fairness, transparency and trust underpin all interpersonal relationships, and individual contribution are recognized, encouraged and rewarded. Accordingly, the SGR has always strived to ensure fair working conditions that promote equal opportunities, uphold personal dignity, and foster a professional and participatory workplace.

Consilium also places great importance on employee development, recognizing training as a key driver for motivation, job satisfaction and professional growth.

Guided by these values, Consilium is committed to:

- Promoting equality by countering any kind of discrimination based on age, ethnic origin, nationality, political opinions, religious beliefs, sexual orientation, gender identity, physical and mental disabilities, maternity and paternity, part-time/fixed-term employment and socioeconomic status;
- Ensuring equal treatment for all employees during all phases, i.e., recruitment, onboarding, remuneration, performance evaluation, training, career development, job mobility, and termination of employment;
- Promoting a positive working environment where the contribution of each employee is encouraged and where meritocracy is recognized and rewarded;
- Considering requests for non-standard work arrangements from any employee, where possible (e.g., maternity, paternity and parental leave);
- Improving employee's well-being and welfare;
- Monitoring health and safety risks related to work activities, aiming to eliminate or minimize such risks;
- Supporting employee development by providing training and the necessary tools to enhance ESG awareness and develop broader operational skills relevant to their role.

Commitment to Ethics and Governance

Honesty, integrity, fairness and transparency are at the foundation of Consilium's governance culture, guiding everyday actions and underpinning a clear stance against all forms of corruption.

Consilium operates in compliance with the Italian Banking Act, the Italian Anti-Money Laundering Act, the Italian Investment Act and the Italian Securities Trading Act.

Consilium has established clear guidelines to ensure compliance with high corporate governance standards, including a Code of Conduct (first adopted in 2006) that defines the principles guiding the SGR's activities. In

addition, the SGR has implemented whistleblowing mechanisms for the confidential reporting of unethical behaviour.

Guided by its commitment to integrity and good governance, Consilium translates these principles into concrete actions by:

- Complying with all applicable laws and promoting international best practice standards;
- Working against all forms of corruption;
- Acting with honesty, integrity, fairness and respect in all its activities;
- Ensuring the proper implementation of its Code of Conduct;
- Defining clear responsibilities, procedures and controls;
- Promoting transparency and accountability in all business activities;
- Adhering to the Responsible Investing Principles.

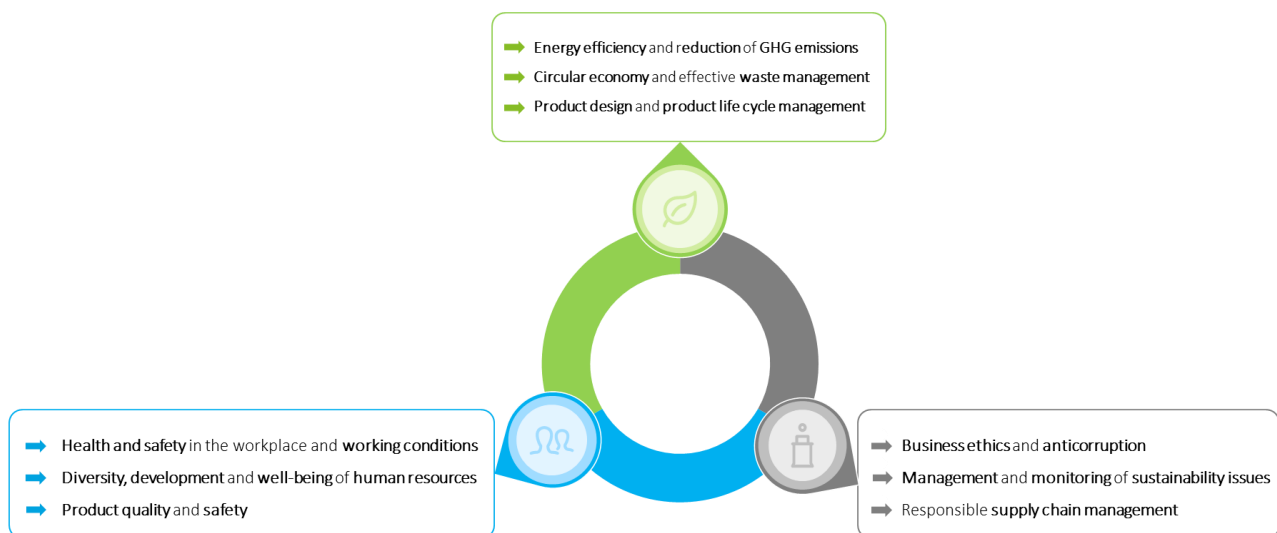
4 Investment process and ESG integration

