About this report

The PRI Reporting Framework is a key step in the journey towards building a common language and industry standard for reporting responsible investment (RI) activities. This RI Transparency Report is one of the key outputs of this Framework. Its primary objective is to enable signatory transparency on RI activities and facilitate dialogue between investors and their clients, beneficiaries and other stakeholders. A copy of this report will be publicly disclosed for all reporting signatories on the PRI website, ensuring accountability of the PRI Initiative and its signatories.

This report is an export of the individual Signatory organisation's response to the PRI during the 2019 reporting cycle. It includes their responses to mandatory indicators, as well as responses to voluntary indicators the signatory has agreed to make public. The information is presented exactly as it was reported. Where an indicator offers a response option that is multiple-choice, all options that were available to the signatory to select are presented in this report. Presenting the information exactly as reported is a result of signatory feedback which suggested the PRI not summarise the information. As a result, the reports can be extensive. However, to help easily locate information, there is a Principles index which highlights where the information can be found and summarises the indicators that signatories complete and disclose.

Understanding the Principles Index

The Principles Index summarises the response status for the individual indicators and modules and shows how these relate to the six Principles for Responsible Investment. It can be used by stakeholders as an ‘at-a-glance’ summary of reported information and to identify particular themes or areas of interest.

Indicators can refer to one or more Principles. Some indicators are not specific to any Principle. These are highlighted in the ‘General’ column. When multiple Principles are covered across numerous indicators, in order to avoid repetition, only the main Principle covered is highlighted.

All indicators within a module are presented below. The status of indicators is shown with the following symbols:

<table>
<thead>
<tr>
<th>Symbol</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>✔️</td>
<td>The signatory has completed all mandatory parts of this indicator</td>
</tr>
<tr>
<td>☣️</td>
<td>The signatory has completed some parts of this indicator</td>
</tr>
<tr>
<td>⚫</td>
<td>This indicator was not relevant for this signatory</td>
</tr>
<tr>
<td>-</td>
<td>The signatory did not complete any part of this indicator</td>
</tr>
<tr>
<td>⚫️</td>
<td>The signatory has flagged this indicator for internal review</td>
</tr>
</tbody>
</table>

