

**Five Arrows**

 Rothschild & Co



# Five Arrows Responsible Investment Policy

V 1.0 November 2025

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# 1. Introduction

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## 1.1 PURPOSE, SCOPE AND APPLICATION

This document sets out the Five Arrows approach to integrating responsible investment practices into its investment decision-making processes and portfolio management (the 'activities').

This policy applies to the Five Arrows activities of Rothschild & Co Investment Managers and each of Five Arrows Managers LLP, Five Arrows Managers SAS, Five Arrows Managers North America LLC, and Five Arrows Managers USA LLC (collectively 'Five Arrows', 'we', or 'us').

This policy covers the four Five Arrows investment strategies, unless otherwise stated:

- Corporate Private Equity (CPE);
- Multi Strategies (FAMS);
- Direct Lending (DL); and
- Credit Management (CM).

The policy outlines the overarching framework guiding the integration of Environmental, Social, and Governance (ESG) considerations across the various investment strategies and stages of the investment lifecycle at Five Arrows.

However, certain vehicles are excluded from the application of this framework, including, but not limited to:

- Vehicles used primarily for specific structuring purposes, such as co-investment, or syndication vehicles,
- Older vintage funds launched prior to the release of the SFDR regulation, which currently operate with ad-hoc support from the Sustainability and Risk Management teams pending formal process implementation, or are in wind-down phases where applying the full framework would provide limited added value.

The purpose of this policy is to set out the principles established by Five Arrows regarding the integration of responsible investment practices. It should be reviewed in conjunction with other relevant Five Arrows policies, particularly those concerning the management of sustainability risks in our operations.

## 1.2 POLICY REVIEW AND APPROVAL

**Drafted by:** Five Arrows Sustainability Team.

**Last approved by:** Five Arrows Sustainability Committee in November 2025.

**Policy review frequency:** Regularly by Five Arrows Sustainability Committee.

**Previous version issue date:** NA.

Each Rothschild & Co Group Entity is required to implement procedures, systems and controls, as appropriate, to comply with this Policy, whilst also incorporating any local law requirement where necessary.

If no revisions to this Policy are required, the review must still be recorded, and a newly dated, but unamended, version be issued. This should also be recorded on the Document History section. The local policies which implement this Policy are subject to the same review cycle as this Policy. All local policies will include a policy review and approval clause.

## 1.3 OTHER RELEVANT POLICIES AND PROCEDURES

The following documents should be referenced in conjunction with these policies:

- Five Arrows Sustainability Risks Management Policy
- [Five Arrows Principles of Adverse Impact Statement](#)

## 2. Our initiatives and engagements

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We actively engage with industry networks and initiatives<sup>1</sup> to shape sustainability standards, anticipate regulatory developments, and continuously improve our practices. By forging alliances and exchanging best practices, we aim to contribute to a more resilient and responsible investment ecosystem.

Signatory of



As a long-standing signatory of the [United Nations Principles for Responsible Investment \(PRI\)](#), we are committed to integrating ESG considerations into our investment decisions and ownership practices. This commitment reflects our belief that responsible investing is essential to long-term value creation and risk management.



Climate Change is a key topic in our responsible investment strategy. It is either addressed as a potential risk to mitigate, and/or as an opportunity to create long-term value and resilience in our portfolio. While we mainly invest in asset-light businesses, we recognise that energy transition requires collective action — and that every contribution counts. In line with this conviction, we have developed an ambitious climate strategy aligned with the goals of the Paris Agreement. **Our near-term emissions reduction targets have been officially approved by the [Science Based Targets initiative \(SBTi\)](#)** in December 2024, marking a key milestone in our journey toward a low-carbon future. Our participation in the [International Climate Initiative \(iCi\)](#) reaffirms our determination to address the climate crisis.



Five Arrows is committed to advancing gender diversity across our firm and portfolio. We support this through our adherence to the [France Invest Gender Equality Charter](#), our sponsorship of [Level 20](#) to foster female talent in private equity, and our alignment with the [Women in Finance Charter](#) to increase female representation in senior leadership positions. These initiatives reflect our belief that diverse teams drive better outcomes and long-term value.



At Five Arrows, we believe that access to reliable, high-quality data is essential to managing portfolios sustainably. That is why we actively support efforts to improve ESG data across asset classes — from our role in the [ESG Data Convergence Initiative \(EDCI\)](#), which promotes transparency and comparability in private equity, to our participation in the [ESG Committee of the European Leveraged Finance Association](#), where we collaborate with partners to address data challenges in credit markets and enhance ESG integration, particularly among sub-investment grade borrowers.



