ICG

Sustainability & People Report 2022

JANUARY 2023

CONTENTS

INTRODUCTION

ICG is a global alternative asset manager. We provide flexible financing solutions to help companies develop and grow.

INVESTING SUSTAINABLY

ICG seeks to expand and embed responsible investing practices throughout its portfolios.

OPERATING PURPOSEFULLY

How we do our work matters as much as what we do. We operate with the ambition of making a positive impact on society.

FURTHER DISCLOSURES

ABOUT THIS REPORT

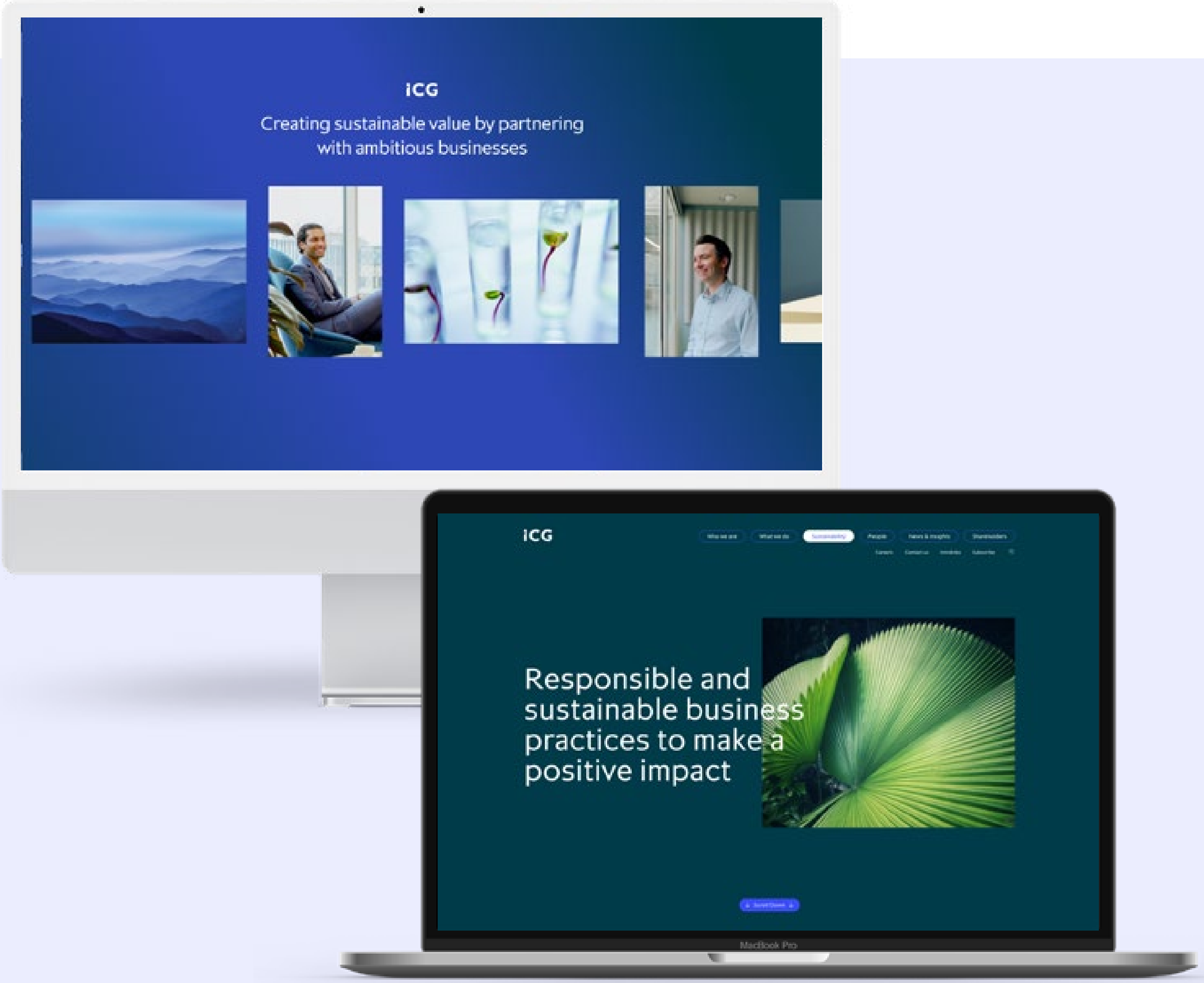
Welcome to ICG's Sustainability & People Report 2022.

This report provides sustainability achievements and updates delivered by ICG through the year in both our investments under management and within ICG's operations.

The report focuses on our key priorities, approach and performance through an environmental, social and governance (ESG) lens which are integral to our vision and strategy.

Reported data is provided for the 12-month period ending 30 September 2022, and is provided for all operating subsidiaries within the Group, unless otherwise stated.

In developing this report, we have considered the guidance of SASB and the Global Reporting Initiative (GRI) in the approach, structure, principles and indicators on which we report. Our SASB and GRI content index is provided in the final section of the report.



How to use this report

The following symbols indicate that additional information can be found either in this report, on our website, in a video online, or in our latest Annual Report:

Read more in this report

View more on our website

Watch as a video online

Find out more in our 2022 Annual Report

Find out more about our approach to sustainability online at www.icgam.com/sustainability-esg/

Introduction

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

CEO FOREWORD

Benoît Durteste
Chief Executive Officer and Chief Investment Officer, ICG

I am pleased to share our 2022 Sustainability & People Report, which builds on last year's efforts to make the report more comprehensive and reflective of ICG's progress, and to ensure more robust communication with our stakeholders.

Over the last year, against an increasingly challenging macro environment, ICG continued to grow – in AUM, in client base, in profitability, and in number of employees. We have maintained a strong focus on sustainability and people, as both are integral to our continued success.

I believe leadership on ESG is not only the right thing to do – enabling us to contribute to a more sustainable global economy, more equitable workplaces and communities, and more robust and transparent governance practices – but it also makes good business sense.

While we consider numerous environmental, social and governance matters on an ongoing basis, this year three themes emerged as particular priorities across both our investment approach and our own operations: climate change, diversity and inclusion (D&I), and digital resilience as a governance matter. These topics are not only timely, but worthy of focus as they contribute to greater business resilience – in our own firm and in the ambitious companies in which we invest.

Last year I was proud to announce our commitment to achieving net zero greenhouse gas emissions across our operations and relevant investments by 2040, supported by two ambitious targets which have been approved and validated by the Science Based Targets initiative (SBTi) (see pg. 12). While it is exciting to be one of the first alternative asset managers to have set a net zero commitment, it's even more important to show progress against that goal. Hence, I'm pleased to share that on the first anniversary year of ICG's net zero commitment, nine portfolio companies have led the way in setting science-based GHG emissions reduction targets: 15% of relevant investments in our first year alone. And, many other companies have advanced their target-setting plans, placing ICG well on track to achieve its interim target of 50% of relevant investments having such targets by 2026 (see pg. 12).

We continue to build a culture that promotes ESG through our people (see pg. 32) and in the expansion of our investment strategies. During the year we enhanced our approach to ESG integration in order to enable our investment teams to better evaluate ESG factors and engage on ESG matters with our portfolios – with results demonstrated throughout this report.

We have approached the Sustainable Finance Disclosure Regulation (SFDR) with thoughtfulness and intent, and I'm pleased to note that the vast majority of the funds we manage are Article 8 – meaning they promote environmental and/or social characteristics.

We have made some strategic hires across the organisation to ensure we have the breadth and depth of expertise to execute on the long-term opportunities ahead, and helping to future-proof ICG as we continue to market a larger range of products to a growing and increasingly complex set of clients.

I invite you to review our progress and explore some areas we will look to expand in the future, as we continue to strengthen our approach to ESG throughout the firm.

Benoît Durteste
Chief Executive Officer and Chief Investment Officer, ICG

2022 benchmarks and ratings[2]

UN PRI[1]
2021 assessment
★★★★☆
Investment & Stewardship Policy
★★★★★
Fixed Income – Corporate
★★★★☆
Fixed Income – Private Debt

CDP
Climate Change Score 2022
Leadership A-
(2021: Management, B)

S&P Global
Corporate Sustainability Assessment 2022
65/100
(2021: 59/100)

MSCI
ESG Rating 2022
Industry Leader AAA
(2021: Industry Leader, AAA)

Sustainalytics
ESG Risk Rating 2022
Low risk 15.8
(2021: Low risk, 18.4)

Member of Dow Jones Sustainability Indices
Powered by the S&P Global CSA
Became a member of DJSI Europe Index in 2022

FTSE4Good
Constituent of the FSTE4Good UK Index since 2018

1. 2021 UN PRI assessment scores: 4/5 stars for Investment & Stewardship Policy; 5/5 stars for Fixed Income – Corporate; and 4/5 stars for Fixed Income – Private Debt.
2. All scores and information with regards to benchmarks and ratings were accessed on 13 December 2022.

ICG AT A GLANCE

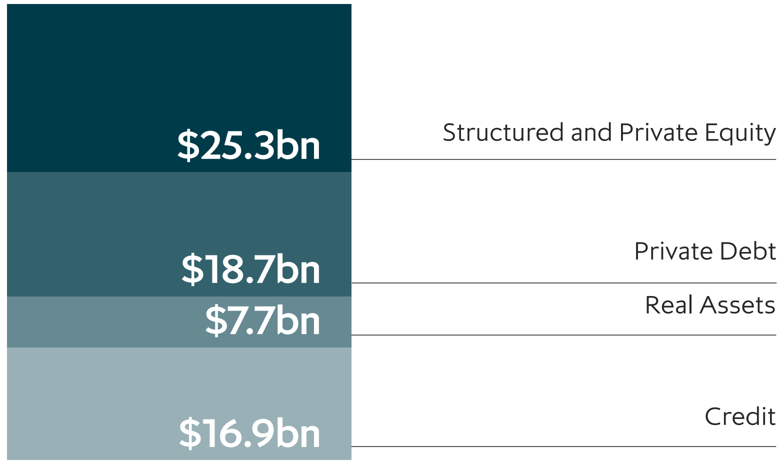
ICG provides flexible capital solutions to help companies develop and grow. We manage and invest capital on behalf of our clients across the asset capital structure to achieve our strategic objectives.

575[1]
permanent employees across

15
countries

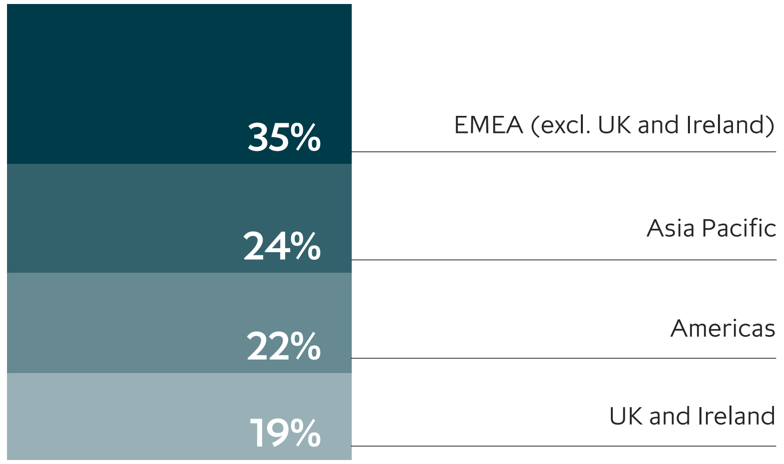
Assets under management

$68.6bn[2]



Global client franchise

618[3]



1. Group headcount as of 30 September 2022.
2. Total AUM as at 30 September 2022. Due to rounding, numbers do not add up precisely to the total.
3 As at 30 September 2022. Split based on Total AUM.

Our key strengths

Local presence
A global network of 575 employees in 15 countries underpins our ability to source, execute, support and manage investments.

Focus on clients' needs
Our global client team ensures that we continue to understand and meet the requirements of our clients.

Ability to invest across the capital structure
We provide capital to companies in a form appropriate to their needs.

Capital to support growth
Our balance sheet is a strategic advantage that enables us to seed and accelerate new strategies and align our interests with our clients.

GENERATING SUSTAINABLE VALUE

We develop long-term, resilient relationships to deliver value for shareholders, clients and employees, and work with our portfolio companies to foster positive impacts on society and the environment. We identify the ESG topics most relevant to our stakeholders as well as those that align to our company values and investment ethos.

Our values drive success

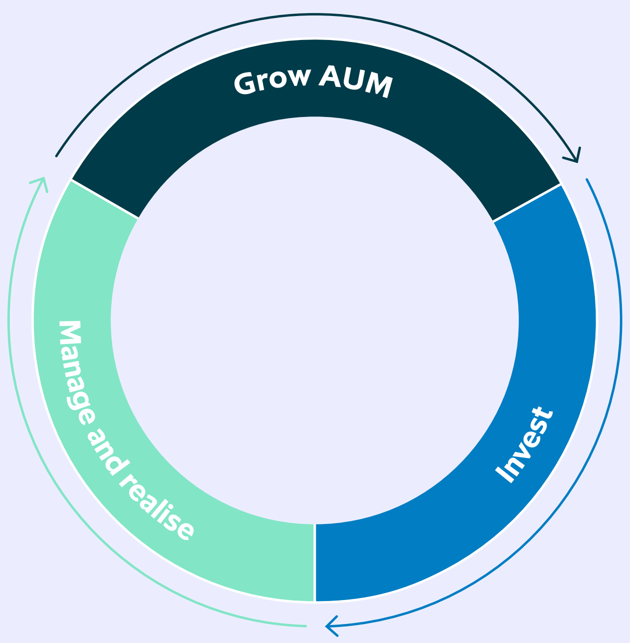
Entrepreneurialism and innovation

Performance for our clients

Taking responsibility and managing risk

Working collaboratively and acting with integrity

Ambition and focus



Our platform generates value for...

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

to inform our ESG priorities

For Group and investment activities

Environmental
- Climate change*

Social
- Diversity and inclusion*
- Employee development & engagement

Corporate governance & business ethics
- Governance & business ethics
- Digital resilience*

Read more*
Areas of focus in 2022 on pg. 9

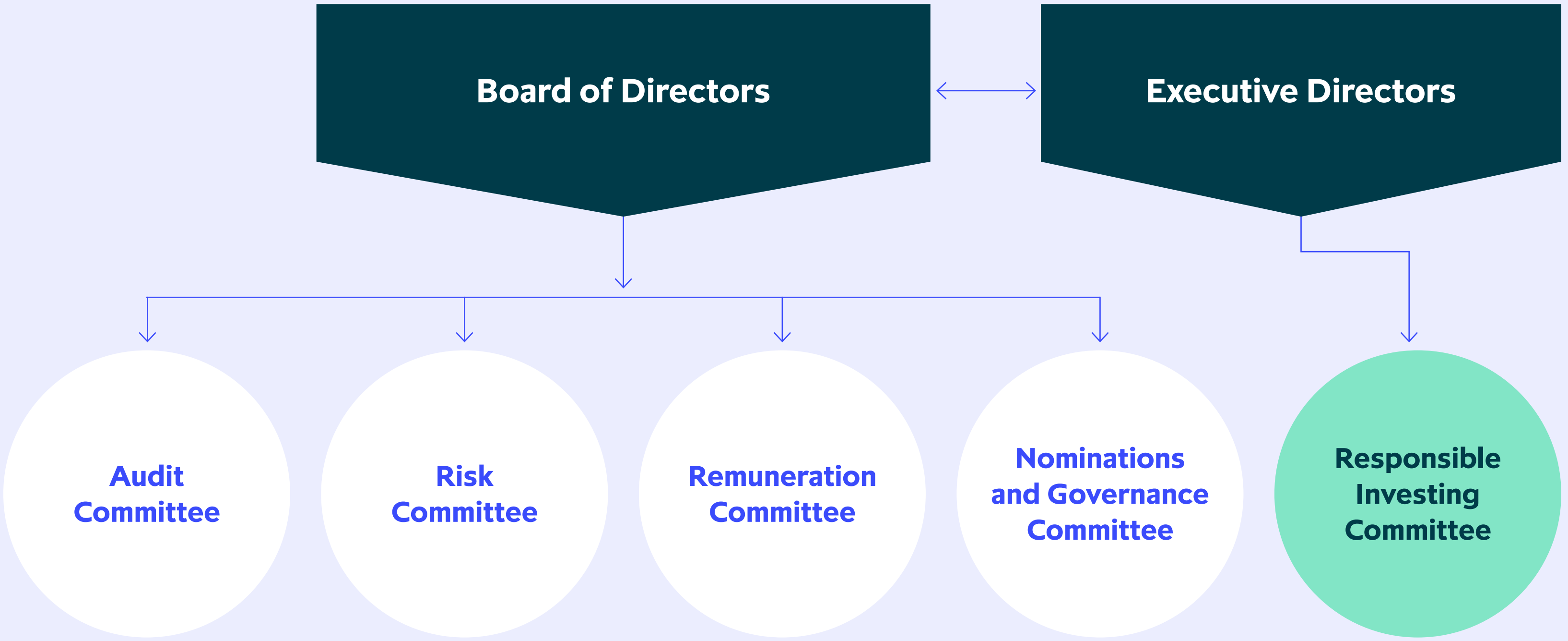
Read more
about how we assess materiality in our Further disclosures on pg. 51

ESG GOVERNANCE

ICG has been a publicly listed company since 1994. We seek to promote the highest standards of corporate governance throughout our activities and culture to act in the best interests of our stakeholders.

