



| LEA 02 | Monetary | Gateway |
|-----------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Type of engagement</p> <p>Individual/ internal staff engagements</p> <p>Collaborative engagements</p> <p>Service provider engagements</p> | <p>Reason for Interaction</p> <p><input checked="" type="checkbox"/> To support investment decisionmaking in & company's material ESG issues</p> <p><input checked="" type="checkbox"/> To enhance corporate transition or identify the need for additional or other spend</p> <p><input type="checkbox"/> To support investment decisionmaking in & company's material ESG issues</p> <p><input type="checkbox"/> To enhance corporate transition or identify the need for additional or other spend</p> <p><input type="checkbox"/> To support investment decisionmaking in & company's material ESG issues</p> <p><input type="checkbox"/> To enhance corporate transition or identify the need for additional or other spend</p> | <p>Reason for Interaction</p> <p><input checked="" type="checkbox"/> To support investment decisionmaking in & company's material ESG issues</p> <p><input checked="" type="checkbox"/> To enhance corporate transition or identify the need for additional or other spend</p> <p><input type="checkbox"/> To support investment decisionmaking in & company's material ESG issues</p> <p><input type="checkbox"/> To enhance corporate transition or identify the need for additional or other spend</p> |

RI TRANSPARENCY REPORT

2020

Bregal Investments

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 2020 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:

| Symbol | Status |
|--------|-------------------------------------------------------------------|
| ✓ | The signatory has completed all mandatory parts of this indicator |
| ☑ | The signatory has completed some parts of this indicator |
| 🔒 | This indicator was not relevant for this signatory |
| - | The signatory did not complete any part of this indicator |
| Ⓜ | The signatory has flagged this indicator for internal review |

Within the table, indicators marked in blue are mandatory to complete. Indicators marked in grey are voluntary to complete.

Principles Index

| Organisational Overview | | | | Principle | | | | | | General |
|-------------------------|------------------------------------------------------------------------------|--------|------------------------------|-----------|---|---|---|---|---|---------|
| Indicator | Short description | Status | Disclosure | 1 | 2 | 3 | 4 | 5 | 6 | |
| OO TG | | 🔒 | n/a | | | | | | | |
| OO 01 | Signatory category and services | ✓ | Public | | | | | | | ✓ |
| OO 02 | Headquarters and operational countries | ✓ | Public | | | | | | | ✓ |
| OO 03 | Subsidiaries that are separate PRI signatories | ✓ | Public | | | | | | | ✓ |
| OO 04 | Reporting year and AUM | ✓ | Public | | | | | | | ✓ |
| OO 05 | Breakdown of AUM by asset class | ✓ | Asset mix disclosed in OO 06 | | | | | | | ✓ |
| OO 06 | How would you like to disclose your asset class mix | ✓ | Public | | | | | | | ✓ |
| OO 07 | Fixed income AUM breakdown | 🔒 | n/a | | | | | | | ✓ |
| OO 08 | Segregated mandates or pooled funds | ✓ | Private | | | | | | | ✓ |
| OO 09 | Breakdown of AUM by market | ✓ | Public | | | | | | | ✓ |
| OO 10 | Active ownership practices for listed assets | 🔒 | n/a | | | | | | | ✓ |
| OO 11 | ESG incorporation practices for all assets | ✓ | Public | | | | | | | ✓ |
| OO 12 | Modules and sections required to complete | ✓ | Public | | | | | | | ✓ |
| OO LE 01 | Breakdown of listed equity investments by passive and active strategies | 🔒 | n/a | | | | | | | ✓ |
| OO LE 02 | Reporting on strategies that are <10% of actively managed listed equities | 🔒 | n/a | | | | | | | ✓ |
| OO FI 01 | Breakdown of fixed income investments by passive and active strategies | 🔒 | n/a | | | | | | | ✓ |
| OO FI 02 | Reporting on strategies that are <10% of actively managed fixed income | 🔒 | n/a | | | | | | | ✓ |
| OO FI 03 | Fixed income breakdown by market and credit quality | 🔒 | n/a | | | | | | | ✓ |
| OO SAM 01 | Breakdown of externally managed investments by passive and active strategies | 🔒 | n/a | | | | | | | ✓ |
| OO PE 01 | Breakdown of private equity investments by strategy | ✓ | Public | | | | | | | ✓ |
| OO PE 02 | Typical level of ownership in private equity investments | ✓ | Private | | | | | | | ✓ |
| OO PR 01 | Breakdown of property investments | 🔒 | n/a | | | | | | | ✓ |
| OO PR 02 | Breakdown of property assets by management | 🔒 | n/a | | | | | | | ✓ |
| OO PR 03 | Largest property types | 🔒 | n/a | | | | | | | ✓ |
| OO INF 01 | Breakdown of infrastructure investments | 🔒 | n/a | | | | | | | ✓ |
| OO INF 02 | Breakdown of infrastructure assets by management | 🔒 | n/a | | | | | | | ✓ |
| OO INF 03 | Largest infrastructure sectors | 🔒 | n/a | | | | | | | ✓ |
| OO HF 01 | Breakdown of hedge funds investments by strategies | 🔒 | n/a | | | | | | | ✓ |
| OO End | Module confirmation page | ✓ | - | | | | | | | |