Finally, as active members of the [France Invest Sustainability and Private Debt Commissions](#), we contribute to advancing sustainability practices across the private investment industry. **We regularly participate in working groups** such as Sustainability and Value Creation, Sustainable Finance Regulation, and the CSO Club. In addition, we are signatories to several key initiatives, including the [Best Practice Guide for Private Debt Sustainability-Linked Financing](#), which supports the alignment of financing structures with measurable ESG outcomes.

<sup>1</sup> Membership to the initiatives listed is kept through the timely payment of any applicable fees.

# 3. Our responsible investment approach

## 3.1 OUR SUSTAINABILITY STRATEGY




The Five Arrows investment philosophy is deeply rooted in long-term thinking, leading to a sustainability strategy that is both concrete and actionable, with quantified, time-bound targets on key issues to ensure measurable progress and accountability.

Our strategy is built on three interrelated pillars — Our Teams, Our Investments, and Our Ecosystem — forming a set of commitments that maximise long-term value creation for our stakeholders and investors.

While capitalising on bespoke ESG value creation opportunities by investment where and when appropriate, we place a particular focus on climate change management and gender diversity, recognising their critical role in shaping a sustainable future. These material stakes are either addressed as potential risks to mitigate, and/or as opportunities to leverage.

On top of these dimensions, good governance and business ethics — including key topics such as data protection and security — remain at the heart of our discussions with our stakeholders. By prioritising these areas, we reinforce our commitment to building a more sustainable and equitable world.

## 3.2 OUR TARGETS

	At Firm Level	At investment level
 <p>SCIENCE BASED TARGETS <small>DRIVING AMBITIOUS CORPORATE CLIMATE ACTION</small></p>	<p>Achieve a</p> <p><b>50%</b></p> <p>Absolute reduction in Scope 1 and Scope 2 GHG emissions for Five Arrows employees from 2023 to 2030</p>	<p><b>39%</b></p> <p>Of eligible direct private equity investments (by invested capital) with science-based targets set by 2029, and 100% by 2040, using 2023 as the base year<sup>2</sup></p>
 <p>FRANCE INVEST <small>Investors for growth</small></p> <p>Charter Promoting Gender Equality in Private Equity</p>	<p><b>40%</b></p> <p>Female representation in the investment teams based in France by 2030</p> <p><b>25%</b></p> <p>Of French law employees seating in one of our investment Committees to be female by 2030 and 30% by 2035</p>	<p><b>30%</b></p> <p>Of the Board members in French-based companies with over 500 employees to be female – invested in through Corporate Private Equity and Direct Lending</p>
 <p>Rothschild &amp; Co</p>	<p><b>32%</b></p> <p>In line with the Group's Diversity objective to reach 33% of women at Principal level and above, Five Arrows has set its own target at 32%. This target excludes the US population.</p>	

<sup>2</sup> An investment is considered as eligible and will be integrated in the calculation of progress made to achieve the target if Five Arrows owns more than 25% of the fully diluted shares of the portfolio company related to the investment and Five Arrows has at least one seat on the company's board of December 31st of the relevant year.

### 3.3 FIVE ARROWS INVESTMENT RESTRICTIONS

Under the Five Arrows investment restriction framework presented below and undertaken by our business lines<sup>3</sup>, no direct investment will be made in companies that:

- derive all or part of their revenue from the use, development, production, acquisition, stockpiling, retention, transfer, trade and/or distribution of controversial weapons and components dedicated to such weapons. Controversial weapons include cluster munitions, anti-personnel landmines, chemical weapons and biological weapons, as such terms are defined under international conventions or standards such as the Oslo Convention on Cluster Munitions (2008) and the Ottawa Treaty on Anti-Personnel Mines (1999);
- breach fundamental principles due to gross corporate misconduct such as severe infringements of human rights, substantial environmental damage or those linked with corruption and bribery, to Five Arrows' knowledge and as evidenced by official credible third-party sources;
- derive all or part of their revenue from direct thermal coal production, exploration, mining & processing and power generation using thermal coal;
- derive all or part of their revenue from prostitution;
- derive a material part of their revenue from the production, trade and/or distribution of tobacco and pornographic content (including rental and licensing).

For CM, the implementation of this exclusion policy is more complex and will be carried out on a best effort basis only. Taking into account the current limitations of third-party tools and of data availability, including data retrieved from third-party data providers, Five Arrows will seek to integrate the analysis of the investment restriction framework presented above into our selection process.

