

# **Quilvest Capital Partners Responsible Investment Policy**

**July 2025**



# Responsible Investment Policy

## Quilvest Capital Partners sustainability commitments

### Founding principles

At Quilvest Capital Partners, we are convinced that as leading financial institution we have a responsibility towards society to manage the environmental and social impacts of our investment activities. The focus on sustainability has always been core for our Company given Quilvest family shareholding structure and DNA. Our role as long-term investor should be to create growth and value in a durable manner: we believe that taking into account Environmental, Social and Governance (“ESG”) criteria contribute to long-term absolute returns and to wealth preservation.

This policy goes beyond legal and compliance conformity; it sets both our commitment to sustainability and our approach to responsible investment with the main objective being the support of our people in performing their work and decision-making. It applies to QCP professionals and non-permanent staff working on behalf of QCP, in all countries where we do business.

### Our commitments

Following QCP founding principles, we have set forth commitments regarding sustainability. Meeting these commitments will determine the success of our approach to sustainability:

- We will systematically assess ESG impacts, risks and opportunities and inform the Investment Committee (“IC”) before making any investment decision.
- In deals where QCP exercises a significant level of control, we will engage actively with investees to design and agree-upon action plans to improve business practices in relation to the management of ESG issues. In deals where QCP does not exercise significant control, QCP will exercise its stewardship duties in alignment with the values reflected in this ESG policy.
- We will promote awareness on ESG investment techniques within our organization in order to endorse sustainability in our investment culture and to deliver our ESG ambitions.
- We commit to frame clear statements of ESG investment beliefs for our investment products, define the investment strategies to reach our ESG goals and to monitor and report on the ESG performance.
- QCP recognizes climate change as a significant challenge for both the economy and society. In alignment with global commitments, QCP supports the objectives of the Paris Agreement and other international initiatives aimed at limiting global warming. We will commit to take proactive steps to combat climate change both at QCP level and at portfolio level. At QCP level, we will reduce our direct environmental impact by limiting the CO<sup>2</sup> impact from QCP business trips and by reducing all disposable or single-use items within QCP premises [KPI\*: travel carbon emissions/FTE]

## Responsible investment in practice

### Roles & Responsibilities

The Sustainability policy has been endorsed by the QCP Board and Executive Committee with Alexis Meffre – the CEO – as the ESG Sponsor.

The Global Head of Sustainability will be responsible for the definition of the Sustainability strategy and its implementation at both the QCP group and portfolio levels, communication, reporting, support to investment, etc.

Each BU head is a sponsor of the Responsible Investment Policy, their responsibility is to ensure its effective implementation providing the necessary support to their team so that QCP will be successful at meeting its commitments.

QCP investment professionals are primarily responsible for ensuring that investment decisions properly integrate ESG criteria. QCP teams will use the different techniques and tools available for integrating ESG in company analysis, asset valuation, portfolio decision making, and stewardship. Where additional subject matter expertise is needed, the teams will utilize external resources as relevant and necessary.

## Our approach

QCP will seek to integrate the consideration and thoughtful management of ESG issues throughout the investment cycle. Additionally, the entire organization regularly interacts with key clients, beneficiaries and various stakeholders in the ecosystem, which ensures that our sustainability commitments are aligned with their priorities and best practices.

### Negative Screening

For any direct investment opportunity, preliminary screening ensures that the targeted investment do not directly derive revenues from, or is critical to the value chain, of industries that are blacklisted. These industries are the following:

- fossil fuels,
- tobacco,
- gambling,
- pornography,
- prostitution,
- lethal weapons,
- recreational drug use,
- mining,
- palm oil,
- logging,
- the use of GMOs (except when applied to fertility services or general HC-related services)
- human cloning
- animal experimentation

This exclusion list notably aligns with our commitment to mitigating climate change risks. The oversight and accountability for these exclusions and the broader responsible investment policy rest with our senior-level bodies, including board members and senior executives, who ensure these guidelines are effectively implemented and adhered to across all investment activities.

### Pre-investment Due-Diligence (“ESG DD”)

For all direct investment opportunities, in each business unit, QCP will carry out an ESG analysis.