Within the table, indicators marked in blue are mandatory to complete. Indicators marked in grey are voluntary to complete.
<table>
<thead>
<tr>
<th>Indicator</th>
<th>Short description</th>
<th>Status</th>
<th>Disclosure</th>
</tr>
</thead>
<tbody>
<tr>
<td>OO TG</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>OO 01</td>
<td>Signatory category and services</td>
<td>✓</td>
<td>Public</td>
</tr>
<tr>
<td>OO 02</td>
<td>Headquarters and operational countries</td>
<td>✓</td>
<td>Public</td>
</tr>
<tr>
<td>OO 03</td>
<td>Subsidiaries that are separate PRI signatories</td>
<td>✓</td>
<td>Public</td>
</tr>
<tr>
<td>OO 04</td>
<td>Reporting year and AUM</td>
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<td>Public</td>
</tr>
<tr>
<td>OO 05</td>
<td>Breakdown of AUM by asset class</td>
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<td>Asset mix disclosed in OO 06</td>
</tr>
<tr>
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<td>How would you like to disclose your asset class mix</td>
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<tr>
<td>OO 07</td>
<td>Fixed income AUM breakdown</td>
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</tr>
<tr>
<td>OO 08</td>
<td>Segregated mandates or pooled funds</td>
<td>[ ]</td>
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<tr>
<td>OO 09</td>
<td>Breakdown of AUM by market</td>
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</tr>
<tr>
<td>OO 10</td>
<td>Active ownership practices for listed assets</td>
<td>[ ]</td>
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<tr>
<td>OO 11</td>
<td>ESG incorporation practices for all assets</td>
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<td>Public</td>
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<tr>
<td>OO 12</td>
<td>Modules and sections required to complete</td>
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<tr>
<td>OO LE 01</td>
<td>Breakdown of listed equity investments by passive and active strategies</td>
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<td>n/a</td>
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<tr>
<td>OO LE 02</td>
<td>Reporting on strategies that are &lt;10% of actively managed listed equities</td>
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<td>RI policy and coverage</td>
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<td>Public</td>
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<td>SG 01 CC</td>
<td>Climate risk</td>
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<td>n/a</td>
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<td>SG 02</td>
<td>Publicly available RI policy or guidance documents</td>
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<td>Public</td>
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<tr>
<td>SG 03</td>
<td>Conflicts of interest</td>
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<td>Public</td>
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<td>Identifying incidents occurring within portfolios</td>
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<td>SG 05</td>
<td>RI goals and objectives</td>
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<td>Public</td>
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<tr>
<td>SG 06</td>
<td>Main goals/objectives this year</td>
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<tr>
<td>SG 07</td>
<td>RI roles and responsibilities</td>
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<tr>
<td>SG 07 CC</td>
<td>Climate-issues roles and responsibilities</td>
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<tr>
<td>SG 08</td>
<td>RI in performance management, reward and/or personal development</td>
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<td>Private</td>
</tr>
<tr>
<td>SG 09</td>
<td>Collaborative organisations / initiatives</td>
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</tr>
<tr>
<td>SG 09.2</td>
<td>Assets managed by PRI signatories</td>
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<td>SG 11</td>
<td>Dialogue with public policy makers or standard setters</td>
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<td>SG 12</td>
<td>Role of investment consultants/fiduciary managers</td>
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<td>Public</td>
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<td>SG 13 CC</td>
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<td>SG 14</td>
<td>Long term investment risks and opportunity</td>
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<td>SG 14 CC</td>
<td>Allocation of assets to environmental and social themed areas</td>
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<td>Private</td>
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<tr>
<td>SG 15</td>
<td>ESG issues for internally managed assets not reported in framework</td>
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<td>n/a</td>
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<tr>
<td>SG 16</td>
<td>ESG issues for externally managed assets not reported in framework</td>
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<td>Innovative features of approach to RI</td>
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<td>SG 18</td>
<td>Communication</td>
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<td>Public</td>
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### Direct – Private Equity

<table>
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<tr>
<th>Indicator</th>
<th>Short description</th>
<th>Status</th>
<th>Disclosure</th>
<th>General</th>
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<tbody>
<tr>
<td>PE 01</td>
<td>Description of approach to RI</td>
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<td>Private</td>
<td>✓</td>
</tr>
<tr>
<td>PE 02</td>
<td>Investment guidelines and RI</td>
<td>✓</td>
<td>Public</td>
<td>✓</td>
</tr>
<tr>
<td>PE 03</td>
<td>Fund placement documents and RI</td>
<td>✓</td>
<td>Public</td>
<td>✓</td>
</tr>
<tr>
<td>PE 04</td>
<td>Formal commitments to RI</td>
<td>✓</td>
<td>Private</td>
<td>✓</td>
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<tr>
<td>PE 05</td>
<td>Incorporating ESG issues when selecting investments</td>
<td>✓</td>
<td>Public</td>
<td>✓</td>
</tr>
<tr>
<td>PE 06</td>
<td>Types of ESG information considered in investment selection</td>
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<td>Public</td>
<td>✓</td>
</tr>
<tr>
<td>PE 07</td>
<td>Encouraging improvements in investees</td>
<td>✓</td>
<td>Private</td>
<td>✓</td>
</tr>
<tr>
<td>PE 08</td>
<td>ESG issues impact in selection process</td>
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<td>✓</td>
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<tr>
<td>PE 09</td>
<td>Proportion of companies monitored on their ESG performance</td>
<td>✓</td>
<td>Public</td>
<td>✓</td>
</tr>
<tr>
<td>PE 10</td>
<td>Proportion of portfolio companies with sustainability policy</td>
<td>✓</td>
<td>Public</td>
<td>✓</td>
</tr>
<tr>
<td>PE 11</td>
<td>Actions taken by portfolio companies to incorporate ESG issues into operations</td>
<td>-</td>
<td>n/a</td>
<td>✓</td>
</tr>
<tr>
<td>PE 12</td>
<td>Type and frequency of reports received from portfolio companies</td>
<td>-</td>
<td>n/a</td>
<td>✓</td>
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<tr>
<td>PE 13</td>
<td>Disclosure of ESG issues in pre-exit</td>
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<td>n/a</td>
<td>✓</td>
</tr>
<tr>
<td>PE 14</td>
<td>ESG issues affected financial/ESG performance</td>
<td>-</td>
<td>n/a</td>
<td>✓</td>
</tr>
<tr>
<td>PE 15</td>
<td>Examples of ESG issues that affected your PE investments</td>
<td>✓</td>
<td>Private</td>
<td>✓</td>
</tr>
<tr>
<td>PE 16</td>
<td>Approach to disclosing ESG incidents</td>
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<td>Private</td>
<td>✓</td>
</tr>
<tr>
<td>PE End</td>
<td>Module confirmation page</td>
<td>✓</td>
<td>-</td>
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</table>