Consilium believes that responsible investing can mitigate risks and enhance the risk-return profile of investments, meeting investors' expectations and, at the same time, creating a positive impact on people and the planet.

Consilium invests in private companies mainly in Italy but its targets may also have operations and subsidiaries abroad. It has an experienced management team with financial experience, which follows clear ethical and economic guidelines along each phase of the investment life-cycle.

As a PRI signatory, Consilium has established a responsible investment strategy that integrates ESG factors throughout all stages of the investment lifecycle, from pre-investment analysis to ownership and divestment. ESG integration is implemented in a balanced and gradual manner, ensuring that the approach is tailored to the specific characteristics of each company, in line with the principle of materiality.

In this context, Consilium has identified a set of potentially relevant ESG areas, which are specifically investigated during the ESG due diligence phase and, where deemed material, monitored throughout the holding period. Examples of these ESG areas include:



Consilium's responsible investment strategy is implemented across the following phases:

1. Pre-Investment

During the pre-investment phase, Consilium adopts a multidimensional approach to ESG analysis, which ensures that environmental, social, and governance considerations are systematically integrated into investment decision-making. This approach includes:

- Negative screening (sector-based; norm-based): exclusion of companies operating in controversial sectors and screening of investments against minimum standards of business practice, based on national and international laws and standards, such as those issued by the OECD or the ILO;
- ESG integration: systematic inclusion of ESG factors in the assessment of investment opportunities, enabling the identification and evaluation of both ESG-related risks and potential value-creation opportunities.

1.1. *Negative Screening*

Consilium does not consider investment opportunities in companies operating in sectors deemed controversial according to international best practice, including:

- i. Tobacco: production and trade of tobacco products;
- ii. Alcohol: production of distilled alcoholic beverages and related products;
- iii. Gambling: casinos, betting, gaming arcades and online gambling platforms;
- iv. Pornography: production or distribution of pornographic content;
- v. Weapons and military equipment: production, development or trade of weapons and military equipment; dual-use technologies are considered on a case by case basis;
- vi. Military activities banned under Italian Law 220/2021;
- vii. Hacking: software and devices specifically intended to enable illegal access to electronic data networks or unauthorized data extraction;
- viii. Fossil fuel-based energy production and related activities: extraction, processing, transport and storage of coal, oil and natural gas, as well as power generation exceeding the Emissions Performance Standards applicable to fossil fuel-fired power, cogeneration, geothermal, and large-reservoir hydropower plants;
- ix. Animal testing: practices involving live animals for experimental or scientific purposes, to the extent that compliance with the European Convention for the Protection of Vertebrate Animals used for Experimental and Other Scientific Purposes cannot be ensured;
- x. GMOs: production or commercialization of genetically modified organisms;
- xi. Human cloning and genome modification: research or activities aimed at human cloning, hereditary genome modification, or embryo creation for research/stem cell extraction;
- xii. Research & Development activities supporting any of the previously listed controversial sectors.

The above exclusions represent general guidelines and may be further specified in the internal regulations governing each individual investment fund.

Additionally, Consilium does not consider investment opportunities in companies that operate in breach of national or international laws and standards. To this end, Consilium assesses policies and procedures adopted by target companies to prevent bribery, corruption, fraud and other unethical conduct, and values the adoption, where applicable, of the Italian Organizational Model pursuant to Legislative Decree 231/2001 and of whistleblowing channels. Consilium also verifies whether target companies have been involved in serious violations of anti-terrorism, anti-money laundering or anti-corruption regulations, as

well as breaches of the UN Global Compact principles or the OECD Guidelines for Multinational Enterprises.

