

A person in winter gear is walking through a vast, snow-covered mountain landscape. The person is leaving a trail of footprints in the snow. In the background, there are large, snow-capped mountains under a clear blue sky.

ICG

INTERMEDIATE CAPITAL GROUP PLC

SUSTAINABILITY & PEOPLE REPORT 2021

January 2022



INSIDE THIS REPORT

INTRODUCTION

ICG at a glance	2
CEO foreword	3
Our highlights	4
Our journey	5
Our priorities	6
Towards net zero	7
Governance and business ethics	9

INVESTING SUSTAINABLY

Embedding responsible investing	11
Engage	14
Innovate	18
Report	22
Collaborate	24

OPERATING PURPOSEFULLY

Our people and culture	26
Charitable giving	30
Cyber risk	31

FURTHER DISCLOSURES

GRI and SASB Index	33
Complementary disclosures	41

Visit www.icgam.com



ICG AT A GLANCE

ICG is a global alternative asset manager. We provide flexible financing solutions across the capital structure to help companies develop and grow. We adopt responsible and sustainable business practices to make a positive impact to society through our investments and operations.

508
employees¹

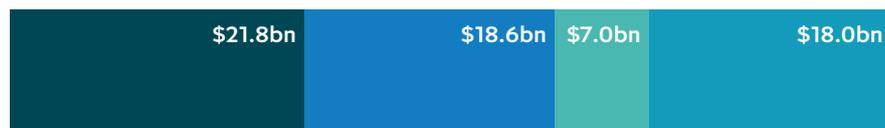
15
countries

What we do

We manage and invest capital on behalf of our clients. We develop long-term resilient relationships with our partners to deliver value for shareholders, clients and employees.

Assets under management²

\$65.3bn



● Structured and Private Equity ● Private Debt ● Real Assets ● Credit

Global client franchise³

542



● EMEA (excl. UK and Ireland) ● Asia Pacific ● Americas ● UK and Ireland

Our values drive success

- Entrepreneurialism and innovation
- Performance for our clients
- Taking responsibility and managing risk
- Working collaboratively and acting with integrity
- Ambition and focus

Our platform generates value

- Grow AUM**
 - Raise and manage third party assets, largely in closed-ended funds
- Invest**
 - Identify and secure attractive investment opportunities
- Manage and realise**
 - Work with management teams in our investments to drive strategic change
 - Successfully realise investments to crystallise returns for clients and shareholders

Our stakeholders

- Shareholders and lenders
- Clients
- Employees
- Communities
- Environment
- Suppliers
- Regulators
- Portfolio companies

1. Group permanent headcount as at 30 September 2021
 2. Third-party AUM as of 30 September 2021. Due to rounding, numbers do not add up precisely to the total
 3. As at 30 September 2021. Split based on third-party AUM. Excludes CLOs and listed vehicles



CEO foreword

THE YEAR IN REVIEW



“I am proud of our progress this year in driving a continued focus on sustainability and our people across the business and wider industry, as we strive to create a more sustainable world.”

At ICG we invest sustainably, we operate with purpose, and we act in a way that is transparent. We believe that adopting this approach is key to our success in executing our ambitious plans.

We have made significant progress in the last year, including broadening this report to encompass our wide-ranging efforts around sustainability and people. Transparency in communications with our stakeholders is important in maintaining the trust of the people with whom we work and whom we serve, and this report is an important step in enhancing our corporate disclosures.

The past year has seen progress on a number initiatives. Most notably, I am incredibly proud of our commitment to achieving net zero greenhouse gas (GHG) emissions across our operations and investments by 2040. Our commitment is supported by two ambitious targets by 2030, which have been approved and validated by the Science Based Targets initiative (see p. 7). As one of the first alternative asset managers to commit to net zero, we are proud to be part of this important initiative and contribute to an industry-wide drive to achieve net zero emissions. This is the latest step in our long-standing focus on using our position of influence to help mitigate climate change.

We will continue to play an active role in bringing the industry along with us in these efforts, and work with our peers through Initiative Climat International (iCI), Principles for Responsible Investment (PRI) and the Net Zero Asset Managers initiative to enable a robust and consistent focus on the decarbonisation across our investment portfolios.

Our people are key to our success and we continue to support and invest in their development, skills and expertise as well as creating an inclusive environment for them to succeed. Whether through our enhanced learning and development programmes, targeted engagement on topics of importance to our employees, or our efforts around diversity and inclusion, we have focused this year on ensuring that ICG is well positioned to attract, retain and develop the very best. I am excited by the range of backgrounds we welcomed to the organisation and energised by the quality and creativity of their thoughts and decision making.

Our footprint and impact are far greater through our investment activities. We have continued to make progress on enhancing our Responsible Investing (RI) framework across our investment strategies to enable us to better identify, assess and embed environmental, social and governance (ESG) considerations in the investment process.

The vast majority of the funds we manage are classified as Article 8 under the Sustainable Finance Disclosure Regulation (SFDR), meaning they promote environmental and/or social characteristics. ESG is also integral to the design and launch of new strategies: 2021 saw the launch of our third sustainably-themed fund: Real Estate Debt VI, which is in addition to Infrastructure Equity and Sale and Leaseback launched in 2020 and 2019 respectively. We also launched Europe VIII with an enhanced ESG framework focused on climate change, human capital management, and diversity and inclusion (see p. 15).

The focus on ESG has increased substantially over the last twelve months and I anticipate it will continue. I welcome this heightened interest, and I firmly believe that the long-term financial prospects of ICG are intimately entwined with the long-term environmental and social actions we take. As we continue to execute on our growth ambition, the way we act is just as important as what we do.

I invite you to explore the progress we have made in this Sustainability and People Report.

Benoît Durteste,
Chief Executive Officer and Chief Investment Officer, ICG



HIGHLIGHTS FOR THE YEAR

42%¹
Females as % of new hires

100%
of relevant investments will commit to Science Based Targets by the end of 2030

42%
of the Board members are women

3
Sustainably-themed products in the market

\$3bn²
ESG-linked Fund level financing raised

99%
of capital raised since March 2021 is in funds classified as Article 8³ as per SFDR

2021 Benchmarks and Ratings:

ICG received the highest ESG rating of 'AAA' by MSCI



ICG retained FTSE4Good Index status



ICG improved its score by 43% vs 2020, placing the company in the 91st percentile in the industry⁴

S&P Global
Corporate Sustainability Assessment

1. In the twelve months to 31 March 2021
2. As at 30 September 2021

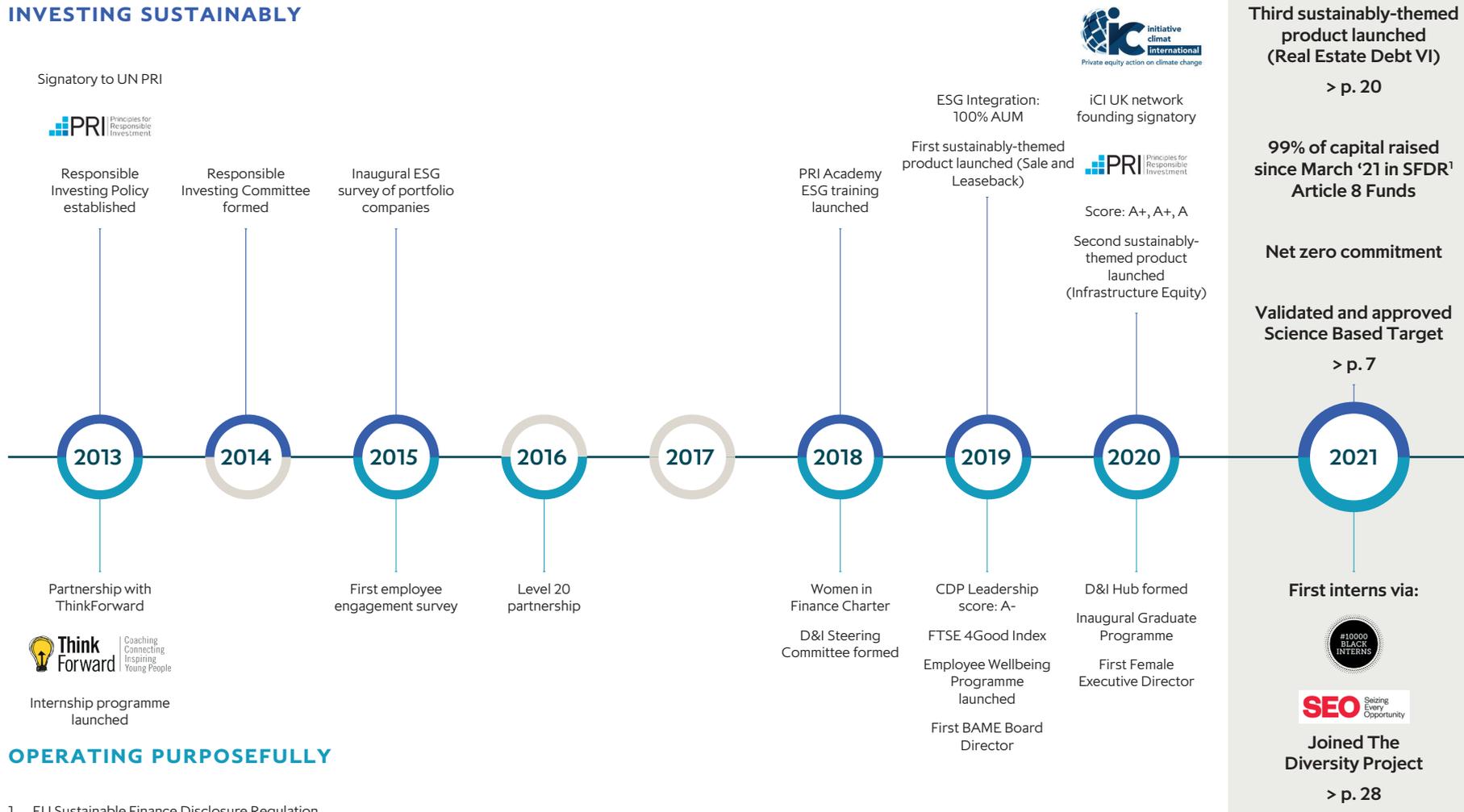
3. Funds that promote, among other characteristics, social and/or environmental characteristics
4. ICG's benchmark industry is Diversified Financial Services and Capital Markets. Score date: Nov 12, 2021



OUR FOCUS ON SUSTAINABILITY AND PEOPLE

Our focus on sustainability and people is longstanding at both a Group level and in our investment activities. We have made progress over time around all of our material issues.