| CCStrategy and Governance | | | | Principle | | | | | | General |
|---------------------------|--------------------------------------------------------------------|--------|------------|-----------|---|---|---|---|---|---------|
| Indicator | Short description | Status | Disclosure | 1 | 2 | 3 | 4 | 5 | 6 | |
| SG 01 | RI policy and coverage | ✓ | Public | | | | | | | ✓ |
| SG 01 CC | Climate risk | ✓ | Private | | | | | | | ✓ |
| SG 02 | Publicly available RI policy or guidance documents | ✓ | Public | | | | | | ✓ | |
| SG 03 | Conflicts of interest | ✓ | Public | | | | | | | ✓ |
| SG 04 | Identifying incidents occurring within portfolios | ✓ | Private | | | | | | | ✓ |
| SG 05 | RI goals and objectives | ✓ | Public | | | | | | | ✓ |
| SG 06 | Main goals/objectives this year | ✓ | Private | | | | | | | ✓ |
| SG 07 | RI roles and responsibilities | ✓ | Public | | | | | | | ✓ |
| SG 07 CC | Climate-issues roles and responsibilities | ✓ | Private | | | | | | | ✓ |
| SG 08 | RI in performance management, reward and/or personal development | ✓ | Private | | | | | | | ✓ |
| SG 09 | Collaborative organisations / initiatives | ✓ | Public | | | | ✓ | ✓ | | |
| SG 09.2 | Assets managed by PRI signatories | ✓ | Private | ✓ | | | | | | |
| SG 10 | Promoting RI independently | ✓ | Public | | | | ✓ | | | |
| SG 11 | Dialogue with public policy makers or standard setters | - | n/a | | | | ✓ | ✓ | ✓ | |
| SG 12 | Role of investment consultants/fiduciary managers | ✓ | Public | | | | ✓ | | | |
| SG 13 | ESG issues in strategic asset allocation | ✓ | Public | ✓ | | | | | | |
| SG 13 CC | | 🔒 | n/a | | | | | | | ✓ |
| SG 14 | Long term investment risks and opportunity | ✓ | Private | ✓ | | | | | | |
| SG 14 CC | | ✓ | Private | | | | | | | ✓ |
| SG 15 | Allocation of assets to environmental and social themed areas | ✓ | Private | ✓ | | | | | | |
| SG 16 | ESG issues for internally managed assets not reported in framework | 🔒 | n/a | | | | | | | ✓ |
| SG 17 | ESG issues for externally managed assets not reported in framework | 🔒 | n/a | | | | | | | ✓ |
| SG 18 | Innovative features of approach to RI | ✓ | Private | | | | | | | ✓ |
| SG 19 | Communication | ✓ | Public | | ✓ | | | | ✓ | |
| SG End | Module confirmation page | ✓ | - | | | | | | | |

| Indirect – Manager Selection, Appointment and Monitoring | | | | Principle | | | | | | General |
|----------------------------------------------------------|----------------------------------------------------------------------------------------------|--------|------------|-----------|---|---|---|---|---|---------|
| Indicator | Short description | Status | Disclosure | 1 | 2 | 3 | 4 | 5 | 6 | |
| SAM 01 | ESG incorporation strategies | 🔒 | n/a | ✓ | | | | | | |
| SAM 02 | Selection processes (LE and FI) | ✓ | Public | ✓ | | | | | | |
| SAM 03 | Evaluating engagement and voting practices in manager selection (listed equity/fixed income) | 🔒 | n/a | | ✓ | | | | | |
| SAM 04 | Appointment processes (listed equity/fixed income) | ✓ | Public | ✓ | | | | | | |
| SAM 05 | Monitoring processes (listed equity/fixed income) | ✓ | Public | ✓ | | | | | | |
| SAM 06 | Monitoring on active ownership (listed equity/fixed income) | 🔒 | n/a | ✓ | | | | | | |
| SAM 07 | Percentage of (proxy) votes | 🔒 | n/a | | ✓ | | | | | |
| SAM 08 | Percentage of externally managed assets managed by PRI signatories | ✓ | Private | ✓ | | | | | | |
| SAM 09 | Examples of ESG issues in selection, appointment and monitoring processes | ✓ | Public | ✓ | | | | | ✓ | |
| SAM End | Module confirmation page | ✓ | - | | | | | | | |

| Direct – Private Equity | | | | Principle | | | | | | General |
|-------------------------|--------------------------------------------------------------------------------|--------|------------|-----------|---|---|---|---|---|---------|
| Indicator | Short description | Status | Disclosure | 1 | 2 | 3 | 4 | 5 | 6 | |
| PE 01 | Description of approach to RI | - | n/a | ✓ | | | | | ✓ | |
| PE 02 | Investment guidelines and RI | ✓ | Public | | ✓ | | | | | |
| PE 03 | Fund placement documents and RI | ✓ | Public | ✓ | | | ✓ | | ✓ | |
| PE 04 | Formal commitments to RI | ✓ | Private | | | | ✓ | | | |
| PE 05 | Incorporating ESG issues when selecting investments | ✓ | Public | ✓ | | | | | | |
| PE 06 | Types of ESG information considered in investment selection | ✓ | Public | ✓ | | ✓ | | | | |
| PE 07 | Encouraging improvements in investees | ✓ | Private | ✓ | ✓ | | | | | |
| PE 08 | ESG issues impact in selection process | ✓ | Private | ✓ | | | | | | |
| PE 09 | Proportion of companies monitored on their ESG performance | ✓ | Public | | ✓ | | | | | |
| PE 10 | Proportion of portfolio companies with sustainability policy | ✓ | Public | | ✓ | | | | | |
| PE 11 | Actions taken by portfolio companies to incorporate ESG issues into operations | ✓ | Private | | ✓ | | | | | |
| PE 12 | Type and frequency of reports received from portfolio companies | ✓ | Private | | ✓ | ✓ | | | | |
| PE 13 | Disclosure of ESG issues in pre-exit | ✓ | Private | | ✓ | | | | | |
| PE 14 | ESG issues affected financial/ESG performance | ✓ | Private | ✓ | ✓ | | | | | |
| PE 15 | Examples of ESG issues that affected your PE investments | ✓ | Private | ✓ | ✓ | | | | | |
| PE 16 | Approach to disclosing ESG incidents | ✓ | Private | | | | | | ✓ | |
| PE End | Module confirmation page | ✓ | - | | | | | | | |

