




# FURTHER DISCLOSURES







# GRI AND SASB CONTENT INDEX

The following index tables summarise our disclosures against relevant SASB and GRI Standards. Reference pages within this report are labelled “SPR p.”, “AR p.” refers to relevant pages within ICG Annual Report and Accounts 2021, and  refers to a webpage.

## SASB CONTENT INDEX

Topic	Ref	Metric	Location of disclosure	Commentary
Transparent information & fair advice for customers	FN-AC-270A.1	Number of covered employees with a record of investment-related investigations, consumer-initiated complaints, private civil litigations, or other regulatory proceedings	See Commentary	To the best of our knowledge, in FY21, there were no known: <ul style="list-style-type: none"> <li>covered employees with records of investment-related investigations, consumer-initiated complaints, private civil litigations or other regulatory proceedings</li> <li>monetary losses as a result of legal proceedings incidents of non-compliance associated with marketing and communications of financial product related information to new and returning clients</li> </ul>
Transparent information & fair advice for customers	FN-AC-270a.1	% of covered employees with a record of investment-related investigations, consumer-initiated complaints, private civil litigations, or other regulatory proceedings	See Commentary	
Transparent information & fair advice for customers	FN-AC-270a.2	Total amount of monetary losses as a result of legal proceedings associated with marketing and communication of financial product related information to new and returning customers	See Commentary	
Transparent information & fair advice for customers	FN-AC-270a.3	Description of approach to informing customers about products and services	See Commentary	At ICG, there is a dedicated Marketing and Client Relations teams that ensures timely, regular and transparent communication and interaction with existing and prospective clients. Information about products and services is disclosed in strict compliance with applicable laws and regulations and undergoes review in accordance with ICG's compliance procedures. All investors in ICG Funds receive regular performance reports (typically quarterly). ICG hosts an Investor day each year where we provide an overview of ICG Funds' performance and key developments and create a forum to interact with clients and answer their questions.
Employee Diversity & Inclusion	FN-AC-330a.1	Percentage of gender and racial/ethnic group representation for: (1) executive management (2) non-executive management (3) professionals (investment) (4) all other employees	SPR p. 27; See Commentary	As at 30 September 2021: ICG's Executive directors: 33% female, 67% male ICG's Non-executive directors: 44% female, 56% male. See ICG's website for further details on the composition of the Board of Directors.  Due to legal and other restrictions we do not monitor the ethnicity of employees in some of the jurisdictions in which we operate. Therefore, we have only provided the self reported breakdown of our employees in the UK, which is ICG's largest office representing nearly 50% of all employees.
Incorporation of ESG Factors in Investment Management & Advisory	FN-AC-410a.1	Amount of assets under management, by asset class, that employ: (1) integration of ESG issues (2) sustainability themed investing (3) screening	SPR p. 12, 13; 19; ICG RI Policy 	ICG's Responsible Investing Policy, including ESG screening and integration, applies to 100% of ICG's AUM. ICG has launched three sustainably-themed products to date – see p. 19 of this report.
Incorporation of ESG Factors in Investment Management & Advisory	FN-AC-410a.2	Description of approach to incorporation of ESG factors in investment and/or wealth management processes and strategies	SPR p. 11-24; ICG RI Policy 	