### Confidence building measures

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Short description</th>
<th>Status</th>
<th>Disclosure</th>
<th>General</th>
</tr>
</thead>
<tbody>
<tr>
<td>CM1 01</td>
<td>Assurance, verification, or review</td>
<td>✓</td>
<td>Public</td>
<td>✓</td>
</tr>
<tr>
<td>CM1 02</td>
<td>Assurance of last year’s PRI data</td>
<td>✓</td>
<td>Public</td>
<td>✓</td>
</tr>
<tr>
<td>CM1 03</td>
<td>Other confidence building measures</td>
<td>✓</td>
<td>Public</td>
<td>✓</td>
</tr>
<tr>
<td>CM1 04</td>
<td>Assurance of this year’s PRI data</td>
<td>✓</td>
<td>Public</td>
<td>✓</td>
</tr>
<tr>
<td>CM1 05</td>
<td>External assurance</td>
<td>🕵️‍♂️</td>
<td>n/a</td>
<td>✓</td>
</tr>
<tr>
<td>CM1 06</td>
<td>Assurance or internal audit</td>
<td>🕵️‍♂️</td>
<td>n/a</td>
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<tr>
<td>CM1 07</td>
<td>Internal verification</td>
<td>🕵️‍♂️</td>
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<td>✓</td>
</tr>
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<td>CM1 01</td>
<td>Module confirmation page</td>
<td>✓</td>
<td>-</td>
<td></td>
</tr>
</tbody>
</table>

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SPEAR Capital Pty Ltd

Reported Information

Public version

Organisational Overview

PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.
# Basic information

## OO 01  Mandatory Public Gateway/Peering General

### OO 01.1  Select the services and funds you offer

<table>
<thead>
<tr>
<th>Select the services and funds you offer</th>
<th>% of asset under management (AUM) in ranges</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fund management</td>
<td>○ 0%</td>
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<tr>
<td></td>
<td>○ &lt;10%</td>
</tr>
<tr>
<td></td>
<td>○ 10-50%</td>
</tr>
<tr>
<td></td>
<td>☑ &gt;50%</td>
</tr>
<tr>
<td>Fund of funds, manager of managers, sub-advised products</td>
<td>○ 0%</td>
</tr>
<tr>
<td></td>
<td>○ &lt;10%</td>
</tr>
<tr>
<td></td>
<td>○ 10-50%</td>
</tr>
<tr>
<td></td>
<td>○ &gt;50%</td>
</tr>
<tr>
<td>Other</td>
<td>○ 0%</td>
</tr>
<tr>
<td></td>
<td>○ &lt;10%</td>
</tr>
<tr>
<td></td>
<td>○ 10-50%</td>
</tr>
<tr>
<td></td>
<td>○ &gt;50%</td>
</tr>
</tbody>
</table>

Total 100%

Further options (may be selected in addition to the above):
- Hedge funds
- Fund of hedge funds

## OO 02  Mandatory Public Peering General

### OO 02.1  Select the location of your organisation's headquarters.

- South Africa

### OO 02.2  Indicate the number of countries in which you have offices (including your headquarters).

- ○ 1
- ☑ 2-5
- ○ 6-10
- ○ >10
**OO 02.3** Indicate the approximate number of staff in your organisation in full-time equivalents (FTE).

