Obviam Global Impact Fund I

(the “**Fund**”)

Sustainability related disclosures required for Article 9 funds that have sustainable investments as their objective

I. Summary

The Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (the “SFDR”) and the Regulation (EU) 2020/852 on the establishment of a framework to facilitate sustainable investment and amending EU Regulation 2019/2088 (the “Taxonomy Regulation”) (together the “Disclosure Regulations”) aim at providing more transparency to investors on sustainability risk integration, on the consideration of adverse sustainability impacts in the investment processes, on the promotion of environmental, social and/or governance (“ESG”) factors, and on having a sustainable investment objective. In particular, it requires fund managers and advisers to disclose specific ESG-related information to investors on their websites.

The objective of the Fund is sustainable investment, and it complies with the “do not significantly harm” principle within the meaning of Art. 2(17) SFDR. It does so pre-investment via screening potential investments according to ESG and impact criteria, which enables it to identify and assess any significant potential harm. Should an asset be flagged with potential for significant harm, and such harm is unlikely to be mitigated by the Manager’s value addition and engagement, the Fund will abstain from investing in such asset. Post-investment, the Investment Manager monitors and manages the environmental and social performance of investments throughout their life, in accordance with the Investment Manager’s *Responsible Investment Policy*,[1] which includes ESG standards.

The sustainable investment objective of the Fund is to generate measurable social impact while achieving long-term capital growth for investors. The Fund intends to realise its investment objective by investing in a diversified portfolio of small and medium sized private equity and credit Underlying Funds. The Fund also has the flexibility to invest directly in private equity and credit investments by co-investing alongside small and medium sized private equity and credit funds.

The Fund invests at least 75% in socially sustainable investments.

The Manager actively monitors sustainability indicators and ESG incidents and reviews investee funds’ ESG compliance on a regular basis, so as to avoid negative impacts. To assess positive impacts in according with the sustainable investment objective, the Investment Manager collects both quantitative and qualitative impact indicators, which are selected to measure contributions to one or more of the Sustainable Development Goals (“SDGs”) according to the investment thesis.

The Investment Manager’s impact and ESG assessment and management methodology is based on the following concepts and tools: (1) Impact rationale and "Theory of Change"; (2) United Nations

[1] https://www.obviam.ch/fileadmin/user_upload/pdf_docs/200115_Responsible_Investment_Policy_V1.3_Website_Version_01.pdf

Sustainable Development Goals; (3) Impact indicators (including IRIS+ and HIPSO metrics); and (4) ESG assessment.

The Manager obtains impact metrics from investees and undertakes statistical checks and quality control procedures, and liaises with investees as required to clarify or revise data points. While there may be several limitations to the methodologies and data, the Investment Manager undertakes steps to minimise any such limitations and provide high-quality data.

The Investment Manager pursues an active investment management strategy which involves setting realistic sustainable investment objectives and defining ESG risk mitigation requirements and impact metrics to measure impact performance. The Fund does not invest by reference to any index and does not intend to do so.

II. No significant harm to the sustainable investment objective

The objective of the Fund is sustainable investment, and it complies with the "do not significantly harm" principle within the meaning of Art. 2(17) SFDR. It does so pre-investment via screening potential investments according to ESG and impact criteria, which enables it to identify and assess any significant potential harm. Should an asset be flagged with potential for significant harm, and such harm is unlikely to be mitigated by the Investment Manager's value addition and engagement, the Fund will abstain from investing in such asset. Post-investment, the Investment Manager monitors and manages the environmental and social performance of investments throughout their life, in accordance with the Investment Manager's *Responsible Investment Policy*, which includes ESG standards. In addition, the Investment Manager considers the principal adverse impact indicators as set out in Table 1, 2 and 3 of Annex 1 of the regulatory technical standards. In this way, the Investment Manager strives to ensure that the Fund is not contributing to harmful effects on investees, their employees, communities and the environment, and minimizes such sustainability risks.

How have the indicators for adverse impacts on sustainability factors been taken into account?

