

**– Apax XI EUR SCSp, Apax XI USD SCSp (the “Luxembourg Partnerships”) –**

**SFDR RTS Website Disclosures**

**(a) Summary**

This financial product promotes environmental or social characteristics, but does not have as its objective sustainable investments. The AIFM, the Guernsey General Partner and the Investment Adviser have identified a number of environmental and social objectives as the ESG framework applicable to investments in the Luxembourg Partnerships.

The AIFM, the Guernsey General Partner and the Investment Adviser will monitor the following indicators across the Luxembourg Partnerships' portfolio with respect to majority owned investments (within 18 months post investment):

- At least 90% of portfolio companies to have carbon emissions reporting covering Scope 1, 2 and 3 and which is in accordance with the GHG protocol;
- At least 90% of portfolio companies to have a de-carbonization plan;
- At least 30% of Apax-appointed board members across the Luxembourg Partnerships' investments or a minimum of one board member per portfolio company identifying as female, excluding Apax employees serving on boards;
- At least 90% of portfolio companies to have a workplace safety & harassment policy and 50% of portfolio companies to also have an anonymous reporting process in place;
- At least 90% of portfolio companies to have a cybersecurity and incidence response policy; and
- At least 90% of portfolio companies to have an anti-corruption policy.

Sustainability risks will be integrated into the investment decision making of the Luxembourg Partnerships. The AIFM, the Guernsey General Partner, and the Investment Advisor will conduct ESG due diligence on all new potential investments. The AIFM, the Guernsey General Partner, and the Investment Advisor will consider the governance of investment companies and shall seek

to ensure all such investments adhere to standards of “good governance” over the course of the Luxembourg Partnerships’ investment.

The AIFM, the Guernsey General Partner and the Investment Advisor do not intend for the Luxembourg Partnerships to make any sustainable investments, including taxonomy-aligned environmentally sustainable investments and no assurance is made that the Luxembourg Partnerships will make sustainable investments within the meaning of the SFDR or the EU Taxonomy.

The AIFM, the Guernsey General Partner and the Investment Advisor will utilise the Apax portfolio monitoring process. A key part of the Apax portfolio monitoring process is an annual ESG KPI data collection cycle designed to highlight each portfolio company's ESG footprint. The principal methodology used by the AIFM, the Guernsey General Partner and the Investment Advisor in assessing the social and environmental characteristics is an assessment of the ESG KPI reporting, with the exception of board diversity which is assessed on a quarterly basis as part of the financial processes.

The AIFM, the Guernsey General Partner and the Investment Advisor will generally rely on the self-reported data provided directly by portfolio companies’ management teams and not independently verified by Apax to ascertain whether the Luxembourg Partnerships attain the sustainability indicators set out in section (g). This data will be reviewed by the AIFM, the Guernsey General Partner and the Investment Advisor to assess whether the Luxembourg Partnerships’ sustainability indicators are met and to provide investors with ongoing reporting on this topic.

The AIFM, the Guernsey General Partner and the Investment Advisor intend that the disclosed percentage of majority owned portfolio companies will meet the sustainability indicators set out in section (g) below (within 18 months post-investment) and will become more sustainable during the period that the Luxembourg Partnerships hold the portfolio company but investors should be aware that portfolio companies may be unable or fail to do so. Moreover, portfolio companies may not be in a position to report on the sustainability indicators set out in section (g) below during the initial years of ownership.

Apax will not require portfolio companies to adhere to an engagement policy. No specific index is designated as a reference benchmark to determine whether the Luxembourg Partnerships are aligned with the environmental and/or social characteristics that they promote.

### **(b) No sustainable investment objective**

This financial product promotes environmental or social characteristics, but does not have as its objective sustainable investments.

### **(c) Environmental or social characteristics of the financial product**

The AIFM, the Guernsey General Partner and the Investment Adviser have identified a number of environmental and social objectives as the ESG framework applicable to investments in the Luxembourg Partnerships. The Investment Adviser, the Guernsey General Partner and, to the extent possible, the AIFM will assist the management teams of the portfolio companies to ensure that they adopt and implement an ESG roadmap to achieve these objectives.

The AIFM, the Guernsey General Partner and the Investment Adviser will seek to pursue the following characteristics through post-investment engagement with portfolio companies: environmental characteristics (carbon emissions reporting and de-carbonization), social characteristics (board diversity, workplace safety and harassment, cybersecurity and anti-corruption).