Where we do not invest in individual companies but rather in third-party funds, the implementation of this exclusion policy is more complex and is not mandatory, notably with respect to fund of funds' undrawn capital. To the extent possible, Five Arrows will integrate the analysis of the investment restriction framework presented above into our selection process and periodic portfolio reviews. Five Arrows can also seek to have third-party funds' respective managers agree in a legally binding agreement to comply with the investment restrictions mentioned above or to obtain an acknowledgement by any other mean or any other sort of confirmation or document from such managing entities in that respect.

While the above outlines the overarching Five Arrows framework, individual fund documentation may include additional investment restrictions agreed upon with investors. These often contain broader exclusion criteria or more stringent limitations.

### 3.4 ADVANCING SUSTAINABILITY INTEGRATION VIA FIVE ARROWS SFDR ART. 8 AND 9 FUNDS

The requirements of the Sustainable Finance Disclosures Regulation (SFDR) created an opportunity for us to systematise our product sustainability strategy, while reinforcing our transparency and disclosure efforts. In this regard, we are progressively deploying Article 8 and Article 9 products (as defined under the SFDR).

For more information on the management of sustainability risks or the PAI, please refer to the [Five Arrows Responsible Investing website](#).

<sup>3</sup> This covers investments within CPE, DL, FAMS, and CM, except for specific client requests on dedicated discretionary funds or managed accounts and advisory mandates.

## 4. Steering our approach through strong governance

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Rothschild & Co Gestion is the Statutory Manager of Rothschild & Co SCA, the Group operational holding company. Alexandre de Rothschild, Executive Chairman of Rothschild & Co Gestion, is responsible for the overall management of Rothschild & Co SCA, including the setting of the Group's sustainability strategy. In his role, he relies on the Management Board of Rothschild & Co, which he chairs. The Rothschild & Co Management Board includes the four Managing Partners, together with the Group General Counsel and the Group HR Director.

Each of the three Managing Partners in charge of a business line of the Group also chairs the related management committee (Global Advisory Management Committee, Wealth and Asset Management Committee and Five Arrows Management Committee).

The Five Arrows Management Committee delegates to the Five Arrows Sustainability Committee the task of driving the implementation of the firm's sustainability strategy. The Committee is composed of the Managing Partners from each of the Five Arrows investment verticals, along with the Head of Sustainability.

To further reinforce integration and operational depth, we have established Sustainability Committees at the investment strategy level. These bodies are designed to promote targeted engagement with portfolio-level sustainability considerations and to support the effective execution of the strategy within each of our investment verticals.

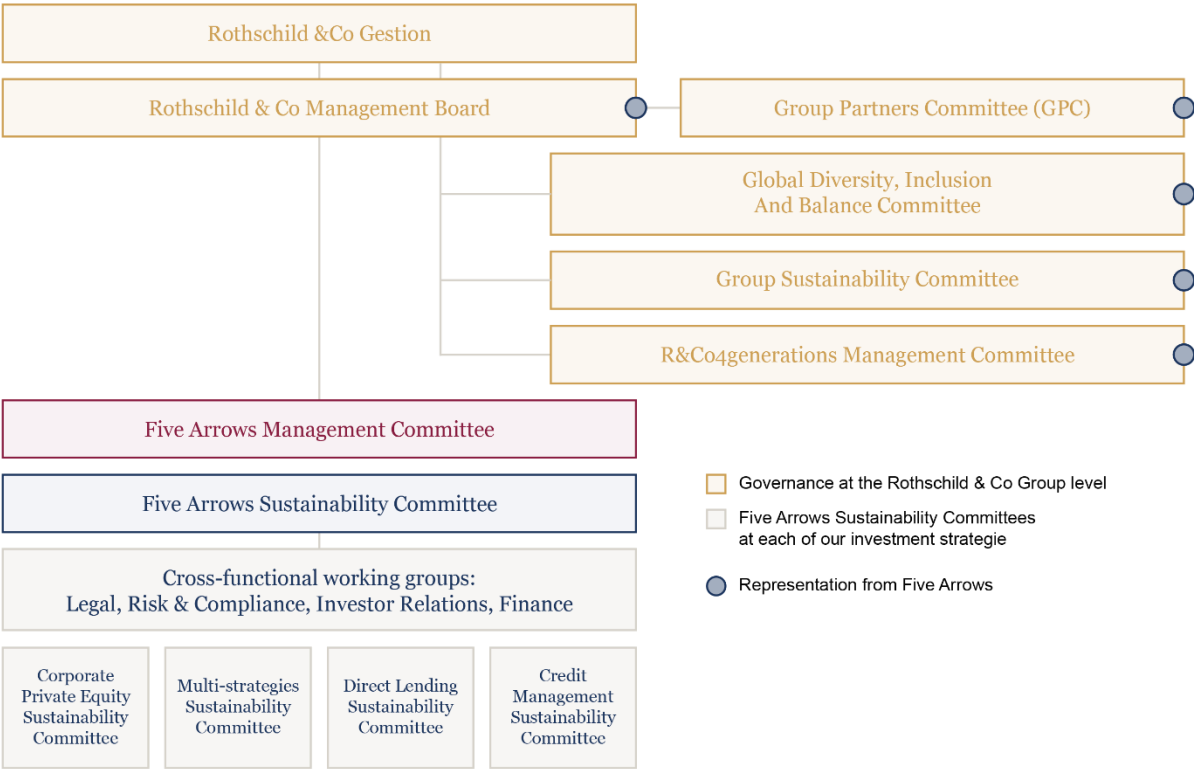
The implementation of the strategy is driven by the Five Arrows Sustainability team, a dedicated group of sustainability experts with specialised knowledge across key areas. Their responsibilities include:

- Designing, deploying, and embedding sustainability frameworks, tools, processes, and training into day-to-day practices across the Five Arrows platform; and
- Proactively engaging with a wide range of stakeholders — including investors, portfolio companies and fund managers, regulatory bodies, industry peers, and associations — to ensure alignment with stakeholder expectations, regulatory developments, and evolving best practices.

Our sustainability governance is anchored in transparency and accountability, to integrate effectively our sustainability principles across all functions — including investment teams, HR, legal, investor relations, compliance, risk, finance, IT, and operations.

The sustainability risk assessment is conducted through cross-functional working groups that bring together Risk Management, Compliance, Finance, and the Five Arrows Sustainability team.

The process of sustainability risks monitoring is formalised in the Five Arrows Risk Management Policies.



## 5. Embedding responsible investment practices across investment strategies

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As Five Arrows invests across a broad range of strategies — Corporate Private Equity, Multi Strategies, Direct Lending, and Credit Management — our ability to influence sustainability outcomes varies depending on factors such as the nature of the investment relationship, ownership stake, governance rights, and access to non-financial information.

To account for this diversity, our platform's responsible investment framework is structured around two complementary components:

- A common approach applied across strategies to establish a consistent baseline. This includes the application of shared exclusion criteria, the integration of sustainability risk assessments into due diligence processes, and the monitoring of controversies during the pre-investment phase.
- A tailored approach that reflects the level of influence each investment strategy can exert on the sustainability performance of portfolio companies during the holding period and at exit.

This dual structure allows Five Arrows to balance the need for a unified, platform-wide foundation with the flexibility required to address the specific characteristics of each investment strategy. Ultimately, the framework is designed to support both value protection and sustainable value creation across the portfolio.

### Standardised baseline applied across the platform



#### Pre-investment

Exclude certain sectors and identify main risks, opportunities and impacts

- Five Arrows investment restrictions and exclusions as stated above.
- ESG due diligence completed.<sup>4</sup>
- ESG controversy assessment conducted.<sup>4</sup>
- Main risks and opportunities shared with the Investment Committee.<sup>4</sup>

<sup>4</sup> Excluding Hermance Capital Partners (HCP) within the FAMS strategy.

## Practices tailored to each investment strategy



### Holding

A tailored approach with the intention to guide portfolio companies and fund managers to achieve better sustainability outcomes

#### CPE

Proactively support and empower portfolio companies in developing and implementing sustainability roadmaps to drive improved ESG outcomes.

#### FAMS

Actively engage GPs to achieve better sustainability performance through tailored stewardship practices.<sup>5</sup>

#### FASI

Drive measurable environmental progress by investing in SDG-aligned companies and developing tailored impact roadmaps.

#### DL

Drive enhanced ESG performance in portfolio companies by embedding sustainability through ESG-linked ratchets.

#### CM

Integrate sustainability into decision-making and continuously monitor company rankings while closing data gaps.

Across CPE, FAMS<sup>4</sup> including FASI, and DL:

- Common ESG reporting tool.
- Tracking of sustainability performance through a bespoke scoring system.
- 'ESG Factsheets' generated for each investment to enhance engagement.



### Exit

Demonstrate sustainability-driven value creation and positive impact

#### CPE & FASI

- Sustainability due diligence where appropriate.
- Discuss sustainability intentions and opportunities with new investors.