## GRI and SASB Content Index continued


## SASB CONTENT INDEX CONTINUED

Topic	Ref	Metric	Location of disclosure	Commentary
Incorporation of ESG Factors in Investment Management & Advisory	FN-AC-410a.3	Description of proxy voting and investee engagement policies and procedures	SPR p. 11-24; ICG RI Policy	
Business ethics	FN-AC-510a.1	Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, anti-trust, anti-competitive behavior, market manipulation, malpractice, or other related financial industry laws or regulations	See Commentary	To the best of our knowledge, there are no known monetary losses as a result of legal proceedings associated with fraud, insider trading, anti-trust, anti-competitive behaviour, market manipulation, malpractice, or other related financial industry laws or regulations in FY21.
Business ethics	FN-AC-510a.2	Description of whistleblower policies and procedures	See Commentary	ICG has an established grievance mechanism for any employee to express concerns. We support anyone who, in good faith, discloses a failure to meet our high standards of business conduct and ethics. All complaints are investigated in accordance with ICG's grievance or complaints procedure and the complainant is informed of the outcome once the investigation is completed. ICG is committed to promoting a 'speak up' culture where staff feel they can raise concerns without fear of retaliation and in the knowledge that the matters they report will be taken seriously. Our Speak Up policy outlines how staff may report a concern through both internal channels, which include reporting to a dedicated Non Executive Director, and external routes. All employees globally have access to a 24/7 anonymous and confidential service for making a report, operated by an independent third-party, EthicsPoint, whose contact details are available on ICG intranet. In addition, all external stakeholders can file a complaint by following ICG's Complaints Policy.
Systemic Risk Management	FN-AC-550a.1	Percentage of open-end fund assets under management by category of liquidity classification	See Commentary	ICG open-ended funds are not in scope of the SEC defined liquidity classification and thus we do not monitor this information.
Systemic Risk Management	FN-AC-550a.2	Description of approach to incorporation of liquidity risk management programs into portfolio strategy and redemption risk management	See Commentary	The majority of funds managed by ICG are close-ended funds. ICG only manages liquid funds as part of its Credit asset class. Within relevant such strategies, the AIFM, Investment Manager or Sub-Investment Manager (where appointed) employ appropriate liquidity management policies and procedures aimed at ensuring that it maintains a level of liquidity for each fund that is appropriate to meet its continuing obligations to investors, counterparties, creditors and other parties in normal and extraordinary conditions. For funds that hold strategic allocations to liquid or semi-liquid assets, liquidity risk management also focuses on the size and liquidity of these allocations, and the manager runs a process of adjusting the investment commitment pace of a fund, keeping sufficient liquidity reserves, producing cash flow forecasts, and ensuring contractual payment obligations are monitored. In addition, the manager is permitted to employ liquidity lines to enable each Fund to meet redemption requests.
Activity metrics	FN-AC-000.A	(1) Total registered and (2) total unregistered assets under management (AUM)	SPR p. 2	



## GRI and SASB Content Index continued

## GRI CONTENT INDEX

Topic	Ref	Indicator <sup>1</sup>	Location of disclosure	Commentary
<b>GENERAL DISCLOSURES</b>				
Organisational profile	102-1	<b>Name of organisation</b>	SPR Front Cover	Intermediate Capital Group plc
Organisational profile	102-2	<b>Activities, brands, products and services</b>	SPR p. 2; AR p. 3	
Organisational profile	102-3	<b>Location of HQ</b>	SPR Back cover	
Organisational profile	102-4	<b>Location of operations</b>	SPR p. 2; AR p. 3	
Organisational profile	102-5	<b>Ownership and legal form</b>	See Commentary	Intermediate Capital Group plc is listed on the London Stock Exchange and headquartered in London, the United Kingdom.
Organisational profile	102-6	<b>Markets served</b>	SPR p. 2; AR p. 3	ICG products are marketed in: <b>Americas:</b> Canada, Chile, Colombia, Peru, and the United States of America <b>Asia Pacific:</b> Australia, China (Mainland), Hong Kong, Japan, New Zealand, Singapore, South Korea, and Taiwan. <b>Europe:</b> Denmark, Finland, France, Germany, Republic of Ireland, Italy, Luxembourg, Monaco, the Netherlands, Norway, Spain, Sweden, Switzerland, and the United Kingdom. <b>Middle East:</b> Bahrain, Israel, Kuwait, Oman, Qatar, Saudi Arabia, and the United Arab Emirates
Organisational profile	102-7	<b>Scale of organisation</b> (total number of employees and operations, and net revenues)	SPR p. 2; AR p. 3, 126	
Organisational profile	102-8	<b>Information on employees and other workers</b>	SPR p. 27	There were no significant variation to the employee numbers reported. We will seek to expand our disclosures in the future.
Organisational profile	102-9	<b>Supply chain</b> (description)	See Commentary	As an asset management company, ICG has a relatively straightforward supply chain model which is built around its core financial practice, maintaining its global offices and supporting its technological infrastructure. See Supplementary Corporate Disclosure section for further details on how we assess ESG risks in our supply chain.
Organisational profile	102-10	<b>Significant changes to the organization and its supply chain</b>	See Commentary	There were no significant changes to the organisation and its supply chain in the year. In 2021, ICG opened an office in Dubai to provide local point of contact for our clients in the region.
Organisational profile	102-11	<b>Precautionary Principle or approach</b>	RI Policy 	ICG's risk management is an ongoing process under the leadership and supervision of the Executive Committee, the Risk Committee and, ultimately, the Board of Directors. ICG's approach to managing risk can be found on p. 49 of AR FY21.
Organisational profile	102-12	<b>External initiatives</b>	SPR p. 5, 24, 28	
Organisational profile	102-13	<b>Memberships in associations</b>	SPR p. 5, 24, 28	
Strategy	102-14	<b>Statement from senior decision maker</b>	SPR p. 3; AR p. 16	
Strategy	102-15	Key impacts, risk and opportunities	SPR p. 6; AR p. 51	
Ethics and integrity	102-16	<b>Values, principles standards, and norms of behavior</b>	SPR p. 2, 36	