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**OO 03** Mandatory | Public | Descriptive | General

**OO 03.1** Indicate whether you have subsidiaries within your organisation that are also PRI signatories in their own right.

- Yes
- No

**OO 04** Mandatory | Public | Gateway/Peering | General

**OO 04.1** Indicate the year end date for your reporting year.

31/12/2018

**OO 04.2** Indicate your total AUM at the end of your reporting year.

- Not applicable as we are in the fund-raising process

**OO 04.4** Indicate the total assets at the end of your reporting year subject to an execution and/or advisory approach.

- Not applicable as we do not have any assets under execution and/or advisory approach

**OO 06** Mandatory | Public | Descriptive | General

**OO 06.1** Select how you would like to disclose your asset class mix.

- as percentage breakdown

<table>
<thead>
<tr>
<th></th>
<th>Internally managed (%)</th>
<th>Externally managed (%)</th>
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<tbody>
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</tr>
<tr>
<td>Fixed income</td>
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<td>0</td>
</tr>
<tr>
<td>Private equity</td>
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<td>0</td>
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<tr>
<td>Commodities</td>
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## Hedge Funds

<table>
<thead>
<tr>
<th>Asset Class</th>
<th>Developed Markets</th>
<th>Emerging Markets</th>
<th>Frontier Markets</th>
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</thead>
<tbody>
<tr>
<td>Hedge funds</td>
<td>0</td>
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<tr>
<td>Fund of hedge funds</td>
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<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Forestry</td>
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<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Farmland</td>
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<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Inclusive finance</td>
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<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Cash</td>
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</tr>
<tr>
<td>Money market instruments</td>
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<td>0</td>
</tr>
<tr>
<td>Other (1), specify</td>
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<td>0</td>
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<tr>
<td>Other (2), specify</td>
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</table>

*as broad ranges

### OO 06.2
Publish asset class mix as per attached image [Optional].

### OO 06.3
Indicate whether your organisation has any off-balance sheet assets [Optional].

- Yes
- No

### OO 06.5
Indicate whether your organisation uses fiduciary managers.

- Yes, we use a fiduciary manager and our response to OO 5.1 is reflective of their management of our assets.
- No, we do not use fiduciary managers.

### OO 09
Mandatory

#### OO 09.1
Indicate the breakdown of your organisation’s AUM by market.

<table>
<thead>
<tr>
<th>Market</th>
<th>AUM</th>
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<tbody>
<tr>
<td>Developed Markets</td>
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</tr>
<tr>
<td>Emerging Markets</td>
<td>100</td>
</tr>
<tr>
<td>Frontier Markets</td>
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</tr>
</tbody>
</table>
### Other Markets

<p>| | | | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
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</tr>
</thead>
<tbody>
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<td>Other Markets</td>
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</tr>
<tr>
<td>Total 100%</td>
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</table>

100%

### Asset class implementation gateway indicators

<table>
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<th>OO 11</th>
<th>Mandatory</th>
<th>Public</th>
<th>Gateway</th>
<th>General</th>
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<tbody>
<tr>
<td>OO 11.1</td>
<td>Select the internally managed asset classes in which you addressed ESG incorporation into your investment decisions and/or your active ownership practices (during the reporting year).</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- Private equity
  - ☑️ We address ESG incorporation.
  - ☐ We do not do ESG incorporation.

<table>
<thead>
<tr>
<th>OO 12</th>
<th>Mandatory</th>
<th>Public</th>
<th>Gateway</th>
<th>General</th>
</tr>
</thead>
<tbody>
<tr>
<td>OO 12.1</td>
<td>Below are all applicable modules or sections you may report on. Those which are mandatory to report (asset classes representing 10% or more of your AUM) are already ticked and read-only. Those which are voluntary to report on can be opted into by ticking the box.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- Core modules
  - ☑️ Organisational Overview
  - ☑️ Strategy and Governance

- RI implementation directly or via service providers

- Direct - Other asset classes with dedicated modules
  - ☑️ Private Equity

- RI implementation via external managers

- Closing module
  - ☑️ Closing module

### Peering questions
Provide a breakdown of your organisation’s internally managed private equity investments by investment strategy.