Board oversight of ESG matters

The Board comprises three Executive Directors, a Non-Executive Chair, and seven Non-Executive Directors (all of whom are independent) who have a broad and diverse set of skills and experience.



Find out more
Please see our Annual Report pg. 57 for our approach to risk management.

The ICG Board is strongly engaged in our focus on stewardship and ESG, regularly receiving reports on client considerations, client experience, investment performance and ESG matters. We have a Non-Executive Director responsible for ESG matters and another Non-Executive Director with a specific responsibility for employee engagement.

The Board receives formal updates on ESG-related matters at least twice every financial year and receives annual updates on progress. In addition, the Board also considers ESG risk, as relevant, when reviewing the annual strategy and business plans over the short, medium, and long term. The Board has delegated responsibility for the implementation of the Responsible Investing Policy to the Executive Directors. As part of the Board, the Executive Directors review and guide any decisions made regarding investment strategies, including the Responsible Investing Policy and the Climate Change Policy, as well as any arising or potential climate-related issues.

The Board Risk Committee oversees the Group's comprehensive risk governance framework and compliance processes and procedures to ensure that all risks, including ESG and climate-related risks, are identified, managed, and monitored and that the Group is compliant with all applicable legislation.

ICG's eight established principal risks incorporate or consider a variety of factors that cut across them, including ESG. Further information on our approach to managing risk can be found on pg. 57 of our Annual Report.

Responsible Investing Committee

ICG has had a Responsible Investing Committee since 2014, made up of our Global Head of Sustainability & ESG, Head of Investment Office, 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 Responsible Investing (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 relevant company management in our portfolio companies on ESG matters.

Find out more
Please see our Responsible Investing Policy.

AREAS OF FOCUS IN 2022

2022 saw significant global macro and geopolitical events that affected the economy and our lives. Three large ESG themes emerged as focal areas for ICG, all of which factor into business resilience and are important traits of business growth and success.

Climate change

Investment activity highlights

Climate risk assessment

90%

of total AUM covered by a comprehensive climate risk assessment, with enhanced scenario analysis of holdings with potentially heightened climate risk exposure (see pg. 17).

Strategies with climate focus

27%

of total AUM in strategies[2] with explicit focus on engagement on climate change and/or in scope of ICG's portfolio coverage science-based target (see pg. 19 and pg. 23).

Renewable energy infrastructure capacity

1,703 MW

of renewable energy capacity deployed across the Infrastructure Equity portfolio[1] (see pg. 26).

Engagement on decarbonisation

300+

investee companies and 10+ GPs engaged on climate change (see pg. 19-27).

9

portfolio companies have set science-based emissions reduction targets, committing to a reduction of over 69 thousand tonnes of CO_2e emissions today in line with the latest climate science (see pg. 11-12).

Group highlights

Renewable energy in ICG operations

58%

of electricity consumed by ICG offices was from renewable sources in FY22, up from only 22.5% in FY21 (see pg. 12 and pg. 38).

Diversity and inclusion

Investment activity highlights

87% of portfolio companies[3] in our European and Asia Pacific corporate funds, and 77% of borrowers in our Senior Debt Partners strategy, are implementing initiatives or targets to improve diversity and inclusion (D&I) in their organisations (see pg. 23).

Group highlights

35% female senior management at ICG globally, and 41% in the UK, at the end of FY22. We were therefore pleased to achieve our UK Women in Finance Charter ambition (33% female senior management in the UK) a year early.

1st Inclusion Survey

conducted across all ICG operations with 75% response rate from our employees globally (see pg. 34).

£4m committed from FY23 to FY25, to support our new partner charities, focusing on education and social mobility (see pg. 36). £2.5m has been donated to charity this year in total[4].

Digital resilience

Investment activity highlights

ESG data

ESG data management platform deployed to support ESG integration, portfolio monitoring and reporting across 100% of AUM (see pg. 29).

94% of portfolio companies where we have sufficient influence across the European Corporate strategy have completed or launched an internal audit of cyber capabilities and include a clear plan of remedial actions.

Group highlights

Cyber controls

Continuously enhanced vigilance and controls over cyber risks at ICG (see pg. 40).

1. As at 30 September 2022.
2. Includes European and Asia Pacific Corporate, Infrastructure Equity, Sale and Leaseback, and European Real Estate Debt.
3. Source: ICG's Annual ESGs survey of portfolio companies across European and Asia Pacific Corporate, and Senior Debt Partners.
4. Year ending 30 September 2022.

OUR ESG APPROACH – LOOKING BACK, LOOKING AHEAD

Elsa Palanza
Global Head of Sustainability & ESG, ICG

I am delighted to have joined ICG. Its track record in investing successfully and its commitment to ESG leadership are clear, and I am excited for the opportunity to further develop and embed meaningful sustainability action throughout the firm and its investment activities.

The universe of ESG topics facing investors is ever-expanding, and ICG's challenge and opportunity will be to add value – both societal and economic – through the thoughtful consideration of these ESG factors. The structural trends towards private markets remain intact, with asset owners continuing to increase allocations. With growing AUM over the long term across multiple asset classes, ICG's opportunity becomes ever-greater to support the development of more resilient, nature-positive and human-centred businesses befitting a low carbon economy and sustainable economic future.

Following a year of important announcements – including ICG's commitment to net zero by 2040, supported by the establishment of two important approved and validated science-based targets (see pg. 12) – the Group has focused on embedding the right internal systems to ensure we can make progress against those targets and further embed ESG into decision-making.

For example, this year we put in place a requirement for portfolio managers to attest to the implementation of relevant ESG assessments and procedures for their given strategies, which will be linked to their year-end compensation. This measure not only ensures accountability for ESG integration, but also enables senior investment professionals to set an example for their teams.

We have also seen innovative approaches to aligning our investments and business with our decarbonisation goals. In one year alone, we have seen a 47% increase in the total AUM of sustainably-themed products in real assets (see pg. 24). And, in 2022 ICG issued an 8-year, €500m unsecured bond with an annual coupon adjustment based on the progress ICG makes in achieving its science-based targets. This is the latest facility to contribute to our overall total of $3.6bn in ESG-linked financing to date.

In recent years, stakeholders have increasingly demanded that financial institutions play an active role in responding to the climate crisis. Looking ahead, not only will climate change remain a central priority for ICG, but we will make our approach more expansive and sophisticated, ensuring we consider the myriad, interconnected social and environmental factors related to climate. For example, we will explore risks and opportunities related to nature and biodiversity, as well as a just transition.

In 2023 and beyond, we will focus on building and implementing a more comprehensive plan for net zero for the firm. Where we have sufficient influence, we will continue to support management teams in setting science-based emissions reduction targets for their businesses. And, we will work to assess possible solutions for asset classes or strategies within our portfolio where we do not yet have the tools to assess, measure and manage for net zero, where relevant.

We will also seek to expand our integration of additional ESG topics as they become focal areas for our stakeholders and as they are increasingly pertinent to our investments. For example, given the challenges facing societies the world over, we will continue to assess the "S" in ESG – advancing our commitment to progress on D&I, and thinking about how best to assess equity and human rights.

We know engagement must remain a focal point in order to drive stronger sustainability outcomes. ICG will continue to prioritise embedding ESG into our activities, always with an eye towards continuous improvement and action in areas where we can make meaningful impact.

Spotlight on emerging issues

Nature

With more than half of the world's economic output moderately or highly dependent on nature, the loss of nature and biodiversity poses enormous risks – and opportunities – for economies, and thus for investors. Moreover, nature loss is inextricably linked to the climate crisis, ensuring we cannot achieve net zero without also addressing nature. In 2022, ICG joined the Taskforce on Nature-Related Financial Disclosures (TNFD) Forum, to support the development of a risk management and disclosure framework for organisations to report and act on evolving nature-related risks, with the ultimate aim of supporting a shift in global financial flows away from nature-negative outcomes and towards nature-positive outcomes. We look forward to exploring ways to better incorporate nature-related risks and opportunities into our company engagement and investment considerations.

Human rights

As stakeholders increase focus on the "S" in ESG, there is growing visibility and awareness of the private sector's responsibilities to uphold and protect human rights. The regulatory and policy environment is increasingly focused on human rights due diligence expectations in investment decision-making, and on the responsibilities of business and institutional investors to respect human rights, as articulated in the UN Guiding Principles on Business and Human Rights (UNGPs). As an alternative asset manager, ICG has a role to play in incorporating human rights considerations into our investment approach, in assessing the important links between human rights and other ESG priorities, such as climate change, and the role we can play in preventing or mitigating potential impacts.

TOWARDS NET ZERO

Climate change remains one of the most existential challenges of our time; a threat to human lives, the natural world, individual livelihoods, and economies at large. As an investor and provider of capital, ICG has an opportunity and a responsibility to support the transition to a more sustainable economy.

In November 2021, ICG announced its commitment to reach net zero greenhouse gas (GHG) emissions across its operations and relevant investments by 2040. The Group's 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) (see targets below).

While our own operational emissions have negligible impact compared to those of our investments, we recognise our responsibility to ensure our own business operations are fully accounted for (see pg. 12). ICG will continue to deploy energy efficiency and renewable energy initiatives, and will offset any residual emissions using credible removal solutions.

In order to chart a path to net zero, ICG's top priority is the decarbonisation of our portfolio wherever possible, through our investment decision-making and engagement.

Over time, the tools to assess financed emissions and measure net zero will evolve in the private markets. In addition to the setting of SBTs for relevant investments, ICG is developing a plan to systematically assess potential net zero solutions for the strategies not covered by our SBTs.

We will continue to engage with industry groups and thought leaders (see pg. 30) to explore decarbonisation tools and net zero measurement frameworks for asset classes which do not currently have them, and ICG will consider these new solutions if/where they might be applicable to our portfolios.

Another powerful tool for responding to climate change is ICG's capacity for investment in climate solutions needed for the real economy to reach net zero emissions, such as the infrastructure needed for the growth of renewable energy (see pg. 26).

Lastly, a successful global approach to net zero will require the financial industry to account for nature's fundamental contributions to combating climate change, as well as a just transition to respond to the impacts that a changing climate has on human communities and livelihoods. ICG will reflect these considerations in our own approach, as we enhance our ESG assessment and action over time.

ICG's net zero strategy will continue to evolve as we work towards building a more comprehensive approach across the firm, to support the global goals of decarbonising the real economy and building a more sustainable financial system.

Our approved and validated science-based targets:

100%

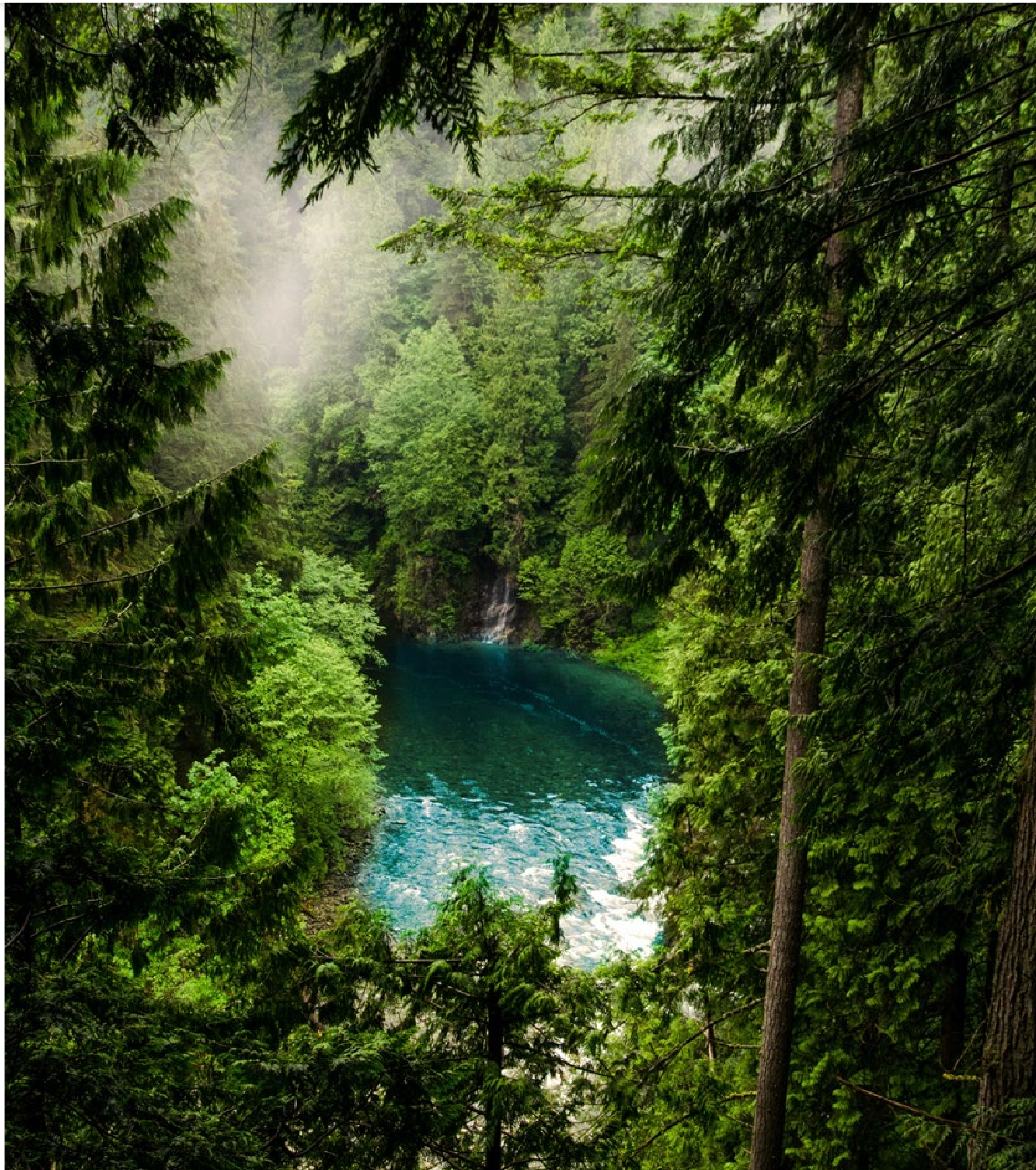
Ensure 100% of relevant investments have SBTi-approved science-based targets by 2030, with an interim target of 50% by 2026[1]

80%

Reduce ICG's direct (Scope 1 and 2) emissions by 80% by 2030 from a 2020 base year

1. Relevant investments includes all investments within Structured and Private Equity and Real Assets where ICG has sufficient influence.

View more
on the SBTi website with our approved targets



TOWARDS NET ZERO CONTINUED

Progress report: Science-based targets

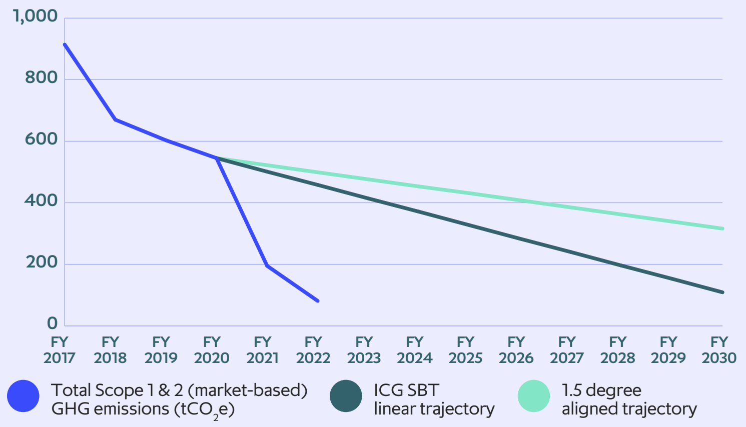
In November 2021, ICG was among the first alternative asset managers to have targets approved by the SBTi. We are pleased to provide an update on the progress made since we first set our targets and will continue to enhance our reporting, particularly on relevant investments, as an industry-wide approach is adopted over time.

A. Scopes 1 and 2 – Absolute emissions reduction target

"ICG commits to reduce absolute Scope 1 and 2 GHG emissions 80% by 2030 from a 2020 base year."

During FY22, our Group Scope 1 and 2 (market-based) emissions decreased by 85% compared to FY20 baseline, primarily due to a rise in the number of offices procuring 100% renewable electricity. While this means we have already achieved our Scope 1 and 2 SBT, we remain determined to sustain this performance over time as the firm continues to grow and expand its presence globally. For further details on our environmental stewardship initiatives across our operations, see pg. 38.

Group Scope 1 & 2 (market-based) greenhouse gas (GHG) emissions (tCO_2e)



B. Scope 3 – Portfolio coverage target

"ICG commits that 50% of its relevant Structured and Private Equity, and Real Assets direct investments by invested capital will have set science-based targets by 2026 and 100% by 2030 from a 2021 base year."

In November 2021, building on years of focus on engaging portfolio companies on climate change, we began implementing a dedicated SBT engagement programme with relevant investments to:

- Socialise what the science-based targets are, how they can be developed, and the benefits to companies, namely further building business resilience and encouraging greater innovation.
- Support portfolio companies in establishing their carbon footprint baseline, following the GHG Protocol. Often this involved educating management teams about the fundamentals of carbon footprinting and recommending third-party climate advisors and/or solutions to support them in completing their baseline assessment; and building the capability to monitor progress in the future.
- Input into the development of science-based targets and emissions reduction action plans to ensure these are ambitious, yet feasible to achieve and aligned with the business plan for our investment.
- Have such targets approved by the SBTi.
- Support the implementation of decarbonisation initiatives through sharing networks, ideas and best practices across our portfolios.