1. GRI 'CORE' indicators under General Disclosures 102 Standard are marked in bold.



## GRI and SASB Content Index continued

## GRI CONTENT INDEX CONTINUED

Topic	Ref	Indicator <sup>1</sup>	Location of disclosure	Commentary
Ethics and integrity	102-17	Mechanism for advice and concerns about ethics	See Commentary	ICG has an established grievance mechanism for any employee to express concerns. We support anyone who, in good faith, discloses a failure to meet our high standards of business conduct and ethics. All complaints are investigated in accordance with ICG's grievance or complaints procedure and the complainant is informed of the outcome once the investigation is completed. ICG is committed to promoting a 'speak up' culture where staff feel they can raise concerns without fear of retaliation and in the knowledge that the matters they report will be taken seriously. Our Speak Up policy outlines how staff may report a concern through both internal channels, which include reporting to a dedicated Non Executive Director, and external routes. All employees globally have access to a 24/7 anonymous and confidential service for making a report, operated by an independent third-party, EthicsPoint, whose contact details are available on ICG intranet. In addition, all external stakeholders can file a complaint by following ICG's Complaints Policy.
Governance	102-18	<b>Governance structure</b>	SPR p. 6, 9, 36; AR p. 58, 62, 66; <i>ICG Governance</i>	
Governance	102-19	Delegating authority (for economic, environmental, and social topics)	See Commentary	The ICG Board provides oversight of our approach to managing our sustainability and people priorities and for reviewing key policies. Stephen Welton has been appointed as a designated Non-Executive Director on ESG matters and Amy Schioldager as the Non-Executive Director responsible for liaising with employees. Day to day responsibility for these matters has been delegated to the Executive Directors as part of their formal remits.
Governance	102-20	Executive-level responsibility for economic, environmental, and social topics	See Commentary	The Executive Directors are responsible for ensuring the effective identification and management of our sustainability and people priorities, and reviews progress at least annually. The Management Committee supports the Executive Directors in overseeing and monitoring our policies and procedures, addressing issues if they arise and approving new strategic initiatives. All sustainability priorities have designated owners within the business to ensure our continued focus and effective management.
Governance	102-21	Consulting stakeholders on economic, environmental, and social topics	SPR p.6; AR p.24	
Governance	102-22	Composition of the highest governance body and its committees	AR p. 58, 62, 66; <i>ICG Governance</i>	
Governance	102-23	Chair of the highest governance body	<i>ICG Governance</i>	
Governance	102-24	Nominating and selecting the highest governance body	AR p. 83	
Governance	102-25	Conflicts of interest	See Commentary	Board level conflicts are overseen by the Global Head of Legal and Compliance. A register of such is maintained, and external positions are notified to the whole Board and disclosed to shareholders as required by the Listing Rules. ICG has implemented a Conflicts of Interest framework including, but not limited to, a Conflict of Interests Policy and Conflicts Register.
Governance	102-26	Role of highest governance body in setting purpose, values, and strategy	<i>ICG Governance</i>	
Governance	102-27	Collective knowledge of highest governance body	AR p. 67, 83	