The Investment Manager considers that avoiding negative impact – which corresponds to a "do-no-harm" approach – is a pre-requisite to the Fund's ability to claim its investments are making a positive impact. The cornerstone of this "do-no-harm" approach is the Investment Manager's Responsible Investment Policy, which is based on internationally accepted, best practice standards for responsible investment.

As part of its ESG risk management system, the Investment Manager closely monitors the compliance of the Fund's investments with the standards mentioned in its Responsible Investment Policy. Most of the activities resulting in adverse impacts are either excluded from the investment scope as per the Investment Manager's exclusion list[2] or specifically addressed through the use of the IFC Performance Standards in the Environmental and Social management system of the Investment Manager and/or manager of the Underlying Fund. For instance, exposure to fossil fuel activities in the fossil fuel sector, activities negatively affecting biodiversity-sensitive areas and exposure to all weapons are excluded as per the exclusion lists used by the Investment Manager. Likewise, the Investment Manager assesses the environmental and social risk management capacities of all its investments against IFC performance standards, including resource efficiency, biodiversity, and labour management. This applies in particular to how investments performed against IFC Performance Standard 2 on labour and

[2] https://www.obviam.ch/fileadmin/user_upload/pdf_docs/Obviam_Exclusion_List_Design.pdf

working conditions, which refer to ILO core conventions. Investees report to the Investment Manager on an annual basis on the results of their social management, how they implemented IFC Performance Standards requirements on labour management. With respect to working conditions, the Investment Manager requests its investee to report on an annual basis not only on quantitative job metrics, but also on qualitative working condition indicators such as the existence of a grievance mechanism, number of grievance cases per year, voluntary and involuntary turnover rates. Such metrics inform the Investment Manager's monitoring and help focus the dialogue with portfolio investee companies on the core ESG challenges. However, no greenhouse gas emission measure is being tracked by the Investment Manager for the time being, given the type of investee companies (SMEs in developing countries) in which the Underlying Funds invest (or in which the Fund co-invests).

How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?

All Fund investments comply with the Investment Manager's Responsible Investment Policy, which is based on internationally accepted, best practice standards, including: *the UN Guiding Principles for Business and Human Rights; International Labour Organization Core Labour Standards; International Finance Corporation (IFC) Standards on Social and Environmental Sustainability (2012); the associated Environmental, Health and Safety (EHS) Guidelines; the Corporate Governance Development Framework; and the Client Protection Principles.*

Requirements to comply with the standards embedded in the Investment Manager's Responsible Investment Policy are included in the legal agreements governing investments made by the Fund in Underlying Funds (or co-investments made by the Fund). In particular, each legal agreement contains specific sections on corporate governance standards and requirements, environmental and social standards, definitions that are fully aligned with the IFC Performance standards, a section on environmental and social performance reporting, as well as the investment exclusion list. These provisions provide legal safeguards to the Fund on the alignment of Underlying Funds and investee companies in which the Underlying Funds invest (or in which the Fund co-invests) with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

III. Sustainable investment objective of the financial product

The sustainable investment objective of the Fund is to generate measurable social impact while achieving long-term capital growth for investors.

The Fund features investments into Underlying Funds with the flexibility to make co-investments investing in developing countries with the objectives of generating a measurable development impact and generating a positive financial return, while adhering to strict environmental, social and governance ("ESG") standards embedded within the Investment Manager's Responsible Investment Policy.

The main development impact objective which is common to all investments is the support and creation of decent jobs in the target markets, thereby contributing to Sustainable Development Goal 8. Depending on the investment focus and thesis of the different investment Underlying Funds (or co-investments made by the Fund), additional development impacts are also identified upfront and subject to specific reporting (e.g. sector-specific Underlying Funds).

As a signatory to the Operating Principles for Impact Management, the Investment Manager applies a development impact management lens to each investment, in order to assess the expected impact and monitor the progress of each investment.