As at 31 December 2022, we have engaged with all 32[1] portfolio companies across five investment strategies[2] qualifying as relevant investments; representing nearly \$8bn of invested capital.

Watch
Portfolio companies at different stages of setting SBTs, talking about their experience.

32
companies located in Asia Pacific, Europe, and North America qualify as relevant investments for ICG's portfolio coverage target. ICG has engaged all such relevant investments on setting SBTi-approved GHG emissions reduction targets.

Completed | In progress | In early stages

Each of these companies is at a different stage of the SBT setting process, with progress shown below across three key milestones:

1 Establishing the required baseline carbon footprint by the SBTi[3]

- **13%** are in early stages
- **16%** are working on their baseline
- **28%** have completed Scope 1 and 2 emissions, and are in the process of completing Scope 3 emissions calculations
- **44%** have completed a full baseline

2 Developing SBTs and decarbonisation plans to deliver on them in the short to mid term

- **25%** are in early stages
- **47%** are in the process of developing their targets and plans
- **28%** have a fully developed target and plan

3 Have set SBTs

	Number of relevant investments	% of relevant investments by invested capital	% of relevant investments by number of companies
Have set SBTs and submitted them to SBTi	9	15%	28%
Of which, have approved targets by SBTi	6	7%	19%

Commitments for over **69** thousand tonnes CO_2e of baseline emissions to be reduced in line with the latest climate science[4]

1. Relevant investments that were in our portfolios at the time of setting our portfolio coverage target that are still in the portfolio as at 31 December 2022. Note that the SBTi currently does not validate and approve SBTs for educational institutions, so three portfolio companies in this sector have been excluded from our update.
2. These are Europe Corporate, Asia Pacific Corporate, Europe Mid-Market, North America Private Equity, and Infrastructure Equity.
3. Percentages are calculated based on number of companies in the respective stages, and may not add to 100% due to rounding.
4. As per the applicable SBTi requirements for target setting and validation, as of 31 December 2022.

Investing sustainably

ESG issues are an important driver of investment value and source of investment risk. By supporting responsible and sustainable practices in our investments 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 ESG IN OUR INVESTMENT CULTURE

ICG aims to nurture a responsible business culture throughout its own organisation as well as in investments in which it has sufficient influence. This culture is embedded through the development of supportive systems and processes. Over 2022, ICG took some significant steps to ensure it is continuously embedding responsible investment practices in the business.

ESG-linked compensation for all ICG portfolio managers

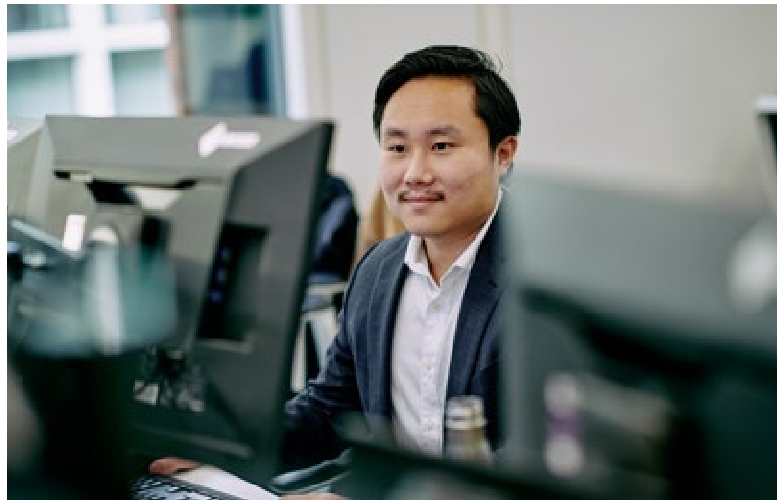
In 2022, ICG incorporated ESG assessment into the annual performance appraisals of portfolio managers across the firm. The aim of this practice is to reinforce alignment and accountability at the right levels for achieving ESG excellence, while ensuring we comply with a continued increase in relevant regulatory requirements. It will also position portfolio managers to lead by example, ensuring ESG is being appropriately and consistently considered in their teams' approaches to investment.

Incorporating ESG into our New Product Approval process

We believe that an enhanced focus on sustainability can be a source of competitive advantage. We seek to integrate ESG considerations into the design of new strategies or funds where their nature allows us to drive better ESG outcomes. This reflects the increased societal need and client demand for funds with strong environmental and social characteristics, and those that support the transition to a net zero economy. Enhanced ESG practices as well as climate change mitigation and adaptation at a fund level are key considerations in the launch of new strategies or funds. For new relevant strategies or funds where we have sufficient influence, we also seek to align ESG priorities and practices with specific UN Sustainable Development Goals (UN SDGs) and consider science-based GHG emissions reduction targets that support the goals of the Paris Agreement.

ESG training to be offered to all ICG staff

Comprehensive online ESG training has been delivered to all investment executives, the senior management and the Marketing and Client Relations team every two years for the past six years. During 2022, ICG has been developing its training programme so it can be delivered to the wider business. Mandatory training will incorporate core understanding of ESG at ICG, while extending the opportunity for more advanced specific knowledge-building for relevant professionals such as investment executives in key topics that relate to their role. Learning pathways can be built upon as users expand their learning in priority topics such as climate change, diversity & inclusion, and governance. The new approach will be rolled out in 2023.



Better utilising ESG data

Since the start of 2022, ICG has partnered with an experienced third-party vendor to develop a dedicated web-based ESG data management platform for the firm. Investment teams can now run ESG data collection processes and analyse the information about their portfolios in a time-efficient and consistent way. The underlying data is a key contributing factor to improving our ESG disclosures to clients.

Read more about our ESG reporting on pg. 28

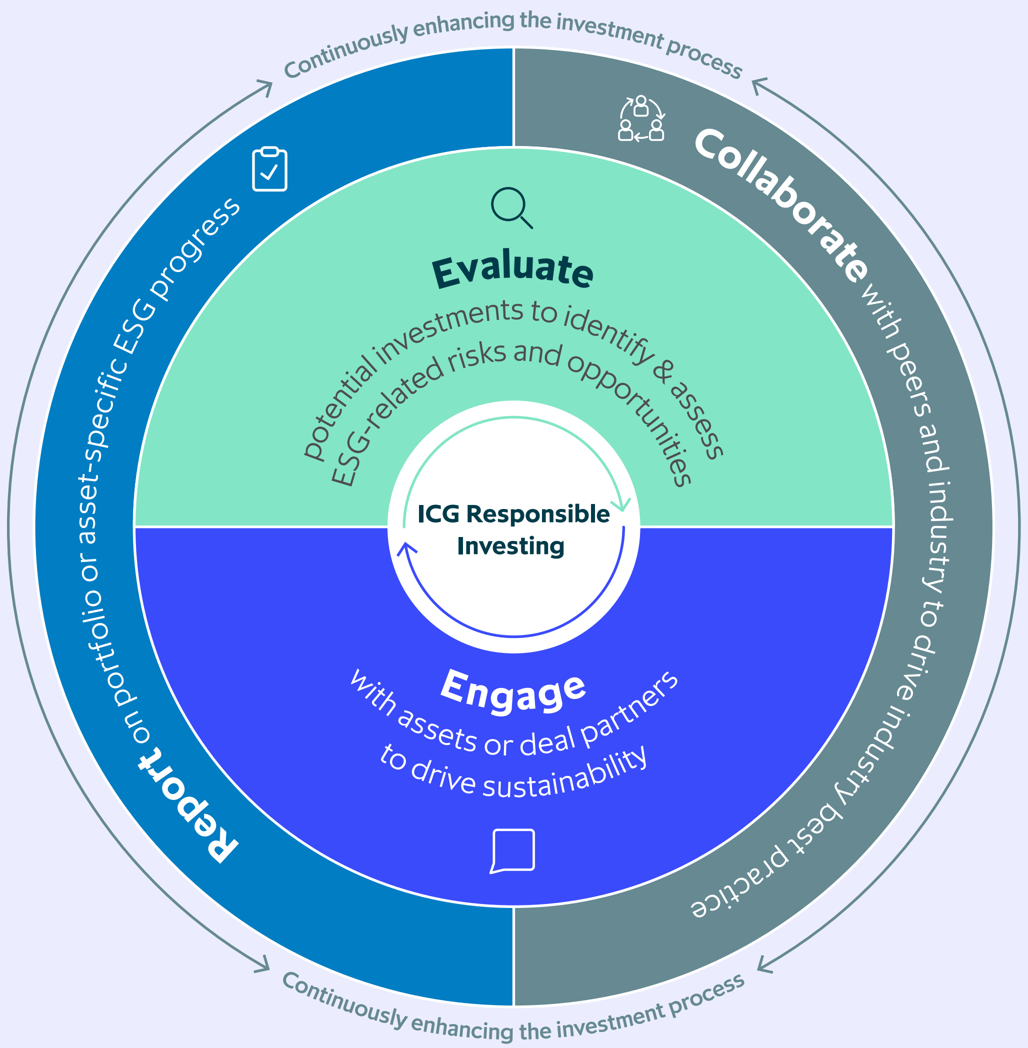
Read more about the use of our ESG data platform on pg. 29

EMBEDDING ESG IN OUR INVESTMENT CULTURE CONTINUED

Our responsible investing approach

Our Responsible Investing Policy provides the overarching charter for our approach to responsible investing and covers 100% of ICG's assets under management. Our approach to responsible investing is focused around four key activities: Evaluate, Engage, Report and Collaborate.

Read more about how we have implemented these across our asset classes – pg. 17-30



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

	Pre-Investment →	Investment Period →	Exit
	EVALUATE	ENGAGE	
	Deal screening, due diligence and investment decision-making	**Ongoing portfolio monitoring and engagement**	**Preparation for exit**
All strategies	– Exclusion List screen – ESG assessment through strategy-specific ESG screening checklist; including a climate risk assessment, with additional review for high-risk exposure deals – ESG findings included in investment proposals, as standard	– Investment teams engage regularly with assets and/or GPs – Annual monitoring of ESG matters, e.g. through ESG surveys and portfolio reviews	– Prepare for exit and visibility for potential buyers
Strategies with greater influence	– Third-party expert ESG due diligence typically conducted as standard and incorporates climate risk assessment	– Raise ESG-related issues to portfolio company boards / LPACs – Implement ESG action plans and targets – Establish ESG KPIs, including on climate change and energy, typically aligned with an SBT – Assess the carbon footprint of portfolios	– Conduct sell-side ESG due diligence prior to exit

RESPONSIBLE INVESTING ACROSS OUR ASSET CLASSES

For each investment strategy, we consider ESG topics at every stage of the investment process. The level of our ability to effect change and influence a portfolio company or an asset varies by asset class, investment strategy, and between investments. However, we strive to adopt best practice in our approach across all asset classes.

Key documents:

View more about our Responsible Investing Policy on our website (last updated June 2022)

View more about our Climate Change Policy on our website (last updated June 2022)

View more about our UK Stewardship Code Statement of Disclosure, published in March 2022

Our ability to effect change is measured by the successful execution of our investment process

ICG asset class	Total AUM (30 Sep 2022)	Overview	Key strategies	EVALUATE	ENGAGE	REPORT
Structured and Private Equity	$25.3bn	Providing structured and equity financing solutions to private companies	European & Asia Pacific Corporate			
			Strategic Equity			
			ICG Enterprise Trust / LP Secondaries			
Private Debt	$18.7bn	Providing debt financing to high-quality corporate borrowers	Senior Debt Partners			
			North America Capital Partners			
Real Assets	$7.7bn	Providing financing solutions to the real estate and infrastructure sectors	Real Estate Debt			
			Real Estate Equity (including Sale and Leaseback)			
			Infrastructure Equity			
Credit	$16.9bn	Investing in primary and secondary credit markets	Liquid Credit CLOs			

Evaluate

For most of our strategies, the best opportunity to fully understand and evaluate the ESG characteristics of a potential investment and to exert influence is at the time of initial investment.

While the subject, methods, and nature of ESG evaluation vary across asset classes and between investments, ICG investment teams use the information, tools and processes available to them and deemed suitable for each investment strategy to evaluate:

Risk

Identify and assess the most material ESG risks pertinent to each investment opportunity, with a view to:

a. avoid investments that are inherently prone to having significant adverse impacts on society and the environment; and/or with significant governance failures/shortcomings; or

b. ensure that, if of acceptable overall risk level, these risks can be feasibly mitigated and/or addressed post investment.

Opportunity

Understand the potential for value creation from material ESG factors, particularly in situations where ICG has sufficient influence.

Alignment

Determine the extent of alignment with sponsors, management teams, third-party managers and/or other investment counterparties, as relevant to each investment, on ESG direction and approach.

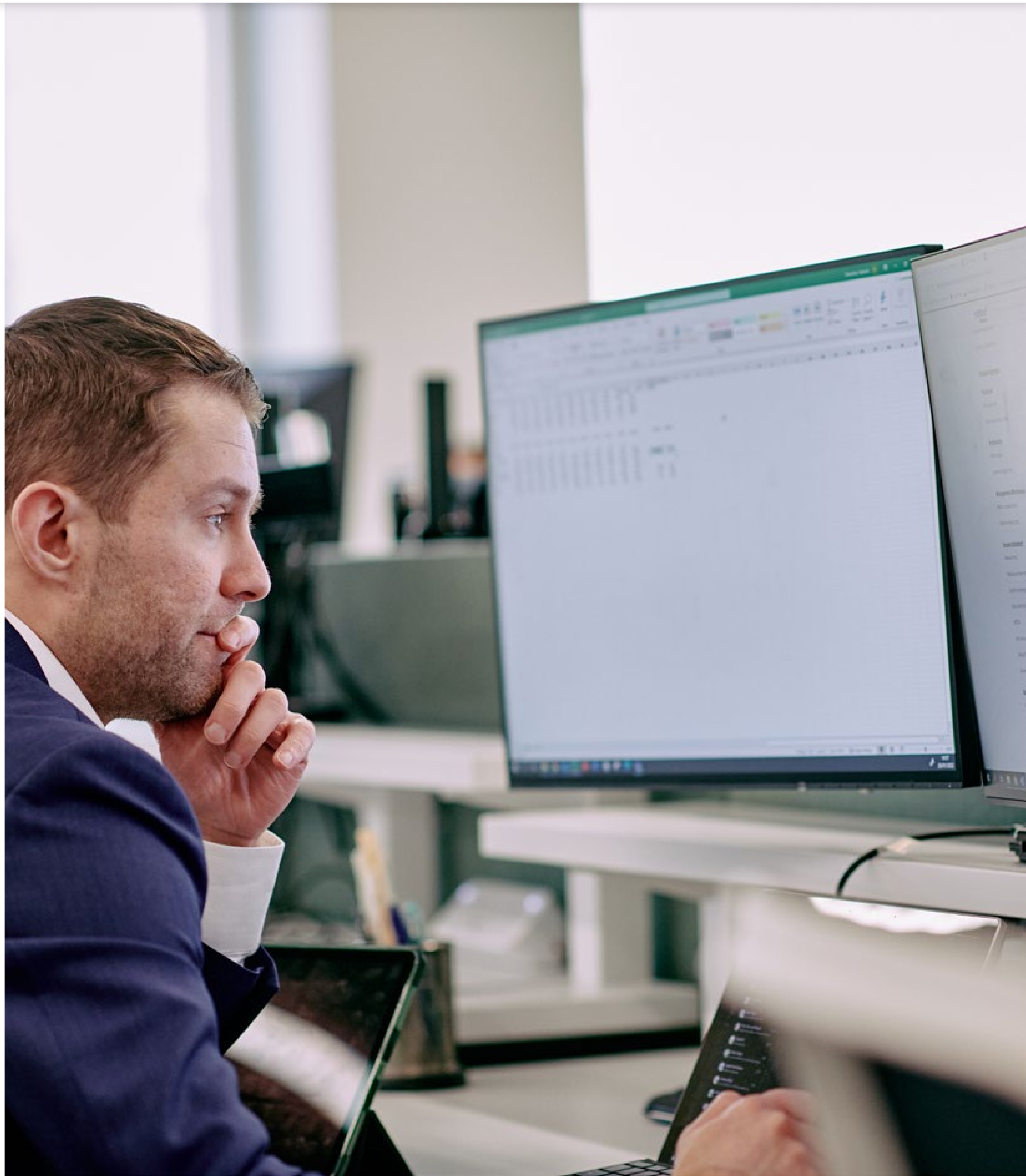
Spotlight: Scenario-based climate risk assessment for corporate deals

Every two years, ICG conducts a formal assessment of exposure to climate-related risks across its portfolios with support from a third-party climate consultancy. We assess the impact of climate-related drivers associated with both changing climatic conditions (physical risks) and the transition to a low carbon economy related to policy, regulatory, market, and technology changes (transition risk).

In Q1 2022, we assessed approximately 900 portfolio companies across our four asset classes covering almost 90% of our AUM as at 31 December 2021, using our proprietary Climate Risk Assessment Tool to identify companies with potentially heightened exposure to climate-related risk. With support from the third-party climate advisors, we then conducted a scenario-based analysis of these investments under the framework provided by the Network for Greening the Financial System.

