

2022 Report

Loi Energie – Climat

Energy-Climate Law

Article 29

At a glance

As a signatory of the Principles for Responsible Investment (PRI), BlackFin Capital Partners ("BlackFin") is committed to integrating ESG criteria at all stages of its investment cycle.

Founded in 2009, BlackFin Capital Partners is an independent private equity firm led by nine partners who have worked together as managers and entrepreneurs in the financial industry for decades. The team has over 45 professionals across offices in Paris, London, Brussels, Frankfurt, and Amsterdam. BlackFin is specialized in financial services and technology across continental Europe, with an investment strategy to create value for the business itself, investors alike, and for the communities in which the businesses perform. We operate as an active and influential investor, supporting management teams to take their businesses to the next level, while fostering the societies they serve. BlackFin actively supports businesses working towards positive outcomes, such as job creation for areas in need of greater economic gains. As such, we are proud to promote ESG characteristics across our funds and to implement required ESG disclosures.

We believe that the prolonged success of any business depends on the health of the economic and environmental systems around it. Thus, we have always treated non-financial factors as intrinsic to our work. Our sustainable investment policy instructs us that for the companies in which we invest, we take into account their impact on employees, clients, customers, society at-large, and the environment. We believe that including ESG criteria in our investment strategy brings additional value to companies' performance. Our ESG approach is also adapted to the specificities of the financial services sector, which are subject to strong regulatory requirements. We perform a monitoring of our portfolio companies to guarantee compliance with our ESG values.

In accordance with the provisions of Article 29 of the Energy-Climate Law and its implementing decree n° 2021-663 of 27 May 2021, this report covers the reference period from 1 January to 31 December 2022 and covers the provisions of Article D. 533-16-1.-III, 1°, 2°, 3°, 4°, 6°, 7°, and 8°. This report details the general ESG practices applied by BlackFin. Some of the practices described herein, particularly regarding engagement with portfolio companies, might vary according to BlackFin's shareholding in these companies.

1) Information on the entity's general approach

This section refers to the Article D. 533-16-1, III, 1° of the French Monetary and Financial Code as modified by the Decree no. 2021-663 of 27 May 2021.

1-a. Summary presentation of the entity's general approach to considering ESG criteria, and in particular in the investment policy and strategy

BlackFin is committed to promoting its ESG values through its investment policy and strategy and to have a significant ESG impact on its portfolio companies. More specifically, BlackFin is committed to:

- Conducting its activities with the highest ethical standards.
- Not investing in the sectors included in BlackFin's exclusion list.
- Working closely with its portfolio companies in order to improve their ESG practices and performance.
- Providing regular and accurate ESG information to investors and other stakeholders.

To ensure these objectives are met, BlackFin considers ESG topics across the investment cycle as follows:

Pre-Investment period: Before a fund invests in a target company, BlackFin assesses whether it is not included in its exclusion list, which includes:

- Mining
- Coal
- Tobacco
- Alcohol
- Gambling
- Weapons & firearms
- Pornography & prostitution
- Illegal economic activities including drugs
- Activities enabling illegal access to IT systems

After the confirmation that the company does not operate in any of the restricted sectors, BlackFin conducts a due diligence to fully identify and assess potential ESG areas of concern and opportunities for improvement. The due diligence results are submitted and assessed by the Investment Committee prior to the final investment decision.

Holding period: Within one year after the investment, BlackFin carries out the first ESG review of the investee company (with the assistance of an independent expert) to comprehensively assess its ESG maturity on the ESG themes that are material for the company. Based on the results of the ESG review, an ESG roadmap is defined and approved during the portfolio company's board meeting. The actions defined in the roadmap are to be implemented by the company within the next one to three years.

Additionally, every year BlackFin collects an average of 60-80 ESG KPIs. These KPIs provide an overview of the ESG performance and situation of the portfolio company, as well as of its progress

over time. The KPIs are updated annually and additional operational support is provided to the portfolio company when needed.

Exit period: The exit phase represents BlackFin's opportunity to demonstrate its added value to the company's ESG performance. An ESG assessment of portfolio companies is made at exit through a Vendor Due Diligence where BlackFin aims to provide to potential buyer an analysis of the company ESG performance over time and the review of the ESG roadmap initially defined during holding period.

1-b. Content, frequency and means used by the entity to inform stakeholders on the criteria relating to the ESG objectives considered in the policy and strategy investment

BlackFin values reporting transparency and regular communication, therefore it provides regular information on the ESG performance of its portfolio to investors, mainly through the following means:

- BlackFin's ESG Annual Report: Firstly published in 2022, this report is dedicated to our investors and provides a comprehensive overview of BlackFin and our portfolio companies' ESG performance.
- BlackFin's website: Our website contains a section on ESG describing the entity's ESG values, approach, and commitments.
- UN PRI's public report: as a PRI signatory, BlackFin publicly reports on an annual basis on its responsible investment activities.
- Ad-hoc requests and questionnaires: BlackFin is readily available to answer any ad-hoc requests and questions on ESG from our investors.
- Presentations to Investors at BlackFin investor events (Limited Partners Advisory Committee, Annual General Meetings): BlackFin is committed to maintaining a close relationship and full transparency with its investors, with yearly communications, in-person meetings and informal discussions. An overview of the main actions taken by the portfolio companies are presented during these meetings.