| Confidence building measures | | | | Principle | | | | | | General |
|------------------------------|------------------------------------|--------|------------|-----------|---|---|---|---|---|---------|
| Indicator | Short description | Status | Disclosure | 1 | 2 | 3 | 4 | 5 | 6 | |
| CM1 01 | Assurance, verification, or review | ✓ | Public | | | | | | | ✓ |
| CM1 02 | Assurance of last year`s PRI data | ✓ | Public | | | | | | | ✓ |
| CM1 03 | Other confidence building measures | ✓ | Public | | | | | | | ✓ |
| CM1 04 | Assurance of this year`s PRI data | ✓ | Public | | | | | | | ✓ |
| CM1 05 | External assurance | 🔒 | n/a | | | | | | | ✓ |
| CM1 06 | Assurance or internal audit | 🔒 | n/a | | | | | | | ✓ |
| CM1 07 | Internal verification | ✓ | Public | | | | | | | ✓ |
| CM1 01 End | Module confirmation page | ✓ | - | | | | | | | |

Bregal Investments

Reported Information

Public version

Organisational Overview

PRI disclaimer

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Basic information

OO 01

Mandatory

Public

Gateway/Peering

General

OO 01.1

Select the services and funds you offer

| Select the services and funds you offer | % of asset under management (AUM) in ranges |
|----------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|
| Fund management | <input type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> >50% |
| Fund of funds, manager of managers, sub-advised products | <input type="radio"/> 0% <input type="radio"/> <10% <input checked="" type="radio"/> 10-50% <input type="radio"/> >50% |
| Other | <input checked="" type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> >50% |
| 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.

United Kingdom

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).

FTE

164

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.

31/12/2019

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

Include the AUM of subsidiaries, but exclude advisory/execution only assets, and exclude the assets of your PRI signatory subsidiaries that you have chosen not to report on in OO 03.2

| | trillions | billions | millions | thousands | hundreds |
|---------------|-----------|----------|----------|-----------|----------|
| Total AUM | | 10 | 365 | 000 | 000 |
| Currency | EUR | | | | |
| Assets in USD | | 11 | 425 | 352 | 946 |

Not applicable as we are in the fund-raising process

OO 04.4 Indicate the assets which are subject to an execution and/or advisory approach. Provide this figure based on the end of your reporting year

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

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

- as percentage breakdown
- as broad ranges

| | Internally managed (%) | Externally managed (%) |
|---------------------|------------------------|------------------------|
| Listed equity | 0 | 0 |
| Fixed income | 0 | 0 |
| Private equity | >50% | 10-50% |
| Property | 0 | 0 |
| Infrastructure | 0 | 0 |
| Commodities | 0 | 0 |
| Hedge funds | 0 | 0 |
| Fund of hedge funds | 0 | 0 |
| Forestry | 0 | 0 |

| | | |
|--------------------------|---|---|
| Farmland | 0 | 0 |
| Inclusive finance | 0 | 0 |
| Cash | 0 | 0 |
| Money market instruments | 0 | 0 |
| Other (1), specify | 0 | 0 |
| Other (2), specify | 0 | 0 |

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** **Public** **Peering** **General**

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

| | |
|-------------------|------|
| Developed Markets | 98 |
| Emerging Markets | 2 |
| Frontier Markets | 0 |
| Other Markets | 0 |
| Total 100% | 100% |

Asset class implementation gateway indicators

| | | | | |
|-------|-----------|--------|---------|---------|
| OO 11 | Mandatory | Public | Gateway | General |
|-------|-----------|--------|---------|---------|

OO 11.1 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).

Private equity

- We address ESG incorporation.
- We do not do ESG incorporation.

OO 11.2 Select the externally managed assets classes in which you and/or your investment consultants address ESG incorporation in your external manager selection, appointment and/or monitoring processes.

| Asset class | ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes |
|----------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Private equity | <p>Private equity - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process <input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process <input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process <input type="checkbox"/> We do not do ESG incorporation |

OO 11.4 Provide a brief description of how your organisation includes responsible investment considerations in your investment manager selection, appointment and monitoring processes.

ESG is an integral part of due diligence on investment managers, through ESG DDQ and due diligence questions. ESG issues are assessed as part of the investment manager's track record of historic deals. ESG is part of side letters to ensure ESG is integrated by the manager and certain exclusions are agreed. Subsequently, after investment we perform a bi-annual ESG screening of the entire portfolio of fund managers (35-40 GPs) to assess ESG management capability of the manager, headline risk of portfolio companies and general ESG exposure of the portfolios. High risk ESG exposures are selectively addressed with the relevant GPs

| | | | | |
|-------|-----------|--------|---------|---------|
| OO 12 | Mandatory | Public | Gateway | General |
|-------|-----------|--------|---------|---------|

OO 12.1 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.

