**Disclosures required under Regulation 2019/2088 on sustainability-related disclosures in the financial services sector dated 27 November 2019 (SFDR) - Hg Pooled Management Limited (the "Manager") and Hg Saturn 3 and Hg Genesis 10 (the "Funds")**

INFORMATION ON THE POLICIES ON THE INTEGRATION OF SUSTAINABILITY RISKS IN THE INVESTMENT DECISION-MAKING PROCESS OF HG POOLED MANAGEMENT LIMITED (THE MANAGER).

- (Article 3(1) of Regulation (EU) 2019/2088 ("**SFDR**"))

- When evaluating investment opportunities, the Manager considers sustainability risks associated with such opportunities including but not limited to risks associated with climate change, health & safety, cybersecurity and bribery and corruption. In particular, the Manager evaluates material environmental, social and governance ("**ESG**") risks, mitigating factors and opportunities applicable for the asset type, geography and the industry as a whole. The Manager tracks relevant data, and where appropriate, integrates such data into the investment research, acquisition and on-boarding and post-acquisition, value creation and realisation, risk monitoring and exit processes. Sustainability risks are also considered in the engagement of any operators or service providers in respect of any portfolio companies or other assets relevant to the funds under management.

- The Manager expects to implement mechanisms to identify material ESG issues in making investments in portfolio companies, and for reporting on key performance indicators from portfolio companies. The Manager expects to evaluate on an on-going basis whether such indicators pose any material sustainability risks on the returns of a fund investment. The Manager compiles and analyses such information and where appropriate, reports the results to the Investors. For instance, Hg's climate change risk assessment tool is tailored to capture risks within the Software and Services industries to identify and mitigate transition and physical risks associated with climate change that may have an impact on the performance of the businesses. Please see the Manager's Responsible Investment Policy for more information.

ENVIRONMENTAL AND/OR SOCIAL CHARACTERISTICS PROMOTED BY HG SATURN 3 AND HG GENESIS 10 (THE FUNDS)

- (Article 8 of SFDR)

- The Manager has identified the following environmental and social characteristics (the "**Characteristics**") which are being promoted as part of the Funds' investment process:

  - the setting of greenhouse gas emission reduction targets and/or Science Based Targets in line with the temperature rise goals of the Paris Agreement for each portfolio company;

  - the implementation of an ESG or Sustainability policy in each portfolio company in respect of the identification and mitigation of sustainability risks and impacts; and

  - the appointment of at least one "ESG/Sustainability champion" on the board of directors of each portfolio company to enable ownership, oversight and management of ESG and sustainability initiatives at the portfolio company board level.

How the identified Characteristics are met and the methodologies to assess, measure and monitor the Characteristics (including any data sources, screening criteria and the relevant sustainability indicators)

- The Manager has developed the Sustainable Business Framework ("**Framework**") which sets out its approach to ESG risk and opportunity management across portfolio companies. As part of the Framework, all portfolio companies are assessed on ESG aspects, including each Characteristic, as part of on-boarding, and then annually thereafter against over 175 ESG metrics that are most material to software companies.

- The Manager embeds this Framework into the entire investment process, from screening through to exit.

- During ownership, the Manager's Responsible Investment team takes an active approach to managing the ESG profile of the business, including with a specific focus on the Characteristics. This starts with on-boarding and maturity assessment within the first few months of acquisition to identify areas for improvement, where the Manager can support the portfolio companies to realise their ambitions within and beyond their Framework. As part of this ongoing engagement, each portfolio company is re-assessed annually and the team follows up to ensure appropriate actions are taken to implement, and/or improve on each Characteristic as required. Face-to-face and online collaboration forums help management teams to network, share best practice and receive support throughout the life of the investment.

- This ESG assessment is led by the Manager's Chief Sustainability Officer, who works together with key individuals within the portfolio company in question, such as the Chief Human Resource officers and Chief Compliance officers.

- The following KPIs will be used to assess each Characteristic for each investment annually:

  - number/percentage of portfolio companies that have conducted a comprehensive baseline carbon footprint calculation in respect of scope 1 and 2 greenhouse gas emissions generated by the portfolio company over the prior year, expressed in tons of carbon dioxide equivalent, as calculated in accordance with the applicable standards issued by the Greenhouse Gas Protocol or equivalent methodology;

  - number/percentage of portfolio companies that have formally established an ESG or sustainability policy; or

  - number/percentage of portfolio companies with a board member whose official responsibilities include oversight of ESG risk and opportunity management.

- Baseline carbon footprint assessments will be conducted on all portfolio companies in year one of the Fund and data covering relevant categories within scope 1, scope 2 and scope 3 emissions will be collected in line with the Greenhouse Gas Protocol and the relevant Science Based Targets initiative ("**SBTi**") corporate guidance manual (to the extent appropriate and depending on the size of the portfolio company). A greenhouse gas emission reduction target will be set for each portfolio company typically within twelve months of the carbon footprint exercise being completed (or such time period as is necessary to obtain SBTi-validated targets where an SBTi target has been set for a portfolio company). If a baseline carbon footprint representing business as usual, including but not limited to major impacts from the pandemic, cannot be established within this timeframe, a company may delay their target setting in order to conduct a baseline carbon footprint which accounts for a more realistic baseline scenario[1].

- The Manager embeds ESG reporting capabilities into its reporting systems.

- Further information on how investments are performing based on the identified KPIs will be included in the Funds' annual Responsible Investment report which will be provided to investors. The annual report will also contain information on how the KPIs are set, assessed and monitored.

Good governance

- The Framework enables the assessment and improvement of governance practices at the portfolio company level during the investment process and then subsequently during post-investment engagement with portfolio companies. Accordingly, the Manager engages with portfolio companies to encourage strong corporate governance.

- There are certain minimum ESG requirements that Hg expects from all portfolio companies:

[1] The COVID-19 pandemic has had significant impact on corporate carbon footprinting assessments and, in many cases, baselines generated in 2020 and 2021 do not represent a business as usual scenario.

- Governance and Business Integrity, such as codes of conduct, appropriate controls and policies, board composition and appropriate health and safety and whistleblowing procedures.

- Risk and Compliance, including compliance with applicable laws and regulations, active risk management, as well as standards and policies to combat bribery, corruption, money laundering, anti-competitive behaviour, tax evasion, harassment and other malpractice.

- Data and Cybersecurity, which includes Hg's minimum standards for cybersecurity along with appropriate data protection and information security practices. Hg has a separate Cybersecurity assessment which all companies are assessed against as part of on-boarding and regularly thereafter.

STATEMENT OF THE CONSIDERATION OF THE ADVERSE IMPACTS OF INVESTMENT DECISIONS ON SUSTAINABILITY FACTORS BY HG POOLED MANAGEMENT LIMITED (THE MANAGER)

- (Article 4(1) of SFDR)

- The Manager has considered, and continues to consider, ESG factors in its investment process but it does not consider adverse impacts of investment decisions on sustainability factors as specifically set out in Regulation 2019/2088 on sustainability-related disclosures in the financial services sector dated 27 November 2019 (SFDR). The Manager has chosen not to do so for the present time as it considers that its existing ESG policies and procedures are appropriate, proportional and tailored to the investment strategies of the funds managed by the Manager. The Manager continues to closely monitor regulatory developments with respect to the SFDR and other applicable ESG-focused laws and regulations, including the implementation of related and secondary legislation and regulatory guidance, and will, where required or otherwise appropriate, make changes to its existing policies and procedures.