

Consumer-facing sustainability disclosures

Basic Product Information

Name of the Product: HgCapital Trust PLC (“HgT”).
Name of the Manager: Hg Pooled Management (“Hg Pooled”).
Date of Disclosure: [24/04/2025]
ISIN: GB00BJOLT190

No Sustainability Label

Sustainability labels help investors find products that have a specific sustainability goal. HgT does not use an FCA sustainability label. These consumer-facing disclosures are being provided in accordance with ESG 5.2.1R(2) of the FCA’s Handbook as Hg Pooled uses certain sustainability-related terms listed in ESG 4.3.2R(2) in HgT’s financial promotions. HgT does not use a sustainability label because it considers financially material sustainability factors in its investment process and uses relevant sustainability-related terms in its financial promotions to describe how it integrates such factors, but the Product does not have a specific sustainability goal.

Product’s Sustainability Approach

HgT seeks to provide investors with consistent long-term returns by investing predominantly in unquoted software and services businesses where value can be created through strategic and operational change. Hg Pooled believes that financial and ESG performance are interconnected, and is committed to driving improvements in HgT’s portfolio across the most material ESG topics.

Hg Pooled has developed a Responsible Investment Policy centred around key ESG focus areas for software and service companies, and has subsequently developed a Sustainable Business Framework to guide ESG due diligence during onboarding and annually thereafter. During onboarding, each portfolio company responds to over 100 questions and gets a score from 0-10 to benchmark their performance across HgT’s portfolio, following which an output report is developed to outline the results alongside some key actions for the next 12 months. A similar diagnostic is conducted at least annually, and improvements are made year on year. Hg Pooled offers hands-on support to portfolio companies to drive progress on their ESG improvement plans i.e., by sharing templates, toolkits and hosting online webinars as well as in-person forums.

Furthermore, Hg Pooled undertook a materiality assessment in 2022 and 2023 to identify the ESG topics that pose the highest risk to HgT's returns, while offering the greatest opportunities. Performance with respect to these six material topics is taken account in respect of each investment. The six material topics are: (1) Diversity, Equity & Inclusion; (2) Cybersecurity; (3) Data protection; (4) Climate change; (5) Anti-trust; and (6) Business Ethics and Culture.

Relevant Sustainability Metrics

A full list of sustainability-related metrics which Hg Pooled collects with respect to HgT's portfolio can be found in the Hg's Sustainability Report, but the key metrics which reflect HgT's portfolio's performance against the "essential" elements of HgT's sustainability are, as of December 2022 and December 2023, covering 41 portfolio companies:

Indicator	2022 Performance	2023 Performance
ESG Strategy in Place	49%	59%
ESG Board Accountability	51%	93%
Anti-Bribery and Corruption Policy in Place	93%	98%
Anti-Discrimination Policy in Place	95%	100%
Competition Law Considered in Compliance Structure	66%	88%
Code of Conduct in Place	88%	98%
Data Privacy Policy in Place	100%	93%
Health & Safety Policy in Place	93%	95%
Risk Register Procedures in Place	85%	88%

Related Information

The Manager can be contacted at +44 (0)20 7089 7888 and its website can be found at www.hgcapital.com. The full investment policy, including relevant non-sustainability related information, is set out in HgT's Annual Report and Accounts, and further details regarding HgT's sustainability approach can be found in the Sustainable Investment Report available at: www.hgcapitaltrust.com.