IV. Investment strategy

The Fund intends to realise its investment objective by investing in a diversified portfolio of small and medium sized private equity and credit Underlying Funds. The Fund also has the flexibility to invest directly in private equity and credit investments by co-investing alongside small and medium sized private equity and credit funds.

As an impact investor, the Investment Manager makes investments on behalf of the Fund with the aim of delivering positive impact to the local populations in developing countries and emerging markets. The investments managed by the Investment Manager on behalf of the Fund contribute to broad-based, sustainable economic development, and are fully aligned with the Sustainable Development Goals adopted by the United Nations in 2015. Through the provision of finance to the Underlying Funds which invest in commercially viable local companies in developing markets (or in which companies the Fund co-invests), the Investment Manager fosters their growth and supports the creation of formal, decent jobs. Considering the scarcity of employment opportunities in many developing countries and emerging markets, this is an important contribution to poverty reduction and local livelihoods.

All Fund investments comply with the Investment Manager's Responsible Investment Policy, which is based on internationally accepted, best practice standards, including: *the UN Guiding Principles for Business and Human Rights; International Labour Organization Core Labour Standards; International Finance Corporation (IFC) Standards on Social and Environmental Sustainability (2012); the associated Environmental, Health and Safety (EHS) Guidelines; the Corporate Governance Development Framework; and the Client Protection Principles.* A specific exclusion list is part of the Investment Manager's Responsible Investment Policy, and is legally binding on the Investment Manager for all investments the Investment Manager makes on behalf of the Fund.

The investment process includes the following elements that are designed to ensure adherence to the sustainable investment strategy and goals:

Screening

- Impact assessment - prospective funds are assessed in terms of their impact potential (see section VII "Methodologies" below).
- ESG due diligence – potential sustainability risks and risks of negative social or environmental impacts are identified (see section X "due diligence" below).
- Both impact assessment and ESG analysis are presented to and discussed in the investment committee, and therefore are key factors that influence the investment decision.