1.2. ESG Due diligence

Consilium conducts an ESG due diligence before completing each investment, taking into consideration the ESG risks and opportunities of the target company, how ESG risks can be addressed and mitigated and the ESG improvements that can be implemented during the Funds' holding period.

The ESG due diligence process is based on the submission of a comprehensive questionnaire to target companies, requiring the disclosure of a broad set of qualitative and quantitative indicators covering all environmental, social, and governance pillars, as well as evidence of all certifications, policies and procedures in place at the time of the evaluation.

Within the analysis, the focus is placed on:

- Materiality analysis, to identify the most relevant ESG issues for the target company's sector and business model;
- Alignment with internationally recognized standards (e.g.; GRI; PAI);
- Assessment of relevant risks, including exposure to climate-related transition and physical risks;
- Review of mitigation measures already implemented by the target company.

Prior to the signing of each new investment, the findings of the ESG due diligence are shared with the Board of Directors of Consilium SGR and incorporated into the final investment memorandum. The results of the ESG due diligence reflect the ESG risks and opportunities related to the target company that have to be considered jointly with its financial valuation.

2. Holding Period:

Once the acquisition is completed, based on the results of the ESG due diligence report prepared in the previous phase:

- An ESG Action Plan is developed for each portfolio company, setting short and medium-term ESG objectives to mitigate ESG risks and improve ESG profile;
- ESG Key Performance Indicators (KPIs) are identified for monitoring throughout the holding period, including:
 - Cross-portfolio KPIs: a set of indicators broken down by sustainability themes collected at the fund level;
 - Company-specific KPIs: a set of additional indicators defined for each portfolio company, based on its sector and the findings of the materiality analysis.

During the holding period, Consilium is committed to continuously monitoring the ESG profile of its portfolio companies and the progress of their ESG Action Plans, with the objective of promptly identifying areas for intervention, improvement opportunities, and ensuring long-term value creation. ESG performance monitoring is carried out through:

- Active engagement with portfolio company management;
- Annual collection of ESG KPIs benchmarked against past performance;
- Tracking progress against the ESG Action Plan;
- Assessment of exposure to climate-related risks.

Active engagement with portfolio companies is a central element of this process, encompassing the definition and implementation of the ESG Action Plan as well as the ongoing monitoring of ESG KPIs, to foster accountability and responsibility on ESG topics. To support this, Consilium establishes a direct communication channel with portfolio companies in order to collect the ESG data necessary to perform the ESG annual monitoring and to track progress against the adopted ESG Action Plan. Consilium also requires each portfolio

company to identify an internal ESG representative, responsible for the adoption and monitoring of ESG issues to make sure that they are properly considered and managed by the portfolio company.

Annually, Consilium prepares an ESG Report for each fund, with the aim of reporting the progress in the implementation of the ESG Action Plan of each portfolio company and the performance on ESG KPIs both at the fund and company level. The annual ESG Report for each Consilium fund is presented to and discussed by the Board of Directors of Consilium SGR and is then made available to investors in a reserved area of the website.

3. Divestment:

During the divestment phase, Consilium conducts an analysis of the ESG performance of the portfolio company at the time of exit to assess the impact of initiatives implemented during the holding period. This analysis considers the evolution of ESG KPIs over the holding period, the progress made in implementing the ESG Action Plan, and the overall improvement in the company's sustainability profile attributable to Consilium's investment.

The outcome of the analysis is reported in the Divestment Memorandum, subject to approval by the Board of Directors, which provides a comprehensive overview of the company's sustainability trajectory. The memorandum, along with all data related to the ESG monitoring activities, is made available to potential buyers upon request.

5 ESG Guidelines

Consilium has established specific ESG guidelines that provide a coherent and structured framework for integrating environmental, social, and governance factors across the different phases of the investment process.

These guidelines set clear criteria for the assessment of ESG aspects and ensure consistency, transparency, and traceability in the engagement with portfolio companies and the implementation of ESG practices throughout the investment lifecycle.