<table>
<thead>
<tr>
<th>Investment strategy</th>
<th>Percentage of your internally managed private equity holdings (in terms of AUM)</th>
</tr>
</thead>
</table>
| Venture capital                              | ○ >50%  
○ 10-50%  
○ <10%  
★ 0%                                             |
| Growth capital                               | ★ >50%  
○ 10-50%  
○ <10%  
○ 0%                                              |
| (Leveraged) buy-out                          | ○ >50%  
○ 10-50%  
○ <10%  
★ 0%                                              |
| Distressed/Turnaround/Special Situations     | ○ >50%  
○ 10-50%  
○ <10%  
★ 0%                                              |
| Secondaries                                  | ○ >50%  
○ 10-50%  
○ <10%  
★ 0%                                              |
| Other investment strategy, specify (1)       | ○ >50%  
○ 10-50%  
○ <10%  
★ 0%                                              |
| Other investment strategy, specify (2)       | ○ >50%  
○ 10-50%  
○ <10%  
★ 0%                                              |
| Total 100%                                   |                                                                                |
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Reported Information

Public version

Strategy and Governance

PRI disclaimer

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**Investment policy**

**SG 01**  
*Mandatory*  
*Public*  
*Core Assessed*  
*General*

New selection options have been added to this indicator. Please review your prefilled responses carefully.

**SG 01.1** Indicate if you have an investment policy that covers your responsible investment approach.

- Yes

**SG 01.2** Indicate the components/types and coverage of your policy.

Select all that apply

<table>
<thead>
<tr>
<th>Policy components/types</th>
<th>Coverage by AUM</th>
</tr>
</thead>
<tbody>
<tr>
<td>✔ Policy setting out your overall approach</td>
<td>✔ Applicable policies cover all AUM</td>
</tr>
<tr>
<td>✔ Formalised guidelines on environmental factors</td>
<td>○ Applicable policies cover a majority of AUM</td>
</tr>
<tr>
<td>✔ Formalised guidelines on social factors</td>
<td>○ Applicable policies cover a minority of AUM</td>
</tr>
<tr>
<td>✔ Formalised guidelines on corporate governance factors</td>
<td></td>
</tr>
<tr>
<td>□ Fiduciary (or equivalent) duties</td>
<td></td>
</tr>
<tr>
<td>□ Asset class-specific RI guidelines</td>
<td></td>
</tr>
<tr>
<td>□ Sector specific RI guidelines</td>
<td></td>
</tr>
<tr>
<td>✔ Screening / exclusions policy</td>
<td></td>
</tr>
<tr>
<td>□ Other, specify (1)</td>
<td></td>
</tr>
<tr>
<td>□ Other, specify(2)</td>
<td></td>
</tr>
</tbody>
</table>

**SG 01.3** Indicate if the investment policy covers any of the following

- ✔ Your organisation’s definition of ESG and/or responsible investment and it’s relation to investments
- ✔ Your investment objectives that take ESG factors/real economy influence into account
- □ Time horizon of your investment
- ✔ Governance structure of organisational ESG responsibilities
- ✔ ESG incorporation approaches
- ✔ Active ownership approaches
- ✔ Reporting
- ✔ Climate change
- □ Understanding and incorporating client / beneficiary sustainability preferences
- □ Other RI considerations, specify (1)
- □ Other RI considerations, specify (2)
### SG 01.4
Describe your organisation’s investment principles and overall investment strategy, interpretation of fiduciary (or equivalent) duties, and how they consider ESG factors and real economy impact.

As part of our mandate/governing documents we have an ESG Policy and an ESMS.

- No

---

### SG 02
Mandatory | Public | Core Assessed | PRI 6

**New selection options have been added to this indicator. Please review your prefilled responses carefully.**

#### SG 02.1
Indicate which of your investment policy documents (if any) are publicly available. Provide a URL and an attachment of the document.