1. GRI 'CORE' indicators under General Disclosures 102 Standard are marked in bold.



## GRI and SASB Content Index continued

## GRI CONTENT INDEX CONTINUED


Topic	Ref	Indicator <sup>1</sup>	Location of disclosure	Commentary
Governance	102-28	Evaluating the highest governance body's performance	AR p. 69	
Governance	102-29	Identifying and managing economic, environmental, and social impacts	SPR p. 6	
Governance	102-30	Effectiveness of risk management processes	AR p. 49, 79	
Governance	102-31	Review of economic, environmental, and social topics	See Commentary	The Board reviews sustainability and people topics and associated risk and opportunities at least twice a year.
Governance	102-32	Highest governance body's role in sustainability reporting	See Commentary	ICG's Executive Directors reviewed and approved this Sustainability and People Report.
Governance	102-33	Communicating critical concerns to highest governing body	See Commentary	The Board of ICG typically meets formally six times per year, and the Audit, Risk and Remuneration Committees typically meet at least four times per year. Each body receives full written reports on all matters within their remit. Senior management, including heads of control functions, report formally to the Board and each Committee, including regular private sessions for the Heads of Compliance, Risk and Internal Audit. In between board meetings, non executives receive regular updates from management, including formal meetings for the Chairman with the CEO, the Chairman with the Global Head of Legal and Compliance, the Audit Chair and the CFOO, the Audit Chair with the Head of Finance, the Audit Chair with the Head of Internal Audit, the Risk Chair with the Global Head of Legal and Compliance, the Risk Chair with the Head of Compliance, the Risk Chair with the Head of Risk and the Remuneration Chair with the Chief People Officer.
Governance	102-35	Remuneration policies	AR p. 92, 96, 102	
Governance	102-36	Process for determining remuneration	AR p. 92, 96, 102	
Governance	102-37	Stakeholders' involvement in remuneration	AR p. 92, 96, 102	
Governance	102-38	Annual total compensation ratio (CEO pay ratio)	AR p. 96	
Governance	102-39	Percentage increase in annual total compensation ratio (CEO pay ratio)	AR p. 96	
Stakeholder engagement	102-40	<b>List of stakeholder groups</b>	SPR p. 6; AR p. 24	
Stakeholder engagement	102-41	<b>Collective bargaining agreements</b>	See Commentary	At the end of FY21, there were collective bargaining agreements in place at two of our geographies, covering approximately 5% of our employees.
Stakeholder engagement	102-42	<b>Identifying and selecting stakeholders</b>	SPR p. 6; AR p. 24	
Stakeholder engagement	102-43	<b>Approach to stakeholder engagement</b>	SPR p. 6; AR p. 24	
Stakeholder engagement	102-44	<b>Key topics and concerns raised</b>	SPR p. 6; AR p. 24	