This analysis is based on our proprietary tool, *QCP ESG framework*, which helps us identify the most material ESG topics to detail and address. (See Annex for a sample of *QCP ESG framework* tool in practice)

- **Buyout:** *QCP ESG framework* is based on a set of specific questions for 22 different industries that will help identify relevant ESG factors. Depending on the complexity of the topics and the quality of information, the investment team may decide to hire an external consultant and at engage with management of the company on these topics. Since the launch of its latest vintage, Buyout Fund III, this external DD is a mandatory step of the investment process.
- **Real Estate:** *QCP ESG framework* is based on a set of questions that are applied systematically for all types of property categories (commercial, residential, and industrial). Based on the results of this analysis and the investment thesis, the investment team may identify primary areas for potential improvements on ESG related matters.

- Private Credit: the investment team assesses the business using an analysis similar to the one conducted in the Buyout BU. The ESG analysis will take into account the non-control nature of private debt, and the availability of ESG-related information, which is generally more limited compared to larger, up-market and control transactions.
- For Primaries, Co-Investments and Secondaries, the investment team assesses the overall commitment to responsible investment of the General Partner (“GP”) and the level to which they integrate ESG factors into their investment process. This assessment is based on two sets of questions: one for GPs operating in developed markets and one for GPs in developing markets. For co-investments, the investment team assesses the business using an analysis similar to the one conducted in the Buyout BU. The ESG analysis will take into account the non-control nature of co-investments. If the investment team believes appropriate, it may also carried out the ESG analysis by assessing the lead sponsor according to ESG criteria

### Investment decision

A summary of the ESG analysis and due diligence work is then included in the memo which is discussed during the Investment Committee (“IC”) so that 1) the material ESG issues are discussed during IC and 2) IC decision-making takes into account ESG issues when appropriate.

### Ownership phase

Where QCP exercises a significant control over the investee companies, QCP will exercise its stewardship duties by engaging with management of these companies.

#### Buyout

- Quilvest will engage with the management of its portfolio companies to open a dialogue and work closely with investees over time on specific governance, social, or environmental issues that the investor regards as posing a downside risk to the business. QCP will promote that investee companies adopt better ESG practices, or at least to relinquish poor practices and will agree-upon specific goals and an action plans to reach these goals. QCP will collaborate with portfolio companies to design tailored ESG roadmaps, aligned with each company’s materiality assessment, industry context, geographic footprint, and other key characteristics. These roadmaps will be fully integrated into the broader value creation strategy. Quilvest commits to monitor the deployment and delivery of corporate ESG goals and to promote ESG awareness through effective oversight.
- Quilvest intends to incentivize the management of its investment targets to enhance their company's Sustainability performance by integrating ESG clauses into their management package and the Shareholder Agreements.

#### Real Estate

- Our approach to ESG includes the inclusion of this topic when defining, designing and implementing any major renovation in Real Estate projects, ensuring that any significant upgrades or refurbishments are aligned with our sustainability goals.

For Buyout and Real Estate BU investees, reports will be generated annually on a set of asset-specific and common ESG metrics. In this phase, the geographical relevance of specific sustainability outcome objectives is considered.

Where QCP does not exercise significant control, QCP will apply its stewardship duties in alignment with the values reflected in this ESG policy. Notably, QCP will encourage its portfolio (borrowers, underlying GPs, etc.) to engage in ESG and can provide support on ESG initiatives. Whenever possible

## Our Sustainability Framework and guidelines

As part of our commitment to responsible investment, Quilvest Capital Partners systematically monitors a defined set of ESG topics across our portfolio and during the evaluation of new investment opportunities. The scope and depth of this monitoring are calibrated based on our level of control or influence. These guidelines are further tailored to reflect sector-specific considerations and the materiality of each topic. Areas of focus include:

#### Environmental topics

- **Climate change:** We assess how companies address climate mitigation and adaptation through their operations and strategic planning.
- **Carbon footprint:** We monitor companies' greenhouse gas emissions, encourage measurement across scopes 1, 2, and 3, and promote the adoption of decarbonation plans.
- **Climate risks and opportunities:** We evaluate exposure to physical and transition climate risks, as well as the ability to capture related opportunities.
- **Biodiversity and planetary boundaries:** We consider the impact of business activities on ecosystems and their alignment with planetary boundaries.
- **Water management:** We review water consumption practices to ensure efficient, sustainable, and equitable use.
- **Waste management:** We monitor the production and disposal of waste and encourage reduction, reuse, and recycling initiatives.