- Policy setting out your overall approach
- Formalised guidelines on environmental factors
- Formalised guidelines on social factors
- Formalised guidelines on corporate governance factors
- Screening / exclusions policy
- We do not publicly disclose our investment policy documents

#### SG 02.2
Indicate if any of your investment policy components are publicly available. Provide URL and an attachment of the document.

- Your organisation’s definition of ESG and/or responsible investment and its relation to investments
- Your investment objectives that take ESG factors/real economy influence into account
- Governance structure of organisational ESG responsibilities
- ESG incorporation approaches
- Active ownership approaches
- Reporting
- Climate change
- We do not publicly disclose any investment policy components

---

### SG 03
Mandatory | Public | Core Assessed | General

#### SG 03.1
Indicate if your organisation has a policy on managing potential conflicts of interest in the investment process.

- Yes
- No

---

**Objectives and strategies**
### SG 05.1

**Indicate if and how frequently your organisation sets and reviews objectives for its responsible investment activities.**

- ○ Quarterly or more frequently
- ☑ Biannually
- ○ Annually
- ○ Less frequently than annually
- ○ Ad-hoc basis
- ○ It is not set/reviewed

### SG 07.1

**Indicate the internal and/or external roles used by your organisation, and indicate for each whether they have oversight and/or implementation responsibilities for responsible investment.**

#### Roles

- □ Board members or trustees
- ☑ Internal Roles (triggers other options)

#### Select from the below internal roles

- ☑ Chief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Operating Officer (COO), Investment Committee
  - □ Oversight/accountability for responsible investment
  - □ Implementation of responsible investment
  - □ No oversight/accountability or implementation responsibility for responsible investment
- □ Other Chief-level staff or head of department, specify
- □ Portfolio managers
- □ Investment analysts
- ☑ Dedicated responsible investment staff
  - □ Oversight/accountability for responsible investment
  - □ Implementation of responsible investment
  - □ No oversight/accountability or implementation responsibility for responsible investment
- □ Investor relations
- □ Other role, specify (1)
- □ Other role, specify (2)
- □ External managers or service providers
We have a dedicated ESG officer in SPEAR as well as ESG officers/responsible persons in each portfolio company.

SG 07.3 Indicate the number of dedicated responsible investment staff your organisation has.

Number

1

I confirm I have read and understood the Accountability tab for SG 07

Select all that apply

☑ Principles for Responsible Investment

Promoting responsible investment

SG 09 Mandatory Public Core Assessed PRI 4,5

SG 09.1 Select the collaborative organisation and/or initiatives of which your organisation is a member or in which it participated during the reporting year, and the role you played.
Your organisation’s role in the initiative during the reporting period (see definitions)

- Basic
- Moderate
- Advanced

- Asian Corporate Governance Association
- Australian Council of Superannuation Investors
- AFIC – La Commission ESG
- BVCA – Responsible Investment Advisory Board
- CDP Climate Change
- CDP Forests
- CDP Water
- CFA Institute Centre for Financial Market Integrity
- Code for Responsible Investment in SA (CRISA)
- Code for Responsible Finance in the 21st Century
- Council of Institutional Investors (CII)
- Eumedion
- Extractive Industries Transparency Initiative (EITI)
- ESG Research Australia
- Invest Europe Responsible Investment Roundtable
- Global Investors Governance Network (GIGN)
- Global Impact Investing Network (GIIN)
- Global Real Estate Sustainability Benchmark (GRESB)
- Green Bond Principles
- Institutional Investors Group on Climate Change (IIGCC)
- Interfaith Center on Corporate Responsibility (ICCR)
- International Corporate Governance Network (ICGN)
- Investor Group on Climate Change, Australia/New Zealand (IGCC)
- International Integrated Reporting Council (IIRC)
- Investor Network on Climate Risk (INCR)/CERES
- Local Authority Pension Fund Forum
- Principles for Sustainable Insurance
- Regional or National Social Investment Forums (e.g. UKSIF, Eurosif, ASRIA, RIAA), specify
- Responsible Finance Principles in Inclusive Finance
- Shareholder Association for Research and Education (Share)
- United Nations Environmental Program Finance Initiative (UNEP FI)
- United Nations Global Compact
- Other collaborative organisation/initiative, specify
- Other collaborative organisation/initiative, specify
- Other collaborative organisation/initiative, specify
- Other collaborative organisation/initiative, specify
### SG 10