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

Indirect - Selection, Appointment and Monitoring of External Managers

- Private Equity

Closing module

- Closing module

Peering questions

| | | | | |
|----------|-----------|--------|-------------|---------|
| OO PE 01 | Mandatory | Public | Descriptive | General |
|----------|-----------|--------|-------------|---------|

| | |
|------------|------------------------------------------------------------------------------------------------------------------|
| OO PE 01.1 | Provide a breakdown of your organisation's internally managed private equity investments by investment strategy. |
|------------|------------------------------------------------------------------------------------------------------------------|

| Investment strategy | Percentage of your internally managed private equity holdings (in terms of AUM) |
|------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|
| Venture capital | <input type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input checked="" type="radio"/> 0% |
| Growth capital | <input type="radio"/> >50% <input checked="" type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> 0% |
| (Leveraged) buy-out | <input checked="" type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> 0% |
| Distressed/Turnaround/Special Situations | <input type="radio"/> >50% <input type="radio"/> 10-50% <input checked="" type="radio"/> <10% <input type="radio"/> 0% |
| Secondaries | <input type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input checked="" type="radio"/> 0% |
| Other investment strategy, specify (1) | <input type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input checked="" type="radio"/> 0% |
| Other investment strategy, specify (2) | <input type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input checked="" type="radio"/> 0% |
| Total 100% | |

Bregal Investments

Reported Information

Public version

Strategy and Governance

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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

| Policy components/types | Coverage by AUM |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <input checked="" type="checkbox"/> Policy setting out your overall approach <input checked="" type="checkbox"/> Formalised guidelines on environmental factors <input checked="" type="checkbox"/> Formalised guidelines on social factors <input checked="" type="checkbox"/> Formalised guidelines on corporate governance factors <input type="checkbox"/> Fiduciary (or equivalent) duties <input type="checkbox"/> Asset class-specific RI guidelines <input type="checkbox"/> Sector specific RI guidelines <input checked="" type="checkbox"/> Screening / exclusions policy <input checked="" type="checkbox"/> Other, specify (1) Impact of own operation <input type="checkbox"/> Other, specify(2) | <input checked="" type="radio"/> Applicable policies cover all AUM <input type="radio"/> Applicable policies cover a majority of AUM <input type="radio"/> Applicable policies cover a minority of AUM |

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.

Bregal funds seek to generate the highest risk-adjusted returns for its investors by investing in and building high-quality business by partnering with entrepreneurial management teams. For Bregal, building a high-quality business includes ensuring high environmental, social and governance standards (ESG). We apply negative screening to make sure we do not invest in industries with a structural negative impact on society, both environmentally and socially. In addition, Bregal seeks to actively address ESG aspects of our businesses and support management teams in improving ESG performance.

SG 01.5

Provide a brief description of the key elements, any variations or exceptions to your investment policy that covers your responsible investment approach. [Optional]

Bregal funds aim to support our management teams in building and growing high-quality businesses, which includes ensuring high environmental, social and governance standards (ESG). This investment philosophy is an integral part of our responsible investment policy. We apply negative screenings and exclusion criteria (ie. weaponry, tobacco, pornography, gambling, etc.) to make sure we do not invest in industries with a structural negative impact on society, both environmentally and socially. In addition, Bregal seeks to actively address ESG aspects of our businesses and support management teams in improving ESG performance. The internal responsibilities are defined in our policy as well as the portfolio companies' boards.

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
- Other, specify (1)
- 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 it's 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
- 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

SG 03.2 Describe your policy on managing potential conflicts of interest in the investment process.

All of our individual fund teams have a dedicated conflicts of interest policy. The policy is set out in their respective compliance manuals and follows the usual form in line with FCA and SEC Regulation; principally mandating a transparent declaration of any potential or actual conflicts of interest and a pro active management and documentation of any potential or actual conflicts of interest in the appropriate conflicts of interest register for the team(s) in question.

No

Objectives and strategies

| | | | | |
|-------|-----------|--------|-----------------------|---------|
| SG 05 | Mandatory | Public | Gateway/Core Assessed | General |
|-------|-----------|--------|-----------------------|---------|

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

Governance and human resources

| | | | | |
|-------|-----------|--------|---------------|---------|
| SG 07 | Mandatory | Public | Core Assessed | General |
|-------|-----------|--------|---------------|---------|

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
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- 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
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- 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
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment

SG 07.2

For the roles for which you have RI oversight/accountability or implementation responsibilities, indicate how you execute these responsibilities.

RI oversight/accountability:

- Participate in all Investment Committee decision-making and consistently address ESG aspects of new deals
- Annual portfolio updates on ESG in Investment Committee to track progress and performance
- Incorporation of ESG in investment strategies
- Publication of annual, external ESG report to Bregal stakeholders and general public

Implementation responsibilities:

- Annual ESG reviews of portfolio companies
- Sustainable Development Fund - ESG improvement projects implemented
- ESG due diligence and assessment pre-deal

SG 07.3

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

Number

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.

Select all that apply

- Principles for Responsible Investment

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
 AVCA: Sustainability Committee
 France Invest – La Commission ESG
 BVCA – Responsible Investment Advisory Board

Your organisation's role in the initiative during the reporting period (see definitions)

- Basic
 Moderate
 Advanced
- CDP Climate Change
 CDP Forests
 CDP Water
 CFA Institute Centre for Financial Market Integrity
 Climate Action 100+
 Code for Responsible Investment in SA (CRISA)
 Council of Institutional Investors (CII)
 Eumedion
 Extractive Industries Transparency Initiative (EITI)
 ESG Research Australia
 Invest Europe Responsible Investment Roundtable

Your organisation's role in the initiative during the reporting period (see definitions)

- Basic
- Moderate
- Advanced
- Global Investors Governance Network (GIGN)
- Global Impact Investing Network (GIIN)
- Global Real Estate Sustainability Benchmark (GRESB)
- Green Bond Principles

Your organisation's role in the initiative during the reporting period (see definitions)

- Basic
- Moderate
- Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]

Bregal's € 40 million Sustainable Development Fund to provide capital to portfolio companies ESG improvement projects is inspired by the Green Bond Principles. In launching the Bregal SD Fund we engaged with the Green Bond principles organization

- HKVCA: ESG Committee
- 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 Financial Action in the 21st Century
- 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

SG 10.2

Indicate the actions your organisation has taken to promote responsible investment independently of collaborative initiatives. Provide a description of your role in contributing to the objectives of the selected action and the typical frequency of your participation/contribution.

Provided or supported education or training programmes (this includes peer to peer RI support) Your education or training may be for clients, investment managers, actuaries, broker/dealers, investment consultants, legal advisers etc.)

