

Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector dated 27 November 2019 (“SFDR”)

TRANSPARENCY OF SUSTAINABILITY RISK POLICIES (Article 3, SFDR)

Hg Pooled Management Limited and its affiliates (“**Hg**” or “**we**”) considers sustainability risks associated with investment opportunities including but not limited to risks associated with climate change, health & safety, cybersecurity and bribery and corruption. In particular, Hg evaluates environmental, social and governance (“**ESG**”) risks, mitigating factors and opportunities applicable for the asset type, geography and the industry as a whole. Hg tracks relevant data, and, where appropriate, integrates such data into the investment research, acquisition and onboarding and post-acquisition, value creation and realisation, risk monitoring and exit processes.

Hg’s targeted investment approach means they have extensive knowledge and a clear focus on the ESG metrics that are most material to the software and service sector. These ESG metrics are outlined in Hg’s Sustainable Business framework

Hg maintains a Responsible Investment Policy that sets out its approach to the identification and management of sustainability and ESG related risks and opportunities throughout the investment activities, including the management of investee companies. HgCapital LLP has been a signatory to the United Nations Principles for Responsible Investment (“**UNPRI**”) since 2012 and is dedicated to the UNPRI’s six principles.

Further information on Hg’s policies on the integration of sustainability risks in our investment decision-making process is located on Hg’s website at: [Hg | Responsibility](#).

NO CONSIDERATION OF ADVERSE SUSTAINABILITY IMPACTS AT ENTITY LEVEL (Article 4, SFDR)

While Hg will continue to take into account ESG factors in its investment process, Hg does not consider adverse impacts of investment decisions on sustainability factors as set out in the SFDR. Hg has chosen not to do so presently as they consider that their existing ESG approach is appropriate, proportionate and tailored to the investment strategy they currently pursue.

While Hg does not currently intend to consider adverse impacts of investment decisions on sustainability factors, they continue to monitor regulatory developments with respect to the SFDR and other relevant laws and regulations, including the implementation of related and secondary legislation and regulatory guidance. Where required or otherwise appropriate, Hg will accordingly make changes to its existing policies and procedures.

TRANSPARENCY OF SUSTAINABILITY RISK POLICIES (Article 5, SFDR)

Hg pays their staff a combination of fixed remuneration and variable remuneration. Variable remuneration for relevant staff takes into account compliance with all of Hg’s policies and procedures, including those relating to risk management and the integration of sustainability risks. ESG is embedded into the performance process through one performance objective, applying across all teams, which relates to how the employee has contributed to ESG & Diversity across the firm or its portfolio. Furthermore, variable remuneration also depends on the performance against Hg’s values as part of the annual review process. One of Hg’s values is ‘Win right’ where the employees are asked to consider the firm’s long-term ESG performance.