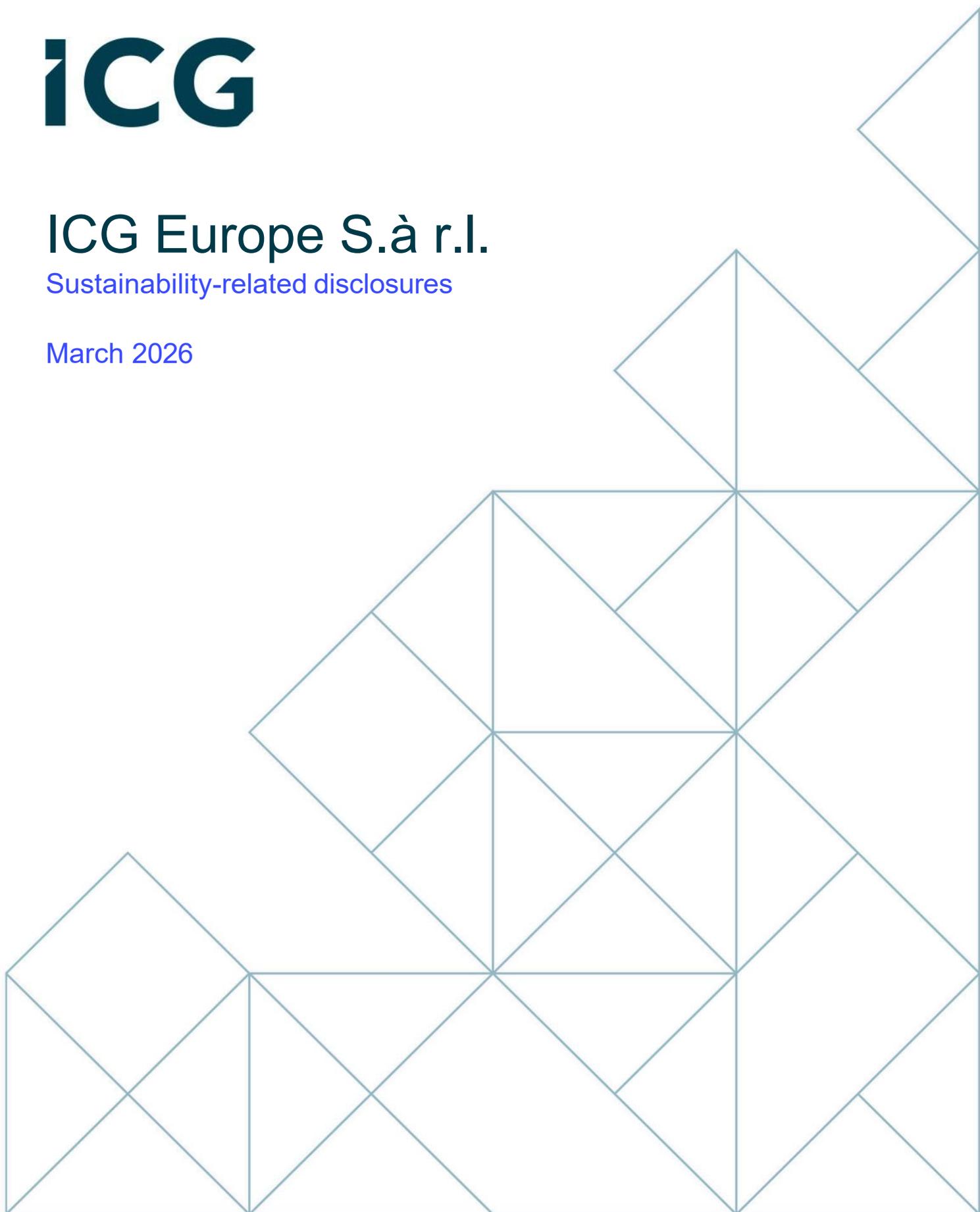




# ICG Europe S.à r.l.

Sustainability-related disclosures

March 2026



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**Disclosures in accordance with Articles 3(1), 4(1)(b) and 5(1) of the EU Sustainable Finance Disclosure Regulation (Regulation (EU) 2019/2088) (the "Disclosure Regulation")**

## **Sustainability-related Disclosures**

ICG Europe S.à r.l. (the "**Firm**") makes the following disclosures in accordance with Articles 3(1), 4(1)(b) and 5(1) of the Disclosure Regulation.

### **Sustainability risk policies**

Pursuant to the Disclosure Regulation, "Sustainability Risk" means an environmental, social or governance event or condition that, if it occurs, could cause an actual or potential material negative impact on the value of the investment.

Before any investment decisions are made on behalf of any funds that the Firm manages, the Firm will have completed a process that identifies the Sustainability Risks associated with each such proposed investment, as described as follows:

- A mandatory exclusion list (as described in the Firm's [Responsible Investing Policy](#)) into which the Firm will not knowingly make direct investments; and
- A sustainability assessment to identify investments that pose higher Sustainability Risks.

No investment that is a business of a type identified in the mandatory exclusion list can be put forward to the investment committee for the relevant fund. Such investment committee will consider the completed sustainability assessment as a part of its overall assessment of the likely risks associated with investments pursuant to the relevant fund's investment policy and objectives before making any investment decision. The Firm applies the same processes to segregated mandates.

The Firm may from time to time delegate portfolio management of its funds to other members of the ICG group. Where the Firm has delegated portfolio management to another member of the ICG group, the delegate is under an obligation to apply the mandatory exclusion list and the sustainability assessment.

### **No consideration of adverse impacts of investment decisions on sustainability factors**

The Firm does not currently consider the principal adverse impacts of its investment decisions on sustainability factors in the manner prescribed by article 4 of the Disclosure Regulation.

Article 4 of the Disclosure Regulation requires investment managers to make a clear statement as to whether or not they consider the "principal adverse impacts" of investment decisions on sustainability factors. Despite the Firm's efforts, the limited availability of reliable and consistent data across underlying funds across all the Firm's strategies makes it challenging to assess and report these impacts accurately and at a reasonable cost. Additionally, the absence of standardised methodologies for measuring adverse sustainability impacts complicates the process of providing meaningful disclosures and relying on different methodologies risks being misleading. Given those risks and the significant costs associated with gathering and analysing systematically and consistently the necessary data, the Firm has determined that it is not currently in a position to obtain and/or measure all the data which it would be required by the Disclosure Regulation to report. The Firm keeps this situation under ongoing review in the short and medium term.

### **Remuneration policy**

The Firm pays staff a combination of fixed remuneration (salary and benefits) and variable remuneration (including bonus). Variable remuneration for ICG staff takes into account compliance with all the Firm's policies and procedures, including, for relevant staff, those relating to the impact of Sustainability Risks on the investment decision making process.