

**BluePeak Private Capital GP**  
**(Article 8 – Website Entity Level Disclosures)**

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## **I. Summary**

Through its investments, BluePeak Capital LLP (hereinafter as “BluePeak Capital” or “Fund Manager”) aims to promote Environmental and Social (“E&S”) characteristics with the belief that Environmental, Social and Governance (“ESG”) factors not only contribute positively to investment performance, but also help to build a more stable, sustainable, and inclusive global economy. Care for the environment and the communities within which we work is key to the way in which BluePeak Capital does business.

In this line of thought, investment practices have been carefully designed to integrate ESG factors and ESG risk considerations. Further information on the ESG factors and ESG risk management processes implemented by BluePeak Capital can found in the Environmental, Social and Governance Policy (“ESG Policy”), the Environmental and Social Management System (“ESMS”) and the **Corporate Governance Framework**. Due to investee lack of data availability, Principal Adverse Impacts (“PAIs”) are not currently considered in the investment process. However, if reliable proxies are identified, the Fund Manager may choose to monitor and report on PAIs. It is to note that if any material ESG gaps are identified, the investee will be required to implement an Environmental & Social Action Plan (“ESAP”) and/or a Corporate Governance Action Plan (“CGAP”) with support from BluePeak Capital.

## **II. Transparency of sustainability risk policies**

The Fund Manager **integrates sustainability considerations at all stages of its investment process**. In particular, the **Fund Manager assesses sustainability risks** which could have an actual or potential material negative impact on the financial value of the investment and portfolio before and after investment decisions have been made. **E&S risks** are identified, categorized, assessed, and monitored in alignment with the environmental and social responsibility categorization based on the guidelines agreed by the European Development Financing Institutions (“EDFI”). **Good governance practices and potential Governance risks** are identified, assessed, and monitored based on the **proprietary Corporate Governance Framework** and **IFC Risk Categorization on Business Integrity**. In the case where material ESG gaps have been identified during screening and due diligence, the Fund Manager will implement and include in the legal documentation an Environmental and Social Action Plan (“ESAP”) alongside a Corporate Governance Action Plan (“CGAP”).

Further information on the ESG risk management process implemented by BluePeak Capital can found in the Environmental, Social and Governance Policy (“ESG Policy”), the Environmental and Social Management System (“ESMS”) and the **Corporate Governance Framework**.

## **III. Transparency of principal adverse sustainability impacts “PASI”**

**Principal Adverse Impacts** of investment decisions on sustainability factors are **not considered by BluePeak Capital due to investee lack of data availability and lack of reliable proxy indicators**. No actions on any PAI indicators are taken at this stage, however if reliable proxy indicators are identified or investees are able to report on the mandatory principal adverse sustainability impacts indicators outlined by the Regulatory Technical Standards, the Fund will consider monitoring and reporting on PAIs.

The Fund Manager, when deemed necessary, works with investees to implement best practices and potential **ESAP and CGAP aiming to strengthen their ESG approach** in order to reach an increased level of environmental and social performance alongside good governance practices. If any investee breaches any of the ESG requirements, then a series of remediation measures are put in place to bring the portfolio company back into compliance as soon as possible. Further information can be found in the **ESG Policy, ESMS and Corporate Governance Framework**.

## **IV. Transparency of remuneration policies in relation to the integration of sustainability risks**

The Fund Manager’s approach to remuneration is designed to support the long-term business interests of its shareholders and its Fund’s investors, to reflect the risk management approach and to deliver long-term environmental, social, and financial performance. **The Fund Manager’s compensation approach** is underpinned by a common philosophy and guiding principles and is structured to align the interests of its employees with the interests of the strategy. **It is consistent with and promotes effective risk management, including (amongst other things) sustainability risks and the interests of both its portfolio companies and shareholders.**

Employees are remunerated through the payment of an annual salary and through various bonus schemes. The Fund promotes sound and effective risk management with respect to sustainability risks, ensuring that the structure of remuneration does not encourage excessive risk-taking with respect to sustainability risks and (ii) is linked to risk-adjusted

performance. The inclusion of sustainability risks in the areas of environment, social affairs and corporate governance is therefore explicitly included in the remuneration scheme of BluePeak. Employees shall be assessed on their adherence to ESG factors and impact