



Responsible Investment
& Stewardship Policy
September 2024

Mission Statement

Apax’s mission is to cultivate and help realize the potential of portfolio companies, their management teams, and their employees to generate superior returns in a responsible manner for the investors in the Funds it advises – investors that are often pension funds and investment plans, the ultimate beneficiaries of which are millions of individuals.

Apax Values

Apax has a distinct culture with 4 values at its core which guide decision-making and support the firm in achieving its mission.



We choose right over easy

A duty to all stakeholders to treat them with respect and to “do the right thing”;



We succeed as a global team

Working collaboratively across teams and geographies to achieve optimal results;



We have impact through insight and tenacity

An entrepreneurial spirit to seek differentiated opportunities and perspectives;



We learn, adapt and grow

Seeking out and learning from diverse perspectives to improve continuously.

Responsible Investment Principles

Apax firmly believes that a focus on responsible investing can lower risk and enhance financial returns for the Funds and underlying portfolio companies, whilst also creating a net benefit for society.

Apax has been a proud signatory to the UN Principles for Responsible Investing ("PRI") since 2011 and has fully integrated processes to adhere to the six PRI Principles. Responsible investing is an integral part of Apax's investment approach and is embedded in the investment process to support the achievement of Apax's mission. Apax's sustainability programme covers the lifecycle of a Fund investment from pre-investment due diligence to post-investment monitoring, value creation, and reporting.

Over time, Apax has become a supporter of many collaborative sector initiatives including iCI, PESMIT and Level20, all of which aim to drive the adoption of responsible investing principles across the industry.

In addition, certain Apax Funds are subject to the EU Sustainable Finance Disclosure Regulation ("SFDR"), which mandates compliance with specific sustainable investment principles. Apax is committed to upholding these principles and adhering to SFDR requirements. As other regulatory bodies introduce similar measures, we will assess their applicability to the Funds.

Apax believes that responsible investing is not only the right thing to do, but also makes good business sense. We are committed to advancing this objective through environmental, social and governance initiatives that have material and measurable business logic.

Approach and Scope

Apax is an active investor and works to create long-term relationships with the management teams of the Fund portfolio companies by seeking representation on the boards of these companies. Apax has integrated sustainability and compliance considerations into its investment processes and ownership practices, in particular, for those portfolio companies where Apax has the ability to control and influence the integration of risk mitigation and value creation initiatives. In cases where the Funds are a minority shareholder or where other circumstances affect Apax's ability to assess or monitor non-financial performance goals, it may not necessarily be feasible to implement sustainability-related principles; however, in such instances, Apax will aim to incorporate responsible investment-related considerations as much as reasonably possible.

Apax established the Operational Excellence Practice ("OEP") to help the Funds identify value creation opportunities during due diligence and generate operational impact during ownership by the Funds. The OEP consists of individuals with a differentiated collection of capabilities and expertise in adding value across multiple functional areas of a company's operations to support the accelerated growth within Apax Fund portfolio companies. The involvement of Apax's OEP, therefore, is paramount to the success of the Firm's commitment to and execution of its responsible investment programme.

Apax has been collecting key performance indicators from portfolio companies across environmental, social and corporate governance areas since 2012. Over the last decade, we have continued to refine our framework to identify areas of materiality and improvement across the portfolio. We remain committed to promoting excellence in sustainability, transparency and accountability, while creating long-term value for Apax Fund investors and portfolio companies.

Apax's Stewardship Focus

The purpose of Apax's stewardship initiatives for the Funds' portfolio companies is to help protect the planet and people with initiatives which contribute to the UN Sustainable Development Goals ("SDGs") (such as Climate Action and Gender Equality) by engagement with management teams of the Apax Funds' portfolio companies. Engagement typically focuses on preserving and strengthening the portfolio companies' ability to do business in the future by improving resource efficiency, reducing costs, increasing workforce inclusion, equality and stability.

Apax collects relevant data from portfolio companies on an annual basis and works with portfolio company management teams to focus, in particular, on the guidelines in the following areas:

ENVIRONMENTAL



- Efficient use of natural resources;
- Reduction of energy usage;
- Carbon footprint measurement and decarbonisation projects;
- Consideration of impacts on biodiversity amongst others through:
 - Effective waste management and minimal land contamination;
 - Reduction of pollution and appropriate handling of hazardous waste; and
- Compliance with local environmental regulations.

SOCIAL



- Eliminating child labour or other forms of forced or compulsory labour;
- Avoiding discrimination (e.g., based on age, race, gender, religion, sexual orientation or disability);
- Consideration of employee working conditions (e.g., minimum wages, working hours, health, and safety of the work force);
- Supply chain sustainability management;
- Product quality and safety; and
- Compliance with human rights conventions (e.g., ILO).

GOVERNANCE



- Upholding a culture of good governance;
- Abiding by all relevant anti-corruption laws and regulations;
- Prohibiting corruption in all its forms, including extortion and bribery;
- Positive engagement with key stakeholders; and
- Customer privacy, data and cybersecurity

Pre-Investment Due Diligence Framework

Apax investment professionals undertake relevant pre-investment sustainability and compliance due diligence for each new private equity buyout investment made by the Funds. The focus of the due diligence may vary but, in all instances, will cover the areas that Apax believes are key to understanding the operational footprint of the company in which the Funds are considering an investment. Good governance is a key area of focus at this stage of the investment process.