Recognising that our ability to influence our investments varies depending on the nature of the relationship and the control we have, the levers we action as a responsible investor depend on the specificities of each investment strategy<sup>6</sup>:

- **Corporate Private Equity:** As a direct majority shareholder for most investments, we actively support investee companies in their sustainability journey and assist them in defining and implementing their sustainability action plans. Given the opportunity to actively participate in the companies' Board of Directors

<sup>5</sup> Applies only to Article 8 funds.

<sup>6</sup> More information describing the tailored approach of each fund is made available to investors in the fund-specific documentation.

and through our annual ESG reporting, we facilitate the development of data-driven action plans with clear and strategic targets. Prior to investment, we make every effort to include ESG clauses in the shareholder agreement to ensure a minimum level of ambition.

Throughout the holding period, the Head of Portfolio Sustainability provides support to portfolio companies, reinforcing our stewardship as responsible investors. We particularly encourage the exploration of value creation opportunities through the development of products and services that address the sustainability challenges of the markets in which we invest, thereby positively impacting financial KPIs.

- **Direct Lending:** As lenders rather than shareholders, our ability to influence sustainability policies is somewhat more limited. Nonetheless, the recent funds employ sustainability-linked mechanisms within loan agreements, known as “sustainability-linked” or “ESG-linked” ratchets. These provisions adjust the interest margin based on the company’s achievement of predefined ESG targets. Moreover, we endeavour to integrate sustainability into the agenda of our discussions with portfolio companies to the best of our ability.
- **Multi-Strategies:** As secondary, fund of funds, and minority investors, we have a role of influence rather than direct control at the portfolio company level. Nevertheless, particularly within our GP-led secondary funds, we are steadfast in our belief that we can accomplish meaningful change by engaging with the fund managers with whom we invest. Our aim is to exert influence on sustainability outcomes through collaborative efforts with these fund managers, both regarding the fund as well as their underlying companies.
- **Credit Management:** As a manager specialising in portfolios of secured, highly diversified, sub-investment grade credit transactions, direct engagement with portfolio companies is not a possibility and therefore not a part of the investment process at any given time. However, we select our investment destinations and integrate ESG factors into our decision-making. Our exclusion policies form the first layer of this approach, and are complemented by an ESG scoring tool used by our research and investment teams during both the pre-investment assessment and the ongoing holding period.

## 5.1 EMPOWERING INVESTMENT TEAMS THROUGH TARGETED ESG TRAINING

Five Arrows recognises that our investment professionals play a critical role in driving responsible investing across the full investment lifecycle. To support them in this responsibility, we are committed to ensuring they are well-versed in key ESG topics and equipped with the tools needed to identify risks, seize opportunities, and integrate sustainability considerations into their investment decisions.

To this end, the Five Arrows Sustainability Team regularly deploys targeted tools and training sessions designed to empower investment teams with the knowledge, resources, and guidance necessary for effective ESG integration — from due diligence to ownership and exit.

In addition, other functions — including investor relations, compliance, risk management and other support functions — receive sustainability-related training where relevant, helping to ensure a coherent and informed approach to responsible investing across the organisation.

## 5.2 REINFORCING ACCOUNTABILITY THROUGH ESG-LINKED INCENTIVES

Five Arrows actively manages sustainability-related risks across its businesses by embedding ESG considerations into variable remuneration. Since 2023, 10% of the annual variable compensation has been linked to sustainability criteria.

Starting in 2025, ESG criteria are progressively tailored to reflect the specificities of each Five Arrows investment strategy. While indicators may differ across strategies, the framework will be guided by the following principles:

- **Broad coverage:** ESG criteria will apply to as many eligible employees as possible;
- **Collective and Individual mechanism:** Where relevant, the mechanism will combine a bonus linked to collective team efforts with a bonus based on individual performance;
- **Focus on outcomes:** While criteria may include training completion or policy attestation, the aim is to go beyond process-based metrics and increasingly link remuneration to measurable sustainability performance across the Five Arrows portfolio;
- **Role-specific criteria:** ESG expectations will be adapted to the function of each team; and,
- **Accountability and documentation:** ESG compliance and its impact on remuneration will be monitored and archived for a minimum of five years.