1. GRI 'CORE' indicators under General Disclosures 102 Standard are marked in bold.



## GRI and SASB Content Index continued

## GRI CONTENT INDEX CONTINUED


Topic	Ref	Indicator <sup>1</sup>	Location of disclosure	Commentary
Reporting practice	102-45	<b>Entities included in the consolidated financial statements</b>	See Commentary	The Group consists of a Parent Company, ICG plc, incorporated in the UK, and a number of subsidiaries held directly or indirectly by ICG plc, which operate and are incorporated around the world. See AR FY21 for further details.
Reporting practice	102-46	<b>Defining report content and topic Boundaries</b>	SPR p. 6; See Commentary	The content of the report was determined on the basis of the outcomes of our materiality assessment (see p.6) and draws on relevant GRI Standards and the SASB guidelines for asset managers.
Reporting practice	102-47	<b>List of material topics</b>	SPR p. 6	
Reporting practice	102-48	<b>Restatements of information</b>	See Commentary	No previously disclosed information has been restated in this report.
Reporting practice	102-49	<b>Changes in reporting</b>	See Commentary	There have been no material changes in our reporting.
Reporting practice	102-50	<b>Reporting period</b>	See Commentary	This annual Sustainability & People Report 2021 complements our AR FY21 and provides a more comprehensive account of our progress and activities related to our sustainability and people priorities across the entire ICG Group for the year ending 30 September 2021, unless indicated otherwise.
Reporting practice	102-51	<b>Date of most recent report</b>	See Commentary	ICG's previous Responsible Investing Report was published in October 2020.
Reporting practice	102-52	<b>Reporting cycle</b>	See Commentary	ICG follows an annual reporting cycle.
Reporting practice	102-53	<b>Contact point for questions regarding the report</b>	See Commentary	For any questions or feedback related to this report, get in touch with us via: <a href="https://www.icgam.com/contact-us">https://www.icgam.com/contact-us</a> 
Reporting practice	102-55	<b>GRI Content index</b>	SPR p. 35	
<b>TOPIC-SPECIFIC DISCLOSURES</b>				
GRI 201: Economic performance 2016	201-1	Direct economic value generated and distributed	SPR p. 30; AR p. 96, 126, 150	
GRI 203: Indirect Economic Impacts 2016	203-1	Infrastructure investments and services supported	SPR p. 23	
GRI 205: Anti-corruption 2016	205-2	Communication and training about anti-corruption policies and procedures	See Commentary	Our policy is never to offer, request or receive bribes, and to refuse any request to pay them. We actively seek to reduce opportunities for corruption. We do not invest in companies or projects that engage in corruption or appear to have a high risk of such behaviour and we investigate and deal with all reported or identified cases of corruption in line with our policy. The policy applies to all entities within the Group wherever we do business and is communicated to all employees and Directors of ICG PLC. Training on anti-money laundering, anti-bribery corruption and information security and cyber awareness is mandatory and is provided to all ICG employees on an on-going basis. Employees are required to undertake the training, which is web-based, at least once a year, and pass a test on what they have learned.

1. GRI 'CORE' indicators under General Disclosures 102 Standard are marked in bold.



## GRI and SASB Content Index continued

## GRI CONTENT INDEX CONTINUED

Topic	Ref	Indicator	Location of disclosure	Commentary
GRI 207: Tax	207-1	Approach to tax	See Commentary	ICG's <i>Tax Strategy</i>  sets out the governance and core principles underpinning the tax affairs of ICG plc and its subsidiaries, both in the UK and in each of the markets in which it operates. The Group is committed to full compliance with tax legislation across its geographical markets and maintaining open and transparent communication with both HMRC and the respective local tax authorities.
GRI 207: Tax	207-2	Tax governance, control, and risk management		
GRI 302: Energy 2016	302-1	Energy consumption within the organization	SPR Supplementary Corporate Disclosures; AR p.33; See Commentary	Details on the energy consumption within our operations are provided in the Supplementary Corporate Disclosures.
GRI 302: Energy 2016	302-3	Energy intensity		
GRI 305: Emissions 2016	305-1	Direct (Scope 1) GHG emissions	AR p.33	
GRI 305: Emissions 2016	305-2	Energy indirect (Scope 2) GHG emissions	AR p.33	
GRI 305: Emissions 2016	305-3	Other indirect (Scope 3) GHG emissions	AR p.33	
GRI 305: Emissions 2016	305-4	GHG emissions intensity	AR p.33	
GRI 307: Environmental Compliance 2016	307-1	Non-compliance with environmental laws and regulations	See Commentary	To the best of our knowledge, there were no known material fines or sanctions for non-compliance with environmental laws and/or regulations across ICG Group in FY21.
GRI 401: Employment 2016	401-1	New employee hires and employee turnover	SPR p. 27; See Commentary	Total employee turnover rate: FY21: 7.74%; FY20: 9.01% Voluntary employee turnover rate: FY21: 5.46%, FY20: 7.16%
GRI 401: Employment 2016	401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	SPR p. 29; See Commentary	All benefits offered to full time employees are offered to part time employees.
GRI 403: Occupational Health & Safety 2018	403-6	Promotion of worker health	SPR p.29	
GRI 404: Training and Education 2016	404-2	Programs for upgrading employee skills and transition assistance programs	SPR p.29	
GRI 404: Training and Education 2016	404-3	Percentage of employees receiving regular performance and career development reviews	See Commentary	All ICG employees receive regular performance and career development review.