#### Social topics

- **Diversity and inclusion (D&I):** We promote inclusive practices across governance, recruitment, and workplace culture.
- **Labour practices:** We assess whether companies uphold safe, fair, and compliant employment conditions.
- **Employee engagement:** We encourage practices that foster motivation, retention, and a strong sense of purpose among staff.
- **Training and development:** We support continuous learning opportunities and capacity-building for employees.
- **Value sharing:** We advocate for mechanisms that ensure fair sharing of the value created with employees and stakeholders.
- **Health and safety:** We expect robust policies and practices that protect physical and mental well-being in the workplace.
- **Human rights:** We monitor companies' respect for human rights throughout their operations and supply chains.
- **Community engagement:** We value strong relationships with local communities and positive contributions to societal well-being.

#### Governance topics

- **Board organisation and independence:** We review governance structures to ensure effectiveness, diversity, and proper oversight.
- **ESG certifications:** We encourage companies to pursue recognised certifications that validate their ESG practices.
- **Supply chain management:** We expect due diligence and oversight to ensure ethical and sustainable sourcing.
- **Anti-corruption:** We expect the implementation of strong anti-corruption policies and internal controls.
- **Code of conduct:** We monitor the existence and enforcement of codes of ethics and professional behavior.

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- **Data security:** We assess cybersecurity measures and compliance with data protection regulations.
  - **Business ethics:** We expect high standards of integrity, transparency, and compliance in all business dealings.
  - **Customer engagement:** We expect companies to maintain open, responsible, and trust-based relationships with their clients.
  - **CSR strategy:** We value the articulation and implementation of a clear corporate social responsibility strategy.
  - **Stakeholder engagement:** We promote dialogue with key stakeholders, including investors, co-investors, and underlying managers.
  - **Conflict of interest management:** We expect mechanisms to be in place to identify, disclose, and manage conflicts of interest proactively.

## Industry groups participation

We are convinced that collaboration within the industry is essential to promote the acceptance and practical application of responsible investments. Following this belief, Quilvest Capital Partners (“QCP”) became signatory in 2016 of the United-Nations backed *Principles for Responsible Investment* (“PRI”) and joined the 3000+ organizations worldwide, managing US\$ 100+ trillion worth of assets, which are committed to incorporate ESG criteria into investment practices<sup>1</sup> and to report annually on progress. Additionally, QCP is a member of France Invest, an organization whose one of the goals is to promote responsible and sustainable growth. France Invest works towards a fair transition to greener practices, creating both value and jobs in the process. As a member, QCP is committed to these goals, aiming to make investments that benefit both the economy and society.

## Stewardship Approach

As part of our responsible investment strategy, Quilvest Capital Partners exercises stewardship to promote long-term value creation and sustainable business practices. Our stewardship objectives include active engagement with investees, particularly where we hold significant influence, to advance material ESG issues. We prioritize ESG factors based on sector relevance and materiality, and focus our efforts on entities where we can have the greatest impact. Our stewardship tools include direct engagement, ESG action plans, board participation, and the integration of ESG clauses in shareholder agreements. We escalate our efforts when necessary through enhanced dialogue or governance mechanisms. We also collaborate with industry peers and initiatives such as the PRI and France Invest to amplify our influence. Conflicts of interest related to stewardship are identified and managed in accordance with our broader conflict of interest guidelines. Insights from stewardship activities are shared internally to inform investment decisions and are communicated to stakeholders through regular ESG reporting.