Following this analysis, we are working with the advisors to enhance our Climate Risk Assessment Tool to incorporate sector-based transition risk scenario analysis. When rolled out in 2023, this improvement will provide investment teams with more nuanced climate risk insights as part of the ESG evaluation process for new deals.

View more
for further details on our latest TCFD disclosures



Evaluate

Over the course of 2022, ICG introduced new ESG tools and resources and enhanced existing ones to better equip investment teams with the capabilities to evaluate investment opportunities.

2022 developments

Across all asset classes

ICG updated its Good Governance Policy in line with the requirements of EU SFDR. This provides more clarity and consistency as well as asset class-specific approaches to assessing the governance practices of relevant counterparties for new deals and during the lifecycle of investments.

Structured and Private Equity

– Introduced an ESG Screening Checklist specifically designed to assist the evaluation of portfolios considered for investment by the ICG LP Secondaries strategy.
– Conducted, as standard, climate risk and maturity assessment, D&I diagnostics, and cyber risk assessment as part of due diligence carried out on new direct corporate investment opportunities, where ICG has sufficient influence.
– Cyber risk assessments formalised as standard part of the due-diligence process for new investment opportunities in our European Corporate and Europe Mid-Market strategies.

Real Assets

– Developed a tailored ESG Screening Checklist for real estate investments to fully capture and assess the nuances and characteristics of this asset class. The checklist includes a dedicated evaluation of location-based physical climate risk and transition climate risk. We will roll out the checklist to be used to evaluate new deals starting in 2023.

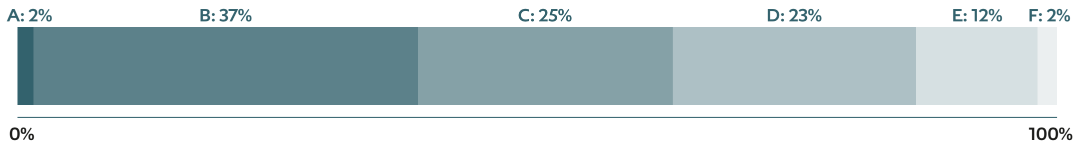
Private Debt and Credit

– Rolled out ICG's proprietary ESG risk rating across ICG Private Debt and Credit; to not only evaluate ESG-related risks for each potential investment but also to re-evaluate existing holdings and enable an assessment of complete portfolios as a whole.
– In 2022, our Private Debt and Credit investment teams carried out more than 400 evaluations utilising the enhanced ESG Screening Checklist to produce a two-dimensional ESG risk rating.

ESG risk distribution of the portfolios of select flagship liquid credit funds[1]

Inherent sector ESG risk

The **inherent sector ESG risk** is measured on a 6-grade scale of A (Very Low) to F (Very High); and captures the inherent level of risk exposure associated with the primary sector of operation of the company being evaluated.



Company-specific ESG risk

The company-specific ESG risk is measured on a 6-grade scale of 1 (Very Low) to 6 (Very High); and represents a composite rating based on four risk components, each with a weighting as indicated: A) Risks related to countries of operations (20%); B) Reputational risk (20%); C) Climate risk (20%); and D) level of ESG maturity and transparency (40%).

ESG considerations are an integral part of making investment decisions and, as such, there are deals we decline or assets we exclude because they do not meet ICG's robust ESG standards. In the 12 months prior to 30 September 2022, more than

65

investment opportunities were not approved due to ESG concerns, such as reputation risks, climate risk, corporate governance and bribery and corruption concerns; across key strategies in our Structured and Private Equity, Private Debt, and Credit asset classes.

Next steps:

– Incorporate a climate scenario-based transition risk analysis into the Climate Risk Assessment Tool to support the pre-investment evaluation of corporate deals (see pg. 17).
– Continue to enhance our approach to assessing Good Governance practices with regard to our investments.
– Over time, update existing tools and processes to incorporate an appropriate level of evaluation of emerging ESG themes, such as nature and biodiversity and human rights (see pg. 10).

1. Portfolios consist of 265 unique issuers as at 30 September 2022, across six liquid credit funds managed by ICG. Percentages are calculated based on number of issuers in the respective portfolios, and may not add to 100% due to rounding.

Engage

STRONG ESG PERFORMANCE ACROSS OUR EUROPEAN AND ASIA PACIFIC CORPORATE PORTFOLIOS

We recognise the commercial opportunity in engaging with portfolio companies to drive sustainability performance.

Asset class

STRUCTURED AND PRIVATE EQUITY

Total asset class AUM

$25.3bn[1]

Strategies in focus

European and Asia Pacific Corporate

Strategies overview

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

We know that every portfolio company is different, so we take the time to understand their business model, exposure to ESG risks and opportunities, key stakeholders, and their actual and potential positive and negative impacts on society and/or the environment. These insights inform our engagement with management teams and help us identify the areas where we can support them in achieving their sustainability ambitions and building lasting value across our portfolios.

For any new investment where we have sufficient influence, we conduct a structured ESG onboarding process to align with management teams on ESG governance, key ESG areas of focus for the business, and KPIs and progress monitoring. Typically, ESG is a regular agenda item at Board meetings, and we review ESG progress and performance with all portfolio companies at least annually.

While topics of engagement vary for each portfolio company, we focus our engagement on the following three topics:

- Climate change
- Diversity and inclusion
- Cyber resilience

Read more
about our Areas of focus in 2022 on pg. 9

1. As at 30 September 2022.

Engage

STRONG ESG PERFORMANCE ACROSS OUR EUROPEAN AND ASIA PACIFIC CORPORATE PORTFOLIOS CONTINUED

Climate change

Key aims and drivers

- Reduce carbon intensity of portfolio companies
- Set ambitious GHG emissions reduction targets in line with a 1.5°C global warming scenario
- Sustainable business growth

Progress and impacts

64%[1] ↑

of portfolio companies have assigned board or management responsibility for climate change-related risks and opportunities

(2021: 61%, 2020: 42%)

78%[1] ↑

of portfolio companies have set or are in the process of establishing climate change or energy-related objectives and targets

(2021: 67%, 2020: 55%)

80%[1] ↑

of portfolio companies have assessed, or began assessing, the business risks and opportunities associated with climate change

(2021: 58%, 2020: 39%)

76%[1] ↑

of portfolio companies have assessed their carbon footprint

(2021: 61%, 2020: 32%)

Science-based targets

7 (out of 9 across ICG)

relevant[2] portfolio companies have set SBT in the last 12 months, with 4 being approved by the SBTi and 3 awaiting approval

13

other relevant[2] portfolio companies have started developing their SBTs

Next steps

→ **Encourage the exchange of best practices, innovation and ideas among portfolio companies.**

→ Continue to drive decarbonisation across the portfolios and support the setting of SBTs by relevant portfolio companies.

Diversity and inclusion

Key aims and drivers

- Promote a more inclusive and equitable working environment that supports attracting and retaining best talent
- Improve diversity at senior management and board level
- Sustainable business growth

Progress and impacts

75%

of portfolio companies in European Corporate Fund VIII, the latest fund in the strategy, have improved gender diversity at board level since ICG's investment

76%[1] ↑

of portfolio companies have a D&I policy in place

(2021: 69%, 2020: 55%)

87%[1] ↑

of portfolio companies are implementing initiatives or targets to improve D&I

(2021: 64%, 2020: 48%)

76%[1] ↑

of portfolio companies run regular employee engagement surveys

(2021: 69%, 2020: 68%)

Next steps

→ **Encourage the exchange of best practices, innovation and ideas among portfolio companies.**

→ ICG will continue to promote and encourage greater diversity at strategic decision-making levels.

1. Source: ICG's Annual ESGs survey of portfolio companies across European and Asia Pacific Corporate.
2. Relevant companies are those where ICG has sufficient influence (i.e. at least 25% of fully diluted shares and a board seat).

Engage

STRONG ESG PERFORMANCE ACROSS OUR EUROPEAN AND ASIA PACIFIC CORPORATE PORTFOLIOS CONTINUED

Cyber resilience

Key aims and drivers

- Ensure appropriate cybersecurity governance, tools and processes – in line with best practice
- Enhance transparency on risk detection
- Encourage cyber training for portfolio company employees
- Continuously improve cyber resilience in the context of changing threat landscape

Progress and impacts[1]

(across the European Corporate portfolio)

100%

Cyber due diligence completed on all new investments in European Corporate Fund VIII. No red flags were identified and portfolio companies took mitigating actions to address key potential risks.

100%

of portfolio companies, where we have sufficient influence, have discussed cyber risk at board level at least once in the last 12 months.

94%

of portfolio companies, where we have sufficient influence, have completed or launched an internal audit of cyber capabilities. This includes having a clear plan of remedial actions.

Incidence response

retainer established to ensure immediate support in the event of a cyber attack.

Next steps

→ **Encourage the exchange of best practices, innovation and ideas among portfolio companies, where appropriate.**

→ As cyber-attacks become more frequent and sophisticated, full immunity is very difficult to achieve so we will continue to reinforce our efforts and monitor cyber risks and capabilities.

1. Figures as at 31 December 2022. Data excludes any sponsor-led deals and recent exits.

2022 Annual ESG Survey

ICG has been conducting its Annual ESG Survey for portfolio companies across the European and Asia Pacific Corporate portfolios since 2015, seeking to engage with portfolio companies to understand the ways in which they are managing ESG issues and areas that can be further improved.

The Annual ESGs survey assesses practices with regards to ESG governance and oversight, compliance with ESG-related laws and regulations, climate change, and diversity, equity and inclusion. In 2022, the survey was further enhanced to include performance metrics drawn from leading industry frameworks such as the Principal Adverse Impact metrics under the EU Sustainable Finance Disclosure Regulation (SFDR), the ESG Data Convergence Initiative, the Task Force on Climate-related Financial Disclosures (TCFD), the GRI standards, and SASB standards.

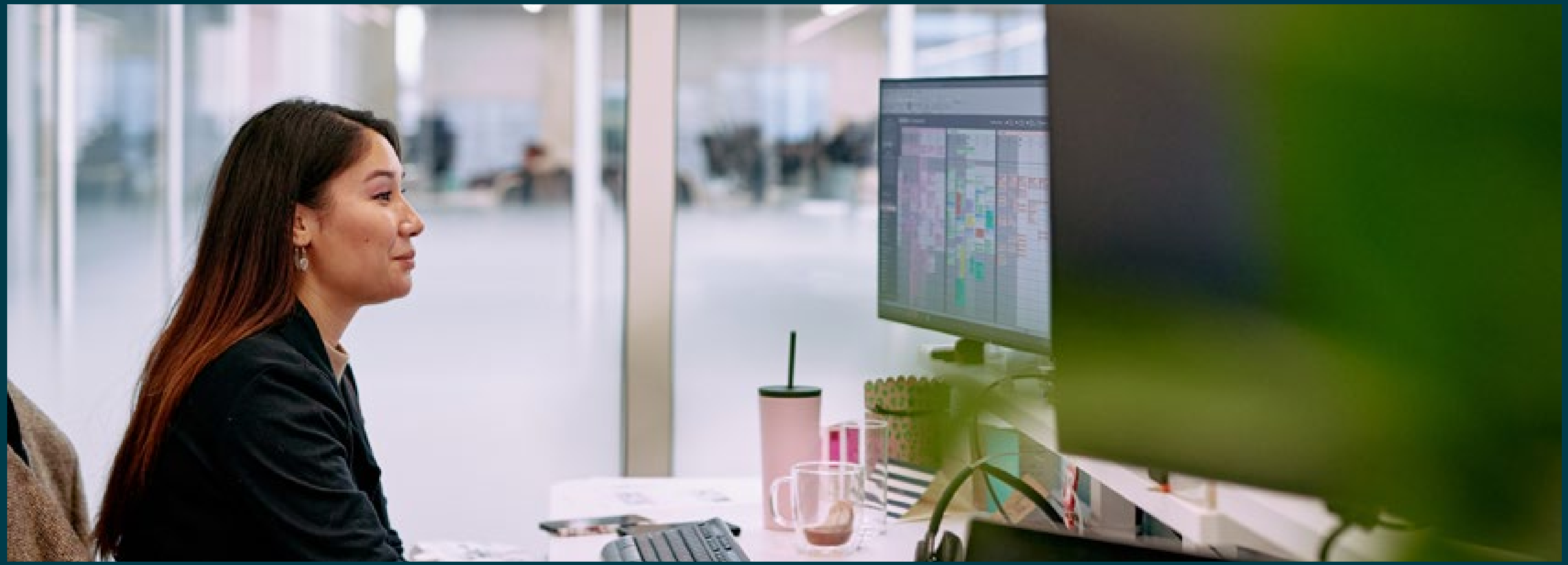
In 2022, a total of 45 companies across the European and Asia Pacific Corporate portfolios took part in the survey (36 in 2021, 32 in 2020), maintaining a 100% response rate.

45

portfolio companies took part in the 2022 survey

100%

response rate



Engage

ALIGNING ESG OBJECTIVES WITH GP PARTNERS

We believe that GP partners that are better able to manage ESG risks and capitalise on ESG opportunities across their portfolio may create more lasting value for investors and the underlying assets.

Asset class

STRUCTURED AND PRIVATE EQUITY

Total asset class AUM

$25.3bn[1]

Strategy in focus

Strategic Equity

Strategy overview

Strategic Equity invests in bespoke sponsor-led liquidity transactions (termed "GP-Led Transactions"), providing equity 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 GP partners vary in terms of size, scale, geographical or sector focus, and ESG maturity. That is why we carefully evaluate the ESG credentials of potential deals, both of GP partners and underlying assets, and make engagement on ESG matters a crucial component of ICG's approach.

Ongoing ESG engagement and monitoring is achieved through a combination of board seats, information rights, active engagement with the GP/sponsor on material ESG issues and the Annual GPs Survey and follow up dialogues to discuss progress. The Strategic Equity team, with support from ICG's Sustainability & ESG team, targets engagement with GP partners 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. For the first time in 2022, we utilised our corporate Annual ESGs survey (see pg. 21) to assess the ESG practices of underlying assets, and we plan to share key findings with our GP partners to support further ESG improvements.

Continued focus on aligning with GP partners on:

ESG governance

100%
of managers have an ESG Policy which is broadly aligned with ICG's RI Policy
(2021: 100%)

89% ↑
of managers have dedicated ESG resource
(2021: 60%)

89% ↑
are UN PRI signatories
(2021: 79%)

100%
use board influence to engage on ESG matters
(2021: 100%)

Source: ICG Annual GP survey. In 2022 all 9 GP partners in Strategic Equity IV responded to the survey. In 2021, 10 GP partners in Strategic Equity III and IV responded.

Climate change

44% ↑
have a formalised approach to managing climate-related risks and opportunities
(2021: 40%)

33% ↑
already monitor the carbon footprint of portfolio companies
(2021: 30%)

Diversity and inclusion

100% NEW
of GP partners state that they actively support D&I in their firms
(2021: n/a)

19% ↑
female investment professionals on average among GP partners
(2021: 14%)

Engage

CONTINUED ESG PROGRESS ACROSS OUR DIRECT LENDING PORTFOLIOS

In our Direct Lending portfolios, the success of our engagement with borrowers depends on the strength of our relationship with their private equity shareholders and the continuous alignment of our overarching ESG objectives.

Asset class
PRIVATE DEBT

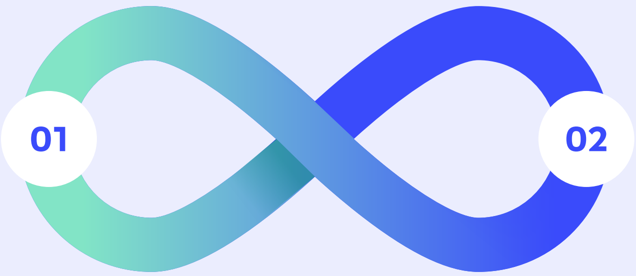
Total asset class AUM
$18.7bn[1]

Strategy in focus
Senior Debt Partners

Strategy overview
Providing senior debt financing to high-quality corporate borrowers.

Engagement in our Direct Lending portfolios is vital to understand and account for the ESG risks and opportunities pertinent to our investments. We engage with borrowers and monitor the ESG performance of investments through a two-pronged approach:

01
Deal teams maintain ongoing dialogue with management and/or PE sponsors, which covers material ESG developments.



02
Our Annual ESG Survey enables us to assess more holistically how ESG matters are managed by borrowers in our portfolios and the progress they have achieved over time.

The focus of engagement varies from deal to deal but we typically prioritise the following three themes as we believe they have universal importance for the lasting success of any business: **ESG governance, Climate change, and Diversity and inclusion**.

We noted continued progress among the borrowers in our Direct Lending portfolios, as demonstrated by responses to our Annual ESG Survey (see pg. 21). 37 borrowers responded to the survey in 2022, up from 31 in 2021, and 26 in 2020. Among the borrowers who took part:

ESG governance

87% ↑
have implemented or are implementing a sustainability policy
(2021: 65%, 2020: 44%)

62% ↑
have set or are in the process of developing ESG KPIs and targets
(2021: 38%, 2020: 33%)

Climate change

57% ↑
have begun assessing exposure to climate risks & opportunities
(2021: 35%, 2020: 28%)

81% ↑
have initiatives to reduce GHG emissions
(2021: 69%, 2020: 39%)

Diversity and inclusion

77% ↑
have implemented or are developing initiatives or targets to improve diversity
(2021: 50%, 2020: 33%)

89% ↑
run regular employee engagement surveys
(2021: 81%, 2020: 72%)

1. As at 30 September 2022.

Engage

FINANCING THE GROWTH OF SUSTAINABLE REAL ASSETS

We recognise promising investment opportunities in growing sustainable real assets, and in supporting the transition of real estate and infrastructure assets to more sustainable models.