Description

Peer to peer RI support and sharing of best practices

Frequency of contribution

- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad hoc
- Other

Provided financial support for academic or industry research on responsible investment

Provided input and/or collaborated with academia on RI related work

Encouraged better transparency and disclosure of responsible investment practices across the investment industry

Description

Side letters of fund investments addressing ESG performance of GPs

Frequency of contribution

- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad hoc
- Other

Spoke publicly at events and conferences to promote responsible investment

Description

Green Equities Conference - London and Responsible Investment Forum

Frequency of contribution

- Quarterly or more frequently
 - Biannually
 - Annually
 - Less frequently than annually
 - Ad hoc
 - Other
- Wrote and published in-house research papers on responsible investment
- Encouraged the adoption of the PRI

Description

Side letters of fund investments encourage adoption of UN PRI

Frequency of contribution

- Quarterly or more frequently
 - Biannually
 - Annually
 - Less frequently than annually
 - Ad hoc
 - Other
- Responded to RI related consultations by non-governmental organisations (OECD, FSB etc.)
- Wrote and published articles on responsible investment in the media

Description

Annual publication of Bregal Responsible Investment report

Frequency of contribution

- Quarterly or more frequently
 - Biannually
 - Annually
 - Less frequently than annually
 - Ad hoc
 - Other
- A member of PRI advisory committees/ working groups, specify
- On the Board of, or officially advising, other RI organisations (e.g. local SIFs)
- Other, specify
- No

Outsourcing to fiduciary managers and investment consultants

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

| | |
|----------------|----------------------------------------------------------------------------------------------------------------------------------|
| SG 12.2 | Indicate how your organisation uses investment consultants in the selection, appointment and/or monitoring of external managers. |
|----------------|----------------------------------------------------------------------------------------------------------------------------------|

- We use investment consultants in our selection and appointment of external managers
- We use investment consultants in our monitoring of external managers

| | |
|--|-------------|
| | Asset class |
|--|-------------|

- Private equity (PE)
- Other asset classes
- We do not use investment consultants for selection, appointment and monitoring of external managers.

| | |
|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------|
| SG 12.3 | Indicate if your organisation considers responsible investment in the selection, appointment and/or review processes for investment consultants. |
|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------|

- Responsible investment is considered when evaluating investment consultants' investment beliefs, strategies and policies in the selection process.
- Responsible investment is considered when evaluating investment consultants' public commitment to, and promotion of, responsible investment in the selection process.
- Responsible investment is considered when reviewing investment consultants' approach to investment manager ratings, research and recommendations in the monitoring process.
- Consultants' responsibilities in terms of responsible investment in manager selection, appointment and monitoring processes are included in our contractual agreements with the investment consultants.
- We do not consider responsible investment in the selection, appointment and/or review processes for investment consultants.

| | |
|----------------|---------------------------------------------------------------------------------------------------------------------------------------------------|
| SG 12.4 | Indicate whether you use investment consultants for any the following services. Describe the responsible investment components of these services. |
|----------------|---------------------------------------------------------------------------------------------------------------------------------------------------|

- Custodial services
- Investment policy development
- Strategic asset allocation

| | |
|--|-----------------------------------------------------|
| | Describe how responsible investment is incorporated |
|--|-----------------------------------------------------|

ESG impact and exposure of indirect portfolio is periodically assessed by a consultant

- Investment research
 - Other, specify (1)
 - Other, specify (2)
 - Other, specify (3)
 - None of the above
- No, we do not use investment consultants.

ESG issues in asset allocation

| | | | | |
|-------|-----------|--------|-------------|-------|
| SG 13 | Mandatory | Public | Descriptive | PRI 1 |
|-------|-----------|--------|-------------|-------|

| | |
|---------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| SG 13.1 | Indicate whether the organisation carries out scenario analysis and/or modelling, and if it does, provide a description of the scenario analysis (by asset class, sector, strategic asset allocation, etc.). |
|---------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

- Yes, in order to assess future ESG factors
- Yes, in order to assess future climate-related risks and opportunities
- No, our organisation does not currently carry out scenario analysis and/or modelling

Communication

| | | | | |
|-------|-----------|--------|---------------|----------|
| SG 19 | 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. |
|---------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

Selection, Appointment and Monitoring

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

| | |
|--------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Disclosure to clients/beneficiaries | |
| Disclosure to clients/beneficiaries | <input checked="" type="checkbox"/> How responsible investment considerations are included in manager selection, appointment and monitoring processes <input checked="" type="checkbox"/> Details of the responsible investment activities carried out by managers on your behalf <input checked="" type="checkbox"/> E, S and/or G impacts and outcomes that have resulted from your managers' investments and/or active ownership <input type="checkbox"/> Other |
| Frequency | <input type="checkbox"/> Quarterly or more frequently <input type="checkbox"/> Biannually <input checked="" type="checkbox"/> Annually <input type="checkbox"/> Less frequently than annually <input type="checkbox"/> Ad-hoc/when requested |

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

| | |
|--------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Disclosure to clients/beneficiaries | |
| Disclosure to clients/beneficiaries | <input checked="" type="checkbox"/> ESG information in relationship to our pre-investment activities <input checked="" type="checkbox"/> ESG information in relationship to our post-investment monitoring and ownership activities <input checked="" type="checkbox"/> Information on our portfolio companies' ESG performance <input type="checkbox"/> Other |
| Frequency | <input type="checkbox"/> Quarterly or more frequently <input type="checkbox"/> Biannually <input checked="" type="checkbox"/> Annually <input type="checkbox"/> Less frequently than annually <input type="checkbox"/> Ad-hoc/when requested |

