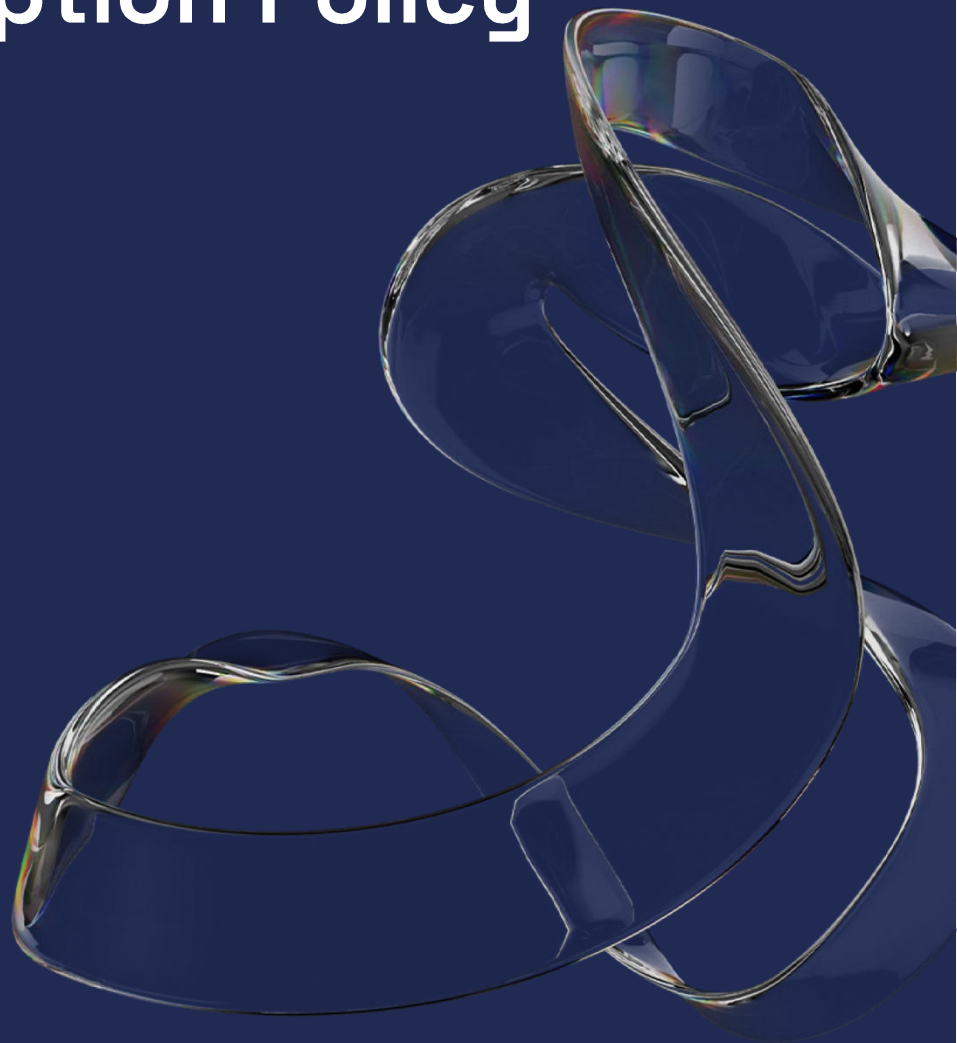


sg capital

# Anti-Corruption Policy

Version 2.0 – 19 May 2026



SG Capital Partners Sustainable Forest and Land  
Fund I, KS

Reg. No.: 40203333070

# 1. Abbreviations and definitions

- 1.1. **Manager** – SIA SG Capital Partners AIFP.
- 1.2. **Forest Fund/Fund** – SG Capital Partners Sustainable Forest and Land Fund I, KS, a closed-ended alternative investment fund managed by the Manager.
- 1.3. **Employee** – any person who is actually employed by the Fund or whom the Manager employs for the management and administration of the Forest Fund's assets.
- 1.4. **Corruption** – any direct or indirect solicitation, offering, granting or acceptance of material or non-material benefits to influence a person's conduct, decisions or performance of duties in a manner inconsistent with regulatory acts, ethical principles or the organisation's interests. Corruption includes, but is not limited to, bribery, the acceptance or offering of unauthorised benefits, the misuse of a conflict of interest, and the use of one's official position for personal gain or the gain of third parties.
- 1.5. **Policy** – SG Capital Partners Sustainable Forest and Land Fund I, KS Anti-Corruption Policy.

## 2. ANTI-CORRUPTION PRINCIPLES AND REQUIREMENTS

- 2.1. The Forest Fund undertakes to prevent any form of corruption and to implement preventive measures to eliminate manifestations of corruption within the company. The Fund's objective is to adhere to the highest standards of business transparency by establishing key anti-corruption principles and requirements.

