



TRANSOM

RESPONSIBLE INVESTING REPORT

2024 & 2025

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# About this report

Welcome to our 2024 & 2025 Responsible Investing (RI) Report of Transom Capital Group, LLC (“Transom”).

The purpose of this report is to provide transparency on our RI process, governance and operations.

The report is organized into two sections:

- **Responsible Investing:** activities related to the integration of material sustainability considerations in portfolio company evaluation and stewardship.
- **Responsible Operations:** activities related to the implementation of responsible business practices at the firm-level.

The report covers activities through December 31, 2025.



# A Note from Leadership

## *Empowering Growth through RI Practices*

We are pleased to share with you our 2024 & 2025 RI Report, building upon the foundation laid in our inaugural report. This report reflects Transom's steadfast commitment to transparency with stakeholders and integration of material sustainability factors into our investment process.

At Transom, we have long viewed RI as a meaningful element of our broader strategy to support sustainable growth across our portfolio. This led us to become a signatory to the United Nations Principles for Responsible Investment ([UNPRI](#)) in 2022, aligning our investment practices and operations with its six principles.

Leveraging this framework has helped us to establish standardized practices and to provide a structured approach for reporting, which we have continued to refine this year.

We believe that integrating RI into our processes empowers us to make well-informed investment decisions and manage risks and opportunities effectively. This approach allows us to stay true to Transom's strategy without compromising our underwriting standards or return expectations, serve as impactful stewards of investor capital, and drive value creation that fosters positive change.



**Russ Roenick**

*Co-Founder & Managing Partner*



**Dana Goldstein**

*Head of Investor Relations &  
Marketing*



**Nathan Dastic**

*Chief Financial Officer & Chief  
Compliance Officer*



## About Transom

Transom is a leading operationally focused private equity firm that thrives in complexity, specializing in identifying and unlocking value in the middle market. Founded in 2008 and headquartered in Los Angeles, Transom has established a strong track record across various economic cycles by employing a time-tested, operationally intensive strategy to drive transformative outcomes. We draw on the real-world leadership experience of our large in-house operations team to deliver tailored solutions backed with functional expertise to help companies unlock their full potential. The firm provides not only capital, but also the tools, insights, and operational capabilities necessary to accelerate performance and create long-term value.

Since our founding, we have specialized in unlocking portfolio company potential through our operational approach to value creation, the “ARMOR<sup>SM</sup>” (Acquisition, Restructuring, Monitoring & Operations, Return) model. This proprietary framework applies a systematic process that ensures stakeholders are aligned, timelines are clear, and goals have a defined path toward achievement. Transom considers sustainability-related factors throughout all phases of the investment lifecycle.

Private equity is a unique and transformative vehicle that, when managed responsibly, can enhance long-term value across the spectrum of stakeholders. Transom believes our holistic approach will enhance value creation, mitigate risk, uncover opportunities, and align outcomes with the priorities of our firm and stakeholders.

Instead of benefitting just investors or owners, we see private equity as a tool to boost long-term value for everyone on the org chart—from the entry level to the C-suite. Transom aims to generate substantial returns by building teams that can execute our playbook and who live our values in all areas of our operation.

“

We begin with the end in mind. Working hand-in-hand with company leadership, we aim to go beyond just providing capital to delivering the tools, insights, and operational expertise to create lasting value.

”



# Transom's RI Journey



# Annual Update

In 2024 and 2025, Transom continued to enhance and refine our strategy, processes, and tools to support consistent and effective integration of sustainability considerations across our portfolio. Our goal remains to identify, track, and manage material risks and opportunities in order to drive long-term value creation for our investors, while actively considering the interests of stakeholders.

## 2024 & 2025 RI Highlights

### Prioritization of transparency

Transom published its first public UN PRI Transparency Report, and released its second RI report.

### Enhancement of tools

Refinements were made to our templates for tracking KPIs in addition to our “Sustainability Assessment Dashboard,” as pertinent risks and opportunities continue to evolve.

### Publishing of Scope 3 GHG emissions

Transom calculated and publicly published its Scope 3 emissions for relevant categories for the first time.

### Setting the foundation for decarbonization efforts

Further efforts have been made to understand portfolio company GHG emissions, energy, and renewable energy usage, to identify potential intervention opportunities.

### Investing in green opportunities

With the 2024 acquisition of Ampure, Transom continues to support the transition to a low-carbon economy by scaling transition-enabling infrastructure.