This financial product promotes environmental or social characteristics through the following targets:

- At least 90% of portfolio companies to have carbon emissions reporting covering Scope 1, 2 and 3 and which is in accordance with the GHG protocol;
- At least 90% of portfolio companies to have a de-carbonization plan;
- At least 30% of Apax-appointed board members across the Luxembourg Partnerships' investments or a minimum of one board member per portfolio company identifying as female, excluding Apax employees serving on boards;
- At least 90% of portfolio companies to have a workplace safety & harassment policy and 50% of portfolio companies to also have an anonymous reporting process in place;
- At least 90% of portfolio companies to have a cybersecurity and incidence response policy; and
- At least 90% of portfolio companies to have an anti-corruption policy.

The AIFM, the Guernsey General Partner and the Investment Adviser will monitor the following indicators across the Luxembourg Partnerships' portfolio with respect to majority owned investments to report on attainment of the above targets:

- 1) carbon emissions reporting covering Scope 1, 2 and 3

- 2) decarbonization plan in place
- 3) Apax-appointed board members across the Luxembourg Partnerships' investments identifying as female
- 4) workplace safety & harassment policy
- 5) anonymous reporting process
- 6) cybersecurity and incidence response policy
- 7) anti-corruption policy

#### **(d) Investment strategy**

The primary investment objective of the Luxembourg Partnerships, which form part of the Apax XI fund (the "**Fund**") is to achieve long-term capital growth by investing principally in unquoted trading companies across Apax's sectors, being the Technology, Services, Healthcare and Internet/Consumer sectors, globally (subject to the investment restrictions set out in the partnership agreements governing the Luxembourg Partnerships).

Sustainability risks will be integrated into the investment decision making of the Luxembourg Partnerships. The AIFM, the Guernsey General Partner, and the Investment Advisor will conduct ESG due diligence on all new potential investments, will consider the governance of investment companies and shall seek to ensure all such investments adhere to standards of "good governance" over the course of the Luxembourg Partnerships' investment.

#### **(e) Proportion of investments**

The AIFM, the Guernsey General Partner and the Investment Advisor do not intend for the Luxembourg Partnerships to make any sustainable investments, including taxonomy-aligned environmentally sustainable investments and no assurance is made that the Luxembourg Partnerships will make sustainable investments within the meaning of the SFDR or the EU Taxonomy. However, sustainable investments may be made as an indirect consequence of the Luxembourg Partnership pursuing their objective to promote, among other characteristics, environmental and/or social characteristics as part of its investment strategy.

#### **(f) Monitoring of environmental or social characteristics**

The AIFM, the Guernsey General Partner and the Investment Advisor will utilise the Apax portfolio monitoring process. A key part of the Apax portfolio monitoring process is an annual ESG KPI data collection cycle designed to

highlight each portfolio company's ESG footprint. Apax has developed a comprehensive set of key performance indicators across environmental, social and governance areas based on the Global Reporting Initiative (GRI), LP questionnaires and other reporting standards focused on the reporting of non-financial metrics. Core areas of focus are highlighted below. The KPI's collected help inform the Apax team and Apax Fund stakeholders with regard to areas of materiality and focus.

To facilitate and streamline the data capture of the KPI information and to function as a central repository for portfolio company ESG information and its related supporting documentation, Apax uses a specific sustainability software platform. Apax uses the identified ESG KPIs to measure the progress that the Apax Funds' portfolios as a whole and also the individual portfolio companies are making in managing material ESG factors within their businesses.

The AIFM shall disclose the progress made towards attaining the objectives on an annual basis, as required under SFDR.

### **(g) Methodologies**

This financial product promotes environmental or social characteristics through the following targets:

- At least 90% of portfolio companies to have carbon emissions reporting covering Scope 1, 2 and 3 and which is in accordance with the GHG protocol;
- At least 90% of portfolio companies to have a de-carbonization plan;
- At least 30% of Apax-appointed board members across the Luxembourg Partnerships' investments or a minimum of one board member per portfolio company identifying as female, excluding Apax employees serving on boards;
- At least 90% of portfolio companies to have a workplace safety & harassment policy and 50% of portfolio companies to also have an anonymous reporting process in place;
- At least 90% of portfolio companies to have a cybersecurity and incidence response policy; and
- At least 90% of portfolio companies to have an anti-corruption policy.

The AIFM, the Guernsey General Partner and the Investment Adviser will monitor the following indicators across the Luxembourg Partnerships' portfolio

with respect to majority owned investments (within 18 months post investment) to report on attainment of the above targets:

- 1) carbon emissions reporting covering Scope 1, 2 and 3
- 2) decarbonization plan in place
- 3) Apax-appointed board members across the Luxembourg Partnerships' investments identifying as female
- 4) workplace safety & harassment policy
- 5) anonymous reporting process
- 6) cybersecurity and incidence response policy
- 7) anti-corruption policy

The principal methodology used by the AIFM, the Guernsey General Partner and the Investment Advisor in assessing the social and environmental characteristics is an assessment of the ESG KPI reporting as outlined above, with the exception of board diversity which is assessed on a quarterly basis as part of the financial processes. The AIFM, the Guernsey General Partner and the Investment Advisor shall consider the outcome of such reporting against the objectives of the Luxembourg Partnerships to consider the extent to which such objectives are being met by the investment.