**Mandatory** | **Public** | **Core Assessed** | **PRI 4**
--- | --- | --- | ---

**SG 10.1** Indicate if your organisation promotes responsible investment, independently of collaborative initiatives.

- [ ] Yes
- [ ] No

### Outsourcing to fiduciary managers and investment consultants

**Mandatory** | **Public** | **Core Assessed** | **PRI 4**
--- | --- | --- | ---

New selection options have been added to this indicator. Please review your prefilled responses carefully.

**SG 12.1** Indicate whether your organisation uses investment consultants.

- [ ] Yes, we use investment consultants
- [ ] No, we do not use investment consultants

### ESG issues in asset allocation

**Mandatory** | **Public** | **Descriptive** | **PRI 1**
--- | --- | --- | ---

**SG 13.1** Indicate whether the organisation undertakes scenario analysis and/or modelling and provide a description of the scenario analysis (by asset class, sector, strategic asset allocation, etc.).

- [ ] Yes, to assess future ESG factors
- [ ] Yes, to assess future climate-related risks and opportunities
- [ ] No, not to assess future ESG/climate-related issues

### Communication

**Mandatory** | **Public** | **Core Assessed** | **PRI 2, 6**
--- | --- | --- | ---

**SG 19.1** Indicate whether your organisation typically discloses asset class specific information proactively. Select the frequency of the disclosure to clients/beneficiaries and the public, and provide a URL to the public information.

Caution! The order in which asset classes are presented below has been updated in the online tool to match the Reporting Framework overview.
If you are transferring data from an offline document, please check your response carefully.

- Private equity
Do you disclose?

- We do not disclose to either clients/beneficiaries or the public.
- We disclose to clients/beneficiaries only.
- We disclose to the public
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Reported Information

Public version

Direct – Private Equity

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### Overview

**PE 02**  
Mandatory  
Public  
Core Assessed  
PRI 2

**PE 02.1**  
Indicate whether your organisation’s investment activities are guided by a responsible investment policy / follow responsible investment guidelines.

- Our investment activities are guided by a responsible investment policy
- Our investment activities are not guided by a responsible investment policy
- We do not have a responsible investment policy

### Fundraising of private equity funds

**PE 03**  
Mandatory  
Public  
Core Assessed  
PRI 1,4,6

**PE 03.1**  
Indicate if your most recent fund placement documents (private placement memorandums (PPM) or similar) refer to responsible investment.

- Yes

**PE 03.2**  
Indicate how your most recent fund placement documents (PPM or similar) refer to the following responsible investment:

- Policy and commitment to responsible investment
- Approach to ESG issues in pre-investment processes
- Approach to ESG issues in post-investment processes
- Approach to ESG reporting

- No
- Not applicable as our organisation does not fundraise

### Pre-investment (selection)

**PE 05**  
Mandatory  
Public  
Gateway  
PRI 1

**PE 05.1**  
During due-diligence indicate if your organisation typically incorporates ESG issues when selecting private equity investments.

- Yes

**PE 05.2**  
Describe your organisation’s approach to incorporating ESG issues in private equity investment selection.

We follow our ESMS, starting with a screening tool.

- No
## PE 06

**PE 06.1** Indicate what type of ESG information your organisation typically considers during your private equity investment selection process.

- [ ] Raw data from target company
- [ ] Benchmarks against other companies
- [ ] Sector level data/benchmarks
- [ ] Country level data/benchmarks
- [ ] Reporting standards, industry codes and certifications
- [ ] International initiatives, declarations or standards
- [ ] Engagements with stakeholders (e.g. customers and suppliers)
- [ ] Advice from external resources
- [ ] Other, specify

We are assisted in the DD process by a renowned ESG consulting firm.