INVESTING SUSTAINABLY



OPERATING PURPOSEFULLY

1. EU Sustainable Finance Disclosure Regulation



OUR SUSTAINABILITY AND PEOPLE PRIORITIES

It is crucial for us to understand, prioritise and report on the issues that matter most to our business and our stakeholders. Focusing on our most material issues will underpin our long-term success.

Engaging stakeholders

The ICG Board considers the following stakeholder groups as being key to our business, and we seek to understand their interests and expectations, which are then factored into our decisions.

	Shareholders and lenders
	Clients
	Employees
	Communities
	Environment
	Suppliers
	Regulators
	Portfolio companies

We do this through various methods, including direct engagement, participation in industry initiatives and consultations, and reporting.

For more details on the topics of importance to our stakeholders and our engagement, see p. 24 of ICG’s *Annual Report and Accounts 2021 (AR FY21)*.

Determining our material issues

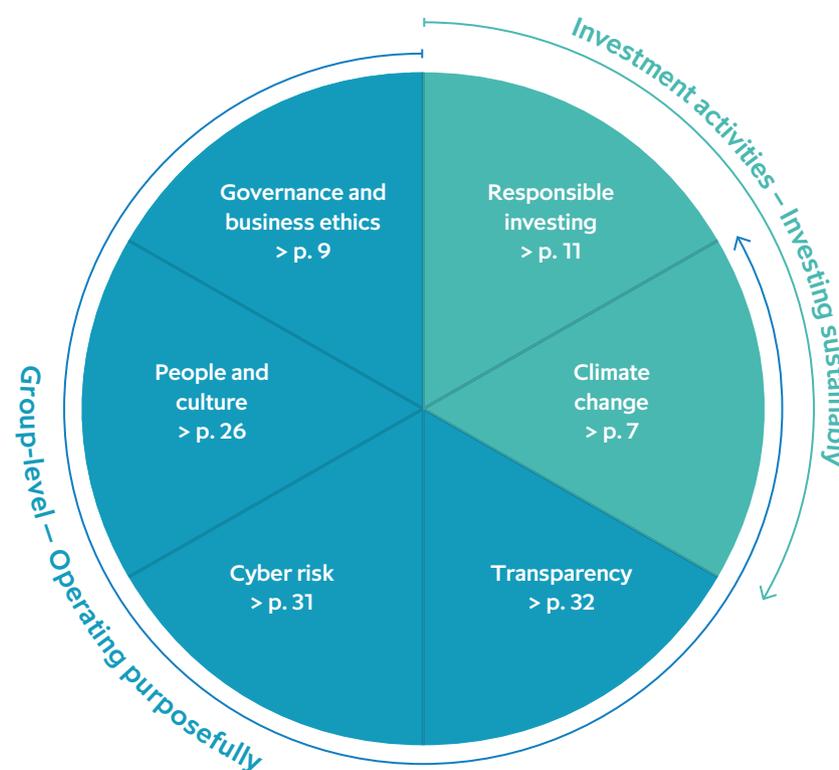
We assess materiality from two angles, first at a Group level; secondly within our investment activities. We identified the environmental, social and governance issues that are relevant to our industry and company. This included the topics of importance to our clients, shareholders and employees, as well as those that align to our company values and investment ethos.

Additionally, we assessed these topics against the sustainability reporting standards and emerging disclosure regulations, such as the Global Reporting Initiative (GRI), the Sustainability Accounting Standards Board (SASB), SFDR, the EU Taxonomy and the Task Force on Climate-Related Financial Disclosures (TCFD), as well as relevant aspects of ICG’s principal risks and uncertainties.

We consolidated the issues into six priorities. We plan to update the materiality assessment at least every two years to ensure that we continue to focus on the topics that matter most.

Our priorities

This report presents our ambitions, goals and progress for each of these six priorities.





OUR NET ZERO ROADMAP

Climate change is happening at an alarming rate and is already having a significant impact on our lives. We recognise that we can help decarbonise our economy through the strategies we offer to our clients, the investment decisions we take, and the focused engagement with our portfolio companies and peers in our industry.

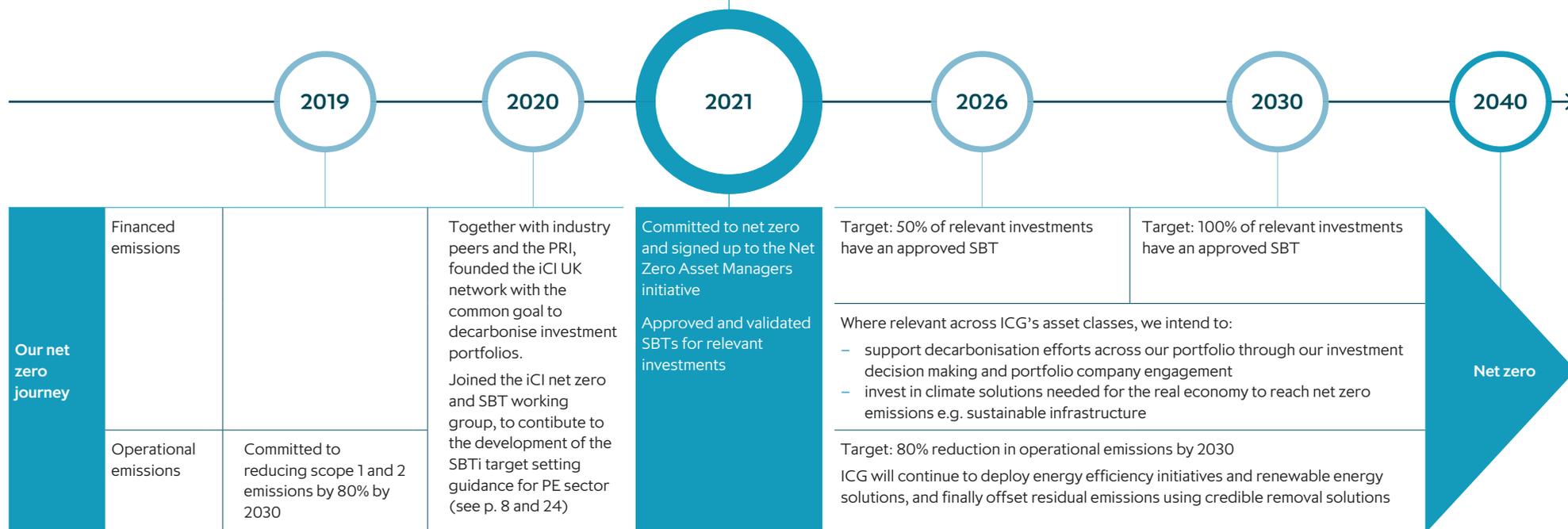
ICG is committed to support the goal of net zero GHG emissions by 2040 or sooner, in line with global efforts to limit warming to 1.5°C.

Our net zero commitment is supported by two ambitious emissions reduction targets by 2030, which have been approved and validated by the Science Based Targets initiative (SBTi).

Our approved and validated science-based targets

- Ensure 100% of relevant investments have SBTi-approved science-based targets by 2030, with an interim target of 50% by 2026¹
- Reduce ICG’s direct (Scope 1 and 2) emissions by 80% by 2030 from a 2020 base year

For further information on our SBTs, please refer to the SBTi website [here](#).



1. Relevant investments include all investments within Structured and Private Equity and Real Assets where ICG has sufficient influence. At 30th September 2021, this equated to 22.5% of ICG’s AUM



SETTING THE FOUNDATIONS TOWARDS NET ZERO

We have developed a robust approach to net zero based on our four key Responsible Investing Fundamentals:



Engage

with portfolio companies to drive sustainability outcomes

- In strategies where we have influence, we work with management teams to:
 - ensure effective oversight of climate risks and opportunities
 - conduct an energy audit and assess carbon footprint
 - develop a climate strategy and action plan
 - set science based emission reduction targets (SBTs) for all relevant investments
 - implement measures to achieve targets e.g. promote energy efficiency initiatives, onsite renewable energy and transition to low carbon solutions
- Where we don't have influence, we seek to engage with private equity sponsors and fund managers on integrating climate change considerations in investment decisions and portfolio monitoring

[See p. 11 for further details on our Responsible Investing Fundamentals](#)



Innovate

to develop sustainably-themed products

- ICG has developed three sustainably-themed products (p. 19)
- ICG's Exclusion List prohibits direct investments in coal, oil and gas
- ICG's bespoke Climate Risk Assessment is mandatory for each investment opportunity and forms part of ICG's standard ESG Screening Checklist. For opportunities with higher risk exposure, additional climate risk analysis is completed, and, where applicable, incorporated in external ESG due diligence
- ICG conducted a Climate risk high-level screening of more than 700 existing portfolio holdings and detailed scenario analysis of 30 higher exposure companies to physical risks (up to 2050) and transition risks (2020 to 2040), conducted in 2020, with follow up analysis every 2 years