Bregal Investments

Reported Information

Public version

Indirect – Manager Selection, Appointment and Monitoring

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Selection

| | | | | |
|---------------|------------------|---------------|----------------------|--------------|
| SAM 02 | Mandatory | Public | Core Assessed | PRI 1 |
|---------------|------------------|---------------|----------------------|--------------|

SAM 02.1 | Indicate what RI-related information your organisation typically covers in the majority of selection documentation for your external managers

| | | | | | | Private equity | | |
|-----------------------------------------------------------------------------|--|--|--|--|--|-------------------------------------|--|--|
| Your organisation's investment strategy and how ESG objectives relate to it | | | | | | <input checked="" type="checkbox"/> | | |
| ESG incorporation requirements | | | | | | <input checked="" type="checkbox"/> | | |
| ESG reporting requirements | | | | | | <input checked="" type="checkbox"/> | | |
| Other | | | | | | <input type="checkbox"/> | | |
| No RI information covered in the selection documentation | | | | | | <input type="checkbox"/> | | |

SAM 02.2 | Explain how your organisation evaluates the investment manager's ability to align between your investment strategy and their investment approach

Strategy

| | | | | | | Private equity | | |
|---------------------------------------------------------------------------------------------------|--|--|--|--|--|-------------------------------------|--|--|
| Assess the time horizon of the investment manager's offering vs. your/beneficiaries' requirements | | | | | | <input type="checkbox"/> | | |
| Assess the quality of investment policy and its reference to ESG | | | | | | <input checked="" type="checkbox"/> | | |
| Assess the investment approach and how ESG objectives are implemented in the investment process | | | | | | <input checked="" type="checkbox"/> | | |
| Review the manager's firm-level vs. product-level approach to RI | | | | | | <input checked="" type="checkbox"/> | | |
| Assess the ESG definitions to be used | | | | | | <input type="checkbox"/> | | |
| Other | | | | | | <input type="checkbox"/> | | |
| None of the above | | | | | | <input type="checkbox"/> | | |

ESG people/oversight

| | | | | | | | | | Private equity | | |
|----------------------------------------------------------------------------|--|--|--|--|--|--|--|--|-------------------------------------|--|--|
| Assess ESG expertise of investment teams | | | | | | | | | <input checked="" type="checkbox"/> | | |
| Review the oversight and responsibilities of ESG implementation | | | | | | | | | <input checked="" type="checkbox"/> | | |
| Review how is ESG implementation enforced /ensured | | | | | | | | | <input checked="" type="checkbox"/> | | |
| Review the manager's RI-promotion efforts and engagement with the industry | | | | | | | | | <input checked="" type="checkbox"/> | | |
| Other | | | | | | | | | <input type="checkbox"/> | | |
| None of the above | | | | | | | | | <input type="checkbox"/> | | |

Process/portfolio construction/investment valuation

| | | | | | | Private equity | | |
|-----------------------------------------------------------------------------------------------------------|--|--|--|--|--|-------------------------------------|--|--|
| Review the process for ensuring the quality of the ESG data used | | | | | | <input type="checkbox"/> | | |
| Review and agree the use of ESG data in the investment decision making process | | | | | | <input type="checkbox"/> | | |
| Review and agree the impact of ESG analysis on investment decisions | | | | | | <input type="checkbox"/> | | |
| Review and agree ESG objectives (e.g. risk reduction, return seeking, real-world impact) | | | | | | <input type="checkbox"/> | | |
| Review and agree manager's ESG risk framework | | | | | | <input checked="" type="checkbox"/> | | |
| Review and agree ESG risk limits at the portfolio level (portfolio construction) and other ESG objectives | | | | | | <input type="checkbox"/> | | |
| Review how ESG materiality is evaluated by the manager | | | | | | <input checked="" type="checkbox"/> | | |
| Review process for defining and communicating on ESG incidents | | | | | | <input checked="" type="checkbox"/> | | |
| Review and agree ESG reporting frequency and detail | | | | | | <input checked="" type="checkbox"/> | | |
| Other, specify | | | | | | <input type="checkbox"/> | | |
| None of the above | | | | | | <input type="checkbox"/> | | |

SAM 02.3

Indicate the selection process and its ESG/RI components

- Review ESG/RI responses to RfP, RfI, DDQ etc.
- Review responses to PRI's Limited Partners' Responsible Investment Due Diligence Questionnaire (LP DDQ)
- Review publicly available information on ESG/RI
- Review assurance process on ESG/RI data and processes
- Review PRI Transparency Reports
- Request and discuss PRI Assessment Reports
- Meetings with the potential shortlisted managers covering ESG/RI themes
- Site visits to potential managers offices
- Other, specify

SAM 02.4

When selecting external managers does your organisation set any of the following:

| | | | | | | | Private equity | | |
|-------------------------------------|--|--|--|--|--|--|-------------------------------------|--|--|
| ESG performance development targets | | | | | | | <input type="checkbox"/> | | |
| ESG score | | | | | | | <input checked="" type="checkbox"/> | | |
| ESG weight | | | | | | | <input type="checkbox"/> | | |
| Real world economy targets | | | | | | | <input type="checkbox"/> | | |
| Other RI considerations | | | | | | | <input type="checkbox"/> | | |
| None of the above | | | | | | | <input type="checkbox"/> | | |

Appointment

| | | | | |
|---------------|------------------|---------------|----------------------|--------------|
| SAM 04 | Mandatory | Public | Core Assessed | PRI 1 |
|---------------|------------------|---------------|----------------------|--------------|

SAM 04.1 | Indicate if in the majority of cases and where the structure of the product allows, your organisation does any of the following as part of the manager appointment and/or commitment process

- Sets standard benchmarks or ESG benchmarks
- Defines ESG objectives and/ or ESG related exclusions/restrictions
- Sets incentives and controls linked to the ESG objectives
- Requires reporting on ESG objectives
- Requires the investment manager to adhere to ESG guidelines, regulations, principles or standards
- Other, specify (1)
- Other, specify (2)
- None of the above

SAM 04.2 | Provide an example per asset class of your benchmarks, objectives, incentives/controls and reporting requirements that would typically be included in your managers' appointment.

