



Capria Ventures

Environmental, Social and Governance (ESG) Policy

Updated: April 2024

Capria Ventures takes an inclusive approach to impact and ESG. We apply global best practices of impact investment and ESG management to support entrepreneurs using digital technology to build highly scalable, profitable businesses that improve the lives of 100s of millions of middle and low-income families. We favor companies driven by local consumption, resulting in uncorrelated growth (vs. the West) and resilience to global downturns. Our ecosystem development efforts amplify the impact created by companies across the global markets in which we and our partners invest.

Three Dimensions of Impact

Our investment strategy generally envisages impact across three dimensions

- **Underserved Markets**—Foster innovative, fast-growing tech-enabled businesses in vast, largely underserved markets of the Global South, including India, Southeast Asia, Latin America, and Africa.
- **Catalytic Capital**—Provide access to early-stage and early-growth capital to companies that are comparatively undervalued and/or undercapitalized in forms best suited to their needs.
- **People and Environment**—Invest in diverse companies primarily addressing local consumption of essential products and services, resulting in greater impact per dollar invested and greater resilience to economic downturns.

Delivering Scaled Positive Impact

Capria believes positive, sustainable change comes from delivering social and environmental returns coupled with market-rate financial returns. We will maximize positive impact through:

- **Investment Selection.** We will screen companies and funds that invest in companies that positively impact their communities in underdeveloped and developing economies with critical needs for early-stage capital.
- **Portfolio Support.** We will facilitate workshops and provide resources to help Capria's portfolio integrate impact strategies into their firms.
- **Internal Policy & Values Alignment.** We have a set of core policies and guiding principles, which are memorialized in our corporate documents, employee handbooks, and policies.



Environmental, Social and Governance (ESG) Commitments

We invest in companies directly and indirectly through investments into funds. Capria commits to:

- **Social and Environmental Risk Mitigation**

- Capria has developed and implemented an Environment and Social Management System (ESMS) using IFC's Performance Standards¹ as a guiding principle to manage the risks associated with companies in Capria's portfolio. This includes conducting our business operations according to assessments of all environmental, health, and social legislation and risks, including efficiency in resource usage, pollution prevention, and ensuring community health, safety, and security.
- Capria will review our ESG policies, processes, and systems regularly and, based on market changes, provide appropriate training to our team.
- Capria will provide training and support to our portfolio of companies and funds to help them develop their own ESG policies and ESMS, if necessary.
- Funds and companies that receive a substantial commitment from Capria will be required to adhere to their ESG policies and implement their ESMS in accordance with side letters entered into between Capria and each investee. Those with lesser commitments will have limited requirements due to having limited risk profiles, fewer company execution capabilities, and market expectations.
- For all transactions, Capria will use the "[TEMPLATE: Capria Environmental and Social Due Diligence Form](#)" to require that portfolio companies:
 - Have or create a system to enforce a zero-tolerance anti-corruption policy and appropriately address any identified corruption and/or money laundering issues.
 - Are or will be compliant with all local and national laws.
 - Are not participating in any activities on the IFC Exclusion List and are not Category A investments.
 - Where ESG issues are identified, Capria will work with investees to develop and implement an Environmental / Social Action Plan (ESAP).

- **Inclusion of Impact Strategy**

- Capria will require portfolio funds to develop and implement an impact strategy integrated with their investment strategy, with buy-in and commitment from all partners and constituents.
- Capria will include impact goals and expectations in formal documents with portfolio funds.
- Capria will support fund managers to enable their portfolio companies to adopt an impact strategy and grow their impact.

- **Impact and ESG Intent**

¹ [IFC Performance Standards](#)



- Capria will allocate capital to entrepreneurs creating businesses that positively impact the environment or populations lacking access to resources, essential products or services, finance, or opportunities for improvement. This includes low—and middle-income populations, minorities, women, etc.
 - Capria will not invest in and support any activities on IFC's Exclusion List (see [Appendix I](#)). Capria will also require portfolio funds not to invest in IFC's Exclusion List.
- **Compliance and Reporting**
 - Capria will require portfolio companies to report impact and ESG metrics at least annually, either directly to Capria (for direct investments) or indirectly (via portfolio funds).
 - Capria will provide its investors with reasonable access to all information necessary to monitor and evaluate Capria's portfolio's compliance with ESG policies.
 - Funds and companies that receive a commitment from Capria will be provided with our Anti-Corruption, Impact, and ESG Questionnaire, which will be self-assessed and answered annually.
 - Capria will review and update, if needed, on a regular basis, the Capria ESG Policy in compliance with IFC Performance Standards.
- **Governance and Anti-Discrimination**
 - Capria will follow hiring and employment practices such as paying fair wages, providing appropriate benefits, maintaining clean and safe working conditions, and providing flexible hybrid work environments.
 - Capria will treat all team members and external partners equally without discrimination, regardless of race, gender, ethnicity, abilities, religious or political beliefs, age, national origin, sexual orientation, family or marital status, and culture. (Read our [DEI Policy](#) for further explanation).
- **Legal and Ethical Compliance**
 - Capria will comply with principles of applicable civil, environmental, and social laws and will pledge not to accept or offer bribes, and will require employees to pledge to do the same.
 - Capria will be transparent, ethical, and accountable in all business operations, including adhering to the principles of good corporate governance.