Report

on progress to enhance transparency with our stakeholders

- We systematically monitor a range of climate metrics across our investment strategies in line with TCFD and SFDR, and will begin reporting to clients in 2022 on these metrics
- We typically include climate metrics in sell-side materials for portfolio companies in strategies where we have influence
- ICG has published an annual TCFD disclosure since 2019 (see p.34 of *AR FY21*)
- We measure, independently verify and invest in the offsetting of our Scope 1 and 2 and selected Scope 3 GHG emissions, and publicly report these (p.33 of *AR FY21*)
- We take part in the CDP Climate Change Assessment and received an 'A-' Leadership Score for our latest report



Collaborate

on initiatives to drive industry best practice

- As a founding member of the iCI UK network, ICG works with others to support the establishment of SBTs, improve carbon reporting and effective ESG policy implementation in private markets
- ICG was one of the first alternative asset manager signatories to the Net Zero Asset Managers initiative in 2021
- We are an active member of the industry wide Expert Advisory Group (EAG) that supported the SBTi with the development of target setting guidance for the PE sector, published in November 2021
- We supported the development of and piloted the CDP's Private Companies Climate Assessment framework, to launch in 2022
- ICG is a Member of the PRI Corporate Reporting Reference Group and the BVCA working group on TCFD
- We signed the *2021 Global Investor Statement to Governments on the Climate Crisis*

[See our RI Policy for further details on our RI processes](#)



GOVERNANCE AND BUSINESS ETHICS

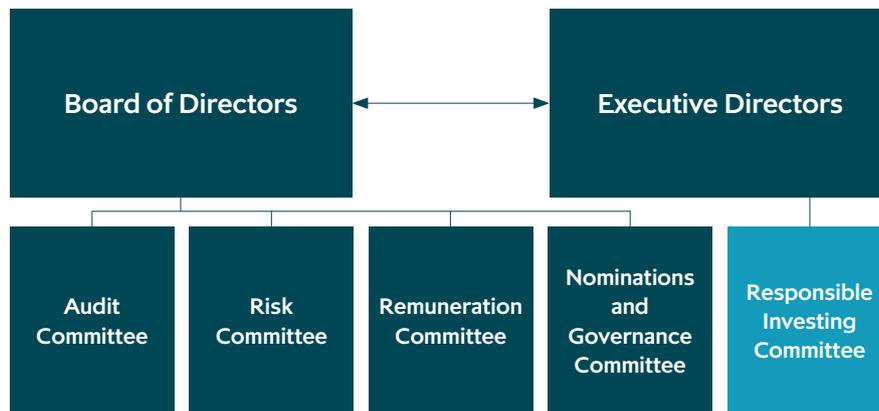
ICG has been a publicly listed company since 1994 and is a constituent of the FTSE 100. We seek to promote the highest standards of corporate governance through our structures and culture.

ICG Corporate Governance

The Board provides leadership and oversight for the strategic direction of the business, including ensuring that the Group has the necessary human and financial measures in place to meet its objectives. The Board has appointed Stephen Welton as a designated Non-Executive Director on ESG matters. Further details of our policies can be found at the end of this report.

As ICG continues to grow and the regulatory environment evolves, having relevant policies is one part of the process of ensuring strong corporate and ethical behaviour. Through our training programmes and rigorous committee processes, we strive to instill a culture of compliance, transparency and high standards of business ethics.

Corporate Governance Framework



[See the Further Disclosures section for more information](#)

Responsible Investing Governance

Responsible Investing Committee

ICG has had a Responsible Investing Committee since 2014, made up of our Head of Investment Office (chair), Head of Responsible Investing and senior investment professionals from across ICG's investment strategies.

The Committee promotes, supports and helps to integrate responsible and sustainable business practices across ICG's investment strategies and the businesses in which we invest, in line with our RI Policy and Framework.

The Committee is also responsible for ensuring that ICG's investment teams have the required skills and understanding to effectively identify ESG risks and opportunities and engage with company management in our portfolio companies on ESG matters.

“Our Responsible Investing Committee is accountable for the genuine purpose of our ESG initiatives. ‘ESG Champions’ work as a conduit across ICG’s products to ensure implementation of the ESG investment frameworks to drive sustainability at the core of our products.”



Rosine Vitman,
Head of Investment Office, ICG



INVESTING SUSTAINABLY

ESG issues are an important driver of investment value and source of investment risk. By implementing responsible and sustainable business practices we can deliver both long-term value and attractive returns to our clients.

ICG has been a signatory to the UN-backed Principles for Responsible Investment (PRI) since 2013, and is an active contributor to a range of industry collaborative initiatives.



EMBEDDING RESPONSIBLE INVESTING

As a member of the financial services industry, we are in a position of privilege and responsibility and it is our duty as a company to ensure that our investing activity is geared towards a more sustainable future. ICG has had a long-standing commitment to Responsible Investing, and has made strong progress over the past year.



Eimear Palmer
Head of Responsible Investing, ICG

“I am proud of our continued focus on climate action, not only in being one of the first alternative asset managers to commit to net zero by 2040 and set an approved SBT, but also in supporting others to do the same.”

Collaboration is key to tackling the climate challenge, and ICG continue to explore ways to decarbonise our investment portfolios credibly and transparently – and respond effectively to climate related regulations. Most significantly, ICG is among the first alternative asset managers to commit to net zero by 2040 and have an interim 2030 target approved and validated by the SBTi.

We have continued to drive **engagement** with our portfolio companies on ESG matters and expand on the areas we seek to address. ICG’s new enhanced ESG framework has an increased focus and commitment on climate action, human capital management and diversity and inclusion. The latest fund in our European Corporate strategy, Fund VIII, has been the first to adopt the framework.

The Group is also focused on developing innovative and sustainable investment opportunities for our clients. Our third sustainably-themed product, Real Estate Debt VI, focuses on financially incentivising borrowers to improve the sustainability of mid-market commercial real estate. Our Green Loan Framework provides an **innovative approach** to green financing, focusing on energy and water efficiency, waste management and sustainable travel.

Looking ahead, we will focus on improved **reporting** and accountability to drive performance. From next year, we intend to include in our reporting an ESG rating and fund level carbon footprint metrics, in line with the TCFD recommendations. We are also implementing a dedicated ESG data management system across the firm to streamline our data collection and reporting and enable targeted engagement with portfolio companies and in launching new funds and strategies.

PRI Assessment 2020

A+ A+ A
Strategy & Governance, Private Equity, Fixed Income

ICG’s approach to Responsible Investing

Our approach to Responsible Investing is focused around four key activities which represent our Responsible Investing Fundamentals:



Everything we do regarding our Responsible Investing activities is through the lens of these four Responsible Investing Fundamentals; Engage, Innovate, Report, and Collaborate. Please continue reading through the report for examples of the Fundamentals put into practice.



RESPONSIBLE INVESTING FUNDAMENTALS ACROSS OUR ASSET CLASSES

ICG’s ability to influence our portfolio companies varies across the asset classes we invest in, and our approach to responsible investing reflects this. In all asset classes, we strive to adopt best practice and this is guided by our Responsible Investing Fundamentals. Below we set out the degree to which we can apply our Fundamentals considering the nature of each key strategy and ICG’s position in the capital structure.

	Structured and Private Equity	Private Debt	Real Assets	Credit
Third-party AUM	\$21.8bn	\$18.6bn	\$7.0bn	\$18.0bn
Overview	Providing structured and equity financing solutions to private companies	Provide debt financing to high quality corporate borrowers	Providing financing solutions to the real estate and infrastructure sectors	Investing in primary and secondary credit markets
Key strategies	European and Asia Pacific Corporate Strategic Equity Fund of Funds/ Secondaries	Senior Debt Partners	Real Estate Debt and Equity Infrastructure Equity	Structured Credit CLOs Multi-Asset Credit

Ability to:



We collaborate with our industry peers to drive best practices across the sustainability framework. This collaboration benefits all asset classes, see p. 24 for further details.

Lower Higher

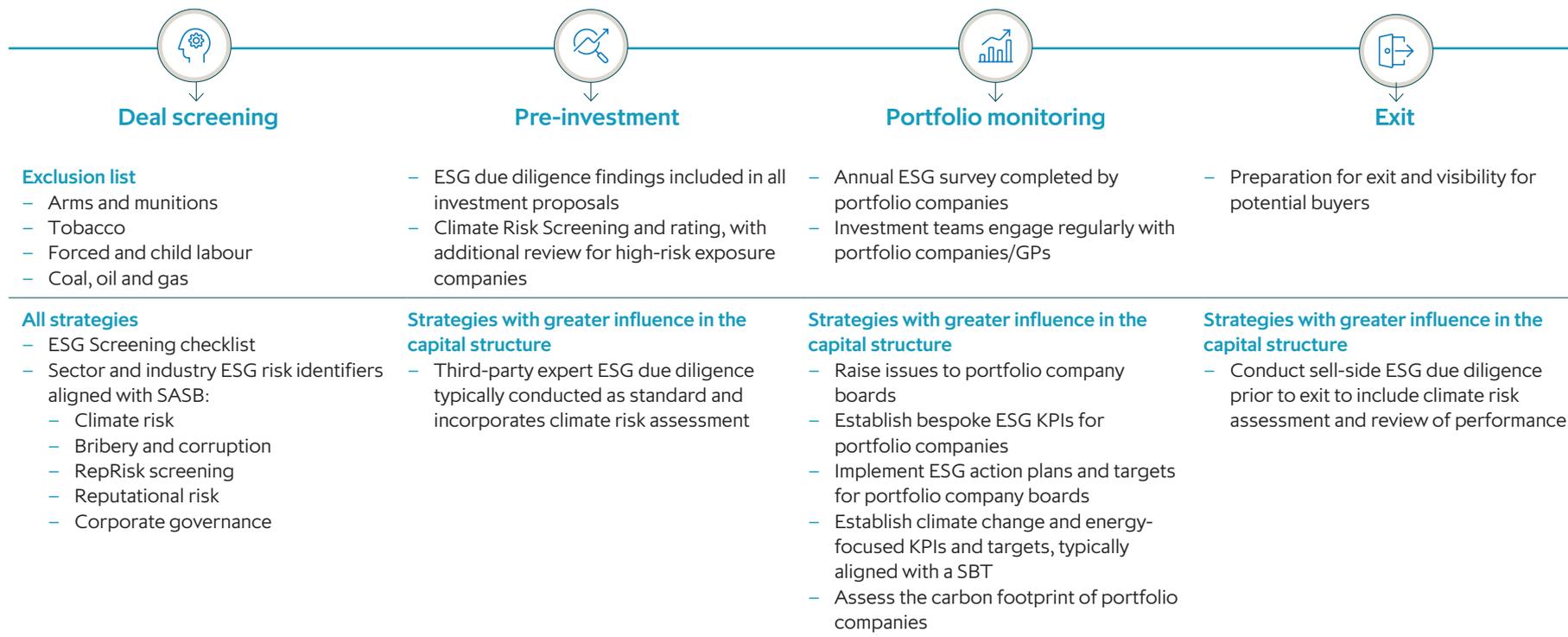
Example of degree of application provided in this Report



EMBEDDING RESPONSIBLE INVESTING THROUGH THE INVESTMENT CYCLE

Our Responsible Investing Policy provides the overarching charter for our approach to responsible investing and covers 100% of ICG’s assets under management.