## GRI and SASB Content Index continued

## GRI CONTENT INDEX CONTINUED

Topic	Ref	Indicator	Location of disclosure	Commentary
GRI 405: Diversity and equal opportunities 2016	405-1	Diversity of governance bodies and employees	SPR p. 27; AR p. 58; <i>ICG Diversity &amp; Inclusion Policy</i> See Commentary	As at 30 September 2021: ICG's Executive directors: 33% female, 67% male ICG's Non-executive directors: 44% female, 56% male. See ICG's website for further details on the composition of the Board of Directors.  Due to legal and other restrictions we do not monitor the ethnicity of employees in some of the jurisdictions in which we operate. Therefore, we have only provided the self reported breakdown of our employees in the UK, which is ICG's largest office representing nearly 50% of all employees.
GRI 405: Diversity and equal opportunities 2016	405-2	Ratio of basic salary and remuneration of women to men	<i>ICG Gender Pay Gap Report 2020</i>	
GRI 406: Non-discrimination 2016	406-1	Incidents of discrimination and corrective actions taken	See Commentary	To the best of our knowledge, there were no known incidents of discrimination and harassment reported in FY21.
GRI 413: Local communities 2016	413-1	Operations with local community engagement, impact assessments, and development programs	SPR p. 30	The Group's approach to charitable giving is overseen by our Charity Committee, which was established in 2019 and also includes an Executive Director among its members. Alongside our continued financial support at Group level for selected charities showcased in this Report, all ICG offices are encouraged to support charitable initiatives of their choice that has young people and education as a focus. We also seek to match any money that our employees, across all our offices, personally raise for charities of their choice. For the year ending on 30 September 2021, ICG contributed more than £850,000 to charities and charitable initiatives.
GRI 415: Public Policy 2016	415-1	Political contributions	See Commentary	It is ICG's Policy not to make any political contributions or lobby policy makers. No contributions were made during the current and prior year for political purposes.
GRI 417: Marketing and labeling 2016	417-3	Incidents of non-compliance concerning marketing communications	See Commentary	To the best of our knowledge, there were no known material incidents of non-compliance with laws and regulations related to advertising, promotion, and sponsorship.
GRI 418: Customer Privacy 2016	418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	See Commentary	To the best of our knowledge, there were no known substantiated complaints concerning breaches of customer privacy and losses of customer data in FY21.
GRI 419: Socio-economic compliance 2016	419-1	Non-compliance with laws and regulations in the social and economic area	See Commentary	To the best of our knowledge, there were no known incidents of non-compliance with laws and regulations in the social and economic area in FY21.



# SUPPLEMENTARY CORPORATE DISCLOSURES

## Governance

### Corporate Governance and oversight

ICG is committed to the highest standards of corporate governance and adheres to the provisions of the Combined Code on Corporate Governance issued by the Financial Reporting Council. Please refer to our *website* for further details.

### Risk management

The Board is accountable for the overall stewardship of the Risk Management Framework (RMF), internal control assurance, and for determining the nature and extent of the risks it is willing to take in achieving ICG's strategic objectives. The RMF is designed to protect the interests of all stakeholders and ensures that current and emerging risks are identified, assessed, monitored, controlled and appropriately governed.

See p.50 of *ICG's Annual Report and Accounts 2021* for further details and our principal risks and uncertainties.

### Cyber security and privacy

Information is a critical business asset for ICG and as such must be protected across its "lifecycle" to prevent damage to the organisation's financial and reputational position. Data protection and cybersecurity form part of ICG's risk management framework. Key risks are agreed and monitored as part of our

centralised risks register. ICG's Head of Risk is responsible for governance and oversight (see p. 54 of *ICG's Annual Report and Accounts 2021*).