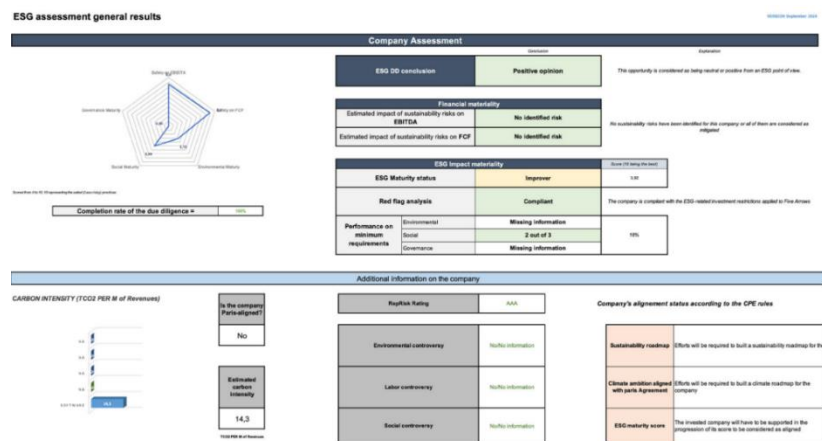
# 6. Strengthening ESG integration with purpose-built tools

The main sustainability-related tools are the following:

## ESG due diligence tools

Five Arrows is currently in the process of progressively deploying new proprietary ESG due-diligence tools, mainly within DL and FAMS, that will reinforce the assessment of sustainability risks during pre-investment.

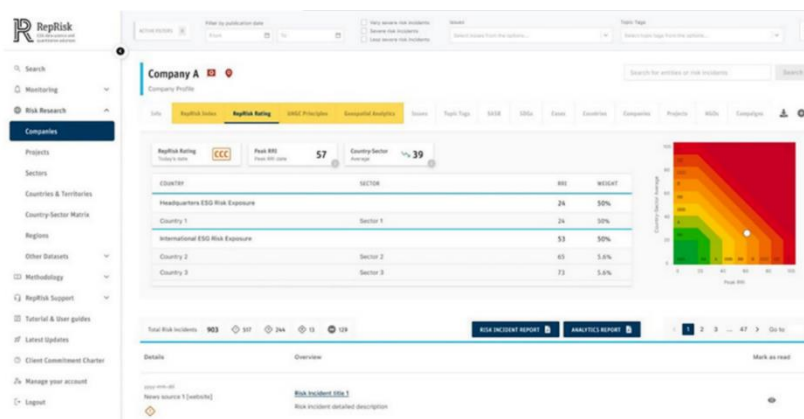
These tools are built with a modular architecture, allowing for a quick set-up or adjustment as required. Each module serves a distinct purpose, with one dedicated specifically to the assessment of Sustainability Risks Assessment. This module ensures a comprehensive evaluation of sustainability risks, tailored to the target business sector, by using data from the SASB materiality matrix. This matrix identifies key sustainability issues for each sector, based on input from industry experts, and prompts the investment team to address relevant questions on risk prevalence and mitigation.



The results of the sustainability risk assessment and the ESG due diligence are integrated into the relevant Investment Committee Memorandum. If the ESG characteristics of an investment opportunity do not align with the ESG requirements outlined in the fund's legal documentation, or if they are deemed incompatible with the investment strategy of the relevant fund(s), the opportunity will be declined.

## ESG controversy monitoring tool

In the case of direct investments, the RepRisk ESG platform is used to assess and monitor ESG controversies while doing due diligence as well as during the holding period.



The platform aggregates vast amounts of data from publicly available sources worldwide, such as news articles, regulatory filings and NGO reports, to provide comprehensive risk assessments. It uses machine learning algorithms to analyse this data and identify potential ESG risks that could impact a company's reputation, financial performance or sustainability practices.

For CM and FAMS, the assessment is done during pre-investment due diligence and holding period when possible.

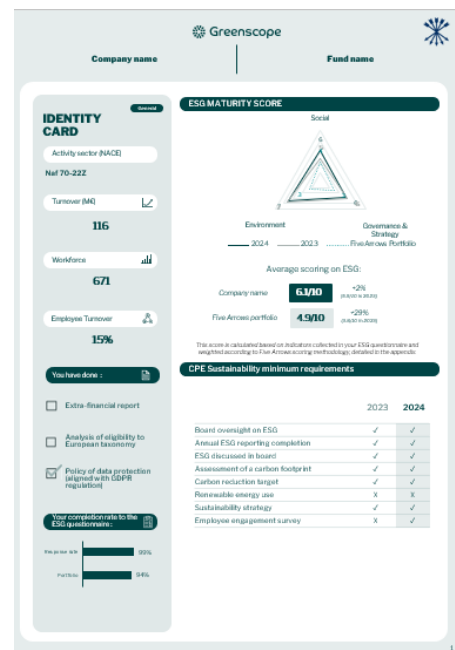
## ESG reporting tool

During the holding period — except for the CM strategy and parts of the FAMS strategy, where access to extra-financial information is limited due to the nature of the investments — Five Arrows requests portfolio companies and fund managers to complete an annual ESG questionnaire. This questionnaire supports ongoing ESG performance monitoring through a dedicated reporting tool.