1-c. List of financial products mentioned pursuant to Article 8 and Article 9 of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019, and the overall share, in percentage, assets under management considering environmental, social, and quality of governance criteria in the total amount of assets managed by the entity

100% of the funds created since the Regulation (EU) 2019/2088 are subject to Article 8. Therefore, BlackFin Tech II fund is subject to Article 8 of Regulation (EU) 2019/2088 and BlackFin Financial Services Fund IV will be subject to this Article 8.

1-d. Consideration of ESG criteria in the decision-making process for the allocation of new management mandates by the entities mentioned in Articles L. 310-1-1-3 and L. 385-7-2 of the French Insurance Code

This question is not applicable as BlackFin does not manage any mandate.

1-e. Adherence of the entity, or of certain financial products, to a charter, code, initiative or obtaining a label on the consideration of ESG criteria, as well as a brief description of these, consistent with d) of 2 of article 4 of the regulation mentioned above

BlackFin's consideration of ESG criteria is reinforced by our commitments to global initiatives.

- BlackFin is a signatory of the Principles for Responsible Investment since 2015. BlackFin has received the grade of A and we are committed to implementing all necessary measures to maintain this grade.
- BlackFin is directly involved in collaborating and advancing different international guidelines:
- ICI (Initiative Climat International, former IC20): BlackFin became a signatory of ICI in 2021. The ICI, is a GP-led initiative created after COP21, sponsored by the PRI to allow the Private Equity asset class to tackle climate change, define common carbon foot printing methodologies and prepare shared commitments and guidelines ahead of COP26. As well, we will mobilize our best efforts to reach CoP 21 target of limiting global warming to 2°C and we will contribute to deploy Greenhouse Gas (GHG) emission reduction initiatives and secure sustainable investment performance among portfolio companies. The ICI is a global sharing platform which brings together and mobilizes all private equity firms wishing to make a concrete contribution to the fight against climate change.
- France Invest: BlackFin is a member of France Invest.
- Invest Europe: BlackFin has adopted the Invest Europe code of conduct (European Private Equity and Venture Capital Association).
- Level 20: In 2022, BlackFin joined Level 20, an association that aims to promote gender diversity in the private equity industry. Among other objectives, members commit to reach the 20% target of women in at all levels of seniority.
- Out Investors: In 2022 BlackFin signed in 2022 the Out Investors charter, a network for the LGBT+ community dedicated to professional investors.

2) Information on the internal resources deployed by the entity

This section refers to the Article D. 533-16-1, III, 2° of the French Monetary and Financial Code as modified by the Decree no. 2021-663 of 27 May 2021.

2-a. Description of the financial, human, and technical resources dedicated to considering ESG in the investment strategy

As of December 2022, BlackFin's ESG team was composed of three employees (one Partner, one dedicated, full-time, ESG Manager and one Associate) and one intern. BlackFin's ESG team is responsible for fostering awareness-raising at all layers of the firm. The team aims to provide a transversal view of BlackFin overall performance and promotes the smooth integration of ESG criteria in all BlackFin decision-making process. Weekly meetings are organized in order to monitor our ESG strategy.

The ESG team is responsible for:

- Monitoring ESG requirements from sectorial and cross-sector regulation and coordinate associated reporting.
- Designing, reinforcing, and coordinating the implementation of BlackFin ESG strategy (including climate strategy and diversity & inclusion strategy).
- Coordinating, with external consultants, the monitoring of ESG risk in the investment strategy.
- Facilitating and disseminating our ESG commitment to portfolio companies and stakeholders.
- Coordinating training and capacity building strategy related to ESG performance.
- Representing BlackFin in stakeholder discussions (including civil society).

Moreover, the Investment Team is deeply involved in ESG matters. ESG is fully integrated within the deal process and the team works closely with BlackFin's ESG team and the external advisor to comply with our ESG values. ESG matters are weekly reported to the Investment Committee. The reports include updates from portfolio companies, findings of ESG due diligence and ESG reviews, etc. These reports are taken into account whenever the Investment Committee must make an investment decision.

Additionally, BlackFin works with external providers and experts for the implementation of its ESG strategy, such as PwC France Sustainability and IT platforms such as Carbometrix and Sirsa/Reporting 21.

The annual sustainability budget in 2022 mainly covered consultants used for our systematic ESG due diligences and vendor due diligences, our annual ESG reporting tool and campaign, the carbon footprint of BlackFin Capital Partners, trainings and other projects.

Regarding human resources, bonuses are awarded based on individual performance and success, positive contribution to the development of the firm. ESG factors flow into this indirectly.

2-b. Actions taken to strengthen the entity's internal capacities.

BlackFin trains and raises awareness among its employees on ESG to embed good practices in our teams' daily work. ESG training sessions are organized with the following topics covered:

- Understanding ESG's main themes and trends,
- BlackFin's approach to diversity,
- BlackFin's approach to whistleblowing,
- ESG integration to BlackFin portfolio strategic analysis,
- BlackFin's ESG roadmap and reporting.

