

Hayfin NV GP S.à r.l. – Entity-level Website Disclosures

In order to comply with the sustainable finance disclosure regulation (**SFDR**)* and the SFDR Regulatory Technical Standards (**SFDR RTS**)**, Hayfin NV GP S.à r.l. (**Hayfin GP**) makes the following disclosures.

Integration of sustainability risks (Article 3 (1) of the SFDR)

A sustainability risk means "*an environmental, social or governance event or condition that, if it occurs, could cause an actual or potential material negative impact on the value of the investment*" (Article 2(22) of the SFDR).

Before any investment decisions are made on behalf of a fund that Hayfin GP manages, an investment decision process is followed which, with regards to specific investments, includes the approval of the ESG Deal Committee of the Hayfin group entity to whom the portfolio management of the applicable fund has been delegated by the Hayfin GP (the **Portfolio Manager**). Sustainability risks are fully integrated into Hayfin's investment processes. Wherever appropriate, the Portfolio Manager seeks to engage with stakeholders in order to raise awareness of and encourage better ESG practice.

Hayfin GP views sustainability as a standard topic in the pre-investment due diligence process. Part of the investment decisions process is that the Portfolio Manager assesses the risks attached to a potential investment opportunity, which includes sustainability risks. Identified sustainability risks are considered by the ESG Deal Committee when making investment decisions. The ESG Deal Committee comprises senior management and members of the investment, legal, and business development teams. The ESG Deal Committee meets regularly to implement and oversee the ESG policy and processes, monitor progress towards the identified goals, and deliberate on how improvements can be made.

The Portfolio Manager will assess sustainability risks and long-term ESG trends during all stages of investment, from initial screening through to investing, monitoring, and exit.

Employees are made aware of the applicable policies and procedures when starting their employment with Hayfin GP and/or the applicable Portfolio Manager.

Further details of the process for identifying and integrating sustainability risks in investment decision-making is contained in the Hayfin Responsible Investment Policy.

No consideration of adverse impacts of investment decisions on sustainability factors (Article 4 (1)(b) of the SFDR)

Hayfin GP does not consider adverse impacts of investment decisions on sustainability factors at entity level within the meaning of article 4(1)(b) of the SFDR. Hence, Hayfin GP does not make the disclosures as described in article 4(1)(a) of the SFDR. Considering the aggregate assets under management at Hayfin GP level, it has been determined that it wouldn't be proportionate to consider adverse sustainability impacts (**PAI**) at entity (i.e. Hayfin GP) level. For the avoidance of doubt, this wouldn't prevent Hayfin GP from considering PAI at product level to the extent disclosures to this effect are included in the SFDR pre-contractual disclosures of the relevant product.

Consistency of remuneration policy with integration of sustainability risks (Article 5 of the SFDR)

Hayfin GP's remuneration policy promotes a culture of sound and effective risk management which aims to protect the value of its investment portfolios. Sustainability risks are another type of risk which Hayfin GP expects its employees to manage effectively in accordance with the firm's risk management framework.

*Regulation (EU) 2019/2088

**Commission Delegated Regulation (EU) 2022/1288