1. Environment

Consilium integrates environmental considerations across the investment lifecycle, ensuring systematic identification, management and mitigation of environmental risks. Key focus areas include:

- Emissions efficiency and climate risk awareness: assessment of GHG emissions and energy consumption, promotion of energy efficiency initiatives, and evaluation of exposure to climate-related risks;
- Resource management: evaluation of water usage, waste management and sustainable use of raw materials;
- Product design and product life cycle management: integration of environmental considerations throughout the product development and life cycle, including eco-design and sustainable materials selection;
- Environmental compliance and certifications: adoption of an environmental policy and, where relevant, recognized environmental certifications, including, by way of non-exhaustive example, ISO 14001 for environmental management systems, ISO 50001 for energy management systems, EMAS and Ecolabel. Certifications and policies are assessed for their relevance to each target company to ensure a tailored approach.

The identification of shortcomings in any of these areas can trigger the implementation of a tailored improvement strategy by Consilium and the integration of corresponding objectives into the ESG Action Plan, aimed at improving performance.

Climate Change

Consilium acknowledges the urgent need for climate action to support the transition to a low-emission economy, while remaining fully aware of the physical and transition risks that businesses face in responding to climate change. Accordingly, as part of its environmental responsibility, Consilium systematically integrates climate risk assessments during due diligence of target companies and throughout the ongoing monitoring of portfolio companies.

To support this assessment, Consilium relies on specialized quantitative models provided by an external advisor, capable of estimating the year-by-year impact of climate risks on SMEs under various climate scenarios developed by the Network for Greening the Financial System (NGFS). The model allows a forward-looking evaluation of climate risk exposure through 2050, distinguishing between:

- Transition risk: economic impact resulting from the adoption of regulations and policies aimed at reducing CO₂ emissions and supporting the transition to a low-carbon economy;
- Physical risk: exposure of company assets to acute and chronic natural events, which may negatively affect asset value.

This approach enables Consilium to anticipate and evaluate potential climate-related risks before investment and, throughout the holding period, to proactively identify emerging risks, engage in constructive dialogue with portfolio companies, and implement corrective actions to strengthen their climate risk management capabilities.

2. Social

Consilium systematically integrates social considerations throughout the investment lifecycle, promoting high standards in workers' rights protection, equality, workplace health and safety, and product quality. Key focus areas include:

- Diversity, development and well-being of human resources: assessment of workforce composition, including female representation, review of employee training programs, and initiatives promoting overall workforce well-being;
- Health & Safety in the workplace: assessment and ongoing monitoring of occupational health and safety measures to ensure their effectiveness;
- Product quality and safety: ensuring portfolio companies maintain high standards of product quality, safety, and responsible marketing practices;
- Social certifications: adoption of recognized social standards and certifications where relevant, such as, by way of non-exhaustive example, ISO 9001 for quality management systems, ISO 45001 for occupational health and safety, and UNI PdR 125 on gender parity.

The identification of weakness in one or more of these areas can trigger the implementation of a tailored improvement strategy by Consilium and the integration of corresponding objectives into the ESG Action Plan, aimed at addressing the gaps and improving performance.

3. Governance

Consilium requires that portfolio companies uphold high standards of corporate governance, promoting transparency, accountability, and ethical conduct across all levels of management. For all portfolio companies operating in Italy, Consilium requires the implementation of the Organizational Model pursuant to Legislative Decree 231/2001.

Key focus areas include:

- Governing body and management: assessment of the composition, roles and responsibilities of the Board of Directors, including independence and gender diversity;
- Business ethics and anti-corruption: assessment of policies and procedures adopted to prevent bribery, fraud, and other unethical conduct, including, where applicable, the Italian Organizational Model pursuant to Legislative Decree 231/2001;
- Responsible supply chain management: evaluation of the practices adopted to ensure that suppliers operate in compliance with environmental, social, and ethical standards.

The identification of deficiencies, fines, or controversies in any of these areas prompts Consilium to implement a tailored improvement strategy and incorporate corresponding objectives into the ESG Action Plan.

6 Transparency and Disclosures

Consilium is committed to ensuring maximum transparency toward all stakeholders, providing clear, accurate, and timely information on sustainability matters.

On an annual basis, Consilium provides investors with a dedicated ESG Report for each fund, outlining portfolio companies' progress in implementing ESG Action Plans, together with performance against ESG KPIs and the results of climate risk assessments, reported at both the portfolio company and fund level.