### Compliance with legal requirements and standards of conduct

- 2.2. The Forest Fund and its Employees shall, in their activities, comply with all requirements set out in the law and other legislation applicable to the Forest Fund or the Manager, including anti-corruption legislation. In situations where this Policy, the law and other legislation do not specify

the relevant standards of conduct, Employees shall act in a manner consistent with generally accepted principles of trust, honesty and transparency. This Policy meets or exceeds the requirements of the relevant legislation.

### Disclosure of information and transparent reporting

- 2.3. The Forest Fund ensures that its activities and objectives are transparent and clearly stated.
- 2.4. The Fund's accounts must be accurate and must correctly reflect all transactions and events, in strict compliance with all applicable legislation and local and international (to the extent applicable to the Fund) financial reporting standards.
- 2.5. The management and oversight of the Fund's documents must be accurate and correct, and must be carried out in strict compliance with applicable legislation. The Forest Fund does not tolerate and prohibits any actions involving the destruction, damage, falsification or other manipulation of original documents.

### Zero-tolerance policy on corruption

- 2.6. In its operations, the Forest Fund is committed to conducting business in accordance with the principle of zero tolerance towards corruption. The principle of zero tolerance towards corruption is observed in relations with both the public and private sectors.
- 2.7. The Forest Fund opposes corruption in all its forms or corrupt practices referred to in laws and other legislation applicable to the Fund or in this Policy, including such forms of corruption as soliciting or offering bribes, trading in influence, facilitation payments and other acts carried out as a means of seeking/requesting or offering a bribe, trading in influence, facilitation payments or concealing such corrupt offences.
- 2.8. The Forest Fund's business partners, suppliers and other third parties associated with the Fund must also base their activities on the principles of ethical and responsible business conduct and conduct their business in accordance with applicable legislation. Where possible, the Forest Fund signs the Code of Conduct for Business Partners with its business partners,

which sets out requirements regarding compliance, human rights, labour rights and other legal obligations, including anti-corruption requirements.

2.9. Upon detection of bribery, coercion or other corrupt practices, the Forest Fund takes corrective action.

### **Conflict of interest**

- 2.10. The Forest Fund's decisions and actions are based on the principle of acting in the best interests of the Fund and/or the Fund's investors, whilst also taking sustainability principles into account.
- 2.11. Employees must avoid any form of conflict of interest that could adversely affect the honest and objective performance of their duties or functions.
- 2.12. The Forest Fund's working tools, financial and material resources, as well as internal and confidential information, may only be used for the performance of Employees' direct duties, except where other uses are clearly and in writing regulated.
- 2.13. The Fund Manager has drawn up a Procedure for the Prevention of Conflicts of Interest and the Conduct of Personal Transactions, which sets out the requirements for the prevention and management of conflicts of interest, as well as the reporting procedure for identified conflicts of interest or breaches relating to personal transactions.

### **Procurement**

- 2.14. The Forest Fund ensures that all its procurement is conducted in a transparent manner in accordance with the requirements of equal treatment, non-discrimination, mutual recognition, proportionality and objectivity.

### **Nepotism and cronyism**

- 2.15. SG Capital does not permit favouritism towards family members or relatives (nepotism) or towards friends or other connected persons (cronyism), nor does it permit direct reporting or control relationships between such persons. The selection of employees is carried out without

discrimination, transparently, conscientiously, based on their competence and in accordance with the law.

## Foreign officials

- 2.16. Employees who have contact with foreign public officials or who operate abroad must adhere to the principle of zero tolerance regarding corruption, as well as the provisions set out in this Policy, regardless of whether corrupt practices are punishable in the foreign country or not.
- 2.17. The Forest Fund's asset manager, as well as the Manager's Board, shall demonstrate through their conduct the standards of behaviour set out in this Policy and ensure that, in the areas for which they are responsible, activities are carried out in accordance with the provisions of this Policy.
- 2.18. A breach of the provisions of this Policy is considered a serious breach of work discipline, for which disciplinary measures may be taken.
- 2.19. To report actual or potential cases of corruption, follow the procedure set out in the Manager's Whistleblowing Procedure. The Whistleblowing Procedure is also available on the Manager's website <https://sgcapital.lv/lv/korporativa-parvaldiba/> under the section 'Whistleblowing'.
- 2.20. The Policy is freely available on the Fund's website <https://sgcapital.lv/lv/> under the section on the Fund.

## 3. ENTRY INTO FORCE AND REVIEW

- 3.1. The Policy comes into force upon its approval at a meeting of the Manager's Board.
- 3.2. The Policy is regularly reviewed and updated as necessary in the event of significant changes to the regulatory environment or the activities of the Manager or the Fund.

## 4. Document version history

Version No.	Date	Type	Details of changes
1.0	23 July 2023	Initial version of the document	The original version of the document has been published.
2.0	19 May 2026	New version of the document	The policy has been updated in line with current practice and the Fund's organisational structure.