

## BLACKFIN ESG POLICY

*Pursuant to Article 3 of the Regulation (EU) 2019/2088 and Article 29 of the French 2019-1147 Act on Energy and Climate*

BlackFin Capital Partners, as an independent private equity company focusing on financial services across continental Europe, has adopted a responsible investor approach by including Environmental, Social and Governance (ESG) criteria both in its investment process and the monitoring of its investments. BlackFin Capital Partners adapted its ESG approach to the specificities of the financial services sector, subject to strong regulatory requirements. BlackFin Capital Partners believes that including Environmental, Social and Governance (ESG) criteria accordingly in its investment strategy brings additional value to companies' performance.

BlackFin Capital Partners is committed to make responsible investments in order to create sustainable, long-term value in close partnership with management teams. As proof of this commitment, BlackFin Capital Partners has signed the UN-PRI (United Nation Principles for Responsible Investment) and is a member of the AFIC (Association Française des Investisseurs pour la Croissance). On top of these commitments, BlackFin Capital Partners has defined its own ESG policy, detailed below in this document.

### **Governance**

BlackFin Capital Partners believes that corporate governance is the foundation for companies' growth and longevity. In this respect, the firm promotes best governance practices by systematically implementing a strong governance structure which is the keystone to ensure transparency, independence and prevent from conflicts of interest. In addition, the firm pays particular attention to identifying ethical risks in the highly regulated financial sector, such as fraud, money laundering, terrorist financing.

### **Social**

BlackFin Capital Partners believes that human capital is a key factor of value-creation for the financial services sector: people at the right place taking decisive action based on their knowledge and experience have a significant impact on businesses. In this respect the firm insists on the definition of clear social policy and human capital management within its portfolio companies. In particular, BlackFin Capital Partners pays close attention to retention schemes and equal opportunities during recruitment, promotion and remuneration decision-making processes.

### **Environment**

By adopting a positive attitude on environmental protection and by implementing small but smart actions, a company can easily reduce its impacts, including companies from financial services sector where the weight of such impacts on environment and biodiversity is known as limited. BlackFin Capital Partners supports the integration of environmental impacts by its portfolio companies. These environmental measures can encompass their internal processes (adoption of green IT policies) as well as the services they provide (especially regarding energy transition financing and risks related to climate change).

### **Responsible investment and responsible offering, as an opportunity**

BlackFin Capital Partners, as a company, follows responsible investment principles and excludes tobacco, alcohol, weapon, gambling and pornography industries, as well as any activity directly supporting the development of above listed sectors, from its investment strategy.

Besides, as professional financing institution with strong ESG convictions, BlackFin Capital Partners has identified the opportunity for its portfolio companies to develop responsible products and services. Therefore, the firm focuses on the quality of services its portfolio companies offer (data protection, client satisfaction...) and supports them when addressing clients' needs regarding responsible investment, environmental, social and governance risk and opportunity management.

## ESG process: implementation of ESG practices as an Investor

BlackFin Capital Partners implements relevant ESG actions depending on each fund's maturity level and current ESG standards. Indeed, the firm follows up the steady evolutions of the ESG framework to keep its ESG policy and practices up to date. These principles are to be applied progressively in BlackFin Capital Partners' investments, following a continuous improvement process.

For instance, BlackFin Capital Partners has established for its Buy-out Funds since BlackFin Financial Services Fund II a process structured around three key points:

1. **Completion of an ESG questionnaire:** established during the investment process, it enables the investment team to identify the level of awareness of the management on ESG topics, potential areas of concern or opportunities.
2. **ESG audits:** they focus on the above listed principles and are implemented within 18 months after acquisition. They lead to the setting up of an ESG roadmap listing some improvement areas.
3. **Discussion on the ESG roadmap during portfolio companies' Board meetings:** conducted at least once a year, this follow-up on relevant objectives is specific for each company. It also helps in the raise of management's awareness on ESG issues and opportunities.

For its Tech funds, BlackFin aims at investing in companies which contribute to a more transparent, efficient and reliable financial industry, which position themselves as leaders through their exemplary business practices. BlackFin supports companies innovating to simplify and improve access to financial services, secure data handling and ensure transparency. Before any investment, BlackFin investment team evaluates the company on its ESG principles and selects key KPIs to be monitored over the holding period.

BlackFin works with its portfolio companies to align its investment strategy with its ESG principles and encourage measurable best practices.

The ESG strategy is supported by all Partners within BlackFin Capital Partners. One Partner and one analyst have been designated to ensure the implementation and the follow-up of the ESG process. Furthermore, BlackFin Capital Partners is assisted in the definition and implementation of its ESG strategy by external consultants such as PwC Sustainability. They intervene at strategic and operational level to support BlackFin Capital Partners in the fulfilment of its commitments.

BlackFin Capital Partners performs regular reviews of its ESG policy and processes and will disclose updates accordingly.

## BlackFin Capital Partners: ESG practices as a Management Company

BlackFin Capital Partners intends to act in accordance with the ESG principles above mentioned at the Management Company level and has taken various actions itself on identified topics:

1. **Governance:** with the nomination of two independent members among the compensation committee and the adoption of a Code of Conduct within the firm, and with the deployment of a remuneration policy that, in conformity with applicable regulation, integrates risk management aspects including ESG risks;
2. **Social:** BlackFin Capital Partners implements training sessions for its employees on key topics such as deontology, anti-money laundering regulations or ESG integration;
3. **Environment:** the firm implements standard initiatives to reduce paper consumption from prints and favors recycling actions.



### About BlackFin Capital Partners

BlackFin Capital Partners is a sector-focused fund, specializing in Financial Services across Europe. BlackFin's investment strategy focuses on asset-light businesses in the financial services & technology sector, across continental Europe. Businesses of interest to BlackFin include asset-management, institutional and retail brokerage, distribution of insurance and banking products, both digital and through traditional channels, payments, processing, debt management and collection, fund administration, business process outsourcing and financial technology. BlackFin operates as an active and influential investor, supporting management teams to take their businesses to the next level.

BlackFin manages c.€1800m through three financial services growth / buyout funds and one FinTech focused venture capital fund.

BlackFin Capital Partners is a fully independent firm, run by its four founding partners who have worked together as managers and entrepreneurs in the financial industry for decades. Altogether the team consists of 35 experienced professionals operating out of offices in Paris, Brussels and Frankfurt.