Consilium also prepares an annual Sustainability Report, presenting its environmental, social, and governance performance, as well as its activities related to the integration of ESG factors into the investment process. The report also includes the sustainability performance of portfolio companies and their exposure to climate-related risks.

In addition, Consilium publishes annually, in the investor-dedicated section, the Climate Change Risk Report, which provides a detailed analysis of investee companies' and the overall portfolio's exposure to transition and physical climate risks.

As a PRI signatory, Consilium prepares the annual PRI Transparency Report, which is publicly available on the UN PRI website and enables stakeholders to better understand how ESG factors are embedded within Consilium's investment processes.

7 Stewardship Guidelines

As a PRI signatory, Consilium is committed to applying the six Principles for Responsible Investment, including Principle 2, which states: "We will be active owners and incorporate ESG issues into our ownership policies and practices".

The PRI defines stewardship as "the use of investor rights and influence to protect and enhance overall long-term value for clients and beneficiaries, including the common economic, social, and environmental assets on which their interests depend".

In line with this interpretation, Consilium, in its role as an active investor and long-term partner, considers stewardship a fundamental pillar of its investment strategy, implemented through an active approach aimed at promoting sustainable and responsible practices within portfolio companies. The main stewardship tools adopted by Consilium are:

- **Engagement:** ongoing dialogue with the management of portfolio companies to foster the integration of ESG considerations, support sustainable growth, and address potential areas of improvement;
- **Voting:** exercise of voting rights on management resolutions, to formally express approval or disapproval on relevant matters.

In addition, Consilium leverages the support of external advisors to provide enhanced guidance and expertise to portfolio companies.

To effectively guide its engagement activities, Consilium has identified a set of priority themes, aligned with the Sustainable Development Goals (SDGs) that it considers most relevant to its investment strategy, as outlined in paragraph 1. These priority themes include:

- Energy efficiency and climate change awareness;
- Sustainable product design and responsible resource management;
- Employee health and safety and well-being;
- Diversity, equal opportunities and talent development;
- Ethical and transparent business conduct.

In addition to these priority themes, Consilium applies a bespoke approach tailored to the specific characteristics of each portfolio company. This approach considers the company's level of ESG maturity and focuses on areas where the most significant gaps are identified, as well as those with clear potential for tangible improvement. By aligning engagement efforts with both the company's current ESG profile and the broader priority themes, Consilium ensures that its stewardship activities are targeted, effective, and aligned with long-term value creation.

Consilium is aware that potential conflicts of interest may arise in the course of its stewardship activities and recognizes the importance of addressing them to ensure that engagement remains transparent, impartial, and aligned with the best interests of investors. To this end, Consilium has established a dedicated policy that identifies potential conflict situations that may occur in the context of its activities, together with the safeguards to be adopted to prevent such conflicts from undermining investors' interests.

All stewardship activities undertaken by Consilium are carried out exclusively in the best interest of its investors.

8 ESG Roles and Responsibilities

Consilium SGR has established a solid Sustainability Governance Framework, built on close collaboration and a clear allocation of ESG roles and responsibilities across different corporate bodies:

- **Board of Directors:** responsible for the approval and periodic updating of the ESG and Responsible Investment Policy, for the correct integration of ESG criteria in the various phases of the investment life-cycle and the approval of the annual ESG Report. The Board of Directors appoints one of its members as the "ESG Supervisor", that oversees the relevant ESG matters and the implementation of the ESG and Responsible Investment Policy.
- **Investment Team:** responsible for direct engagement with the portfolio companies in order to define and implement the ESG Action Plan and for cooperating with the management of the portfolio companies to collect the ESG data necessary to perform the annual monitoring of the ESG KPIs.
- **"ESG Function":** responsible for the implementation of the "ESG and Responsible Investment Policy", for the promotion of the PRI and for supporting the Investment Team in the engagement with portfolio companies on sustainability topics.

9 Policy Availability and Update

The Policy is published on Consilium's website (www.consiliumsgr.com) to ensure its awareness and proper application by all employees within the organization and by relevant stakeholders.

The SGR undertakes to keep this Policy up to date over time, in line with developments in the regulatory and normative framework and in accordance with market best practices, as part of a continuous improvement approach.

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