Apax believes good governance is essential to the success of the Apax Fund portfolio companies. In alignment with widely recognised industry standards, Apax has defined good governance across four topic areas, namely: sound management structure, equitable remuneration of staff, constructive employee relations and tax compliance. For relevant funds subject to SFDR, Apax has implemented a specific good governance policy to ensure the Firm maintains the highest standards of transparency, accountability, and ethical conduct. This includes metrics connected to tracking adherence to adequate human rights practices such as compliance with local labour laws and the presence of a code of ethics. Prior to the closing of each new investment by the Funds, the findings of the sustainability and compliance due diligence process are reviewed by a member of the Apax Sustainability team and /or Compliance team and incorporated into the final Investment Committee documentation. Key issues which could be a material risk to the portfolio company's business are highlighted as part of this process. Where potentially material issues are identified, investment professionals will work with the relevant company's management team to develop an improvement plan to address findings post-investment, either in the 100-day planning process or thereafter.

The OEP's extensive expertise regarding business operations is routinely tapped into by Apax investment professionals for insight into how, among other things, a target company's existing operations might be optimised, risks can be addressed and mitigated, and avenues for value creation can be unlocked during the Funds' ownership tenure.

Post-Investment Monitoring and Engagement Framework

To monitor and manage portfolio company ESG performance following an investment, Apax annually collects Key Performance Indicator ("KPI") data from all portfolio companies of the Apax Funds where Apax has the ability to control and influence the integration of sustainability considerations, as discussed above within the Approach and Scope section.

Through this post-investment monitoring process, Apax is able to unlock value levers for the Funds' relevant portfolio companies and identify areas of materiality where input from investment professionals can create additional value or mitigate risk throughout the life of the investment. This collaborative approach enables the Firm to engage with portfolio companies and thoughtfully deploy the appropriate people, processes and technology in a more focused and effective manner. Apax's OEP is an integral partner to investment professionals during this process, working together to drive value creation and risk mitigation across material topics (e.g., climate and cyber security) identified pre-acquisition or during post-investment monitoring.

Specifically, Apax is committed to engaging with the Fund portfolio companies on a thematic basis with regard to climate action and will support portfolio companies in the most recent Apax Buyout Funds (AIX, AX, AXI) and Apax Global Impact Fund in developing strategies to improve performance in these areas.

Climate-related initiatives will involve engagement with portfolio companies in the specified Funds to measure each portfolio company's greenhouse gas ("GHG") emissions across Scope 1, Scope 2 and Scope 3. Once a company's carbon footprint has been measured, there will be engagement to encourage the development of a decarbonisation strategy for each business. This will take into account the sector in which the portfolio company operates and the materiality of the emissions to the business and wider environment.

Furthermore, as part of Apax's commitment to promoting diversity and inclusion, the Firm is bolstering various internal programs aimed at fostering an inclusive culture where everyone feels seen, safe, and connected. This includes affinity groups for women, LGBTQ employees and working parents, as well as efforts to increase the percentage of women employed at the Firm. Transparency and Reporting

Transparency is very important for Apax. Apax maintains multiple channels of communication on sustainability matters with the Funds' investors, both in the periodic Fund performance update reports to the Fund investors through Apax's Annual Sustainability Report, which discloses ESG information on Apax and the Funds' portfolio companies, and through a dedicated comprehensive site on its online investor portal. The Annual Sustainability Report is publicly available on the Apax website and is also shared with all Fund investors. In addition, on an annual basis, Apax participates in the PRI assessment and the PRI's transparency reports (which are also publicly available on the PRI website).

Through these channels Apax provides periodic updates to its stakeholders on the implementation of its responsible investment programme and the sustainability performance of the Funds' portfolio companies.

The Apax Fund portfolio company sustainability data set is available within the OEP's comprehensive data analytics platform, creating additional state-of-the-art analysis capabilities and heightened data accessibility. Online access to the data is provided to all investors through the Apax investor portal. Every Apax Fund LP has the unique ability to directly download relevant human capital, environmental and compliance indicators by portfolio company from the data suite for bespoke reporting and analytic purposes. Through this additional functionality, Apax is delivering on its commitment to providing industry leading transparency across its Funds.

Sustainability Governance

Responsible investing is part of the day-to-day activities of each investment professional. It is expected that portfolio company management teams and Board members of portfolio companies also monitor the ESG performance of their companies. The ultimate responsibility for ensuring that sustainability and compliance-related initiatives are implemented and followed resides with each portfolio company's Board of Directors and the Apax investment professionals participating on these Boards engage on ESG matters where material.

In addition, Apax has a Sustainability team which functions as the main internal resource responsible for the day-to-day implementation of Apax's responsible investment and stewardship efforts, which in turn are coordinated through and overseen by Apax's Sustainability Committee. The Sustainability Committee consists of members from the OEP, Investor Relations, Communications, and Compliance teams. The Sustainability Committee meets on a monthly basis and reviews matters relating to Apax's internal and external sustainability-related activities to ensure that sustainability matters are appropriately addressed by investment professionals and the relevant operational groups of the Firm.

Apax Responsible Operations

Apax is committed to upholding the same standards and practices in its operations as it expects from the Fund portfolio companies, particularly with respect to Inclusion & Diversity and climate action.

Apax has the conviction that a diverse work environment leads to better performance both within Apax as well as the portfolio. The Firm has been growing its pool of diverse talent and enhancing its internal policies and practices since 2015 in order to foster an inclusive work environment where all people can thrive.

Apax recognises that the Firm must contribute to a decarbonisation trajectory for its own operations to help protect the planet. With this in mind, Apax has offset its GHG emissions across global offices from 2019 – 2023 and intends to continue this into the future as a Carbon Neutral business.