Asset class

- Private equity

Benchmark

- Standard benchmark, specify
- ESG benchmark, specify

Compare ESG performance of prospective manager with similar type of managers

ESG Objectives

ESG guidelines/regulation, principles/standards, specify

We encourage prospective managers to sign up to UN PRI, adopt an ESG policy and incorporate ESG in the investment process

We do not define ESG objectives

Incentives and controls

We do not set incentives and controls

Reporting requirements

Ad-hoc/when requested

Annually

Bi-annually

Quarterly

Monthly

SAM 04.3

Indicate which of these actions your organisation might take if any of the requirements are not met

Discuss requirements not met and set project plan to rectify

Place investment manager on a “watch list”

Track and investigate reason for non-compliance

Re-negotiate fees

Failing all actions, terminate contract with the manager

Other, specify

Engage with manager and discuss progress

No actions are taken if any of the ESG requirements are not met

Monitoring

SAM 05

Mandatory

Public

Core Assessed

PRI 1

SAM 05.1

When monitoring managers, indicate which of the following types of responsible investment information your organisation typically reviews and evaluates

| | | | | | | | | | | | Private equity | | |
|---------------------------------------------------------------------------------------------------------------------------------------------|--|--|--|--|--|--|--|--|--|--|-------------------------------------|--|--|
| ESG objectives linked to investment strategy (with examples) | | | | | | | | | | | <input type="checkbox"/> | | |
| Evidence on how the ESG incorporation strategy(ies) affected the investment decisions and financial / ESG performance of the portfolio/fund | | | | | | | | | | | <input type="checkbox"/> | | |
| Compliance with investment restrictions and any controversial investment decisions | | | | | | | | | | | <input checked="" type="checkbox"/> | | |
| ESG portfolio characteristics | | | | | | | | | | | <input checked="" type="checkbox"/> | | |
| How ESG materiality has been evaluated by the manager in the monitored period | | | | | | | | | | | <input type="checkbox"/> | | |
| Information on any ESG incidents | | | | | | | | | | | <input checked="" type="checkbox"/> | | |
| Metrics on the real economy influence of the investments | | | | | | | | | | | <input type="checkbox"/> | | |
| PRI Transparency Reports | | | | | | | | | | | <input checked="" type="checkbox"/> | | |
| PRI Assessment Reports | | | | | | | | | | | <input checked="" type="checkbox"/> | | |
| RI-promotion and engagement with the industry to enhance RI implementation | | | | | | | | | | | <input type="checkbox"/> | | |
| Changes to the oversight and responsibilities of ESG implementation | | | | | | | | | | | <input type="checkbox"/> | | |
| Other general RI considerations in investment management agreements; specify | | | | | | | | | | | <input checked="" type="checkbox"/> | | |
| None of the above | | | | | | | | | | | <input type="checkbox"/> | | |

If you select any `Other` option(s), specify

Periodic assessment of degree of ESG risk in the portfolio of all managers including an ESG risk score. Subsequently we engage with high ESG risk managers.

SAM 05.2 | When monitoring external managers, does your organisation set any of the following to measure compliance/progress

| | | | | | | | | | | | |
|-----------------------------------|--|--|--|--|--|--|--|--|--|-------------------------------------|--|
| | | | | | | | | | | Private equity | |
| ESG score | | | | | | | | | | <input checked="" type="checkbox"/> | |
| ESG weight | | | | | | | | | | <input checked="" type="checkbox"/> | |
| ESG performance minimum threshold | | | | | | | | | | <input checked="" type="checkbox"/> | |
| Real world economy targets | | | | | | | | | | <input type="checkbox"/> | |
| Other RI considerations | | | | | | | | | | <input type="checkbox"/> | |
| None of the above | | | | | | | | | | <input type="checkbox"/> | |

Outputs and outcomes

SAM 09

Mandatory

Public

Additional Assessed

PRI 1,6

SAM 09.1

Provide examples of how ESG issues have been addressed in the manager selection, appointment and/or monitoring process for your organisation during the reporting year.

Add Example 1

| | |
|-------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Topic or issue | Decline of GP/manager commitment due to ESG performance |
| Conducted by | <input checked="" type="checkbox"/> Internal staff <input type="checkbox"/> Investment consultants |
| Asset class | <input type="checkbox"/> All asset classes <input checked="" type="checkbox"/> Private equity |
| Scope and process | During due diligence on a prospective new investment we identified several high ESG risk investments in their realised and current portfolios. Although these investments were technically within their mandate and our investment restrictions from the side letter, we decided not to commit to this GP due to lack of ESG performance and understanding/recognition. |
| Outcomes | Although these investments were technically within their mandate and our investment restrictions from the side letter, we decided not to commit to this GP due to lack of ESG performance and understanding/recognition. |

Add Example 2

| | |
|-------------------|-----------------------------------------------------------------------------------------------------------------|
| Topic or issue | UN PRI signatory |
| Conducted by | <input checked="" type="checkbox"/> Internal staff <input type="checkbox"/> Investment consultants |
| Asset class | <input type="checkbox"/> All asset classes <input checked="" type="checkbox"/> Private equity |
| Scope and process | We signalled to the prospective manager that we expect them to sign up to UN PRI during this investment period. |
| Outcomes | Subsequently the manager signed up to UN PRI and adopted an ESG policy |