For each investment strategy, we consider ESG issues at every stage of the investment process – from screening and due diligence to closing, monitoring and eventual exit. The level of our ability to effect change and influence of the portfolio company varies by asset class, strategy and between investments.



[Please see our RI Policy for further details on our RI processes](#)



ENGAGE



OUR ANNUAL ESG SURVEY ILLUSTRATES STRONG ESG PERFORMANCE

Asset Class

STRUCTURED AND PRIVATE EQUITY

Third-party AUM
\$21.8bn¹

Product

European and Asia Pacific Corporate

Overview

Providing structured and equity financing solutions to principally mid-market private companies.



We recognise the opportunity that we have to engage with our Corporate portfolio companies to drive sustainability performance and encourage best practice. We acknowledge that every portfolio company is different and take the time to understand their ESG approach, so that we can support them in achieving their sustainability ambitions.

We engage with management teams on specific sustainability topics, and use these to build lasting value across the portfolio.

We have been conducting our Annual ESG survey since 2015, seeking to engage with our portfolio companies and understand the ways in which they are managing ESG issues. Our Annual ESG survey includes questions on risk assessment and management, governance, environmental management, climate change, and social performance.

Corporate strategies ESG survey highlights

- 36 portfolio companies across the European and Asia Pacific Corporate portfolio were surveyed in 2021 (32 in 2020), maintaining 100% response rate. Highlights of the results are included below.

Climate change	People	ESG
<p>61%[▲] (2020: 42%) have assigned Board or management responsibility for climate change</p>	<p>67%[▲] (2020: 55%) have set climate change or energy related objectives and targets</p>	<p>47%[▲] (2020: 41%) have at least one female director on the board</p>
<p>100%[▲] (2020: 87%) have ESG responsibility assigned</p>	<p>58%[▲] (2020: 39%) have assessed the business risks and opportunities associated with climate change</p>	<p>61%[▲] (2020: 32%) assess their carbon footprint</p>
<p>64%[▲] (2020: 48%) have initiatives or targets to improve diversity</p>	<p>81%[▲] (2020: 77%) have ESG KPIs and targets set</p>	<p>64%[▲] (2020: 48%) have initiatives or targets to improve diversity</p>

1. As at 30 September 2021



ENGAGE



EUROPE VIII'S ENHANCED ESG FRAMEWORK

Asset Class

STRUCTURED AND PRIVATE EQUITY

Third-party AUM
\$21.8bn¹

Product

European Corporate (Europe VIII)

Overview

Providing structured and equity financing solutions to principally mid-market private companies.



In preparation for the launch of Fund VIII we enhanced our ESG integration framework and climate change strategy. We have made good progress in implementing this enhanced framework across the first investments of the Fund and have also decided to roll it out, as relevant, across new investments in other corporate and seeded strategies with greater influence in the capital structure.

Enhanced ESG framework

The Fund is aligned with the requirements of the EU's SFDR Article 8 by promoting environmental or social characteristics through the implementation of ICG's Exclusion List and screening process. Core KPIs, targets and assigned Board-level responsibility are set against three key themes: climate change, human capital management, and diversity and inclusion. We have also opted in to report annually against SFDR environmental and social indicators.

Our ESG approach

- Europe VIII promotes environmental or social characteristics in accordance EU SFDR Article 8 through the implementation of ICG's Exclusion List, ESG Screening process and the Fund's enhanced ESG Framework
- Three key themes with core KPIs, targets agreed and responsibility assigned at Board level. Annual reporting to clients against SFDR environmental and social indicators (PAIs)
- ESG-linked line of credit (LOC) facility with targets linked to the implementation of the Fund's ambitious ESG Framework (see p. 21)

FOCUSED ESG ENGAGEMENT AND MONITORING

Climate change

Objectives:

1. Reduce operational emission intensity
2. Source renewable energy
3. Set emission reduction targets in line with SBTs



Human Capital Management

Objectives:

1. Optimise working conditions to improve employee retention
2. Attract the best talent




Diversity and Inclusion

Objectives:

1. Support a more inclusive working environment
2. Improve diversity at manager, senior manager and Board level




EXTERNAL OVERSIGHT

ESG-linked LOC facility

Margin adjustment (+/- 5bps) based on two KPIs linked to portfolio coverage:

1. Set a portfolio company target to reduce emissions by 2030, in line with a SBT; reduction target annually
2. Implementation of the Fund's ESG Engagement Strategy

1. As at 30 September 2021



ENGAGE



ENGAGING WITH PRIVATE EQUITY OWNERS (GPs) ON ESG PERFORMANCE

Asset Class

STRUCTURED AND PRIVATE EQUITY

Third-party AUM

\$21.8bn¹

Product

Strategic Equity

Overview

The strategy invests in bespoke sponsor-led liquidity transactions (termed “GP-Led Transactions”), providing financing to established private equity firms to purchase either a single, high performing asset or a portfolio of assets from their existing fund(s).



Our Strategic Equity strategy is a market leader in the growing General Partner-led secondaries marketplace, with a successful track record of leading a variety of customized liquidity and structural solutions.

We believe we have a key role to play in engaging with GPs to support them to improve their ESG approach. GPs that are better able to manage ESG risk and identify ESG opportunities across the portfolio, create value for us as investors. We are conscious that in this market our GPs partners vary in terms of size, scale and ESG maturity.

In the GP-led secondaries market, GP engagement on ESG matters is crucial.

Following the results of the inaugural survey in 2020, we targeted engagement with GPs/Sponsors to support them in further enhancing their approach to ESG integration by sharing our experience and networks, as well as resources for portfolio monitoring and reporting. In 2021, we conducted the second survey with 100% response rate and questions added to assess in relation to ESG integration, consideration of climate risk and opportunities and gender diversity profile of GP/Sponsor.

The inherent structural complexity of these portfolio transactions require a tailored approach to ESG integration. We incorporate ESG considerations into the screening and due diligence process using our ESG Screening Checklist to assess each underlying company within the portfolio, which is supplemented by a GP/Sponsor questionnaire. Ongoing ESG monitoring is achieved through a combination of Board seats, information rights, active engagement with the GP/Sponsor on material ESG issues and the Annual GP/Sponsor survey and follow up dialogues to discuss improvements.

ESG GP survey highlights

New questions this year

100%[▲]

(2020: 64%)

have an established ESG policy

100%[▲]

(2020: 82%)

use Board influence to engage on ESG matters

60%

integrate climate change considerations into investment decision-making

80%

have gender diversity among the senior management of their firm²

1. As at 30 September 2021
2. Typically in the range of 15-25% female senior managers



ENGAGE



CONTINUED PROGRESS EVIDENT IN DIRECT LENDING PORTFOLIO COMPANIES

Asset Class

PRIVATE DEBT

Third-party AUM

\$18.6bn¹

Product

Senior Debt Partners

Overview

Providing debt financing to high quality corporate borrowers.



Engagement in our Direct Lending portfolio is vital to understand the ESG risks and opportunities of the investment opportunity. At the time of initial investment, we use our ESG screening checklist and climate risk assessment for each new investment. We engage with our portfolio companies and monitor the ESG performance of investments through our Annual ESG survey, which covers areas such as ESG governance and accountability, climate change, diversity and inclusion, among others.

We first started engaging with Senior Debt Partners portfolio companies on ESG in 2017 by circulating the Annual ESG survey. The survey results provide an insight into ESG at a portfolio company level and enables us to track how companies are evolving their ESG processes over time and managing ESG issues.

2021 ESG survey highlights

- 31 portfolio companies surveyed in 2021 (26 in 2020), with 84% response rate (69% in 2020)



1. As of 30 September 2021



INNOVATE



FOCUS ON REAL ASSETS WITH SUSTAINABILITY AT THE CORE

Asset Class

REAL ASSETS

Third-party AUM
\$7.0bn¹

Products

**Sale and Leaseback,
Infrastructure Equity,
Real Estate Partnership
Capital**

Overview

Providing financing solutions in the real estate and infrastructure sectors, with focus predominantly on European mid-market.

Towards a more sustainable economy

Around 70% of global greenhouse gas emissions come from infrastructure construction and operations (such as power plants, buildings and transport)². Meanwhile, buildings account for approximately 40% of energy consumption and 36% of CO₂ emissions in the EU³. It is estimated that a large majority (up to 95%) of the buildings that exist today will still be standing in 2050, so it is necessary to double renovation rates in the next ten years to provide for higher energy and resource efficiency.⁴

This, coupled with increased regulation to improve energy efficiency and green credentials, points to a growing need for sustainable real estate and infrastructure in Europe.