Asset class
REAL ASSETS

Total asset class AUM
$7.7bn[1]

Strategies in focus
European Real Estate Debt, Sale and Leaseback, and Infrastructure Equity

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

Towards a more sustainable real economy

Investments in real assets, such as commercial real estate, housing developments, renewable energy and other infrastructure delivering core services, can play an important role in supporting global economic growth and enhancing social cohesion. The Organisation for Economic Co-operation and Development (OECD) estimates[2] that $6.9 trillion per year is needed up to 2050 for investment in sustainable and resilient infrastructure to achieve the UN Sustainable Development Goals by 2030 and net zero emissions by 2050.

To capitalise on this growing investment opportunity, ICG has launched a number of sustainably-themed products investing in real assets. These products have sustainability frameworks designed to align with specific UN SDGs, and all incorporate climate-focused SDGs including SDG 7 (Clean Energy) and 13 (Climate Action); and deliver tangible, targeted improvements in the sustainability performance of assets as part of the asset management plan.

As at 30 September 2022, these sustainably-themed products constitute nearly half (48%) of total AUM in real assets, compared to 34% a year earlier; and a significant growth opportunity for ICG.

Asset class	**Real Estate**		**Infrastructure**
Strategy	European Real Estate Debt	Sale and Leaseback	Infrastructure Equity
Strategy overview	Pan-European real estate debt strategy with a distinctive approach to investing in self originated, predominantly first mortgage investments	Targets mission-critical, commercial real estate assets across the UK and Europe	Seeks to acquire a diversified sustainable portfolio of Core+ mid-market infrastructure assets in Europe, with a focus on downside protection
Sustainability approach	Financial incentives for improvements, and targeted engagement	Allocated capital for sustainability improvements, and targeted engagement	Incorporated into active asset management
Sustainability focus themes	– Climate change – Natural resource use	– Climate change – Natural resource use	– Climate change – Natural resource use – Diversity and inclusion – Human capital management
Targeted UN SDGs			

1. As at 30 September 2022.
2. Source: UNEP, accessed on 29 November 2022, https://www.unep.org/explore-topics/green-economy/what-we-do/sustainable-infrastructure-investment

Engage

FINANCING THE GROWTH OF SUSTAINABLE REAL ASSETS CONTINUED

European Real Estate Debt

The strategy provides financial incentives, in the form of margin ratchets, to borrowers seeking to improve the sustainability of existing and new commercial real estate. This is achieved through a dedicated Green Loan Framework (GLF) that ICG designed in alignment with current best practice, including the recommendations laid out in the LMA Green Loan Principles and the EU Taxonomy. The aim of is for the majority of committed capital to qualify under the GLF by demonstrating, over time, a high standard of performance across a combination of areas (see graph).

To date,

80%

of committed capital has been in green loans[2] to projects that have made clear commitments to sustainability.

Creating innovative opportunities in sustainable real estate debt investments

Since the inception of the strategy, 80% of committed capital has been in green loans[2] to projects that have made clear commitments to sustainability. The investment team has actively engaged with borrowers and sponsors, typically at the time of investment, to identify value-add opportunities for improvement. Bellow are some examples of green loans provided and our engagement efforts.

Supporting the borrower's commitment to refurbish a central London office with the aim to deliver a Net Zero Carbon[3] building, which among other things will include pursuing an EPC A rating and replacing gas boilers with an electric air source heat pump system. The property will seek an Excellent BREEAM certification in demonstration of its holistic approach to sustainability.

A mezzanine facility to finance an office campus in Berlin with clear commitments to reduce energy consumption by 57% and corresponding carbon emissions by 58%, in line with the Goals of the Paris Agreement.

Supporting the development of a premium hotel in the south of France working with a sponsor that has a long-term commitment to operate the property in line with the Goals of the Paris Agreement, including switching over time to 100% renewable energy supply and delivering top-tier energy efficiency performance when benchmarked against similar properties, among other sustainability characteristics.

1 The Primary Goal of the Paris Agreement is defined as "limiting global warming to well below 2, preferably to 1.5 degrees Celsius, compared to pre-industrial levels." https://unfccc.int/process-and-meetings/the-paris-agreement/the-paris-agreement

2 Committed capital based on deals in the portfolio as at 30 September 2022. Green loan qualification status accurate as at 1 December 2022, based on independent verification by a third-party advisor.

3 In line with the UK Net Zero Carbon Buildings Standard – https://www.nzcbuildings.co.uk/

Engage

FINANCING THE GROWTH OF SUSTAINABLE REAL ASSETS CONTINUED

Sale and Leaseback

ICG Sale and Leaseback has adopted a distinctive approach to enhancing the sustainability of the underlying assets in its portfolios.

The Sale and Leaseback team is working collaboratively with tenants of mission-critical real estate to diagnose current performance and to drive improvements that promote greater energy security and cost predictability, reduction of greenhouse gas emissions, better utilisation of energy and water resources, and efficient waste management programmes.

As part of its approach Sale and Leaseback is able to re-invest up to 2% of its committed capital to enhance the sustainability of the underlying assets in its portfolios. Since launching the strategy in 2019, the team has engaged with the majority of tenants and directly contributed to the financing – or facilitated third-party, innovative financing solutions – for a range of tangible improvements that have a combination of environmental, economic, and social benefits.

Some recent examples of such engagements include:

ICG's Sale and Leaseback team worked closely with the developer and contractors of a logistics park in the Midlands, UK, on one of the largest net zero-ready developments in the UK, benefiting from a BREEAM Excellent rating. High levels of sustainability and safety standards were adopted during construction, including recycling almost all waste, on-site concrete batching, and using 100% green diesel for deliveries, which alone resulted in over 300 tCO_2e saved to date.

ICG worked with an energy solutions tenant in Austria to facilitate the construction of an energy transfer station which deploys innovative technologies to redistribute surplus energy from that tenant's operations to other members of the community, including heating the local public outdoor swimming pool.

The Sale and Leaseback team has partnered with renewable technology solution providers to facilitate the installation of solar panels on the rooftops of suitable assets in the portfolio. Through energy-as-a-service arrangements, tenants benefit from greater energy supply security at competitive prices with limited impact on the environment and in support of their own corporate climate commitments.

Infrastructure Equity

The strategy has adopted a "green generalist" approach, including operational value creation with a sustainability focus.

Through its asset management efforts, ICG operates a tailored Infrastructure Sustainability Framework, 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. Under the Infrastructure Sustainability Framework, portfolio company engagement – including KPIs setting (where ICG has access to and influence over management) – prioritises four themes: Climate change, Natural resource use, Human capital management, and Diversity and inclusion, alongside other material company-specific ESG risks and opportunities.

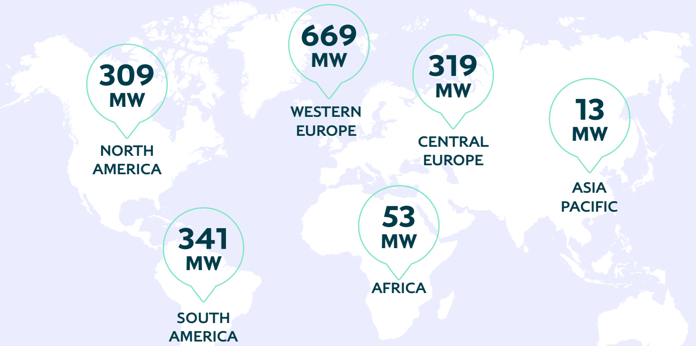
Below are examples of the positive impacts[4] of the portfolio in 2021 and 2022:

455 GWh ↑

of renewable energy generated (2020: 277 GWh), contributing to the growing electricity demand around the world

1,703 MW[5] ↑

of installed renewable energy generating capacity (2020: 221 MW) contributing to the low carbon energy transition on 5 continents



Solar PV | Wind | Hydro | Hybrid | Biomass | Biogas

4,300 km ↑

of owned fibre network deployed and operated (2020: 4,075 km) — 25% in rural areas (2020: 22%), supporting the connectivity of over 112,000 households and businesses (2020: 80,000)

30 million m^3 ↑

of water saved (2020: 27 million m^3) across 1.7 million households through smart metering (2020: 1.6 million)

215 ↑

net jobs created (2020: 135)

Providing decent jobs to over

1,330 ↑

(2020: 1,100) people,

36%

of whom are female (2020: 35%)

4 Source: ICG, figures aggregated from data reported by individual assets in the portfolio for the specified period.
5 Installed capacity across all assets in the Infrastructure Equity portfolio as at 30 September 2022.

Engage

GREATER FOCUS ON ENGAGEMENT ACROSS OUR FLAGSHIP CREDIT FUNDS

In order to play a more active role in encouraging better ESG practices, ICG has increased our focus on engaging directly with issuers in our liquid credit funds, in addition to collaborating with other stakeholders.

Asset class
CREDIT

Total asset class AUM
$16.9bn[1]

Strategies in focus
Syndicated Loans, Multi-Asset Credit, and US and Europe CLOs

Strategies 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.

With over 500 issuers across our credit portfolios, primarily sub-investment grade private issuers in Europe and North America, we recognise the need to be targeted in our engagement efforts. Given the nature of our credit strategies, we may engage directly with management teams or collaboratively with other lenders as part of a syndicate.

In the 12 months to 30 September 2022, ICG credit analysts engaged with more than 300 issuers across North America and Europe to seek more information and/or improvements on relevant ESG topics. As comprehensive ESG disclosures are still nascent among sub-investment grade private issuers, our key focus of engagement in many cases was on improving transparency on ESG matters, including disclosure of ESG performance and GHG emissions.

It is encouraging to see that 48% of issuers in six of our market value credit portfolios (as at 30 September 2022) measure and report GHG emissions – a significant increase from only 30% of issuers as at 31 December 2021.

Our requests for ESG information from issuers[2]

Environment

243
issuers were engaged on Environmental topics, such as climate change, natural resource use, and environmental compliance.

Social

166
issuers were engaged on Social topics, such as health and safety, workforce diversity and inclusion, and customer welfare.

Governance

207
issuers were engaged on Governance topics, such as board diversity, business conduct, and exposure to high-risk countries.

1. As at 30 September 2022.
2. For the 12 months to 30 September 2022. An issuer may be engaged on more than one ESG topic.

Report

IMPROVING TRANSPARENCY ON ESG MATTERS

Why does it matter?

Better-informed investment decisions

We believe that transparency on material ESG-related risks and opportunities, such as those posed by climate change, is important to fully consider the risk-return characteristics of investments and as such can better inform decision-making of investors. That is why we have supported the TCFD since 2019, and in 2022 formally expressed our support for the Taskforce on Nature-related Financial Disclosures (TNFD) by becoming a member of the TNFD Forum.

The role of regulation – standardisation

Financial market regulators around the world have understood the importance of standardised, minimum ESG disclosures for preventing greenwashing. The EU Sustainable Finance Disclosure Regulation (SFDR), which came into effect in March 2021, is a prime example of such a regulation in our industry. As the US Securities Exchange Commission, the UK Financial Conduct Authority and other regulators globally are contemplating ESG disclosure and/or labelling regimes in their markets, we urge for suitable harmonisation and proportionate and practical implementation in private markets, to ensure a truly levelled playing field.
To support this, in 2022, we collaborated with peers at Initiative Climate International and BVCA to collectively respond to the UK FCA consultations on Climate Disclosures for Asset Managers (finalised) and Sustainable Disclosure Regulation (pending); and with fellow members of Invest Europe to respond to further consultations by the European Commission on the implementation of SFDR.

Read more about our participation in collaborative initiatives on pg. 30

Our disclosures

We seek to provide regular updates to our clients and other stakeholders on how ESG considerations are integrated into our investment decisions and processes; and the outcomes we have achieved. We do this at firm level and for individual funds, depending on the purpose of disclosure and nature of underlying information.

ICG-level disclosures

As a listed company and a regulated asset manager, ICG seeks to provide timely and detailed reporting on relevant ESG matters through its own annual disclosures and by participating in voluntary assessments.

TCFD disclosures

Recognising the importance of climate disclosures, ICG has been reporting voluntarily against the TCFD recommendations since 2019. Building on this, as part of its Annual Report for FY22, ICG plc produced its first mandatory climate disclosures in line with the recommendations of the TCFD to respond to the requirements for premium listed companies in the UK.

View more in our TCFD disclosures

Sustainability & People Reports

Our first firm-level ESG report was produced in 2014, and the focus, breadth and depth of this report have considerably expanded ever since. For its 2021 Sustainability & People Report, ICG further enhanced its approach by drawing on relevant GRI & SASB standards.

View more in our Sustainability & People Reports

UK FCA Stewardship Code

ICG was admitted as a signatory to the UK FCA Stewardship Code in March 2022 and has an obligation to provide an annual update on progress on its stewardship activities.

View more in our most recent disclosure

Report

IMPROVING TRANSPARENCY ON ESG MATTERS CONTINUED

Fund-level disclosures

Responding to key regulatory developments

The EU Sustainable Finance Disclosure Regulation has been one of the most substantive disclosure regimes that covers our investment activities. Since March 2021, for each fund in scope of the SFDR, we have prepared and provided to investors:

- pre-contractual disclosures, specifying the promoted environmental and/or social characteristics or the pursued sustainable objectives by each fund, as relevant and applicable.
- periodic disclosures, communicating the extent of attainment of the promoted environmental and/or social characteristics or pursued sustainable objectives by each fund, as relevant and applicable.

99%

of raised capital in scope of SFDR, since March 2021, has been in products that promote environmental and/or social characteristics (Article 8)

Promoting best practice, beyond regulation

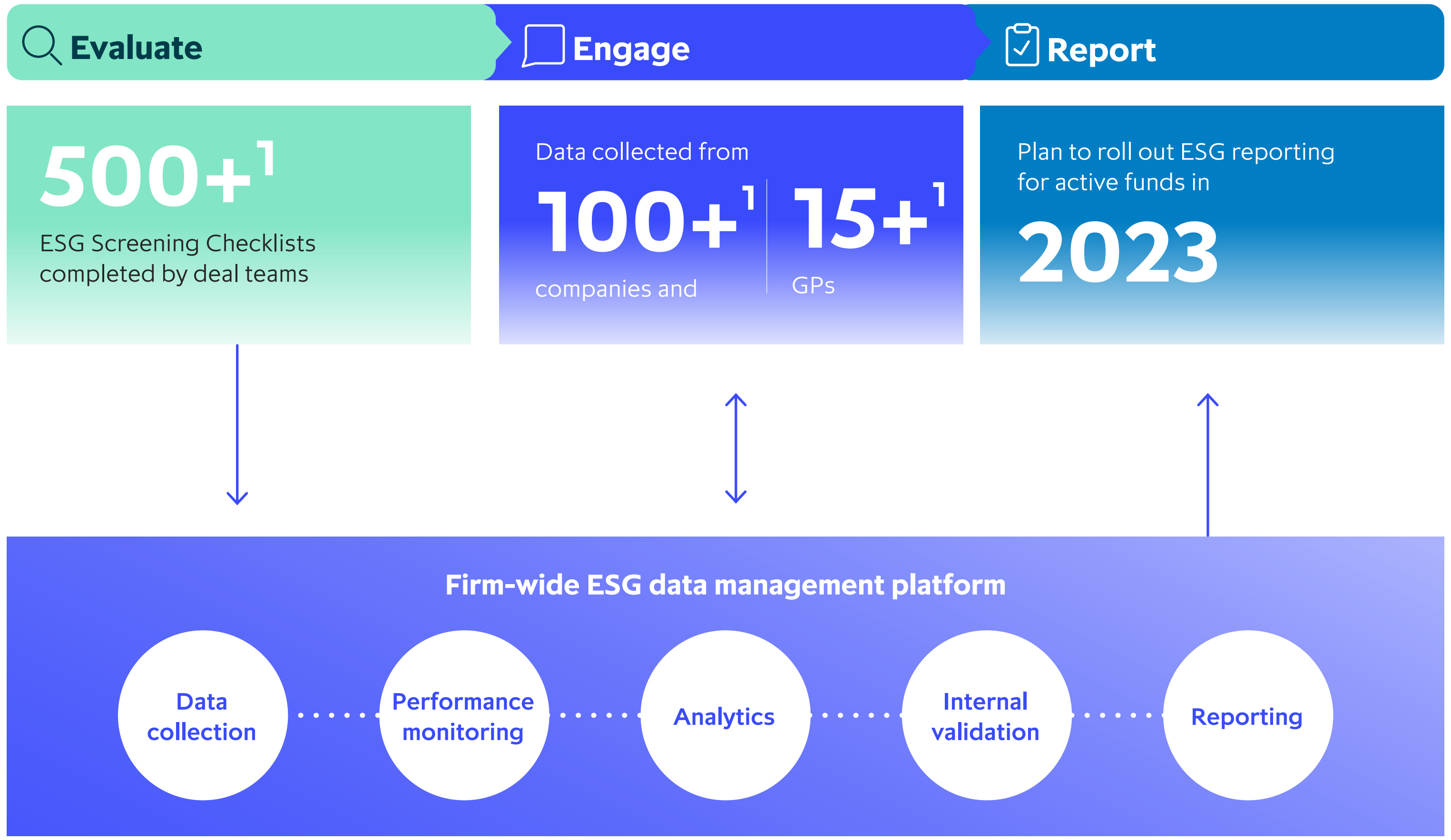
In 2022, after listening to our clients' needs, and exploring best practices from peers, we developed a harmonised, modular approach to fund-level ESG reporting across the firm. This approach was first implemented to one Direct Lending fund (Senior Debt Partners 4) and select liquid credit funds. All of these reports incorporated a presentation of ESG Risk Ratings distribution across the portfolio, based on ICG's proprietary methodology which we rolled out across our Private Debt, and Credit asset classes at the end of 2021 (see pg. 17-18).