Add Example 3

| | |
|-------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Topic or issue | High ESG exposure at existing manager |
| Conducted by | <input checked="" type="checkbox"/> Internal staff <input type="checkbox"/> Investment consultants |
| Asset class | <input type="checkbox"/> All asset classes <input checked="" type="checkbox"/> Private equity |
| Scope and process | Screening of ESG exposure of existing managers |
| Outcomes | Significant ESG risk exposure at an existing manager lead us to engage with the manager and have them report back to us how they manage the ESG risk. The manager subsequently addressed several of these issues with their portfolio companies |

Add Example 4

| | |
|-------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Topic or issue | Share best practices |
| Conducted by | <input checked="" type="checkbox"/> Internal staff <input type="checkbox"/> Investment consultants |
| Asset class | <input type="checkbox"/> All asset classes <input checked="" type="checkbox"/> Private equity |
| Scope and process | Engagement with new external manager on ESG implementation |
| Outcomes | Our inhouse ESG team engaged with the new external manager to assist them in implementing ESG best practices. We had a few calls with the new manager and share best practices and documents from our own ESG programme in order to kickstart their ESG programme. This engagement was part of the understanding with the manager to commit to their fund |

- Add Example 5
- Add Example 6
- Add Example 7
- We are not able to provide examples

Bregal Investments

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

PE 02.2 Describe how your organisation outlines expectations on staff and portfolio companies' approach towards ESG issues in investment activities.

ESG incorporate in all steps of our investment process, from initial screening of opportunities, to investment decision-making and subsequently as part of our value creation approach. Investment managers collaborate with our inhouse ESG team to make sure ESG considerations are in work streams. We apply certain minimum ESG standards to new investment opportunities with a principles based approach to responsible investing which goes beyond a narrow implementation of defined investment restrictions only. Whenever relevant ESG is extensively discussed in investment committee meetings, in which our Head of ESG always participates in. Numerous times per year ESG is the main reason to decline deals, which would pass all other tests (ie. financial returns, value creation potential and management strength etc.).

Once part of our existing portfolio we perform annual ESG reviews during which we have a dialogue with the management team agree ESG priorities, formulate ESG improvement initiatives and measure ESG KPIs.

Deal teams and management pro-actively come up with ESG improvement initiatives, which might be eligible for an investment from Bregal's Sustainable Development Fund, a dedicated EUR 40 m fund which provides loans at attractive terms to existing portfolio companies such as solar panels and energy savings etc.

- 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.

The respective investment/deal team assesses the relevant ESG aspects of a prospective new investment. The materiality of ESG issues is discussed with the head of ESG, who provides input for the scope of ESG related due diligence.

ESG due diligence is on a case-by-case basis; either performed in-house or specialist ESG/sustainability consultants are engaged. ESG due diligence findings are discussed with company management and in our IC meetings. The head of ESG participates in all IC meetings to consistently address ESG considerations. In IC papers there is a mandatory ESG section to make sure that all Bregal fund deal teams address the relevant ESG considerations.

No

| | | | | |
|-------|-----------|--------|---------------|---------|
| PE 06 | Mandatory | Public | Core Assessed | PRI 1,3 |
|-------|-----------|--------|---------------|---------|

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 do not track this information

PE 06.2 Describe how this information is reported to, considered and documented by the Investment Committee or similar.

The Bregal deal teams incorporate ESG due diligence findings in the Investment Committee papers.

In case ESG considerations are material to the business and its long-term prospects, these are discussed in the Investment Committee meetings in which the head of ESG participates to ensure that these considerations are consistently addressed.

Post-investment (monitoring)

PE 09

Mandatory

Public

Gateway/Core Assessed

PRI 2

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

Fuel consumption

Example 2 (optional)

Renewable energy usage

Example 3 (optional)

Carbon footprint

Social

List up to three example targets of social issues

Example 1

Accident rates (health & safety)

Example 2 (optional)

Absenteeism

Example 3 (optional)

Fair wages in supply chain

Governance

List up to three example targets of governance issues

Example 1

Governance related training of management and Board

Example 2 (optional)

Implementation of ABC policy and training

Example 3 (optional)

Data privacy policies

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

Bregal Investments

Reported Information

Public version

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)
 - Whole PRI Transparency Report has been internally verified
 - Selected data has been internally verified
- 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.

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|--------|-----------|--------|-------------|---------|
| 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

CM1 03.3 Provide a link to the public report (such as a sustainability report that you carry out third party assurance over and for which you have used extracts of in this year's PRI Transparency Report. Also include a link to the external assurance provider's report.

Link to sustainability, RI, or integrated report [URL]

https://www.bregal.com/Content/images/Bregal_2018-19-RI-Report-FINAL.pdf

Link to external assurance provider`s report [URL]

https://www.bregal.com/Content/images/Bregal_2018-19-RI-Report-FINAL.pdf

- ESG audit of holdings
- Other, specify
- None of the above

| | | | | |
|--------|-----------|--------|-------------|---------|
| CM1 04 | Mandatory | Public | Descriptive | General |
|--------|-----------|--------|-------------|---------|

CM1 04.1 Do you plan to conduct third party assurance of this year`s PRI Transparency report?

- Whole PRI Transparency Report will be assured
- Selected data will be assured
- We do not plan to assure this year`s PRI Transparency report

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|--------|-----------|--------|-------------|---------|
| CM1 07 | Mandatory | Public | Descriptive | General |
|--------|-----------|--------|-------------|---------|

CM1 07.1 Indicate who has reviewed/verified internally the whole - or selected data of the - PRI Transparency Report . and if this applies to selected data please specify what data was reviewed

Who has conducted the verification

- CEO or other Chief-Level staff

Sign-off or review of responses

- Sign-off
- Review of responses
- The Board
- Investment Committee
- Compliance Function
- RI/ESG Team
- Investment Teams
- Legal Department
- Other (specify)