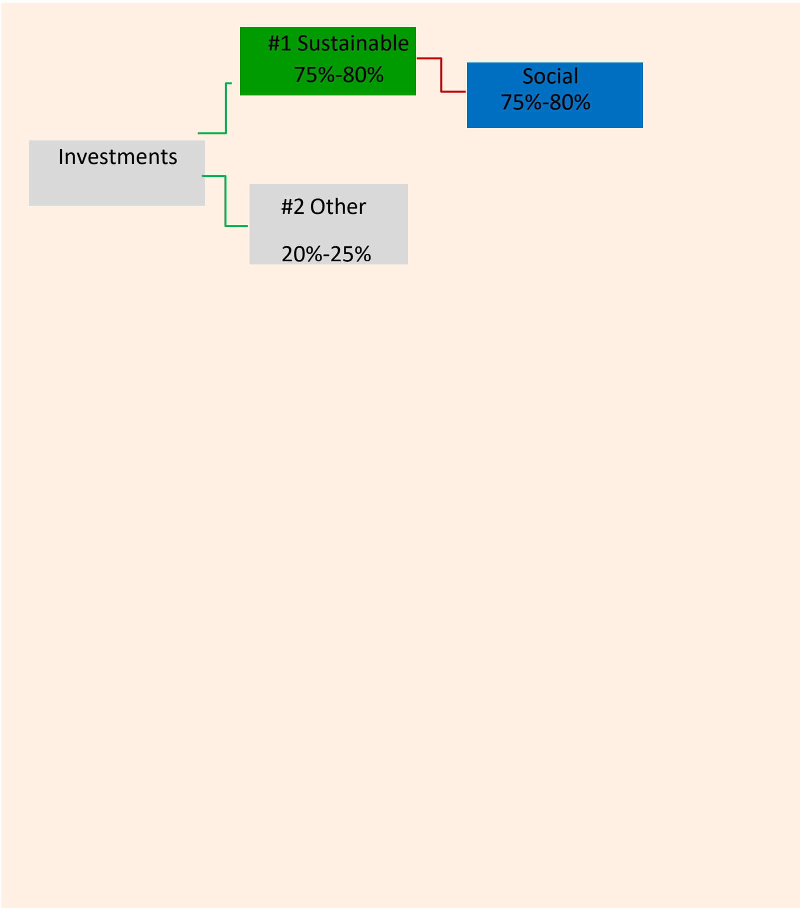
Monitoring

- ESG risks and incidents are monitored during the lifetime of the investment. Engagement with investee organisations is conducted to resolve issues as required.
- Impact metrics, which are aligned with UN Sustainable Development Goals, are monitored throughout the ownership period and reported on in annual impact reports (see section VII "Methodologies" below).

What is the policy to assess good governance practices of the investee companies?

All Fund investments comply with the Investment Manager’s Responsible Investment Policy, which is based on internationally accepted, best practice standards. In the field of governance, the reference framework used in the Responsible Investment Policy is the Corporate Governance Development Framework,[3] which is a joint initiative providing a methodology for evaluating corporate governance risks and opportunities and is adopted by 33 Development Finance Institutions and which builds on the IFC corporate governance methodology. This framework provides a platform to the Investment Manager for evaluating and improving governance practices of Underlying Funds and investee companies.

V. Proportion of investments



#1 Sustainable

covers sustainable investments with environmental or social objectives.

#2 Other

includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The Fund has sustainable investment as its objective within the meaning of Article 9 of SFDR. The Fund invests in an economic activity that contributes to a social objective in pursuing the Fund's investment objective of generating measurable social impact while achieving long-term capital growth for investors.

[3] https://cgdevelopmentframework.com/)

Accordingly, the Fund's investments are not deemed to be in an economic activity that qualifies as environmentally sustainable within the meaning of Article 3 of the Taxonomy Regulation, and the Fund's investments do not take into account the EU criteria for environmentally sustainable economic activities within the meaning of the Taxonomy Regulation. Therefore, for the purpose of the Taxonomy Regulation, the current proportion of environmentally sustainable investments in accordance with the Taxonomy Regulation is 0% of the net assets of the Fund.

The proportion of investments with a social objective is 75-80%.

To assess positive impacts in according with the sustainable investment objective, the Investment Manager collects both quantitative and qualitative impact indicators, which are selected to measure contributions to one or more of the Sustainable Development Goals ("SDGs") according to the investment thesis. Such indicators include job metrics – which are harmonized with IRIS+ (system for measuring, managing, and optimizing impact) and HIPSO (Harmonized Indicators for Private Sector Operations) reporting standards – for all its investments, as well as additional deal-specific metrics which are also harmonised as far as possible with international standards. Quantitative job data are collected annually on a disaggregated basis (by type of contracts and gender), using the full-time equivalent HIPSO definition, and aggregated at the portfolio level for impact reporting.

VI. Methodologies

The Investment Manager's ESG and impact measurement, assessment and management methodology includes the following components, each utilising specific concepts and tools:

1. Impact Rationale and Theory of Change

For each prospective investment, a development impact rationale is formulated to explain how the investment will contribute towards the Fund's sustainable development objective.

The starting point for the impact rationale is an analysis of the geographic, economic (including possibly sectoral) and social context in which the investment would take place. The purpose of this analysis is to identify the socioeconomic development gaps, for example poverty and a lack of decent job opportunities and livelihoods.

The second step is to utilise a "theory of change" to illustrate the contribution of the investment to addressing the development gap or needs. A theory of change aims to comprehensively describe how and why a desired change is expected to happen in a particular context, based on the identification of long-term goals.

2. Sustainable Development Goals

The outcomes and impact are then related to the United Nations Sustainable Development Goals (SDGs). In particular, the outputs of the enterprises that are funded are linked to one or more SDGs and possibly to specific Sustainable Development Targets ("SDTs") attached to the goals. In this way, the Investment Manager and the Fund are fully aligned with the SDGs, in all investment activities.