# Responsible Investing

## *Oversight of RI*

### Governance

#### Firm-Level Oversight

Transom's leaders are deeply committed to fostering its RI practices.

To support RI integration across the firm, Transom maintains a RI Steering Committee. The committee includes senior members of the firm's leadership, including Russ Roenick, Co-Founder and Managing Partner, Nathan Dastic, Chief Financial Officer & Chief Compliance Officer, and Dana Goldstein, Head of Investor Relations & Marketing.

#### Oversight of Sustainability Integration into Investment Decisions

Transom's Investment Committee, which oversees all investment activity, is regularly updated on RI initiatives. The Investment Committee reviews sustainability-related risks and opportunities identified during our sustainability due diligence process and incorporates those findings into investment decision-making.

#### Internal RI & Sustainability Capability

To continue building internal expertise, Transom has hired a dedicated in-house professional to support Transom's RI and sustainability efforts, enhancing day-to-day integration of sustainability considerations across investment and portfolio management activities. This role supports firm leadership, the RI Steering Committee, and investment teams by advancing RI initiatives, deepening internal understanding of sustainability-related risks and opportunities, and ensuring consistent implementation of Transom's RI framework.



# Integration of RI at Transom

## *Commitment to RI Practices*

Transom is committed to RI and to managing sustainability-related risks and opportunities throughout the investment lifecycle. We believe that integrating RI practices into our process helps us act as better stewards of capital, drive sustainable value creation across our portfolio, and contribute to positive outcomes on broader systemic issues.

Transom has been a signatory to the UN PRI since 2022. We continue to align our investment practices and operations with the six Principles, where consistent with our fiduciary responsibilities and firm policy:

- Principle 1: Incorporate sustainability issues into investment analysis and decision-making processes
- Principle 2: Be active owners and incorporate sustainability issues into ownership policies and practices
- Principle 3: Seek appropriate disclosure on sustainability issues by portfolio companies
- Principle 4: Promote acceptance and implementation of the Principles within the investment industry
- Principle 5: Collaborate to enhance effectiveness in implementing the Principles
- Principle 6: Report on activities and progress toward implementing the Principles

*Signatory of:*





## Transom's Commitment to Human Rights

Transom is committed to respecting and protecting human rights across its investments. As part of this effort, we have strengthened our due diligence to identify potential human rights concerns during the pre-investment risk assessment process and enable continued monitoring of these issues throughout the investment lifecycle.

We are also in the process of implementing human rights considerations within our formal sustainability policies at the portfolio company-level.

# Pre-Investment Sustainability Integration

RI considerations are embedded into pre-investment activities and may influence investment decisions when material risks or sustainability-related financial implications are identified. The M&A Team reviews sustainability-related risks, and the Investment Committee evaluates findings prior to transaction approval.

- **Exclusion:** Transom applies fund-level exclusion policies to screen out sectors, products, or services considered high-risk (exclusions are unique to each fund).
- **Sustainability Due Diligence:** Each target company undergoes a structured diligence process that includes both a materiality assessment and a risk assessment:
  - **Materiality Assessment** – Using Transom’s proprietary “Sustainability Assessment Dashboard,” we identify sustainability topics that are most relevant to the target company. This tool incorporates guidance from the UN PRI and SASB. Consideration includes both macroeconomic context and company-specific factors.
  - **Risk Assessment** – We leverage a multi-faceted approach to identify sustainability-related risks and opportunities under the following categories:



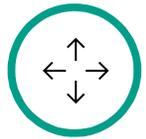
- **Investment Decision:** A summary of the sustainability due diligence is included in materials reviewed by the Investment Committee. These findings inform the overall assessment of the opportunity and play a role in determining whether to proceed with the investment.



# Post-Investment Sustainability Integration

Transom integrates RI practices across the full investment lifecycle, embedding sustainability considerations into each phase of the firm's proprietary ARMOR<sup>SM</sup> Value Creation Process. During the ownership period (Restructuring, Monitoring & Operations, and Return phases), Transom works closely with portfolio company management to monitor sustainability performance, manage risks, and support long-term value creation.

Transom believes that effective sustainability management requires systems and processes that support ongoing engagement, measurement, and accountability. Key areas of focus during the post-investment phase include:



**Remediation of Sustainability Risks** – For any risks identified as “High Risk” by our team, Transom tracks progress and works with portfolio company leadership to address and remediate issues where possible.