ICG maintains an overarching Cyber Security Policy, supported by targeted policies related to areas such as acceptable use, data protection, third party security management, business continuity, change management, physical security. The policy framework is reviewed annually and is aligned to ISO27001. Each policy is supported by a set of Standard Operating Procedures, with compliance tracked and breaches logged. ICG engages third parties to advise on policy and systems as well as to audit compliance.

ICG maintain a Privacy Policy which is available on the ICG website.

## Business ethics

We are committed to ethical business across all our operations and investments. To ensure we maintain high standards of business ethics, we operate a framework of internal policies and procedures:

### Anti-bribery and corruption (ABC)

Our policy is never to offer, request or receive bribes, and to refuse any request to pay them. We actively seek to reduce opportunities for corruption. We do not invest in companies or projects that

engage in corruption or appear to have a high risk of such behaviour and we investigate and deal with all reported or identified cases of corruption in line with our policy. The policy applies to all entities within the Group wherever we do business and is communicated to all employees and Directors of ICG PLC.

### Anti-money laundering (AML)

ICG has established a "Know Your Client" (KYC) process for accepting new clients. Prior to any investment, thorough due diligence is conducted in line with the regulatory requirements. This is underpinned by strict adherence to our Anti-Money laundering, ABC, KYC / Customer Due Diligence procedures (the "Compliance procedures"), which take into account risk of identity or impersonation fraud and procedures to mitigate both internal and external fraud. A risk assessment governance framework exists for both the entity and its customers. The Group's Financial Crime Compliance team advise the business on obtaining KYC clearance. Compliance procedures include, amongst other, customer verification based on reliable, independent source documents and information, identification of Ultimate Beneficial Owner (UBO) and conducting ongoing due diligence on business relationships. Compliance procedures are subject to annual review process.

ICG has established and maintains anti-money laundering systems and controls in accordance with European law and regulation, FCA rules, and Joint Money Laundering Steering Group guidance. The systems and controls are adopted and consistently applied across all group companies. ICG has a Money Laundering Reporting Officer (MLRO) who prepares an annual report for the ICG plc Board on the operation and effectiveness of systems and controls in place to combat money laundering. The MLRO is also responsible for monitoring business developments to determine if any changes are required to ICG's systems and controls.

ICG uses World-Check One (The System) screening tool. The System covers 1,500+ sanctions, watch and regulatory & law enforcement lists, covering 100% global sanction lists. ICG database is subject to daily screening.



### *Supplementary corporate disclosures continued*

As part of the AML process, appropriate checks are performed to identify any Politically Exposed Persons (PEPs), and where there is a PEP, enhanced due diligence is performed. All identified PEPs are subject to periodic review and monitoring process. PEPs and any other customers/investments from countries, businesses, and products with greatest risk of money-laundering/terrorism financing are subject to MLRO and ICG plc Executive Directors (if deemed necessary) sign off process.

Finally, ICG will retain all documentation required to identify the underlying beneficial owners in the funds and anti-money-laundering/terrorism financing-related documents, which have been obtained for the purposes of our due diligence, for a period of minimum five years or greater if required by the law.

#### **Confidentiality of information**

ICG has established Group-wide policies and procedures outlining the requirement to manage information (received and generated) and to ensure such information is handled appropriately. It is the responsibility of each member of staff to protect and control the flow of confidential information in their possession and

ensure they are familiar with the requirements of these policies. In addition, ICG has implemented an Information Wall structure. Information Walls are the system of policies, procedures, information segregation and physical segregation arrangements used to control the flow of information across ICG.

#### **Conflicts of interest**

ICG has implemented a Conflicts of Interest framework including, but not limited to, a Conflicts of Interest Policy and Conflicts Register. Staff must ensure that conflicts are identified, avoided, escalated and managed appropriately in accordance with regulatory requirements and ICG policies and procedures. Where staff identify a potential, actual or perceived conflict this must be reported to relevant Senior Management and Compliance as soon as is possible.