3. Impact Indicators

Once the relevant SDGs have been identified, the Investment Manager selects appropriate impact indicators or metrics that measure the quantitative contribution of the investment to these SDGs (and possibly SDTs). As far as possible, such indicators are drawn from internationally harmonized indicators sets, such as IRIS+ (a catalogue of indicators used for measuring, managing, and optimizing impact that is maintained by the Global Impact Investing Network and widely used across the industry to measure impact performance) and HIPSO (Harmonized Indicators for Private Sector Operations, an initiative of development finance institutions). These impact metrics are tracked annually and aggregated results are presented in the Fund's annual impact report.

Please refer to section VIII "Data sources and processing" for further details.

4. ESG Assessment

An integral component of the assessment of prospective investments is an ESG due diligence process. The aim of ESG due diligence is to identify potential risks from ESG factors that, if not addressed, could impair the attainment of positive impacts or generate negative impacts on society or the environment. Essentially, it is a method for assessing sustainability risks. After investment, ESG tools are employed to manage such risks over the lifetime of the investment through regular ESG monitoring and engagement.

The Investment Manager's ESG methodology, applied during due diligence and subsequent monitoring, is based on its Responsible Investment Policy, which in turn is based on internationally accepted, best practice standards, including: *the UN Guiding Principles for Business and Human Rights; International Labour Organization Core Labour Standards; International Finance Corporation (IFC) Standards on Social and Environmental Sustainability (2012); the associated Environmental, Health and Safety (EHS) Guidelines; the Corporate Governance Development Framework; and the Client Protection Principles.* A specific exclusion list is part of the Investment Manager's Responsible Investment Policy, and is legally binding on the Investment Manager for all investments the Investment Manager makes on behalf of the Fund. All Fund investments must comply with the Investment Manager's Responsible Investment Policy.

The Investment Manager undertakes an ESG assessment of all prospective investments, which establishes the ESG risks across a wide range of social and environmental categories. Please refer to section X "Due diligence" below for additional details.

VII. Data sources and processing

As outlined in section VI above, in order to assess the sustainable investment objective of the Fund, the Manager identifies several impact metrics to capture the contribution of the investment to the objective and to specific, relevant SDGs. The first step is to assess a company or a fund's existing impact framework and data collection system, if such exists. Where possible, the Investment Manager adopts relevant metrics already collected by the investee, in order to minimize reporting burdens and maximise data quality. In some cases, new metrics need to be identified by the Investment Manager, and these are discussed and agreed with the investee prior to investment and inserted into the legal agreements. As far as possible, the Investment Manager selects internationally harmonised indicators. To the extent possible, the Investment Manager identifies common impact metrics that can be aggregated across assets at a sector and portfolio level.

Each year, the Investment Manager sends out a template containing all the impact indicators (and definitions) to the Fund's investees. The Underlying Funds in turn obtain the required data from their investee companies, the fund managers compile these data, and submit the templates back to the Investment Manager. The Investment Manager then undertakes statistical checks and quality control procedures, and liaises with investee funds as required to clarify or revise data points. Once checked and validated, the metrics are aggregated across investees to show the combined impact of the portfolio. This applies in particular to decent job metrics, which are collected for all investments. Deal-specific metrics apply to only a subset of the portfolio.

All of the data are actual, not estimated, with the exception of carbon emissions which may be estimated using a model, the Joint Impact Model,[4] which was developed by a consortium of Development Finance Institutions.

On an annual basis, the Investment Manager produces a comprehensive impact report for all clients. The report illustrates the performance of the portfolio based on the key impact metrics and discusses any pertinent ESG-related issues. The impact report also contains one or more case studies, which delve into qualitative aspects of development impact.

VIII. Limitations to methodologies and data

There are several limitations to the methodologies and data, including, but not limited to the following: (i): limited capacity among portfolio companies to accurately measure or report on certain impact metrics; (ii) limited coverage, e.g. missing values – noting that some impact indicators may not be applicable to all investees; (iii) human error in the capturing or transmission of data; and (iv) different reporting periods for companies situated in different geographies. The Investment Manager tries to avoid such problems as far as possible by agreeing on suitable impact metrics with investees prior to investment. Nonetheless, blind pool funds reduce the visibility and scope for ensuring measurement capacity among future investee companies of Underlying Funds.