We also continued to enhance the dedicated fund-level ESG reporting to investors in our European Corporate funds (first issued in 2019) and Infrastructure Equity fund (first issued in 2021).

In the past year, we also incorporated the TCFD-recommended portfolio climate metrics as standard in our fund-level ESG reporting. Disclosure of greenhouse gas emissions data by private companies is still nascent, so for any gaps in actual data we utilise proxy data modelled by a reputable external data provider.

Data integration for ESG assessment and reporting

At the start of 2022, ICG began implementing a dedicated web-based ESG data management solution to enable more efficient data collection, analysis and reporting for our portfolios, in line with ICG's wider efforts to build digital resilience across the firm.



1 Since the platform was launched at the start of 2022.

Collaborate

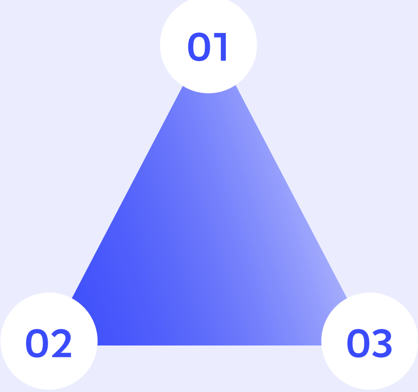
COLLABORATING TO STRENGTHEN THE INDUSTRY

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.

We are committed to working with others operating in the space of responsible investing, in order to advance best practice and drive consistency in shared challenges such as data consistency, measurement frameworks, and reporting. We also recognise the value of learning from industry experts and thought leaders, in order to leverage that knowledge in our own ESG approaches.

ICG has been focused on 3 key areas:

Driving better data, particularly climate data



Supporting standardisation within the industry across asset classes

Promoting efficient and proportionate implementation of ESG regulations

2022 working groups participation

- Active member of the Initiative Climat International (iCI) – co-chaired the Carbon Footprinting Working Group – see spotlight for further details. ICG also cofounded the Private Credit Working Group and sits on the Net Zero, and Regulatory working groups.
- Contributing to industry advancement through a number of other collaboration groups: PRI Investors Corporate Reporting Reference, Invest Europe ESG standards, PRI/LSTA/ACC – ESG Integrated Disclosure Initiative.
- Member of the TNFD Forum.
- Regularly contributes to the BVCA and Invest Europe regulatory working groups.

Industry initiatives

Signatory of: PRI Principles for Responsible Investment

GIIN Global Impact Investing Network

iCi initiative climat international – Private equity action on climate change

Invest Europe

The Net Zero Asset Managers initiative

bvca

Science Based Targets – Driving ambitious corporate climate action

TCFD

TNFD

Spotlight: Towards harmonised GHG accounting and reporting in private equity – an iCI sector guidance

Private market investors are increasingly being called upon to set ambitious climate commitments. Regulators, investors, lenders, and other stakeholders alike, are demanding GHG reporting against consistent and comparable climate metrics.

Against this backdrop of rising transparency requests, the iCI members saw an opportunity to develop a specific guidance to private equity investors. As co-chair of the working group tasked with developing this guidance, ICG was proud to spearhead this effort, and bring our experience to bear in providing investors and their portfolio companies consistent guidance on:

1. Carbon footprinting

Calculating Scope 1, Scope 2 and Scope 3 emissions.

2. Financed emissions

Attributing GHG emissions from portfolios to GPs and Limited Partners (LPs).

3. Fund reporting

Aggregating emissions at the fund level and reporting to stakeholders.

4. Target setting

Conducting portfolio analysis with a view to set targets that support the transition to a net zero economy.

View more
The guidance is available here and was developed in partnership with leading sustainability consultants – ERM

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 & CULTURE

I am excited for the part we will be able to play in the coming years to help ensure that our people are contributing not only to the continued success of ICG, but also to the communities in which we live and work.

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

Successfully hiring and developing our people is key to our growth, as we seek to maintain and enhance our culture as ICG develops.

We have continued to make strategic hires across the organisation to ensure we have the breadth and depth of expertise to execute on the long-term opportunities ahead. We have welcomed a number of senior hires within the organisation across our investment, ESG and Sustainability, and marketing and client relations teams. These are important hires, helping to future-proof ICG as we continue to market and invest a larger range of products to a growing and increasingly complex set of clients.

The number of Group permanent employees at 30 September 2022 was 575 and over the last five years our employee base has grown at a CAGR of 14%.

As we welcome new colleagues to the firm, it is vital that we ensure they integrate quickly and are able to add to our effectiveness and culture. During the year we continued to evolve our induction programmes for new joiners at all levels, ensuring they get a holistic view of ICG and are rapidly able to build their internal networks.

Being able to bring one's full self to work is a core part of having an open working environment, and we have further advanced our employee-led networks during the year, including ensuring that employees across all our offices globally are able to actively participate. We have also reviewed our policies, including around family building and care leave, to ensure that employees are able to balance their work and family lives.

Finally, our charitable efforts have been significantly enhanced in the year, with a targeted approach to support social mobility and early career development, in line with ICG's broader values.

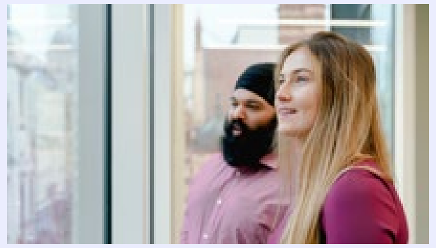
Watch
a video about the passion, energy and the quality of our people

Our people initiatives focus on four key 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
Cultivating a diversity of perspectives, improving our teams' performance

Read more
on pg. 34 of this report

Employee development
Helping our people reach their full potential and building the next generation of talent

Read more
on pg. 35 of this report

Wellbeing and support
Supporting the physical and mental wellbeing of our employees, their families and dependants

Read more
on pg. 35 of this report

Engagement and voice
Effective communication to build and maintain engagement

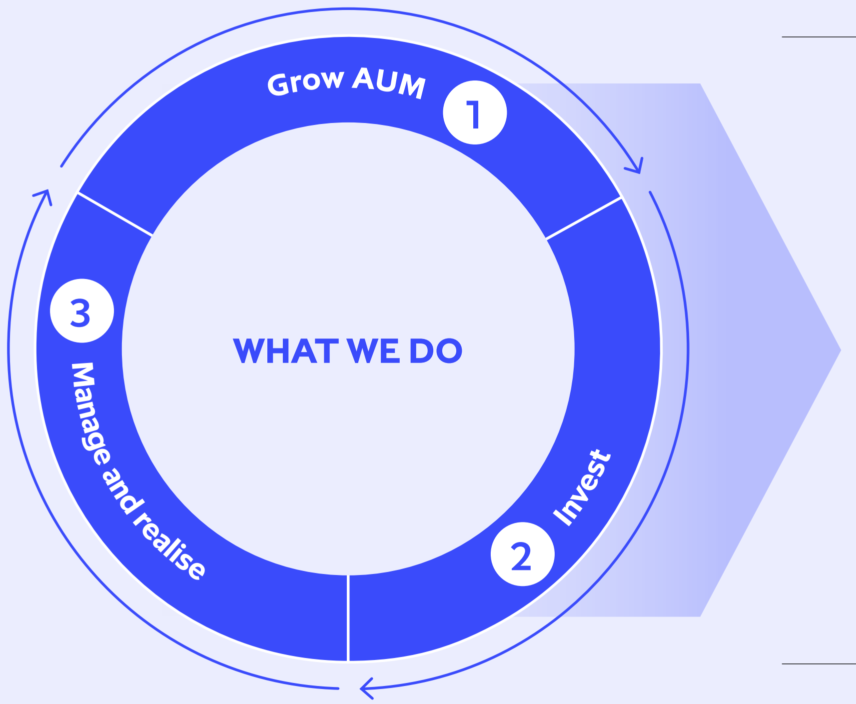
Read more
on pg. 35 of this report

Our values

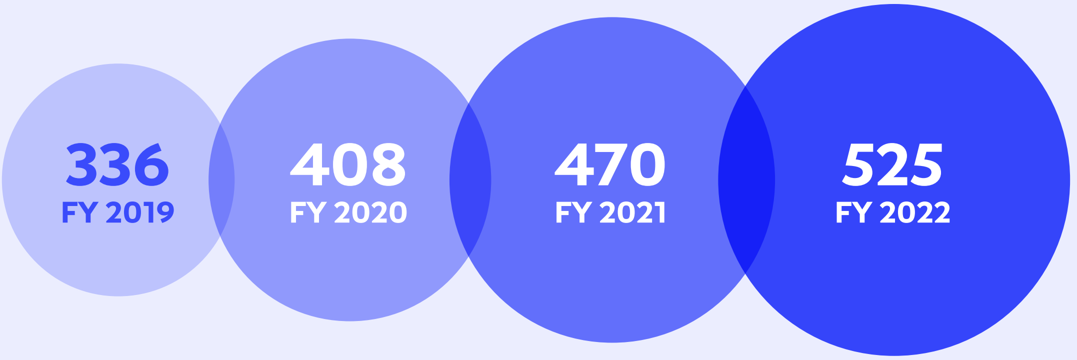
Read more
about our values on pg. 7 of this report

OUR PEOPLE IN NUMBERS

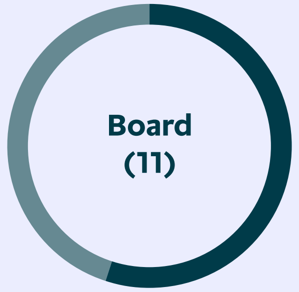
Our people are fundamental to every part of our success. As we continue to grow, we ensure we have the right breadth and depth of expertise across the firm, working in close collaboration and helping to drive each other forward.



Group permanent employees



Gender[4]



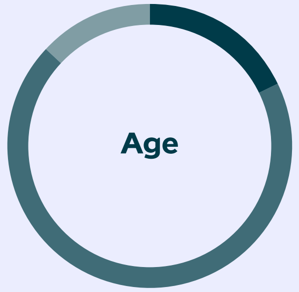
- Male – **55%**
- Female – **45%**

- Male – **61%**
- Female – **39%**

- Male – **65%**
- Female – **35%**

Workforce breakdown[4]

- White – **61%**
- BAME – **24%**
- Unspecified – **15%**



- Below 30 – **18%**
- 30-50 – **69%**
- Over 50 – **13%**

Women in top management positions[3, 4]

41%
in the UK

35%
globally

1. Includes finance, legal, regulatory compliance, operations, Information Technology and other corporate functions.

2. Based on data as at 31 March 2022 for UK only the disclosure rate was 85% (inclusive of "chose not to disclose").
3. Maximum two levels away from the CEO or comparable positions (as % of total top management positions).
4. As at 31 March 2022.

PROGRESS ON OUR DIVERSITY INITIATIVES

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

75%

response to our first Inclusion Survey

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

- D&I Champions Group to bring all our employee networks together, including representatives from all regions to ensure global connectivity
- All leadership development now incorporates a focus on D&I , and a new mandatory annual D&I training programme has been implemented. D&I is also a leadership KPI for Executive Directors
- Our Competency Framework has an area dedicated to D&I, thereby hardwiring this important area into our annual performance management cycle and promotions process
- Following on from our first Inclusion Survey, and in an effort to remain current, we now ask a number of D&I questions within each of our Employee Engagement pulse surveys, ensuring we continue to align our initiatives with what matters most to our employees
- There has been a refocus on unconscious inclusion through mandatory global workshops and new annual mandatory D&I compliance training. Workshops were delivered with our training partners through both in-person and virtual means globally to the vast majority of our employees to aid a successful inclusion culture at ICG. D&I mandatory training also incorporated other important topics such as discrimination and harassment in the workplace

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 the entire sector forward, to challenge each other, and to share best practices.

Key initiatives

- Significantly enhanced our early-years sponsorship through our new charity framework; see pg. 37 for further details
- Continued our Graduate Programme, with focus on diversity: 63% female and 37% identifying as an ethnic minority
- We provided internships to candidates from diverse backgrounds in our investment teams in the UK and USA in Summer 2022, 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

PROGRESS ON OUR ENGAGEMENT INITIATIVES

Employee development

Onboarding

We run a comprehensive programme for new joiners to ensure our people feel welcome and swiftly become part of our culture, irrespective of their background, role or location. The centrepiece is a twice yearly in-person Global Induction, 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 an individual development budget, on-the-job opportunities and social learning through mentoring, coaching and internal and external networks.

Our global learning platform provides structured training and support. With a choice of over 8,000 online courses, the majority of colleagues have explored more than 250 topics since the start of 2021.

We also support all permanent staff (including part-time employees) to complete professional qualifications, such as CFA, CAIA and IMC.

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

8,000

online courses available

We continue to promote our global Employee Assistance Programme, ensuring that all employees are aware of the confidential, independent support available to them and their families. Wellbeing Champions are in our offices globally to support our people by championing health and wellness campaigns and initiatives.

Wellbeing and support

Our wellbeing strategy also incorporates a strong framework of policies to support families, and we have made significant progress in that area this year. We have reviewed our policies to ensure we support employees at every stage in their time with us and introduced a number of new policies during the year. These include policies around Global Conception and Family Building; Pregnancy Loss; Primary and Secondary Care Leave; a Carer Policy; and a Menstruation and Menopause Policy. As an example, parental leave for all primary caregivers globally is 26 weeks and non-primary caregivers is four weeks, during which time we do not pro-rate bonuses.

We view this policy framework as an important tool in ensuring that our employees are able to balance their work and family lives.

- Part-time working options are available to all permanent employees upon mutual agreement between employee and the manager
- Childcare facilities or contributions
- Breast-feeding/lactation facilities or benefits
- Paid parental leave for the primary caregiver is 26 weeks globally, in excess of the minimum legal requirement.
- Paid parental leave for the non-primary caregiver is four weeks globally, in excess of the minimum legal requirement

26

weeks' paid parental leave for the primary caregiver

Engagement and voice

Effective two-way communication with our employees is essential to build and maintain engagement. Following a comprehensive baseline survey in November 2021, we run Group-wide pulse surveys three times a year to ensure we capture timely, targeted feedback from our employees across multiple aspects of engagement. Participation in these surveys is more than 80%, enabling us to focus more dynamically on specific areas of strength and improvement. Managers are strongly encouraged to share and discuss results at a team level to ensure change is targeted and relevant.

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.

CHARITABLE GIVING

During the year we have significantly enhanced ICG's charitable giving, ensuring that it is impactful and clearly aligned to our corporate purpose and values and with a specific focus on education and social mobility. We have committed £4m from FY23 to FY25 to support our new partner charities, in addition to other charitable commitments. We also provide a number of ways for our employees to leverage their own contributions, whether financial or time and expertise. ICG's charitable contributions totalled over £2.5m for the year ending 30 September 2022.

Employee involvement

- Education and social mobility have been embedded within ICG's D&I activities for a number of years
- Following a review of our charitable giving we have decided to focus on these areas
- We are focusing on a wider geographic and a broader spectrum of academic and career stages:

  1. School into university
  2. University into employment
  3. Employment

- This framework, together with our existing initiatives, positions ICG as a committed supporter of education as a means of improving social mobility outcomes
- It also amplifies our voice in the D&I space and allows us to build a more impactful profile at an international scale mirroring our business footprint

These new partnerships are in addition to our long-standing support of other charities, including the Education Endowment Fund and ThinkForward, where we have developed multi-year relationships.

Our new partnerships during the year

The Access Project

School to university (UK)

Description: helps support students from disadvantaged backgrounds to access top universities, through a unique combination of tuition and in-school interventions.

ICG's support: committed £1.5m over three years to support their work in the UK.

UpReach

University to employment (UK)

Description: works alongside The Access Project, helping ensure high-achieving university students from diverse and disadvantaged backgrounds complete their studies and transition into sought-after graduate pathways and into successful careers.

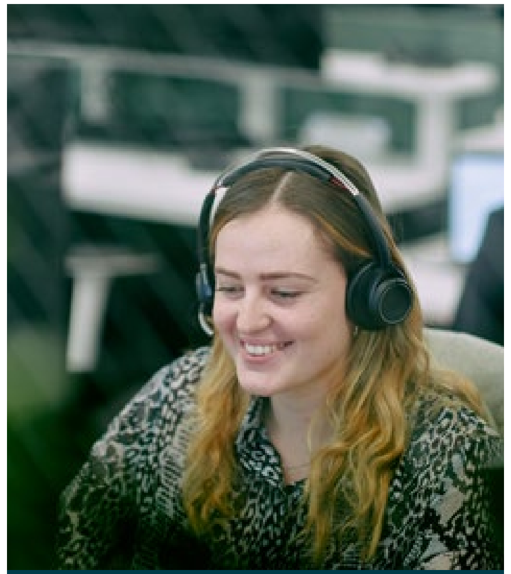
ICG's support: committed £750k over three years to support their work in the UK.

