

## HarbourVest – SFDR Website Disclosures

The present statement contains, in particular, the disclosures which are required to be made on this website by HarbourVest Partners (Ireland) Limited (“HarbourVest Ireland”) under the Regulation (EU) 2019/2088 of the European Parliament and of the Council on sustainability-related disclosures in the financial services sector (the “Sustainability Disclosures Regulation”).

### Transparency of sustainability risk policies at entity level

*(article 3 of the Sustainability Disclosures Regulation)*

HarbourVest views responsible investing, or the incorporation of environmental, social, and governance (ESG) factors into investment and management decisions, as an important part of our business.

HarbourVest has been a proud signatory to the Principles for Responsible Investment (PRI) since 2013 and we strongly believe that ESG risks can affect the performance of investment portfolios, to varying degrees, across companies, sectors, and time periods. As an institutional investor, we have a fiduciary duty to act in the best interests of our clients. Our commitment to ESG integration is grounded in our conviction that the policies and processes of the GPs that we invest with to manage ESG risk can be an indicator for financial performance.

HarbourVest’s policy on the integration of sustainability risks in our investment decision making process can be found [here](#).

### Transparency of adverse sustainability impacts at entity level

*(article 4 of the Sustainability Disclosures Regulation)*

HarbourVest Partners (Ireland) Limited (“HarbourVest Ireland”) does not currently intend to publish a statement on its consideration of the adverse impacts of its investment decisions on sustainability factors in the manner set out in article 4 of the SFDR. Whilst HarbourVest Ireland integrates sustainability risks in its investment process, as a fund of fund sponsor making primary and secondary investments it has limited control over and access to data from underlying fund managers and cannot provide the information in relation to its consideration of the adverse impacts of its investment decisions on sustainability factors in the manner set out in the final draft Regulation on ESG disclosures published by the European Supervisory Authorities on 4 February 2021.

HarbourVest Ireland expects to keep this position under review by reference to applicable market developments and future availability of information.

### Transparency of remuneration policies in relation to the integration of sustainability risks

*(article 5 of the Sustainability Disclosures Regulation)*

HarbourVest requires relevant individuals to adhere to its policy and processes regarding the integration of environmental, social and governance obligations. Specific ESG-related metrics may be set for relevant individuals based on the priorities and objectives for that individual, as determined by their manager and functional leaders. In addition, HarbourVest considers its commitment to ESG integration as material to investment performance over the long term and aligned with its remuneration structure which focuses on long term fund performance.