The data requested is tailored to each investment strategy and covers a defined set of indicators aligned with SFDR requirements and recognised best practices, particularly those relevant to small and medium-sized companies. The responses are used to calculate an ESG score for each portfolio company or fund manager, which feeds into fund-level monitoring and engagement efforts.

These ESG scores, along with other key data points, are compiled into structured reports (“Factsheets”) that serve as a basis for dialogue with portfolio companies and fund managers, helping to mitigate sustainability risks and reduce negative impacts.

Currently, ESG data is collected and monitored using Greenscope, a specialized platform which enables streamlined data consolidation, analysis, and reporting.



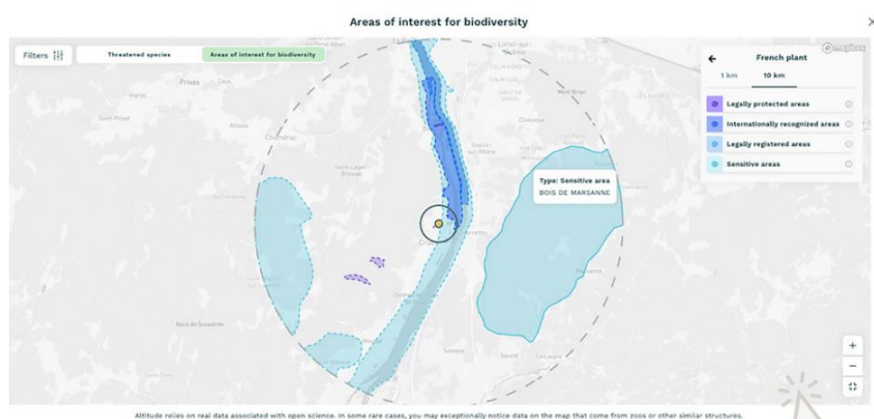
## Climate and Biodiversity risk and impact assessment tool

Five Arrows is currently in the process of progressively deploying a Climate and Biodiversity risk and management tool, mainly within FASI, DL and CPE. This tool quantifies risks related to the physical impacts of climate change, climate transition risks and GHG emissions as well as nature related risks based on dependencies from and impacts on biodiversity.

The tool enables users to detect and assess climate and nature-related risks, for a target and/or a portfolio company, and identify adaptation measures and concrete actions to take.

Assessments are based on a set of official and reliable data providers such as the IPCC, NASA, Exiobase, ADEME, NGFS, Fathom and

AXA. Our intention is to help companies in developing and implementing their climate and biodiversity strategies — from anticipating and measuring risks to defining concrete adaptation measures by using this tool.



## 7. Sustainability reporting to investors

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Five Arrows firmly believes that transparency is important for driving progress in sustainability and promoting responsible practices within the financial ecosystem.

Given the diversity of investment strategies within Five Arrows, the varying sustainability objectives of our investment vehicles, and the differing expectations of our investors, ESG reporting is provided at two distinct levels:

- Firm-wide and Strategy Level: Primarily through the annual Five Arrows Sustainability Report, which is publicly available online.
- Individual Fund Level: Via each fund's annual report, with the level of ESG detail adapted to the fund's SFDR classification (Article 6, 8, or 9).

When appropriate, and upon request, more detailed information on specific portfolio companies can also be shared with investors.

## 8. Contact and document history

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**Policy Contact:**

Five Arrows Sustainability Team.

**Document History:**

Version <sup>7</sup>	Changes Made	Author / Reviewer	Date
v1.0	Document creation	Five Arrows Sustainability Team / Five Arrows Sustainability Committee	November 2025

<sup>7</sup> Version rules are the following: 0.1 should be added for any minor changes and 1 for any material changes