- [ ] We do not track this information

## PE 06.2

Describe how this information is reported to, considered and documented by the Investment Committee or similar.

Extract from the ESG DD are incorporated into the decision material to the IC.

## Post-investment (monitoring)

**PE 09**

**PE 09.1** Indicate whether your organisation incorporates ESG issues in investment monitoring of portfolio companies.

- [ ] Yes

**PE 09.2** Indicate the proportion of portfolio companies where your organisation included ESG performance in investment monitoring during the reporting year.

- [ ] >90% of portfolio companies
- [ ] 51-90% of portfolio companies
- [ ] 10-50% of portfolio companies
- [ ] <10% of portfolio companies

(in terms of total number of portfolio companies)

**PE 09.3** Indicate ESG issues for which your organisation typically sets and monitors targets (KPIs or similar) and provide examples per issue.

**ESG issues**
Environmental

List up to three example targets of environmental issues

Example 1: Electricity usage

Example 2 (optional): Water consumption

Social

List up to three example targets of social issues

Example 1: Gender

Example 2 (optional): Training

We do not set and/or monitor against targets

No

PE 10

Mandatory  Public  Core Assessed  PRI 2

PE 10.1  Indicate if your organisation tracks the proportion of your portfolio companies that have an ESG/sustainability-related policy (or similar guidelines).

Yes

PE 10.2  Indicate what percentage of your portfolio companies has an ESG/sustainability policy (or similar guidelines).

>90% of portfolio companies

51-90% of portfolio companies

10-50% of portfolio companies

<10% of portfolio companies

0% of portfolio companies

(in terms of total number of portfolio companies)

No
SPEAR Capital Pty Ltd

Reported Information

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Confidence building measures

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## Confidence building measures

### CM1 01

**Mandatory** | **Public** | **Additional Assessed** | **General**
--- | --- | --- | ---

**CM1 01.1**

Indicate whether the reported information you have provided for your PRI Transparency Report this year has undergone:

- [ ] Third party assurance over selected responses from this year’s PRI Transparency Report
- [ ] Third party assurance over data points from other sources that have subsequently been used in your PRI responses this year
- [ ] Third party assurance or audit of the correct implementation of RI processes (that have been reported to the PRI this year)
- [ ] Internal audit of the correct implementation of RI processes and/or accuracy of RI data (that have been reported to the PRI this year)
- [ ] Internal verification of responses before submission to the PRI (e.g. by the CEO or the board)
- [ ] Other, specify
- [ ] None of the above

### CM1 02

**Mandatory** | **Public** | **Descriptive** | **General**
--- | --- | --- | ---

**CM1 02.1**

We undertook third party assurance on last year’s PRI Transparency Report

- [ ] Whole PRI Transparency Report was assured last year
- [ ] Selected data was assured in last year’s PRI Transparency Report
- [ ] We did not assure last year’s PRI Transparency report
- [ ] None of the above, we were in our preparation year and did not report last year.

### CM1 03

**Mandatory** | **Public** | **Descriptive** | **General**
--- | --- | --- | ---

**CM1 03.1**

We undertake confidence building measures that are unspecific to the data contained in our PRI Transparency Report:

- [ ] We adhere to an RI certification or labelling scheme
- [ ] We carry out independent/third party assurance over a whole public report (such as a sustainability report) extracts of which are included in this year’s PRI Transparency Report
- [ ] ESG audit of holdings
- [ ] Other, specify
- [ ] None of the above

### CM1 04

**Mandatory** | **Public** | **Descriptive** | **General**
--- | --- | --- | ---
<table>
<thead>
<tr>
<th>CM1 04.1</th>
<th>Do you plan to conduct third party assurance of this year’s PRI Transparency report?</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ Whole PRI Transparency Report will be assured</td>
<td></td>
</tr>
<tr>
<td>☐ Selected data will be assured</td>
<td></td>
</tr>
<tr>
<td>☑ We do not plan to assure this year’s PRI Transparency report</td>
<td></td>
</tr>
</tbody>
</table>