To capitalise on this growing investment opportunity, to date, ICG has launched three sustainably-themed products in real assets. These funds have ESG frameworks designed to align with specific SDGs, and all incorporate climate-focused SDGs including SDG 7 (Clean Energy) and SDG 13 (Climate Action) (p. 19).

We are also developing a green loan framework to target the UK residential real estate market.

First Green Loan investment

Through Real Estate Debt Fund VI, ICG provided an €85.8 million mezzanine facility supporting the off-market acquisition and light capex business plan of a 48,000m² office campus in the centre of Berlin, Germany.

Using the six eligibility criteria of the fund's Green Loan Framework, assessed by an independent party, the **campus has commitments in place to contribute to the reduction of energy consumption by**

57%▼**and corresponding carbon emissions by****58%▼**

in line with the Goals of the Paris Agreement. The building will seek to achieve a **DGNB Gold green building certificate**, requiring top marks across the three sustainability areas of ecology, economy and sociocultural issues. It will also demonstrate 'best practice' in water efficiency, achieve EPC B rating and will incorporate its own green travel plan.

1. As at 30 September 2021
2. WorldBank Blogs, 2018
3. European Commission - February 2020
4. European Commission, Renovation Wave August 2021



INNOVATE



ICG'S SUSTAINABLY-THEMED PRODUCTS

Asset Class

REAL ASSETS

Third-party AUM
\$7.0bn¹

Products

Sale and Leaseback, Infrastructure Equity, Real Estate Partnership Capital

Overview

These real asset strategies have integrated ESG frameworks into their investment approach.

By encouraging responsible and sustainable business practices in our investment strategies, in the companies in which we invest, and in our own operations, we can both enhance our investment performance and contribute to building a more sustainable global economy and inclusive society. Therefore, enhanced ESG practices and climate change mitigation and adaptation at a fund level, have been a priority for us.

These are key considerations in the launch of new products and reflect increased client demand for products with strong environmental and social characteristics and that support the transition to a net zero economy.

ICG currently has three sustainably-themed products in the market which align to specific Sustainable Development Goals (SDGs) and are all classified as SFDR Article 8 funds.

Sustainably-themed products	Targeted SDGs	How the product contributes to sustainable outcomes?
<p>Sales and Leaseback (2019) Targets European commercial real estate assets</p>		<ul style="list-style-type: none"> Up to 2% of committed capital can be re-invested to enhance the sustainability of the underlying portfolio assets, focusing on improving energy efficiency, reducing emissions reduction, decreasing water intensity and implementing waste management programmes Sets specific KPIs to monitor and track impact throughout its investment period
<p>Infrastructure Equity (2020) Seeks to acquire a diversified sustainable portfolio of Core+ mid-market infrastructure assets in Europe, with a focus on downside protection</p>		<ul style="list-style-type: none"> Unique green generalist approach, including operational value creation with a sustainability focus Sustainability Framework designed to assess, monitor and quantify the direct contribution of core activities to relevant SDGs (p. 15)
<p>Real Estate Debt VI (2021) Pan-European real estate debt strategy with a distinctive approach to investing in self originated, predominantly first mortgages through Whole Loans investments</p>		<ul style="list-style-type: none"> Financially incentivising borrowers to improve the sustainability of mid-market commercial real estate Industry leading Green Loan Framework (p. 20) aligned with the Green Loan Principles, EU Taxonomy and future EU Green Loan Principles SFDR Article 8 + fund, as the majority of the loans will be classified as sustainable under the EU Taxonomy

1. As of 30 September 2021



INNOVATE



A SUSTAINABLE APPROACH TO REAL ESTATE DEBT

Asset Class

REAL ASSETS

Third-party AUM

\$7.0bn¹

Product

Real Estate Partnership Capital

Fund Overview

Our Real Estate Partnership Capital Fund VI is a pan-European real estate debt strategy with a distinctive approach to investing in the European mid-market space. The Fund invests in self originated, predominantly first mortgage whole loan investments which contribute to climate change mitigation.

“We are excited to have introduced a sustainable framework to the Partnership Capital strategy which will allow us to have a measurable and positive environmental impact”

Martin Wheeler
Co-Head of ICG
Real Estate



ICG has developed a Green Loan Framework (GLF) as part of its latest Partnership Capital fund (Real Estate Debt VI) which provides a structured, sound and innovative approach to green financing for commercial property investments. ICG has worked alongside a specialist environmental consultancy to ensure that the GLF aligns with current best practice, including the recommendations laid out in the Green Loan Principles and the EU Taxonomy. The GLF incentivises borrowers to continue making sustainability improvements in commercial property.

Green Loan Framework

Investment case

SUSTAINABLE REAL ESTATE DEVELOPMENT

- Higher rental premiums
- Reduced operating costs
- Increased letting speed
- Higher occupancy rates
- Reduced regulatory risk
- Stronger property values

SUSTAINABLE INVESTING

- SFDR Article 8+ Fund: promotes environmental criteria AND
- Majority of Fund loans will be under GLF which has a ‘sustainable objective’ under SFDR Article 9

Highlights

OVERVIEW

- Financially incentivise borrowers to improve the sustainability of mid-market commercial real estate
- Best practice alignment:
 - LMA Green Loan Principles
 - EU Taxonomy and UN SDGs
- Developed in partnership with expert Real Estate sustainability consultants
- Strong governance: Head of RI on Investment Committee to oversee GLF implementation

BEST PRACTICE



Impact

OBJECTIVES:

- Energy efficiency
- Water efficiency
- Responsible use of materials
- Green building certification
- Waste management
- Sustainable travel

SECOND OPINION



1. As of 30 September 2021



INNOVATE



ESG LINKED FACILITIES: CONNECTING SUSTAINABILITY AND PERFORMANCE

By linking the performance of our business and our Funds with efforts to improve sustainability and address the climate challenge, we are showing a commitment to effect real change. We are doing this across a number of facilities and funds, and have worked with 17 banks to achieve the following:

ICG has committed c. \$3billion of ESG-linked financing

ICG plc – Revolving Credit Facility (RCF)

We have a revolving credit facility which is linked to carbon emissions. It underscores ICG's commitment to sustainability, as we align our corporate financing structure with our ESG priorities.

We have a goal to reduce our scope 1 and 2 carbon emissions across our operations by 80% by 2030. If we hit this metric, we get a benefit on the margin and commitment fee. If we miss the targets, we have an increase on the margin and commitment fee.

Europe VIII

The Fund, which is dedicated to investing in mid to upper middle market European businesses, has an enhanced ESG framework (p. 15). In addition, the Fund has an ESG-linked line of credit facility which has margin adjustments based on two KPIs linked to portfolio coverage:

1. Set a portfolio company target to reduce emissions by 2030, in line with a SBT: meet emission reduction target annually
2. Implementation of the Fund's ESG engagement strategy

Real Estate Debt VI

The Fund has integrated a Green Loan Framework (GLF) (p. 20) into its investment strategy to incentivise and support borrowers to make environmentally sustainable improvements to their developments, including major refurbishments and operational investments.

The Fund has incorporated an ESG-linked bridge facility with the margin linked to two KPIs including:

1. 50% of the Fund's assets under management make use of the GLF
2. More than 50% of the underlying assets have achieved a Green Building Certificate to at least a 'very good' level, including BREEAM and LEED

“ICG has raised to date c.\$3bn¹ to ESG-linked financing. ESG is fundamental to ICG and it was definitely the right time for us to link sustainability into the facility. Stakeholders will come to expect ESG-linked pricing metrics as the norm, rather than the exception.”

Steve Burton, Treasurer, ICG



1. As at 30 September 2021



REPORT



DRIVING ESG TRANSPARENCY OF PRIVATE ISSUERS

Asset Class **CREDIT**

Third-Party AUM
\$18 billion¹

Overview

Investing in primary and secondary credit markets, with focus on sub-investment grade credit in Europe and the US. We invest in liquid (tradable) senior secured loans and high yield bonds as part of a syndicate of lenders or investors, as well as structured credit.

We know that transparency on ESG matters is of increasing importance to our clients. Recognising that ESG reporting by private companies is still a nascent practice, we have focused on two key initiatives over the last year: developing a proprietary ESG risk rating and participating in the CDP private markets pilot in an attempt to improve the availability and consistency of climate-related metrics.

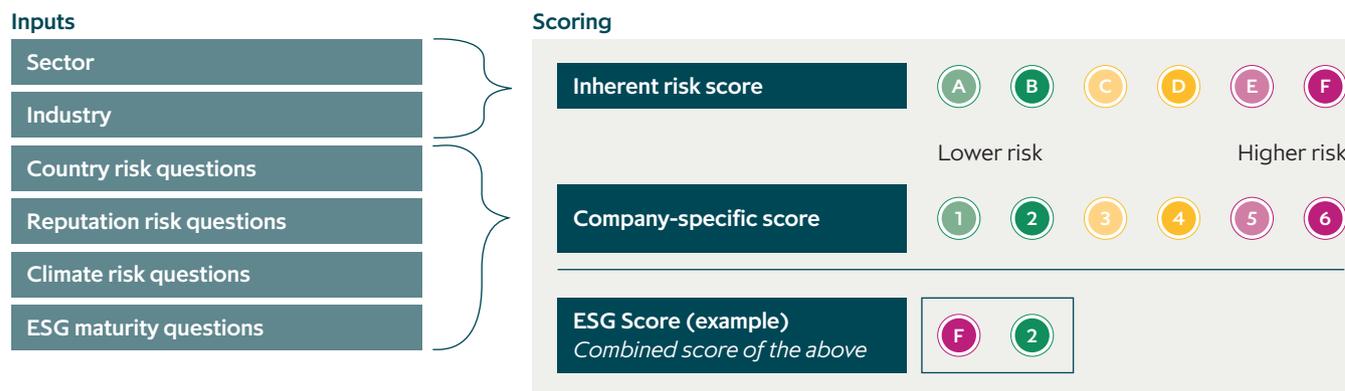
ICG's proprietary ESG rating

External ESG ratings currently provide only limited coverage of the Credit Fund Management platform's investment universe. This is, however, evolving as ESG ratings are expanded gradually to cover private market issuers. We are in ongoing discussions with key providers and are monitoring progress closely.