## Reporting

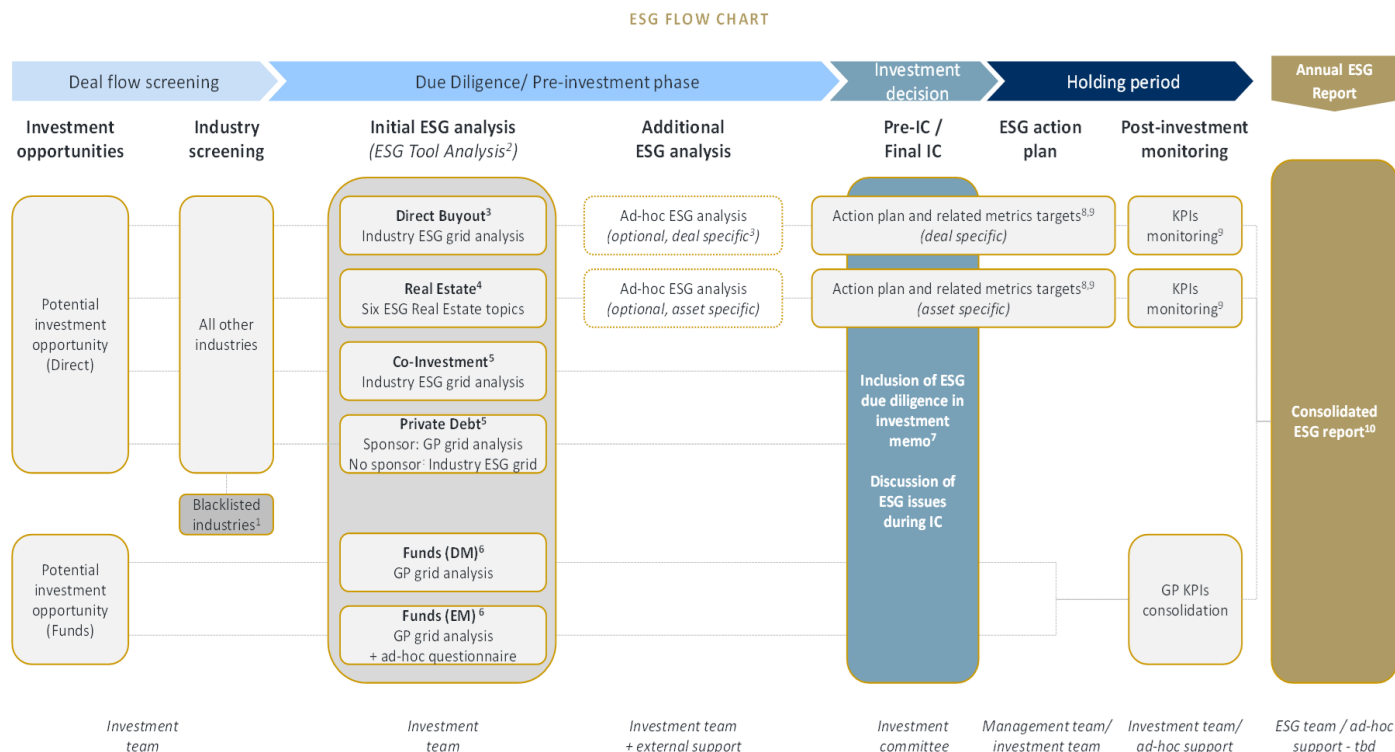
We are committed to transparent and proactive ESG reporting. We disclose any material ESG-related issues that may arise within our portfolio and integrate ESG as a standing topic in our investor communications. ESG performance and developments are addressed regularly in our investor reports, at LPACs and at our annual investor meetings - particularly for strategies where we have significant control and where ESG is a key driver of long-term value creation. This is an evolving process, and we are currently strengthening our reporting framework. Our first dedicated ESG report is expected to be published in 2025, marking a key

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milestone in our efforts to enhance visibility and accountability on sustainability matters.

## Appendices

### QCP ESG framework tool:



### ESG Stewardship and engagement in practice:

- Buyout strategy's latest vintage, Buyout Fund III, is a SFDR Article 8 fund. As part of its Sustainability commitments, the fund will promote, among other characteristics, the development of an ESG strategy, processes and organization at its portfolio companies, using the following indicators:
  - o The # / % of portfolio companies that have developed or updated a ESG strategy/action plan in the year following the investment date and which is subsequently updated annually,
  - o The # / % of portfolio companies where ESG matters are considered as an item on the agenda of 100% of board meetings,
  - o The # / % of portfolio companies with a senior manager / board committee responsible for overseeing ESG matters, including the implementation of the ESG strategy and action plans,
  - o The # / % of portfolio companies that have submitted a dedicated questionnaire on EcoVadis.

### Frameworks / industry standards supported by QCP, and that shape its Responsible Investment Policy approach:

- The 10 principles of the United Nations Global Compact
- The United Nations Principles for Responsible Investment (PRI)
- The United Nations Sustainable Development Goals (SDGs)



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- The Sustainability Accounting Standards Boards (SASB) Materiality Map
  - The Principal Adverse Impacts (PAIs) included in the technical regulatory standards draft associated with Regulation (EU) 2019/2088 (SFDR)
  - The objectives of the Paris Agreement
  - The Task Force on Climate-related financial Disclosure (TCFD)
  - The Task Force on Nature-related financial Disclosure (TNFD)
  - The European Taxonomy (technical and Do No Significant Harm (DNSH) criteria and minimum social safeguards)

#### Version

This version of the Responsible Investment Policy has been updated in July 2025, following previous version released in March 2025. Initial version dating from 2021.

Alexis Meffre

Chief Executive Officer



For more information about our Responsible Investment Policy or our ESG approach, please contact [dtoledano@quilvestcapital.com](mailto:dtoledano@quilvestcapital.com)