#### **(h) Data sources and processing**

The AIFM, the Guernsey General Partner and the Investment Advisor will generally rely on the self-reported data provided directly by portfolio companies' management teams and not independently verified by Apax to ascertain whether the Luxembourg Partnerships attain the sustainability indicators set out in section (g).

This data will be reviewed by the AIFM, the Guernsey General Partner and the Investment Advisor to assess whether the Luxembourg Partnerships' sustainability indicators are met and to provide investors with ongoing reporting on this topic.

At the date of these disclosures, the AIFM, the Guernsey General Partner and the Investment Advisor intends to set up direct communication channels on ESG matters (and more particularly on reporting sustainability indicators) with portfolio companies. Apax will provide guidance to portfolio companies on how to report under each specific metric of the sustainability indicators and on how to ensure data quality and consistency in reporting by the portfolio companies.

Where necessary, Apax will also reach out directly to portfolio companies to discuss and confirm data quality or require further information when deemed appropriate.

If a particular data set is not provided by a portfolio company, this will be disclosed to investors as part of the reporting. In addition, a team on behalf of the AIFM shall reach out directly to the relevant portfolio company to discuss appropriate next steps to remedy any gap on reporting or lack of process on the KPIs which correspond to the Fund's 6 sustainability indicators, and may also reach out regarding other KPIs depending on the context.

Apax is keeping the methodology used to obtain and process data and ensure data quality under review and will update investors of any changes to the extent relevant.

### **(i) Limitations to methodologies and data**

The AIFM, the Guernsey General Partner and the Investment Advisor intend that the disclosed percentage of majority owned portfolio companies will meet the sustainability indicators set out in section (g) above (within 18 months post-investment) and become more sustainable during the period that the Luxembourg Partnerships holds the portfolio company but investors should be aware that portfolio companies may be unable or fail to do so.

Moreover, portfolio companies may not be in a position to report on the sustainability indicators set out in section (g) above during the initial years of ownership. The portfolio companies may not be subject to ESG disclosure requirements (such as the European Union Corporate Sustainability Reporting Directive) or have in place internal ESG reporting mechanisms at the moment of investment, and will need some time to build these processes. In such instances, Apax will work with portfolio companies to strengthen their practices to enable engagement and reporting.

Especially when it comes to data related to carbon reporting, it is common and best practice, to use a materiality approach for calculating scope 3 emissions. This in essence means that the calculation will be accurate, but may not include non-material emissions. In addition, data quality related to carbon emissions is often poor at companies who are in their initial stages, and estimates or a spend-based approach is often used. In such cases, Apax will work with companies to improve the data quality of its carbon footprint assessments, and move from a spend-based to activity-based approach over time.

Apax shall rely on the information provided to it from its portfolio companies. In most instances, this data is not verified, accounted, or assured. However,

Apax works with management teams to understand levels of uncertainty and any potential gaps. In time, and through ongoing engagement, data quality is expected to increase and the instances of data gaps to decrease.

### **(j) Due diligence**

The Apax Investment Team members undertake pre-investment ESG & Compliance due diligence for each new investment made by the Luxembourg Partnerships. This ESG & Compliance due diligence is based on a detailed questionnaire which has been drawn up to cover the ESG areas which Apax believes are key to understanding the ESG profile of the company in which the Luxembourg Partnerships are considering an investment. In some cases, the team brings in additional external expert resources to further assist in understanding the specific risks inherent in the investment under consideration.

Prior to the closing of each new investment, the findings of the ESG due diligence process are reviewed by a member of the Apax Sustainability Committee and incorporated into the final Investment Committee documentation. Key ESG issues, representing either a risk to the portfolio company's business or an opportunity for value creation, are highlighted as part of this process. Where necessary, investment professionals will work with the relevant company's management team to develop an improvement plan to address findings post-investment, either in the 100-day planning process or shortly thereafter.

### **(k) Engagement policies**

Apax will not require portfolio companies to adhere to an engagement policy.

### **(l) Designated reference benchmark**

No specific index is designated as a reference benchmark to determine whether the Luxembourg Partnerships are aligned with the environmental and/or social characteristics that they promote. It has not been possible to obtain a suitable and relevant benchmark considering the Luxembourg Partnerships' intention to invest across multiple geographies and sectors.