## 9. Glossary

Terms and acronyms	Definition
AIF	Alternative Investment Fund as defined in Article 4(1)(a) of the Alternative Investment Fund Managers Directive ('AIFM Directive')
CM	<b>Credit Management ('CM')</b> , manages diversified credit funds, segregated managed accounts and Collateralised Loan Obligations ("CLOs") which invest in European and U.S. leveraged loans and high yield bonds issued by larger issuers. Certain funds and managed accounts also invest in CLOs
CPE	<b>Corporate Private Equity ('CPE')</b> , focuses on investing in Europe and North America (in developed markets) through a series of funds focused on the lower mid-market, mid-market and upper mid-market
DL	<b>Direct Lending ('DL')</b> , provides customised senior and subordinated debt financing solutions to privately owned businesses across the European and U.S. mid-market
ELFA	European Leveraged Finance Association
ESG	Environment, Social and Governance issues
ESG controversy	An event flagged by the RepRisk tool as «Sever and medium reach» concerning a portfolio company or General Partner (GP)
ESG-linked ratchet	A mechanism in loan agreements that adjusts the interest margin based on the borrower's performance against predefined Environmental, Social, and Governance (ESG) criteria
Greenwashing risk	The practice where sustainability-related statements, declarations, actions, or communications do not clearly and fairly reflect the underlying sustainability profile of an entity, a financial product, or financial service. This practice may be misleading to consumers, investors, or other market participants
Climate-related risks	Refer to the potential negative consequences for societies, economies, and ecosystems resulting from climate change. These risks are generally categorised into two main types: <b>Physical Risks:</b> These are risks associated with the direct physical impacts of climate change, such as extreme weather events (e.g., hurricanes, floods, droughts), rising sea levels, and changes in temperature and precipitation patterns, <b>Transition Risks:</b> These risks arise from the process of transitioning to a lower-carbon economy. They include policy and legal changes, technological advancements, market shifts, and reputational risks as organizations adapt to new regulations and societal expectations
FAMS	Five Arrows Multi Strategies focuses on investing in multi-asset GP-led secondaries (Five Arrows Secondary Opportunities - FASO), Single-asset GP-led secondaries and co-investments (Five Arrows Strategic Assets - FASA), investments in third party funds (Five Arrows Private Equity Programme – FAPEP and Hermance Capital Partners – HCP), technology-focused investments (Five Arrows Global Technology - FAGT) and sustainable investments (Five Arrows Sustainable Investments - FASI)
Mandate	Discretionary portfolio management activity on behalf of single investor
RepRisk	The RepRisk platform which aggregates large amounts of data from public sources worldwide, such as news articles, regulatory filings, and NGO reports, to provide comprehensive risk assessments. It uses machine learning algorithms and human intelligence to analyse this data and identify potential ESG risks that could impact a company's reputation, financial performance, or sustainability practices
Rothschild & Co Group or Group	For the purpose of this Policy, means Rothschild & Co SCA and its consolidated subsidiaries
SDG	A Sustainable Development Goal as set forth in the UN General Assembly resolution A/RES/70/1 of 25 September 2015

<b>SFDR</b>	Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector, as amended by Regulation (EU) 2020/852 on the establishment of a framework to facilitate sustainable investment (Taxonomy Regulation), as implemented under local law and regulation
<b>Secondaries</b>	Refers to a type of GP-led secondaries transaction in which a Private Equity sponsor transfers a single portfolio company from an existing fund into a newly formed investment vehicle, typically structured as a Single-Asset Continuation Vehicle (CV). This structure enables the sponsor to continue managing and investing in a specific asset beyond the typical fund holding period, while providing liquidity options to existing Limited Partners (LPs) and bring in new investors under updated terms
<b>Single-Asset transactions</b>	Refers to a type of GP-led secondaries transaction in which a Private Equity sponsor transfers a single portfolio company from an existing fund into a newly formed investment vehicle, typically structured as a Single-Asset Continuation Vehicle (CV). This structure enables the sponsor to continue managing and investing in a specific asset beyond the typical fund holding period, while providing liquidity options to existing Limited Partners (LPs) and bring in new investors under updated terms
<b>Sustainability-linked loan</b>	Any type of loan instruments and/or contingent facilities (such as bonding lines, disclosure lines or letters of credit) which incentivise the borrower's achievement of ambitious, predetermined sustainability performance objectives. The borrower's sustainability performance is measured using Sustainability Performance Targets (SPTs). Sustainability linked loans are commonly aligned in the market with the Sustainability Linked Loan Principles
<b>Sustainability risk</b>	An environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of our investments under article 2(22) of the SFDR

This document has been prepared by Five Arrows Managers and is intended solely for informational purposes and for the sole use of the recipient. It does not constitute an offer to sell, a solicitation to buy, or a personal recommendation regarding any financial instrument or investment strategy. It should not be construed as legal, tax, financial, sustainability or investment advice. No investment decision should be made solely based on the information contained herein.

Please carefully read the legal documentation for the fund before making any final investment decision. Recipients are encouraged to seek independent professional advice tailored to their individual circumstances.

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