SEO London

University while in employment (US, Europe, UK)

Description: aims to increase access to financial and professional services careers among under-represented demographics, with a focus on university-years support in terms of mentoring, coaching and internships and also, distinctively, on supporting early-years careers.

ICG's support: committed £1.5m over three years to work with SEO as a major partner in Europe, building on their UK presence as well as helping scale into key continental markets whilst enhancing our partnership in the US.



ICG's support: more than just financial

- Our employees have the potential to bring a substantial set of experiences to bear
- We believe our employees benefit from this engagement, and we encourage them to dedicate two working days a year to support our charity partners
- To support this, we run a series of co-ordinated, firm-wide volunteering days
- Recognising the importance of local relevance, we encourage our offices around the world to support charities in their communities
- The firm supports all employees who make charitable donations through its matched giving programme

RESPONDING TO LOCAL NEEDS

We are pleased to be able to play a small part in helping support those most in need, as a result of the cost of living crisis, in the communities in which our people live and work. This initiative will not only provide much needed funding to leading charities providing a range of food-based and social support, but also enable our employees to volunteer their time to assist in the practical delivery of much needed assistance on the frontline.

View more
about our charitable giving on our website

ICG launches "Million Meals Initiative" to support charities addressing the cost of living crisis

As a firm we are very conscious of the challenging time many are facing with the rising cost of living as we come into winter in the northern hemisphere.

In response to these clear and growing needs, ICG launched in 2022 the "Million Meals Initiative" to support charities addressing these issues.

This initiative will provide a total of £500,000 of new funding across six leading charities delivering support to people in need in each of the cities in which ICG has major operations worldwide. This seasonal campaign will run from November 2022 to April 2023. The charities ICG is partnering with to provide this critical support are:

£500,000
of new funding across six leading charities

- City Harvest (London)
- City Harvest (New York)
- European Food Banks Federation (pan-European)
- Food from the Heart (Singapore)
- OnSide (UK)
- Whitechapel Mission (London)


Picture relates to ICG's Million Meals Initiative

In addition to providing funding, these charitable partnerships will also offer significant volunteering opportunities to ICG's employees worldwide. ICG has also committed to double any charitable donations by ICG employees to these partner charities during the campaign.

ENVIRONMENTAL STEWARDSHIP IN OUR OPERATIONS

ICG is aware of the potential impact of its business operations on the environment. We seek to manage and reduce such impacts and encourage key suppliers to do the same (see pg. 39 for further details). While our own direct operations have a lower impact on the environment than our investments and financing, we recognise the importance of upholding a high standard of environmental stewardship across our business. Indeed, in 2021, we set an approved and verified science-based target for our own operations, to reduce absolute Scope 1 and 2 GHG emissions by 80% by 2030 from a 2020 base year.

ICG operates from leased offices. As such our environmental stewardship efforts may differ depending on the size of the office and our contractual arrangement with the landlord. However, where possible, we seek to:

- Procure 100% renewable electricity
- Optimise the use of energy for heating and cooling in our offices
- Implement ICG's sustainable fit-out policy when moving or refurbishing office spaces
- Divert all waste from landfill and maximise recycling rates
- Work with cloud-based solution providers with robust decarbonisation policies
- Conduct meetings virtually as far as possible to avoid unnecessary business travel which is one of our highest carbon impacts

ICG annually measures and reports its operational carbon footprint, along with the key impacts that our operations pose on the environment.

GHG emissions (tCO_2e)		FY22	FY21	FY20
Direct emissions (Scope 1)	Combustion of fuel and operation of facilities	**7**	11	66
Indirect emissions (Scope 2)	Purchased electricity/heat (location-based)[1]	**194**	211	448
	Purchased electricity/heat (market-based)	**74**	184	479
Indirect emissions (Scope 3)	Business travel (flights, rail, vehicles & taxis)	**749**	41	2,640
	Water supply and waste generation (offices)	**4**	0.6	8
	Total Scope 3	**753**	42	2,647

1. 2021 Scope 2 (location-based) emissions for the UK have been restated following an update of the electricity consumption.

Scope 1 and 2 (market-based) emissions decreased by 58% this reporting period, primarily due to a rise in the number of offices procuring 100% renewable electricity. This is despite a growth in the number of employees in the Group and their return to more frequent work from the office, following the global pandemic. Our offices are consuming a comparable amount of electricity from FY20 to FY21, which explains why total Scope 2 (location-based) emissions have only decreased slightly as national energy mixes continue to decarbonise.

Our measured emissions equated to carbon intensity of 0.13 tCO_2e/employee or 0.09 tCO_2e/£m revenue.

The GHG information for the period 01/04/2021 – 31/03/2022 is verified by Carbon Intelligence to a limited level of assurance, consistent with the agreed verification scope, objectives and criteria. The verification exercise was performed to the ISO 14064-3 standard.

		FY22	FY21	FY20
Electricity	kWh	**650,729**	686,572	1,468,177
Of which from renewable sources	kWh	**379,161**	154,744	–
Fuels	kWh	**25,992**	37,927	316,156
Energy intensity	MWh/FTE	**0.13**	3.21	3.71
Total water consumption	m^3	**N/A[2]**	779[1]	7,726
Total commercial waste	Tonne	**66.43**	N/A	N/A
Total waste diverted from landfill (London HQ)	%	**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.
2. Data not available from managing agent for new London HQ office meaning FY22 was non-comparable. Figure without London was 591 m^3

Renewable energy

The purchase of renewable energy in our operations has significantly increased year on year, from 154,744 kWh in FY21 to 379,161 kWh in FY22. This constitutes 58.2% of our total electricity procured from renewable sources, up from 22.5% in FY21. This 145% increase is supporting ICG's progress towards achieving its SBTi approved target and will continue to be a foundation for the achievement.

ICG pension

ICG 's employees in the UK are automatically enrolled into a workplace pension. Environmental, social and governance (ESG) factors are integrated into the default fund as far as possible, currently covering 85% of the portfolio. The ESG investments include exclusions for companies with significant revenue from controversial weapons, thermal coal, tobacco, and perennial violators of the United Nations Global Compact (UNGC) principles as a minimum. The default fund goes even further, for example by targeting net zero by 2050 and investing with a lower emissions profile compared to a non-ESG equivalent fund. 84% of UK employees enrol in the UK pension.

Internal and external communications

Building awareness on environmental matters is another important aspect of our environmental stewardship. ICG delivers a range of public updates to its external stakeholders (see pg. 29). We also communicate to our employees via our intranet and through our website, for example through targeted awareness raising campaigns on Earth Day about the value of nature and sustainable living.

SUPPLIER MANAGEMENT

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.

In 2022, ICG began reviewing its processes with suppliers (both onboarding and the go-forward relationship) and is developing a new and enhanced ESG assessment process which all new and existing material suppliers will be required to complete, and also provide certain ongoing information regarding the management of their business, which will seek to confirm how certain ESG risks are managed.

In addition, material suppliers will be requested to adhere to our Supplier Code of Conduct which specifically outlines our expectations with regards to complying with all relevant national laws and regulations:

a. Adopting a responsible and ethical approach to business
b. Upholding and protecting labour & human rights in their business and supply chains
c. Managing and reducing environmental impacts in their business and supply chains
d. Identifying and managing supply chain risks in their own supply chains

We will continue to consider (where appropriate based on the relevant industry or region) whether to include contractual provisions with regards to ESG practice in our material supply contracts – particularly those for services in higher risk industries or regions – to ensure that our suppliers comply with their obligations under relevant legislation.

View more
about our ICG Supplier Code of Conduct 2020 on our website

Supplier review for modern slavery risks

In 2022, we carried out our annual review of our supplier list, which concentrated on suppliers which invoice, on an aggregate basis, over £5,000 or which are from industries or regions which may pose a higher risk of slavery or human trafficking. In total, 442 suppliers were considered, across 24 countries. All suppliers which we considered to potentially pose medium or higher risk were subjected to a more detailed review and/or formally contacted to request details of their practices and policies with respect to modern slavery. There are currently no known matters of concern from a modern slavery perspective in our supply chain, but this statement will be updated if any subsequently arise. For further details see our latest Modern Slavery and Human Trafficking Statement.

View more
about our Modern Slavery Statement on our website

CYBER RISK

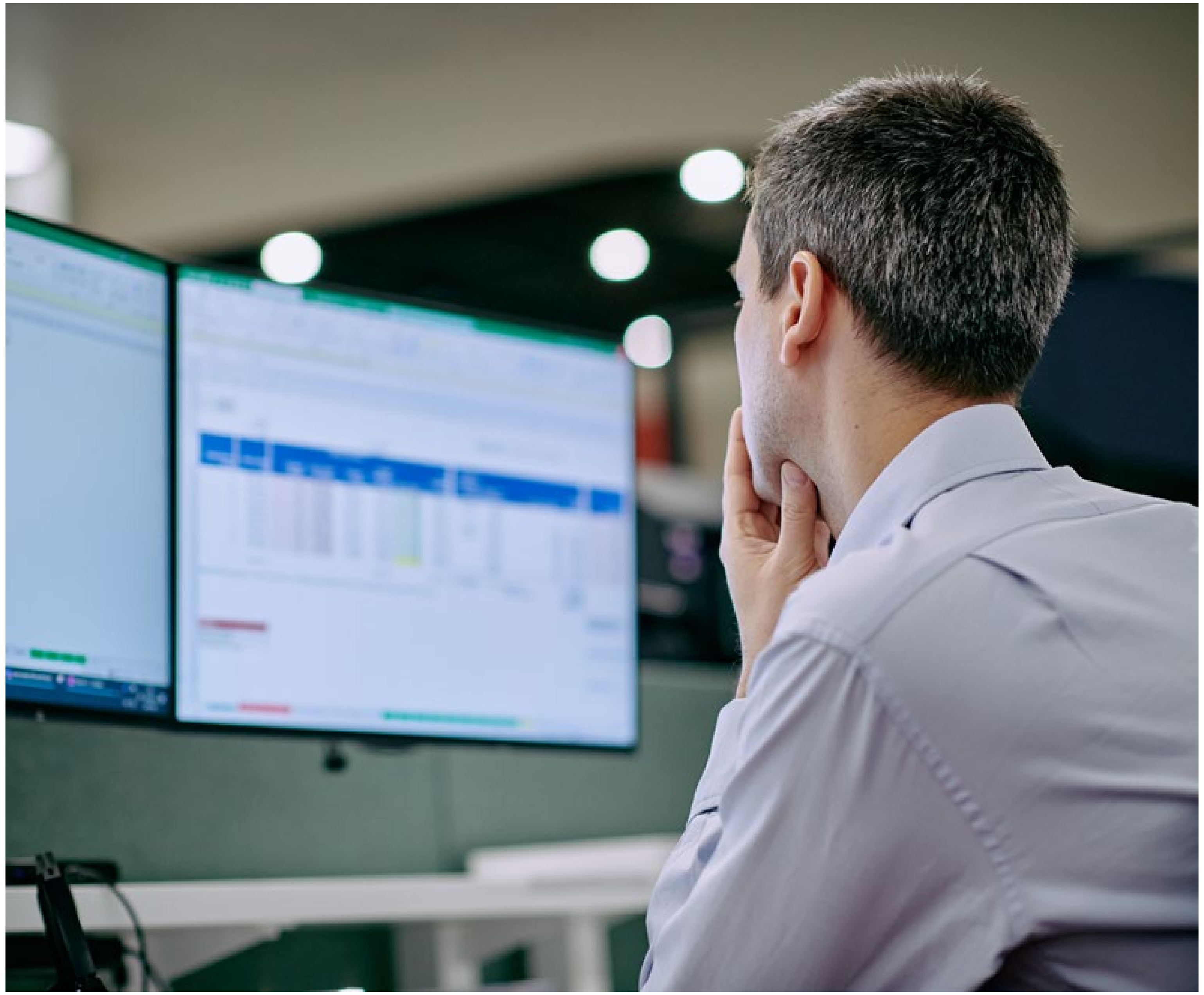
Protecting ICG's data through technical control measures alongside employee training and awareness remain focus areas for ICG. Expectations around how, when and where we work are changing; firms' attack surfaces are widening, and no longer can traditional firewalls and anti-virus tools guarantee a firm's cyber security.

View more
about cyber threats as part of our Principal Risk on pg. 57 of our Annual Report

Ensuring we have a secure and resilient technology environment to deliver effective services to our clients and portfolio companies remains a key focus for ICG.

Delivering resilient IT services to our colleagues is essential to business operations with resilience and security by design one of our architectural pillars. Our Executive Committee and Risk Committee are provided with regular updates providing KPIs to give them full oversight of cyber risks, and we continue to invest heavily in processes and technologies to combat the increased attack surface that comes from working outside a fixed perimeter office.

- ICG runs a 24x7x365 Managed Security Operations Centre manned by cyber security professionals to detect and prevent possible threats to ICG's data.
- The Managed Security Operations Centre additionally provides ICG with Threat Intelligence, giving us early warning to emerging threats across the globe, enabling ICG to put in place barriers to prevent attacks.
- Vulnerabilities are assessed and managed on an ongoing basis 24x7, managed in real time and any software updates deployed rapidly.



Further disclosures

We align with all relevant sustainability bodies, including SASB and GRI Standards, as well as the UN's Sustainability Development Goals.

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 , refers to relevant pages within the ICG Annual Report and Accounts 2022, 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 the 18 months to 30 Sept 2022 , there were no known: – 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 team 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	AR pg. 75; SPR pg. 33 See Commentary	As at 30 September 2022: ICG's Executive Directors: 33% female, 67% male ICG's Non-Executive Directors: 50% female, 50% 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 pg. 9, 12; ICG RI Policy	ICG's Responsible Investing Policy, including ESG screening and integration, applies to 100% of ICG's AUM. https://www.icgam.com/wp-content/uploads/2022/06/ICG-RIPol-May22-FINAL-NoDate.pdf As at 30 September 2022, 27% of total AUM is in funds with explicit focus on engagement on climate change and/or in scope of ICG's portfolio coverage science-based target.
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 pg. 14-30; ICG RI Policy	RI Policy – https://www.icgam.com/wp-content/uploads/2022/06/ICG-RIPol-May22-FINAL-NoDate.pdf

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 pg. 14-30; ICG RI Policy	RI Policy – https://www.icgam.com/wp-content/uploads/2022/06/ICG-RIPol-May22-FINAL-NoDate.pdf
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 behaviour, 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 FY22.
Business ethics	FN-AC-510a.2	Description of whistleblower policies and procedures	See Commentary Group Code of Conduct	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. The is referenced in the ICG Code of Conduct. 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 the ICG intranet. In addition, all external stakeholders can file a complaint by following ICG's Complaints Policy.
Activity metrics	FN-AC-000.A	(1) Total registered and (2) total unregistered assets under management (AUM)	SPR pg. 6	

GRI AND SASB CONTENT INDEX continued

GRI content index – General disclosures 2021 are shown in alignment with the 2016 edition

GRI Universal Standards 2021					GRI Universal Standards 2016		
GRI Standard Title	Disclosure Number	Disclosure Name	Location	Commentary	GRI Standard Title	Disclosure Number	Disclosure Name
GENERAL DISCLOSURES							
GRI 2: General Disclosures 2021	2-1	Organisational details	Front cover	Intermediate Capital Group plc	GRI 102: General Disclosures 2016	102-1	Name of the organisation
			Back Cover		GRI 102: General Disclosures 2016	102-3	Location of headquarters
			ICG website	https://www.icgam.com/who-we-are/our-offices/	GRI 102: General Disclosures 2016	102-4	Location of operations
			See commentary	Intermediate Capital Group plc is listed on the London Stock Exchange and headquartered in London, United Kingdom.	GRI 102: General Disclosures 2016	102-5	Ownership and legal form
GRI 2: General Disclosures 2021	2-2	Entities included in the organisation's sustainability reporting	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 FY22 for further details.	GRI 102: General Disclosures 2016	102-45	Entities included in the consolidated financial statements
GRI 2: General Disclosures 2021	2-3	Reporting period, frequency and contact point	See commentary	This annual Sustainability & People Report 2022 complements our AR FY22 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 2022, unless indicated otherwise.	GRI 102: General Disclosures 2016	102-50	Reporting period
			See commentary	ICG follows an annual reporting cycle.	GRI 102: General Disclosures 2016	102-52	Reporting cycle
			See commentary	For any questions or feedback related to this report, get in touch with us via: https://www.icgam.com/contact-us	GRI 102: General Disclosures 2016	102-53	Contact point for questions regarding the report
GRI 2: General Disclosures 2021	2-4	Restatements of information	See commentary	No previously disclosed information has been restated in this report.	GRI 102: General Disclosures 2016	102-48	Restatements of information
GRI 2: General Disclosures 2021	2-5	External assurance	AR pg. 83		GRI 102: General Disclosures 2016	102-56	External assurance

GRI AND SASB CONTENT INDEX continued

GRI content index – General disclosures 2021 are shown in alignment with the 2016 edition