#### **Political contributions**

It is ICG's policy not to make any political contributions or lobby policy makers. No contributions were made during the current and prior year for political purposes.

#### **Anti-trust and anti-competitive behaviour**

ICG has provided relevant training to investment executives to ensure anticompetitive practices can be avoided. In addition, external counsel is mandated to assist with the identification of antitrust issues on deals and to prepare any necessary filings.

#### **Human rights and modern slavery**

We expect our people to treat each other with dignity and respect, creating an inclusive culture to support equal opportunities. We do not tolerate discrimination, bullying, harassment and victimisation on any ground, including age, race, ethnic or national origin, colour, mental or physical health conditions, disability, pregnancy, gender, gender expression, gender identity, sexual orientation, marital status or other domestic circumstances, employment status, working hours or other flexible working arrangements, or religion or belief.

ICG is committed to detecting and preventing any form of slavery or human trafficking in its business and supply chain, through the implementation and enforcement of appropriate systems and controls; and ensuring transparency in its approach to inhibiting modern slavery in its business and throughout its supply chains. Our commitment reflects the provisions of both the Universal Declaration of Human Rights (the UDHR) and the International

Labour Organization Declaration on Fundamental Principles and Rights at Work (the ILO Declaration), including the right to collective bargaining and freedom of association of all employees.

ICG's latest Anti-Slavery and Human Trafficking Statement is available on our [website](#).

#### **Grievance procedures and Speak Up**

ICG has an established grievance mechanism for any employee to express concerns. We support anyone who, in good faith, discloses a failure to meet our high standards of business conduct and ethics. All complaints are investigated in accordance with ICG's grievance or complaints procedure and the complainant is informed of the outcome once the investigation is completed.

ICG is committed to promoting a 'speak up' culture where staff feel they can raise concerns without fear of retaliation and in the knowledge that the matters they report will be taken seriously. Our Speak Up policy outlines how staff may report a concern through both internal channel (including to a Non-Executive Director) and external routes. All employees globally have access to a 24/7 anonymous and confidential service for making a report, operated by an independent third-party, EthicsPoint, whose contact details are available on ICG intranet. In addition, all external stakeholders can file a complaint by following ICG's [Complaints Policy](#).



### Supplementary corporate disclosures continued

#### Supplier management

We conduct appropriate due diligence of our suppliers and request them to acknowledge their ability to adhere with our *Supplier Code of Conduct*. We also conduct annual screening of nearly 600 existing suppliers on modern slavery, as well as wider environment and social risk, and carry out additional assessment of and engagement with high-risk exposure suppliers.

#### Training

Training on anti-money laundering, anti-bribery corruption and information security and cyber awareness is mandatory and is provided to all ICG employees. Employees are required to undertake the training, which is web-based, at least once a year, and pass a test on what they have learned.

#### Employment

##### Health and safety

During the year to 31 March 2021 there were no RIDDOR-reportable incidents, and no work-related accidents or cases of work-related ill health were reported.

##### Flexible working

Employees across our business are able to work remotely to manage personal, lifestyle or family commitments. Flexible working options include remote working and flexible hours.

##### Notable workforce changes

ICG has not furloughed any employees, or made any employees redundant, as a result of the Covid-19 pandemic.

#### Environmental metrics (operations)

Metric	Unit	FY21	FY20	FY19	FY18
Total non-renewable energy consumption	MWh	<b>873</b>	1,536	1,618	1,614
Total renewable energy purchased or generated for own consumption.	MWh	<b>645</b>	0	0	0
Total energy consumption (electricity and fuel)	MWh	<b>1,518</b>	1,536	1,618	1,614
Energy intensity	MWh/FTE	<b>3.21</b>	3.71	4.82	5.43
Total water consumption (offices)	m3	<b>779<sup>1</sup></b>	7,726	7,560	7,464
Total waste diverted from landfill (London HQ)	%	<b>100%</b>	100%	100%	100%

1. Water consumption in FY21 was significantly lower compared to previous years as offices were closed due to Covid-19 restrictions. Data includes a prorated estimate for water consumption at our new London HQ office – Procession House





## Disclaimer

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