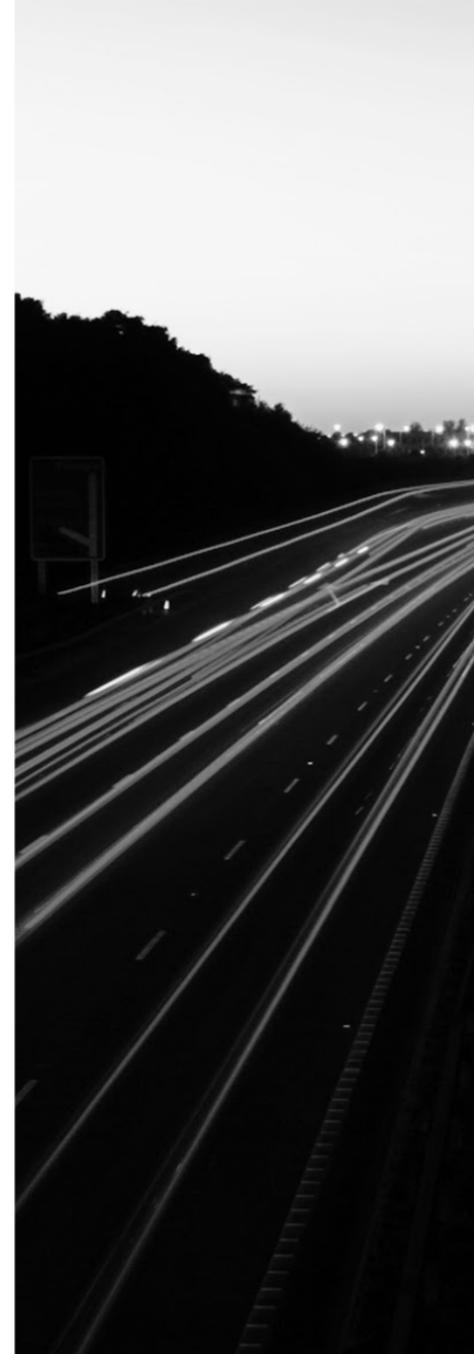
**Sustainability KPIs** – Transom provides portfolio companies with guidance and documentation for annual data collection on key sustainability metrics. Regular check-ins are held to review progress and support performance improvement.



**Portfolio Company Engagement** – Transom meets at least annually with portfolio company teams to discuss relevant sustainability topics and provide support on aligning with the firm's RI guidelines.



**Calculation of GHG Emissions** – Transom supports portfolio company GHG emissions measurement for Scope 1 & 2, including use of standardized questionnaires and templates, and management education.



# Responsible Operations

## *Transom Firm-level Sustainability*

Transom's commitment to RI extends to firm-level operations. We aim to create long-term value by fostering a culture of collaboration, operational discipline, and employee engagement.

As part of these efforts, Transom has:

- Conducted employee engagement surveys to better understand team sentiment and identify opportunities for improvement;
- Calculated firm-level Scope 1 and Scope 2 GHG emissions;
- Measured Scope 3 “business travel emissions” (Category 6) as well as “financed emissions” associated with portfolio company investments (Category 15).



# Greenhouse Gas (GHG) Emissions

Transom has conducted a GHG emissions inventory in alignment with the GHG Protocol Corporate Standard and the Partnership for Carbon Accounting Financials (PCAF). For calendar year 2024, Transom's GHG footprint includes direct emissions (Scope 1), indirect emissions from purchased electricity (Scope 2), as well as a subset of indirect emissions from the value chain (Scope 3).

Breakdown of 2024 firm-level emissions<sup>1</sup>:

**Total Scope 1 Emissions:** 1.23 metric tons CO<sub>2</sub>e

## Total Scope 2 Emissions

- **Location-Based:** 4.97 metric tons CO<sub>2</sub>e
- **Market-Based:** 5.73 metric tons CO<sub>2</sub>e

**Total Scope 3 Emissions<sup>2</sup>:** 24,149.95 metric tons CO<sub>2</sub>e

Note: Organizational boundary is defined using the Operational Control approach in line with the [GHG Protocol](#).

<sup>1</sup> GHG emissions are reported for 2024 and were calculated using data collected in 2025.

<sup>2</sup> Scope 3 categories include Category 6 (Business Travel) and Category 15 (Investments).





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