To address this gap, we are working with an external advisor to develop our own proprietary ESG rating. For each investment opportunity we will assess and rate both its inherent sector risk and company specific risks. This will be done by utilising the information collated through our existing ESG processes and tools, specifically our ESG Screening Checklist and Climate Risk Assessment, and by incorporating additional questions on the maturity of approach to ESG matters of each company.

The internal ESG rating will enable us to not only assess ESG related risks for each potential investment but will also help to inform and guide our ESG engagement and reporting to investors.

Overview of ESG rating – Illustrative output



Carbon emissions reporting

CDP PRIVATE MARKETS TECHNICAL WORKING GROUP

We are currently in the process of rolling out fund-specific ESG reporting and expect to introduce these across our flagship, open-ended funds in H1 2022. Reporting climate risks and carbon emissions data is a key focus for ICG and we are a member and active participant of the CDP Private Markets Technical Working Group. The aim is to improve the availability and consistency of climate-related metrics and facilitate benchmarking of climate-related data across the private market.

1. As at 30 September 2021



REPORT



IMPACT REPORTING FRAMEWORK ESTABLISHED

Asset Class
REAL ASSETS

Third-Party AUM
\$7billion¹

Strategy
Infrastructure Equity

Fund Overview
 The Fund looks to acquire a diversified sustainable portfolio of Core+ mid-market infrastructure assets across Europe. The Fund has ability to invest across the capital structure, enhancing downside protection through investments into equity/quasi equity and mezzanine instruments.

ICG's Infrastructure Equity Fund has established a reporting framework for its portfolio companies, incorporating ESG and impact performance. The direct contribution of the assets' core activities to the relevant SDGs are assessed, monitored (and quantified) annually using key metrics. In 2021, we distributed our first Annual ESG Report on the Infrastructure Equity strategy. In recognition of its comprehensive sustainability framework and impact reporting, ICG's infrastructure equity was shortlisted for the 2020 PRI award in the 'ESG Incorporation Initiative of the Year' category.



Positive outcomes across ICG's infrastructure equity investments

We designed a tailored Sustainability Framework for our Infrastructure Equity investments, drawing on the Global Impact Investing Network's IRIS+ taxonomy, to identify, assess, monitor and, where possible, quantify the direct contribution of portfolio companies' core activities to relevant SDGs. Below are some examples of the impacts achieved across the portfolio in 2020:

	729GWh of renewable energy generated, equivalent to the annual electricity needs of 330,000 people	243,877 tonnes of CO ₂ e avoided
	221MW installed renewable energy capacity mostly in France and other international operations	27 million m³ of water saved across 1.6 million households through smart metering
	Over 80,000 households and businesses provided with fibre connection	4,075km of fibre network deployed and operated (75% in rural areas)
	135 net jobs created	Over 1,100 people employed, 35% of which identify as female

1. As of 30 September 2021



COLLABORATE



WORKING CLOSELY WITH OUR PEERS TO PROMOTE BEST PRACTICE

ICG recognises that, in pursuing the best interests of our clients, we have a responsibility to collaborate and work closely with our peers and other stakeholder groups, particularly on thematic engagements. We are committed to working with others to promote collaboration within our Responsible Investing activities as we believe that a collective voice could provide greater leverage and influence.

Initiative Climat International (iCI) UK Network

- We successfully launched the UK network of the iCI in 2020, sharing a collective commitment to quantify and reduce the carbon emissions of private equity-backed companies
- This network commits to actively engage with private equity-backed companies globally to reduce carbon emissions intensity and secure sustainable investment performance
- We co-chair an iCI UK working group that is developing carbon footprint guidance for private market investors and their portfolio companies, in collaboration with peers and industry bodies such as WRI, PRI, PCAF, CDP, and IIGCC

Science Based Targets initiative (SBTi) Working Group

- Following the successful launch of the iCI UK network, we were actively involved in the Science Based Targets initiative (SBTi) working group and a member of the industry wide EAG (Expert Advisory Group) which provided guidance and input on the development of guidance for the private equity industry to set SBTs. We were **1 of 6** private markets investors to ‘road test’ the guidance and subsequently obtained an approved and validated SBT by the Science Based Targets Initiative

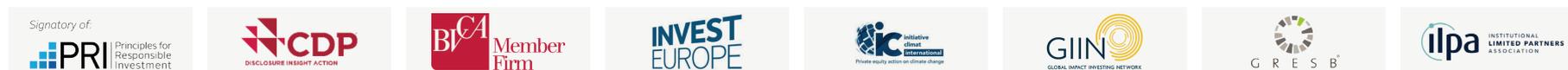
Regulatory Initiatives

- Joined Invest Europe’s SFDR working group
- We are an active member of the BVCA, participating in a number of committees and working groups contributing to industry responses to the FCA, HMRC and HMT
- We also actively contribute to working groups of other industry bodies such as Invest Europe and AIMA

“We commend ICG’s contribution in the process to help drive the development of science-based targets guidance for Private Equity. It has provided valuable insight and leadership for this important initiative, and ICG is helping to push the industry as an early target-setter to help define a new bar of ambition.”

Alberto Carrillo Pineda,
Managing Director of the Science Based Targets initiative

Industry Initiatives and memberships





OPERATING PURPOSEFULLY

How we operate matters as much as what we do.

We are a long-term business that manages capital on behalf of our clients, looks to generate attractive returns for our shareholders, and seeks to have a positive impact on our broad range of stakeholders, including our employees.

We do this by focusing on the hiring, development and inclusion of our people, as well as by ensuring strong governance policies are in place.



OUR PEOPLE AND CULTURE



“I am proud of our relentless focus on our people and culture. In an organisation that has more than doubled its AUM in the last four years, this is a commercial imperative.”

Antje Hensel-Roth
Chief People and External Affairs Officer, ICG

We operate in a competitive and quickly-evolving market. Our colleagues are experiencing first-hand an unprecedented level of activity and complexity. This presents a challenging environment, but one where we are in a position of strength.

This year, we have continued to hire across the business to support our growth ambitions, have enhanced our onboarding programme to welcome new colleagues into ICG’s business and culture, and have significantly overhauled our engagement and wellbeing offerings.

During the twelve months ending 31 March 2021, 42% of our new hires were female and our graduate programme is designed to build a pipeline of diverse future leaders of the firm. There is no quick or easy answer to moving the dial on diversity and inclusion within our industry, but we have the building blocks of commitment, strategy and partnerships in place to achieve our ambitions.

We will continue to focus on our people, and I am grateful to my colleagues throughout the organisation for the support they give the firm and each other as we continue to grow and develop our business.

Our people initiatives focus on four areas:

ATTRACT

- High level of personal impact and business building
- Wide-ranging opportunities for career development
- Inclusive culture at the core and throughout the firm

RETAIN

- Comprehensive career development
- Market-leading, holistic benefits
- Engagement and opportunity to contribute across the firm

DEVELOP

- Dedicated Learning & Development programmes at all levels
- Mentoring and Employee Networks
- Development of teams and individuals a core KPI for leaders

DIVERSITY AND INCLUSION
> P. 28

EMPLOYEE DEVELOPMENT
> P. 29

WELLBEING AND BENEFITS
> P. 29

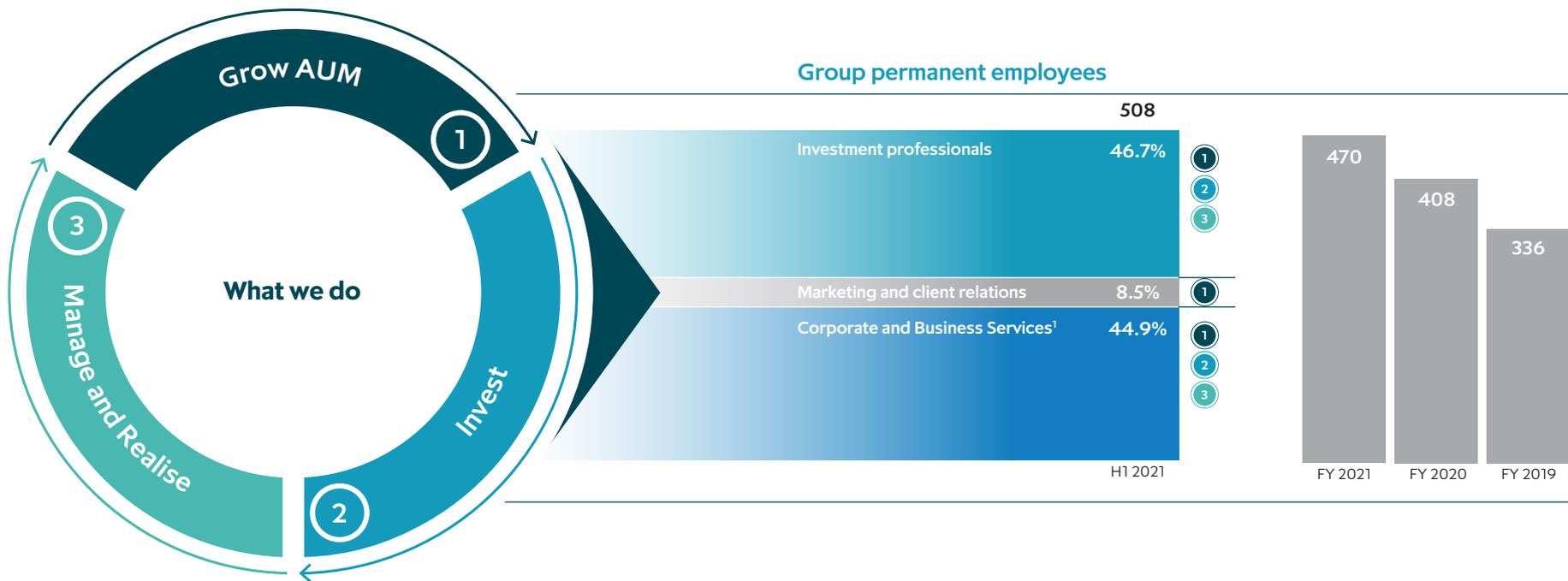
ENGAGEMENT AND VOICE
> P. 29

Our values > p. 2



OUR PEOPLE TODAY

Our people are fundamental to every part of our success. As we continue to grow, we ensure we have the right breadth and depth of expertise across the firm, working in close collaboration and helping to driver each other forward.