- Capria has a zero-tolerance anti-corruption policy. Capria will comply with the [U.S. Foreign Corrupt Practices Act \(FCPA\)](#) and national and local anti-corruption laws of any countries in which partners and their portfolio companies are doing business. Capria will also comply with all International Labor Organization (ILO) conventions, the UN Convention Against Corruption, and the OECD Convention (collectively "Anti-corruption Laws") as sanctioned by the countries where partners maintain operations. Capria will adhere to the International Finance Corporation's 2012 Policy on Environmental and Social Sustainability and Performance Standards.
- Capria will respect the right of every person to be treated with dignity and equality. Capria works to prevent and address any negative human rights impacts related to the operations of its fund and portfolio companies in accordance with [United Nations Guiding Principles on Business and Human Rights](#).
- Capria will use a risk-based approach to anti-money laundering and anti-terrorist financing, assessing exposure to risks for each transaction and relationship and taking the appropriate mitigation measures in accordance with the level of risk. Capria has a system in place to ensure compliance with AML regulations in applicable jurisdictions, including KYC, a reporting mechanism, and risk assessment guidelines.
- Capria will proactively educate its staff on anti-corruption policies and processes. This document will be required reading during the employee and contractor onboarding process.

This policy is approved by the Managing Partners of Capria Ventures LLC.

Dave Richards
Managing Partner
Capria Ventures

Will Poole
Managing Partner
Capria Ventures

Susana Garcia-Robles
Managing Partner
Capria Ventures

Surya Mantha
Managing Partner
Capria Ventures



Appendix I

Exclusion List

- Production or trade in any product or activity deemed illegal under host country laws or regulations or international conventions and agreements or subject to international bans, such as pharmaceuticals, pesticides/herbicides, ozone-depleting substances, PCBs, wildlife or products regulated under the Convention on International Trade in Endangered Species (CITES) of Wide Fauna and Flora.²
- Production or trade in weapons and munitions.
- Production or trade in alcoholic beverages (excluding beer and wine).
- Production or trade in tobacco.
- Gambling, casinos, and equivalent enterprises.
- Production or trade in radioactive materials. This does not apply to the purchase of medical equipment, quality control (measurement) equipment and any equipment where IFC considers the radioactive source to be trivial and/or adequately shielded.
- Production or trade in unbonded asbestos fibers. This does not apply to the purchase and use of bonded asbestos cement sheeting with less than 20% asbestos content.
- Drift net fishing in the marine environment using nets in excess of 2.5 km in length.
- Production or activities involving harmful or exploitative forms of forced labor³/harmful child labor⁴.

Except when engaged in microfinance activities as specified below*, the following exclusions will be applied:

- Commercial logging operations for use in primary tropical moist forests.
- Production or trade in wood or other forestry products other than sustainably managed forests.

*When investing in microfinance activities, the following items will be excluded:

- Production, trade, storage, or transport of significant volumes of hazardous chemicals or commercial-scale usage of hazardous chemicals. Hazardous chemicals include gasoline, kerosene, and other petroleum products.
- Production or activities that impinge on the lands owned or claimed under adjudication by Indigenous Peoples (as defined in Standard 7 of the Performance Standards) without the full documented consent of such peoples.

² This does not apply to project sponsors who are not substantially involved in these activities. "Not substantially involved" means that the activity concerned is ancillary to the project sponsor's primary operations.

³ Forced labor means all work or service, not voluntarily performed, that is extracted from an individual under threat of force or penalty.

⁴ Harmful child labor means the employment of children that is economically exploitative, or is likely to be hazardous to, or to interfere with, the child's education, or to be harmful to the child's health, or physical, mental, spiritual, moral, or social development.



APPENDIX II

Organizational Capacity & Competency

Internal Roles and Responsibilities

This section provides an overview of the roles and responsibilities within Capria Ventures LLC, ensuring transparency and clarity in our organizational structure.

Team Member	Role	Responsibilities
Will Poole	Managing Partner & Co-Founder	Assigned E&S Officer; Senior Management & Human Resources
Mobola da-Silva	Impact & ESG Lead Partner	E&S Strategy and Implementation
Bryan Njuguna	Impact & ESG Officer	Pipeline/Portfolio Management