GRI Universal Standards 2021					GRI Universal Standards 2016		
GRI Standard Title	**Disclosure Number**	**Disclosure Name**	**Location**	**Commentary**	**GRI Standard Title**	**Disclosure Number**	**Disclosure Name**
GRI 2: General Disclosures 2021	2-6	Activities, value chain, and other business relationships	SPR pg. 6-7; AR pg. 3		GRI 102: General Disclosures 2016	102-2	Activities, brands, products, and services
			See commentary	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.	GRI 102: General Disclosures 2016	102-6	Markets served
			SPR pg. 6; AR pg. 5		GRI 102: General Disclosures 2016	102-7	Scale of the organisation
			SPR pg. 39	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.	GRI 102: General Disclosures 2016	102-9	Supply chain
			See commentary	There were no significant changes to the organisation and its supply chain in the year. ICG opened an office in Dubai to provide local point of contact for our clients in the region.	GRI 102: General Disclosures 2016	102-10	Significant changes to the organisation and its supply chain
GRI 2: General Disclosures 2021	2-7	Employees	SPR pg. 33		GRI 102: General Disclosures 2016	102-7-a-i	Scale of the organisation (total number of employees)
			SPR pg. 33	Data provided is given in headcount.	GRI 102: General Disclosures 2016	102-8	Information on employees and other workers
GRI 2: General Disclosures 2021	2-8	Workers who are not employees				102-8-d	Information on employees and other workers (information on workers who are not employees)

GRI AND SASB CONTENT INDEX continued

GRI content index – General disclosures 2021 are shown in alignment with the 2016 edition

GRI Universal Standards 2021					GRI Universal Standards 2016		
GRI Standard Title	**Disclosure Number**	**Disclosure Name**	**Location**	**Commentary**	**GRI Standard Title**	**Disclosure Number**	**Disclosure Name**
GRI 2: General Disclosures 2021	2-9	Governance structure and composition	SPR pg. 8 AR pg. 73		GRI 102: General Disclosures 2016	102-18	Governance structure
			ICG Governance	https://www.icgam.com/who-we-are/leadership-governance/	GRI 102: General Disclosures 2016	102-22	Composition of the highest governance body and its committees
GRI 2: General Disclosures 2021	2-10	Nomination and selection of the highest governance body	AR pg. 79, 91		GRI 102: General Disclosures 2016	102-24	Nominating and selecting the highest governance body
GRI 2: General Disclosures 2021	2-11	Chair of the highest governance body	ICG Governance	https://www.icgam.com/who-we-are/leadership-governance/	GRI 102: General Disclosures 2016	102-23	Chair of the highest governance body
GRI 2: General Disclosures 2021	2-12	Role of the highest governance body in overseeing the management of impacts	SPR pg. 7 AR pg.23		GRI 102: General Disclosures 2016	102-21	Consulting stakeholders on economic, environmental, and social topics
			ICG Governance	https://www.icgam.com/who-we-are/leadership-governance/	GRI 102: General Disclosures 2016	102-26	Role of highest governance body in setting purpose, values, and strategy
			SPR pg. 7		GRI 102: General Disclosures 2016	102-29	Identifying and managing economic, environmental, and social impacts
			AR pg. 57, 58, 59, 64, 87		GRI 102: General Disclosures 2016	102-30	Effectiveness of risk management processes

GRI AND SASB CONTENT INDEX continued

GRI content index – General disclosures 2021 are shown in alignment with the 2016 edition

GRI Universal Standards 2021					GRI Universal Standards 2016		
GRI Standard Title	**Disclosure Number**	**Disclosure Name**	**Location**	**Commentary**	**GRI Standard Title**	**Disclosure Number**	**Disclosure Name**
GRI 2: General Disclosures 2021	2-13	Delegation of responsibility for managing impacts	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.	GRI 102: General Disclosures 2016	102-19	Delegating authority
			See commentary	The Executive Directors are responsible for ensuring the effective identification and management of our sustainability and people priorities, and review 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.	GRI 102: General Disclosures 2016	102-20	Executive-level responsibility for economic, environmental, and social topics
GRI 2: General Disclosures 2021	2-14	Role of the highest governance body in sustainability reporting	See commentary	ICG's Executive Directors reviewed and approved this Sustainability and People Report.	GRI 102: General Disclosures 2016	102-32	Highest governance body's role in sustainability reporting
GRI 2: General Disclosures 2021	2-15	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.	GRI 102: General Disclosures 2016	102-25	Conflicts of interest
GRI 2: General Disclosures 2021	2-16	Communication of critical concerns	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.	GRI 102: General Disclosures 2016	102-33	Communicating critical concerns
					GRI 102: General Disclosures 2016	102-34	Nature and total number of critical concerns

GRI AND SASB CONTENT INDEX continued

GRI content index – General disclosures 2021 are shown in alignment with the 2016 edition

GRI Universal Standards 2021					GRI Universal Standards 2016		
GRI Standard Title	**Disclosure Number**	**Disclosure Name**	**Location**	**Commentary**	**GRI Standard Title**	**Disclosure Number**	**Disclosure Name**
GRI 2: General Disclosures 2021	2-17	Collective knowledge of the highest governance body	AR pg. 74, 79		GRI 102: General Disclosures 2016	102-27	Collective knowledge of highest governance body
GRI 2: General Disclosures 2021	2-18	Evaluation of the performance of the highest governance body	AR pg. 76		GRI 102: General Disclosures 2016	102-28	Evaluating the highest governance body's performance
GRI 2: General Disclosures 2021	2-19	Remuneration policies	AR pg. 93, 94, 105, 110 SPR pg. 14		GRI 102: General Disclosures 2016	102-35	Remuneration policies
GRI 2: General Disclosures 2021	2-20	Process to determine remuneration	AR pg. 93, 94, 105, 110 SPR pg. 14		GRI 102: General Disclosures 2016	102-36	Process for determining remuneration
			AR pg. 93, 94, 105, 110 SPR pg. 14		GRI 102: General Disclosures 2016	102-37	Stakeholders' involvement in remuneration
GRI 2: General Disclosures 2021	2-21	Annual total compensation ratio	AR pg. 105		GRI 102: General Disclosures 2016	102-38	Annual total compensation ratio
			AR pg. 106		GRI 102: General Disclosures 2016	102-39	Percentage increase in annual total compensation ratio
GRI 2: General Disclosures 2021	2-22	Statement on sustainable development strategy	SPR pg. 5 AR pg. 12, 13, 14, 15		GRI 102: General Disclosures 2016	102-14	Statement from senior decision-maker
GRI 2: General Disclosures 2021	2-23	Policy commitments	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 pg. 57 of AR FY22.	GRI 102: General Disclosures 2016	102-11	Precautionary Principle or approach
			SPR pg. 7		GRI 102: General Disclosures 2016	102-16	Values, principles, standards, and norms of behaviour
GRI 2: General Disclosures 2021	2-24	Embedding policy commitments	SPR pg. 14, 15		N/A	N/A	N/A

GRI AND SASB CONTENT INDEX continued

GRI content index – General disclosures 2021 are shown in alignment with the 2016 edition

GRI Universal Standards 2021					GRI Universal Standards 2016		
GRI Standard Title	**Disclosure Number**	**Disclosure Name**	**Location**	**Commentary**	**GRI Standard Title**	**Disclosure Number**	**Disclosure Name**
GRI 2: General Disclosures 2021	**2-25**	Processes to remediate negative impacts	SPR pg. 56 (further disclosures)		**GRI 103: Management Approach 2016**	**103-2-c-vi**	The management approach and its components (Grievance mechanisms)
GRI 2: General Disclosures 2021	**2-26**	Mechanisms for seeking advice and raising concerns	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 the ICG intranet. In addition, all external stakeholders can file a complaint by following ICG's Complaints Policy.	**GRI 102: General Disclosures 2016**	**102-17**	Mechanisms for advice and concerns about ethics
GRI 2: General Disclosures 2021	**2-27**	Compliance with 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 the 18 months to 30 September 2022.	**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 incidents of non-compliance with laws and regulations in the social and economic area in the 18 months to 30 September 2022.	**GRI 419: Socioeconomic Compliance 2016**	**419-1**	Non-compliance with laws and regulations in the social and economic area
GRI 2: General Disclosures 2021	**2-28**	Membership associations	SPR pg. 30, 36, 37		**GRI 102: General Disclosures 2016**	**102-13**	Membership of associations
GRI 2: General Disclosures 2021	**2-29**	Approach to stakeholder engagement	SPR pg. 7 AR pg. 11		**GRI 102: General Disclosures 2016**	**102-40**	List of stakeholder groups
			SPR pg. 56 (further disclosures)		**GRI 102: General Disclosures 2016**	**102-42**	Identifying and selecting stakeholders
			AR pg. 23		**GRI 102: General Disclosures 2016**	**102-43**	Approach to stakeholder engagement

GRI AND SASB CONTENT INDEX continued

GRI content index – General disclosures 2021 are shown in alignment with the 2016 edition

GRI Universal Standards 2021					GRI Universal Standards 2016		
GRI Standard Title	**Disclosure Number**	**Disclosure Name**	**Location**	**Commentary**	**GRI Standard Title**	**Disclosure Number**	**Disclosure Name**
GRI 2: General Disclosures 2021	**2-30**	Collective bargaining agreements	See commentary	As at 30 September 2022 there were collective bargaining agreements in place at two of our geographies, covering approximately 5% of our employees. This constitutes the geographies where collective bargaining agreements are applicable.	**GRI 102: General Disclosures 2016**	**102-41**	Collective bargaining agreements
GRI 3: Material Topics 2021	**3-1**	Process to determine material topics	SPR pg. 7	The content of the report was determined on the basis of the outcomes of our materiality assessment (see pg. 7) and draws on relevant GRI Standards and the SASB guidelines for asset managers.	**GRI 102: General Disclosures 2016**	**102-46**	Defining report content and topic Boundaries
GRI 3: Material Topics 2021	**3-2**	List of material topics	SPR pg. 7		**GRI 102: General Disclosures 2016**	**102-47**	List of material topics
			See commentary	There have been no material changes in our reporting.	**GRI 102: General Disclosures 2016**	**102-49**	Changes in reporting

GRI AND SASB CONTENT INDEX continued

GRI content index – General disclosures 2021 are shown in alignment with the 2016 edition

GRI Universal Standards 2021					GRI Universal Standards 2016		
GRI Standard Title	**Disclosure Number**	**Disclosure Name**	**Location**	**Commentary**	**GRI Standard Title**	**Disclosure Number**	**Disclosure Name**
GRI 3: Material Topics 2021	3-3	Management of material topics	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 pg. 57 of AR FY22.	**GRI 102: General Disclosures 2016**	102-11	Precautionary Principle or approach
					GRI 103: Management Approach 2016	Clauses 1.1 and 1.2	General requirements for reporting the management approach
				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.	**GRI 103: Management Approach 2016**	103-1	Explanation of the material topic and its Boundary
					GRI 103: Management Approach 2016	103-2	The management approach and its components
					GRI 103: Management Approach 2016	103-3	Evaluation of the management approach

GRI AND SASB CONTENT INDEX continued

GRI content index – General disclosures 2021 are shown in alignment with the 2016 edition

GRI Universal Standards 2021					GRI Universal Standards 2016		
GRI Standard Title	Disclosure Number	Disclosure Name	Location	Commentary	GRI Standard Title	Disclosure Number	Disclosure Name
Content that has moved to GRI 1: Foundation 2021							
GRI 1: Foundation 2021	N/A	Requirement 7: Publish a GRI content index	SPR pg. 44 (further disclosures)		GRI 102: General Disclosures 2016	102-55	GRI content index
	N/A	Publish a GRI content index	SPR pg. 44 (further disclosures)				
	N/A	Requirement 8: Provide a statement of use			GRI 102: General Disclosures 2016	102-54	Claims of reporting in accordance with the GRI Standards

GRI AND SASB CONTENT INDEX continued

GRI Topic specific disclosures – content index continued

GRI Universal Standards 2021				
GRI Standard Title	**Disclosure Number**	**Disclosure Name**	**Location**	**Commentary**
TOPIC-SPECIFIC DISCLOSURES				
GRI 201: Economic performance 2016	201-1	Direct economic value generated and distributed	SPR pg. 36, 37; AR pg. 136, 162	
GRI 203: Indirect Economic Impacts 2016	203-1	Infrastructure investments and services supported	SPR pg. 25-27	
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 ongoing 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.
GRI 207: Tax	207-1	Approach to tax	See Commentary	ICG's Tax Strategy 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 organisation	SPR pg. 38; AR pg. 42	Details on the energy consumption within our operations are provided in the Company Environmental Stewardship section.
GRI 302: Energy 2016	302-3	Energy intensity	See Commentary	
GRI 305: Emissions 2016	305-1	Direct (Scope 1) GHG emissions	SPR pg. 38	
GRI 305: Emissions 2016	305-2	Energy indirect (Scope 2) GHG emissions	SPR pg. 38	
GRI 305: Emissions 2016	305-3	Other indirect (Scope 3) GHG emissions	SPR pg. 38	
GRI 305: Emissions 2016	305-4	GHG emissions intensity	SPR pg. 38	
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 the 18 months to 30 September 2022.

GRI AND SASB CONTENT INDEX continued

GRI Topic specific disclosures – content index continued

GRI Universal Standards 2021				
GRI Standard Title	**Disclosure Number**	**Disclosure Name**	**Location**	**Commentary**
GRI 401: Employment 2016	401-1	New employee hires and employee turnover	SPR pg. 33 AR pg. 31	Notable workforce changes – ICG did not furlough any employees, or make any employees redundant, as a result of the Covid-19 pandemic.
GRI 401: Employment 2016	401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	SPR pg. 35; 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 pg. 35	During the year to 31 March 2022 there were no RIDDOR-reportable incidents, and no work-related accidents or cases of work-related ill health were reported.
GRI 404: Training and Education 2016	404-2	Programs for upgrading employee skills and transition assistance programs	SPR pg. 35	
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 reviews based on the ICG Competency Framework. This involves a 360 assessment and SMART goal setting and involves mid-year reviews with line managers.
GRI 405: Diversity and equal opportunities 2016	405-1	Diversity of governance bodies and employees	SPR pg. 33; AR pg. 21, 31, 75; ICG Diversity & Inclusion Policy; See Commentary	As at 30 September 2022: ICG's Executive Directors: 33% female, 67% male ICG's Non-Executive Directors: 50% female, 50% 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. https://www.icgam.com/wp-content/uploads/2022/06/icg-diversity-and-inclusion-policy.pdf
GRI 405: Diversity and equal opportunities 2016	405-2	Ratio of basic salary and remuneration of women to men	AR pg. 107	
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 the 18 months to 30 September 2022.
GRI 413: Local communities 2016	413-1	Operations with local community engagement, impact assessments, and development programs	SPR pg. 36, 37	The Group's approach to charitable giving is overseen by our Charity Committee, which was established in 2019 and 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 have 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 30 September 2022, ICG contributed £2.47m 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 18 months to 30 September 2022 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 in the 18 months to 30 September 2022.

GRI AND SASB CONTENT INDEX continued

GRI Topic specific disclosures – content index continued

GRI Universal Standards 2021				
GRI Standard Title	**Disclosure Number**	**Disclosure Name**	**Location**	**Commentary**
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 the 18 months to 30 September 2022.
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 the 18 months to 30 September 2022. Nor were there found any breaches to our Group Code of Conduct in the same period.

SUPPLEMENTARY CORPORATE DISCLOSURES INDEX

Governance

For further information on our governance approach please find links to our Annual Report along with the relevant page listing.

Annual Report https://www.icgam.com/shareholders/annual-reports/

Document	Chapter	Topic	Page reference
ICG's Annual Report and Accounts 2022	Governance	Corporate governance and oversight	Pg. 67 to 92
	Managing Risk	Risk management (managing, assessing, principal risks and uncertainties	Pg. 57 to 64

ICG's Group Code of Conduct

The following topics are listed in the Group Code of Conduct which can be found on ICG's policies page on our website.

Group Code of Conduct https://www.icgam.com/who-we-are/leadership-governance/policies-disclosures/

Document	Chapter	Topic	Page reference
Group Code of Conduct	Purpose, Culture and Value	Our purpose	Pg. 4
		Our culture and values	Pg. 4
		Grievance procedure and speak up	Pg. 4
	Business Ethics and Integrity	Compliance with laws and regulations	Pg. 6
		Anti-bribery and corruption (ABC)	Pg. 6
		Anti-money laundering (AML)	Pg. 6
		Anti-trust and anti-competition behaviour	Pg. 7
		Insider dealing	Pg. 7
		Conflict of interest	Pg. 8
		Political contributions	Pg. 8
		Confidentiality of information	Pg. 8
		Human rights	Pg. 8
		Modern slavery	Pg. 8
		Supplier management	Pg. 9

Document	Chapter	Topic	Page reference
Group Code of Conduct	Acting in the best interests of clients	Responsible investing	Pg. 10
		Responsible marketing and communication with clients	Pg. 10
		Responsible product offering	Pg. 10
	Employment	Anti-harassment and discrimination	Pg. 11
		Diversity and inclusion	Pg. 11
		Digital and social media	Pg. 11
		Occupational health and safety	Pg. 11
		Flexible working	Pg. 12
	Cyber and Privacy	Cyber security	Pg. 13
		Privacy	Pg. 13
	Implementation and compliance with the Code of Conduct	Oversight of Code of Conduct	Pg. 14
		Compliance	Pg. 14
		Training	Pg. 14

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