1. Includes finance, legal, regulatory compliance, operations and other corporate functions
 2. As at 31 March 2021

3. For the 12 months to 31 March 2021
 4. Based on self-disclosure of UK based employees in the first half of 2021, 82.5% completion rate



PROGRESS ON OUR DIVERSITY INITIATIVES

Diversity and Inclusion

Through an inclusive approach, we cultivate a diversity of perspectives. Our global Diversity and Inclusion (D&I) strategy plays an important role in enhancing our performance by fostering an environment of constructive challenge and creative approaches, as well as enabling us to attract and retain the best talent.

An employer of choice

We aim to create a culture in which our employees feel comfortable to bring their entire experience and background to work, in order to develop their talents and deliver exceptional results. We ensure that leaders are capable of creating an inclusive culture in which a diverse set of perspectives is shared, heard and acted upon.

Key initiatives:

- Continue to cultivate an environment where there are significant opportunities for employees to take incremental responsibility to enable them to grow professionally and personally
- Comprehensive mentoring and development programmes for employees throughout all stages of their careers
- Partnered with The Return Hub in 2020 to promote ICG as a place to for senior women to join after a career break or having pursued a different career path, as well as provide mentors for women in other alternative asset management firms

Enhancing inclusion

Our hiring strategies aim to foster inclusion and to acknowledge diverse representation. We have implemented talent policies and practices to minimise bias at every stage. We work relentlessly on ensuring that we maintain and nurture an inclusive culture and environment.

Key initiatives:

- A D&I Hub was formed through which all employee networks collaborate to provide a broad series events and initiatives. These networks also input as appropriate into top-level corporate decision making
- Three new employee networks were formed in 2021: NextGen (colleagues in the first ten years of their professional lives), Together (LGBTQ+) and Unify (ethnic minorities). These networks join alongside the groups for Women, Family and Carers, and Sport and Wellness
- All leadership development now incorporates a focus on D&I
- Conducted the first Inclusion Survey, which had a 75% response rate, and acted swiftly on a number of suggestions for development

Building a diverse pool of future talent

We are focused on supporting specific external bodies and initiatives whose aim is to increase the diverse pool of talent across the industry in order to help bring to the entire sector forward, to challenge each other, and to share best practices.

Key initiatives:

- Launched our first Graduate Programme in 2020, with focus on diversity: 63% female and 37% identifying as an ethnic minority
- We provided six diversity-oriented internships into investment teams in the UK and USA in Summer 2021, reflecting our partnerships with #10000BlackInterns and SEO USA
- Continued support for Level 20, to mentor and develop women in investment positions
- Sponsored the BVCA Diversity series, educating, promoting and valuing diversity across our sector
- Part of 100 Women in Finance, a global initiative to increase the pool of talented women in our sector

Industry Initiatives





PROGRESS ON OUR ENGAGEMENT INITIATIVES

Employee development

Onboarding

In 2020, we launched a multimedia global induction programme to ensure our people feel welcome and swiftly become part of our culture, irrespective of their background, local lockdowns or geographical distance. This continues to be a key initiative, helping to bring the business together across business lines and geographic boundaries.

Supporting continuous development

We provide our people with varied training and learning opportunities. These include on-the-job learning and social learning, through mentoring, coaching and internal and external networks.

Our learning platform provides structured training and support. With a choice of nearly 9,000 online courses, the majority of colleagues have explored more than 250 topics since the start of 2021.

We also support colleagues with completing professional qualifications, such as CFA, CAIA and IMC.

We run a number of programmes at various levels of the organisation. These include: Successful Promotion; Leading for Impact; Executive Coaching; and Women's Development programmes.

Wellbeing and benefits

Wellbeing

Our Wellbeing strategy focuses on the physical and mental wellbeing of employees. In 2021, we launched a Wellbeing Survey to help build on our existing programme. As a result, a dedicated Covid-19 support hub was established to signpost relevant and timely support. This included promoting our global Employee Assistance Programme, ensuring that all employees were aware of the confidential, independent support available to them and their families. Wellbeing Champions were introduced globally to support our people by championing health and wellness campaigns and initiatives in every office.

An important focus for 2021 has been on mental health. These have included a series of campaigns focused on working practices and maintaining a healthy work-life balance, and have also focused on hard-hitting topics such as suicide prevention, how to support those in a suicidal crisis, and dispelling myths around suicide.

Benefits and reward

We know that talent drives our success, and we recognise that in how we reward our people. We aim to provide a total reward package that recognises employees' contribution and pays them fairly through a market competitive salary, a discretionary bonus and a

comprehensive set of benefits to help employees look after their health and wellbeing, family, and suit their lifestyle.

Some benefits vary by jurisdiction, but generally includes access for all employees to Pension and other financial benefits, such as the opportunity to invest alongside funds we manage on fee and carry-free basis and the opportunity to buy ICG shares at a discounted price; maternity, adoption, paternity, and parental and shared parental leave; Life insurance and private medical insurance; Health screening, Employee Assistance Programme and confidential helpline; and a Wellbeing annual allowance and cycle to work scheme.

Engagement and voice

Effective two-way communication with our employees is essential to build and maintain engagement.

We run a group-wide employee engagement survey every two years. In the latest survey at the end of 2019, 96% of employees gave a high overall engagement score, putting us well ahead of the financial services sector peer group and comfortably in the top quartile globally across all sectors. We have also taken on board nuanced feedback on how we can improve even further on communicating effectively and enabling individual performance.



Amy Schioldager is our designated Non-Executive Director for employee engagement. She conducts focus groups during the year to obtain employees' feedback on the business and culture. These are reported back to the Board and factored into decision making.

Looking ahead, we will pivot towards quarterly 'pulse' surveys to remain even closer to our employees and to enable us to focus more dynamically on specific areas.



CHARITABLE GIVING

We look to support organisations that are aligned to our wider corporate objectives and areas of priority. This approach enables us to provide more than just financial capital, allowing us to leverage the expertise of our colleagues to build stronger relationships and make a bigger impact. Illustrative examples are set out below.

Diversity and Inclusion

Charity	What they do	How we support
ThinkForward	ThinkForward aims to reduce the risk of young people in disadvantaged parts of London becoming NEET (not in education, employment or training). ThinkForward also runs a Business Mentoring Programme to support some of the most disadvantaged young people in preparing for the world of work.	We contribute £100,000 a year to the charity. In addition, about 15 employees take part in ThinkForward's Business Mentoring Programme each year.
Educational Endowment Foundation (EEF)	EEF seeks to break the link between family income and educational achievement, supporting teachers and senior education leaders to raise the attainment of children and close the disadvantage gap. We are contributing £1.5m over three years to charities identified and supported by the EEF. Tutor Trust aims to tackle educational inequality by recruiting and training bright university students as tutors in the core subjects of maths, english and science. In the 2019/20 academic year, tutors were placed in 173 state schools to support 2,595 pupils, 65% from disadvantaged backgrounds. The Tutor Trust is an official 'Tuition Partner' of the National Tutoring Programme, which aims to reach 250,000 pupils in England each year. Nuffield Early Language Intervention (NELI) trains teaching assistants to lead short, structured sessions with pupils aged four to five to improve their language skills. More than 6,500 schools are now signed up for NELI – that is 40% of primary schools across the UK.	A donation of £250,000 in the 2020/21 academic year, as part of a three-year commitment. Annual donation of £250,000 supported the scaling up of an online training programme that enabled this at-pace expansion of NELI.

ICG's support: more than just financial

Our employees have the potential to bring a substantial set of experiences to bear on charities. We believe our employees benefits from this engagement, and we encourage them to dedicate two working days a year to support ThinkForward or any other charity close to their hearts.

Climate change

Charity	What they do	How we support
SolarAid	SolarAid, is an international charity providing access to solar lights in Malawi and Zambia. The charity helps to combat fuel poverty and tackle climate change by distributing solar power technology to replace kerosene lamps. Each solar light distributed averts c. 1.1 tonnes of CO ₂ e.	ICG has partnered with the charity to offset the unavoidable CO ₂ e arising from our own operations. Our donation has supported the installation of 69 solar systems and energy efficient medical appliances in 20 health clinics in Malawi.



HEIGHTENED VIGILANCE AND FOCUS ON ADDRESSING CYBER RISKS

Ensuring we have safe, secure and stable technology services is a key focus for ICG, not only in maintaining a resilient business, but in protecting our clients, our portfolio companies and our employees' privacy and data.

“The risk of cyber attacks continues to rise and we take the protection of our data, and that of our clients, very seriously. With Board oversight of the issue, we invest heavily in minimising cyber risk, ensuring we have robust processes in place, both internally and with our IT providers, to maintain focus and continuously improve our performance”

Julien Rawle,
Head of Cyber Security, ICG

We are committed to combating the various cyber threats that continue to impact the financial services industry.