The Investment Manager works with its partner fund managers and their underlying assets to improve data quality by undertaking quality control and providing feedback, bearing in mind the commercial context (SMEs in emerging and frontier economies) and the capacity of the investees. In this way, the data limitations are minimised to the extent possible.

IX. Due diligence

An integral component of the assessment of prospective investments is the Investment Manager's ESG due diligence process. The aim of ESG due diligence is to identify potential risks from ESG factors that, if not addressed, could impair the attainment of positive impacts or generate negative impacts on society or the environment. Essentially, it is a method for assessing sustainability risks.

The Investment Manager's ESG methodology, applied during due diligence and subsequent monitoring, is based on its Responsible Investment Policy, which in turn is based on internationally accepted, best practice standards, including: *the UN Guiding Principles for Business and Human Rights; International Labour Organization Core Labour Standards; International Finance Corporation (IFC) Standards on Social and Environmental Sustainability (2012); the associated Environmental, Health and Safety (EHS) Guidelines; the Corporate Governance Development Framework; and the Client Protection Principles.* A specific exclusion list is part of the Investment Manager's Responsible Investment Policy, and is applicable for all investments made by the Investment Manager.

The ESG due diligence establishes the extent of alignment and compliance of the potential investment with the Investment Manager's Responsible Investment Policy. This includes an assessment of the organisation's Environmental and Social Management System ("ESMS") and their capacities to

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[4] https://www.jointimpactmodel.org/

administer it, so as to minimise, mitigate or remediate any ESG risks. If necessary, an Environmental and Social Action Plan ("ESAP") is formulated and agreed upon with the organization, so as to bring its ESMS up to the required standard, and/or to capture ESG-related risks identified and the associated roadmap for improvement. Compliance with the Responsible Investment Policy and fulfilment of the ESAP (if applicable) are monitored over the life of the investment. The Investment Manager performs ESG risk screening (including possible integrity and reputational risks) of prospective investees to identify any existing or historical sustainability-related controversies. Material issues are discussed with the organization, and if serious may constitute a reason not to invest. Establishment of the ESG-related risks serves to highlight areas at high risk of material negative impact. A member of the ESG and Impact team is responsible for completing the ESG assessment of each investment, including the identification and assessment of key risks as well as proposing remedial actions.

In addition to the ESG due diligence, an impact assessment is carried out on each prospective investment to gauge its potential to contribute towards sustainable investment objectives. This involves analysing the local socioeconomic and environmental context to establish development needs. The next step is to establish a credible impact thesis based on a logic model, which explains how the investment will contribute towards bridging development gaps through outputs and outcomes, especially in terms of relevant SDGs. Appropriate impact indicators are identified to measure and report on impact outcomes throughout the life of the investment.

The results of ESG and impact assessments performed during due diligence are included in investment papers presented to the Manager's Investment Committee, and as such constitute one of the critical factors influencing the decision of whether to invest.

Please refer to section VII "Methodologies" above for further details.

X. Engagement policies

After investment, the Investment Manager actively monitors ESG-related incidents and accidents, which the investees are obliged to report on. The Investment Manager actively engages on such incidents to ensure that they are adequately addressed and resolved to the best extent possible. For investments via Private Equity or Credit funds, engagement is conducted with the Fund Managers concerned, rather than the underlying investee companies.

Further details may be found in section IV "Investment strategy" above.

XI. Attainment of the sustainable investment objective

As described in preceding sections, the Manager pursues an active investment management strategy. This involves setting realistic sustainable investment objectives and defining ESG risk mitigation requirements and impact metrics. The performance of investments as measured by impact metrics are monitored annually vis-à-vis the objectives. The Fund does not invest by reference to any index and does not intend to do so.