The impacts of the Covid-19 crisis put our operational resilience to the test like never before. Having been fully operational throughout the pandemic, we have demonstrated remarkable

resilience, and technology has played a critical role in delivering a positive colleague and client experience.

In response to the continued heightened risk to cyber security as a result of the pandemic, we have implemented a number of initiatives to further protect against the potential leakage of sensitive data:

- Our technology environment is continually maintained and subject to regular testing, such as penetration testing, vulnerability scans and patch management
- Technology processes and controls are upgraded where appropriate to ensure ongoing technology performance and resilience
- An externally managed security operations centre supplies ICG with skilled security experts and technology to proactively detect and prevent potential threats and to recover from security incidents, including cyberattacks
- We have increased our phishing tests globally and carried out a cyber scenario exercise designed to strengthen incident preparedness and business continuity plans

Asset Class

STRUCTURED AND PRIVATE EQUITY

Third-party AUM

\$21.8bn¹

Product

European Corporate

Case study: European Corporate Portfolio Companies

Our cyber work continued this year with systematic external cyber risk assessments, enhanced cyber assessments pre- and post-deals, with specific deep dives and support for selected portfolio companies.

We have also systematised our cyber risk monitoring process around new deals and our governance approach:

- Pre-investment:
 - Systematic cyber due diligence is conducted for all new deals
 - We conduct a mandatory internal cyber audit
- Post-investment:
 - Ensure each portfolio company nominates a dedicated cyber head to liaise with the board and ensure progress against objectives and KPIs
 - Enhance transparency on risk detection with dedicated Board sessions on cyber
 - Encourage staff cyber training due to the importance of behavioural factors
 - Repeat cyber audit every 18-24 months to monitor progress

1. As at 30 September 2021



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"> covered employees with records of investment-related investigations, consumer-initiated complaints, private civil litigations or other regulatory proceedings 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
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 ¹	Location of disclosure	Commentary
GENERAL DISCLOSURES				
Organisational profile	102-1	Name of organisation	SPR Front Cover	Intermediate Capital Group plc
Organisational profile	102-2	Activities, brands, products and services	SPR p. 2; AR p. 3	
Organisational profile	102-3	Location of HQ	SPR Back cover	
Organisational profile	102-4	Location of operations	SPR p. 2; AR p. 3	
Organisational profile	102-5	Ownership and legal form	See Commentary	Intermediate Capital Group plc is listed on the London Stock Exchange and headquartered in London, the United Kingdom.
Organisational profile	102-6	Markets served	SPR p. 2; AR p. 3	ICG products are marketed in: Americas: Canada, Chile, Colombia, Peru, and the United States of America Asia Pacific: Australia, China (Mainland), Hong Kong, Japan, New Zealand, Singapore, South Korea, and Taiwan. Europe: Denmark, Finland, France, Germany, Republic of Ireland, Italy, Luxembourg, Monaco, the Netherlands, Norway, Spain, Sweden, Switzerland, and the United Kingdom. Middle East: Bahrain, Israel, Kuwait, Oman, Qatar, Saudi Arabia, and the United Arab Emirates
Organisational profile	102-7	Scale of organisation (total number of employees and operations, and net revenues)	SPR p. 2; AR p. 3, 126	
Organisational profile	102-8	Information on employees and other workers	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	Supply chain (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	Significant changes to the organization and its supply chain	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	Precautionary Principle or approach	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	External initiatives	SPR p. 5, 24, 28	
Organisational profile	102-13	Memberships in associations	SPR p. 5, 24, 28	
Strategy	102-14	Statement from senior decision maker	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	Values, principles standards, and norms of behavior	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 ¹	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	Governance structure	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 ¹	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	List of stakeholder groups	SPR p. 6; AR p. 24	
Stakeholder engagement	102-41	Collective bargaining agreements	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	Identifying and selecting stakeholders	SPR p. 6; AR p. 24	
Stakeholder engagement	102-43	Approach to stakeholder engagement	SPR p. 6; AR p. 24	
Stakeholder engagement	102-44	Key topics and concerns raised	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 ¹	Location of disclosure	Commentary
Reporting practice	102-45	Entities included in the consolidated financial statements	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	Defining report content and topic Boundaries	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	List of material topics	SPR p. 6	
Reporting practice	102-48	Restatements of information	See Commentary	No previously disclosed information has been restated in this report.
Reporting practice	102-49	Changes in reporting	See Commentary	There have been no material changes in our reporting.
Reporting practice	102-50	Reporting period	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	Date of most recent report	See Commentary	ICG's previous Responsible Investing Report was published in October 2020.
Reporting practice	102-52	Reporting cycle	See Commentary	ICG follows an annual reporting cycle.
Reporting practice	102-53	Contact point for questions regarding the report	See Commentary	For any questions or feedback related to this report, get in touch with us via: https://www.icgam.com/contact-us
Reporting practice	102-55	GRI Content index	SPR p. 35	
TOPIC-SPECIFIC DISCLOSURES				
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; ICG Diversity & Inclusion Policy 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	ICG Gender Pay Gap Report 2020	
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	873	1,536	1,618	1,614
Total renewable energy purchased or generated for own consumption.	MWh	645	0	0	0
Total energy consumption (electricity and fuel)	MWh	1,518	1,536	1,618	1,614
Energy intensity	MWh/FTE	3.21	3.71	4.82	5.43
Total water consumption (offices)	m3	779¹	7,726	7,560	7,464
Total waste diverted from landfill (London HQ)	%	100%	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

Important notice

This document is being provided to you by the subsidiaries or affiliates of Intermediate Capital Group plc (“ICG”), and together with their respective directors, officers, employees, partners, members, shareholders, advisers and agents, as the context requires, “the ICG Parties”) on a strictly confidential basis and no part may be reproduced or redistributed in any form, by any means without the prior express written consent of ICG. This document is intended only for information purposes and convenient reference and does not create any legally binding obligation on any of the ICG Parties. The ICG Parties expressly disclaim any liability for the use, misuse, or distribution of this information to unauthorised recipients. This document: (i) is not intended as an offer or solicitation with respect to the purchase or sale of any security or financial instrument; (ii) is not to be relied upon in evaluating the merits of investing in any securities; and (iii) is provided solely as reference material for background purposes. You should be aware that investing in a fund sponsored by ICG (an “ICG Fund”) involves a high degree of risk, and there can be no assurance that an ICG Fund’s investment objective will be achieved or that you will receive a return on your capital. The possibility of partial or total loss of capital from an investment in an ICG Fund will exist and you must be prepared to bear such losses. You should refrain from investing in an ICG Fund unless you fully understand all the risks involved and you independently determine that the investment is suitable for you. ICG is not your designated investment advisor. ICG may encounter potential conflicts of interest in connection with the activities of an ICG Fund. Please see the applicable ICG Fund’s offering memorandum or any other such similar documents for additional

information. A private offering of interests in an ICG Fund may only be made pursuant to the final confidential private placement memorandum for the fund and any supplements (or any other such similar documents) thereto (the “Memorandum”) and the fund’s governing and subscription documents (together, the “Offering Documents”), which may be furnished to qualified investors on a confidential basis at their request for their consideration in connection with such offering. The information contained herein will be superseded by and is qualified in its entirety by reference to the Offering Documents, which contains additional information about the investment objective, terms and conditions of an investment in the fund and also contains tax information and risk and conflict of interest disclosures that are important to any investment decision regarding the fund. No person has been authorised to give any information or make any representations other than as contained in the Memorandum and, if given or made, any such information or representation must not be relied upon as having been authorized by the fund or any of the ICG Parties. A prospective investor should not invest in any fund interests unless satisfied that it (alone or together with its investment representative) has asked for and received all information that would enable the investor (or both of them) to evaluate the merits and risks of the proposed investment. Although certain information has been obtained from, and is based upon sources that we consider reliable, none of the ICG Parties guarantee its accuracy, and it may be incomplete or condensed. All opinions, projections and estimates constitute the judgement of the ICG Parties, as of the date of the document and are

subject to change without notice. The ICG Parties make no representation or warranty, express or implied as to the fairness, correctness, accuracy or completeness of this document. The ICG Parties accept no responsibility for any loss arising for any action taken or not taken by anyone using the information contained herein. This document is not to be relied upon in substitution for the exercise of independent judgment. ICG may have issued, and may in the future issue, other communications that are inconsistent with, and reach different conclusions from, the information contained herein. This document reflects the different assumptions, views and analytical methods of the analysts who prepared them and ICG is under no obligation to ensure that such communications are brought to the attention of any recipient of this document. Past performance should not be taken as an indication or guarantee regarding future performance, and no representation or warranty, express or implied is made regarding future performance. Moreover, certain information contained herein constitute “forward-looking statements,” which may be identified by the use of forward looking terminology such as “may,” “will,” “should,” “expect,” “anticipate,” “target,” “project,” “forecast,” “estimate,” “intend,” “continue” or “believe,” or the negatives thereof or other variations thereon or comparable terminology. Any forward looking statements or results in this presentation are based upon current assumptions, may be simplified and may depend on events outside ICG’s control. Due to various risks and uncertainties actual events or results or the actual performance of the fund may differ materially from those reflected or contemplated in such forward looking

statements. Statements herein are made as of the date hereof unless stated otherwise herein. For the avoidance of doubt, this document will not be issued to or directed at, and any investment in an ICG Fund will not be available to, persons in any country where such actions would be contrary to local laws or regulations in that relevant country. This document is not intended for distribution to, or use by any person or entity in any jurisdiction or country where such distribution or use would be contrary to local law or regulation.



Intermediate Capital Group PLC

Procession House,
55 Ludgate Hill,
London EC4M 7JW

icgam.com