3) Information on the process for considering ESG at the governance level of the entity

This section refers to the Article D. 533-16-1, III, 3° of the French Monetary and Financial Code as modified by the Decree no. 2021-663 of 27 May 2021.

3-a. Knowledge, skills, and experience of the governance bodies, in particular the administrative bodies, supervision, and management, in terms of decision-making relating to the integration of ESG into the investment policy and strategy of BlackFin and the entities that the latter controls, where applicable.

BlackFin's Investment Committee make investment decisions that follow the BlackFin's ESG Policy. The committee ensures therefore that ESG criteria are embedded throughout the entire investment cycle (as described in section 1.a above).

BlackFin's Management Committee is responsible for the approval and the review of BlackFin's ESG strategy and roadmaps. All key firm decisions are taken by the Management Committee which include, decisions pertaining to raising new funds / launching new investment activities, determination of employee remuneration, allocation of carried interest.

100% of staff, across all BlackFin offices, attended training sessions on ESG related matters in 2022, including on climate change, trends in private equity and regulations and frameworks.

3-b. Integration of ESG criteria in the internal rules of the entity's board of directors or supervisory board

BlackFin's Board of Directors supervises BlackFin's Management Committee on an ongoing basis and ensures compliance with BlackFin's policies and procedures.

In the event of a breach of the ESG Policy, the incident will be notified to the Risk Committee which will take all the necessary measures to solve the incident.

4) Information on the engagement strategy with stakeholders

This section refers to the Article D. 533-16-1, III, 4° of the French Monetary and Financial Code as modified by the Decree no. 2021-663 of 27 May 2021.

Throughout the holding period, BlackFin maintains a constant dialogue with the portfolio company's teams and actively monitors the evolution of their ESG practices. Furthermore, BlackFin most often has a seat on the Board of portfolio companies, which is a powerful means for promoting the integration of ESG criteria and to disseminate best practices.

Moreover, voting at assembly general meetings is a key component of the ongoing dialogue with companies in which BlackFin Capital Partners invests.

Consequently, BlackFin has set up a governing shareholder commitment and exercising voting rights policy.

None of the funds managed by BlackFin Capital Partners holds publicly traded shares of listed companies as of December 31, 2022.

5) Information on the European taxonomy and fossil fuels

This section refers to the Article D. 533-16-1, III, 5° of the French Monetary and Financial Code as modified by the Decree no. 2021-663 of 27 May 2021.

Given the sector in which BlackFin invests in – financial services sector - as of 31 December 2022, BlackFin did not invest in any companies whose activities fall within the scope of European taxonomy..

As of 31 December 2022, BlackFin did not invest in any companies in the fossil fuel sector.

6) Information on the strategy for alignment with the international objectives for limiting global warming

This section refers to the Article D. 533-16-1, III, 6° of the French Monetary and Financial Code as modified by the Decree no. 2021-663 of 27 May 2021.

6-a. Targets and objectives

At the management company level

Our ESG Policy tackle climate change and promotes the integration of climate risks into the investment strategy, as part of the overall integration of ESG criteria in the investment process. Moreover, BlackFin has further formalized its commitments to fight climate change by signing the ICI.

BlackFin conducted the assessment of its 2022 carbon footprint for scopes 1, 2 and 3 (excl. portfolios information).

At the portfolio level

Through the regular dialogue among with its portfolio companies, BlackFin contributes to raising awareness on climate change risks and issues. Moreover, we strongly encourage portfolio companies to assess their carbon footprint. BlackFin has set the calculation of the carbon footprint of its buy-out investee companies, on a best effort basis, as an objective for 2023.

6-b. When the entity uses an internal methodology, elements of it to assess the alignment of the investment strategy with the Paris Agreement or the national low-carbon strategy

BlackFin worked with an external service provider in its carbon footprint calculation – Carbometrix – and no internal methodology was used.

6-c. Quantification of results using at least one indicator

In 2022, BlackFin pursued work on the calculation of the carbon footprint of its portfolio companies. As described in section 6-a above, for 2023 BlackFin has set the objective of the calculating of the carbon footprint of all its buy-out investee companies (on a best effort basis).

6-d. For entities managing index funds, information on the use of the Union's "climate transition" and "Paris Agreement" benchmarks defined by Parliament Regulation (EU) 2019/2089 European Parliament and of the Council of 27 November 2019

This question is not applicable as BlackFin does not manage index funds.

6-e. Role and application of ESG indicators during the assessment of portfolio companies in line with the investment strategy

BlackFin collects an average of 60-80 ESG KPIs from its buy-out portfolio companies. These KPIs provide an overview of the ESG performance and situation of the portfolio company, as well as of its progress over time. The KPIs include information on the ESG initiatives implemented by the company, information on the how ESG topics are governed and treated by the company's top management, information on the environmental initiatives implemented by the company, the GHG emissions, energy consumption, etc.

The KPIs are updated annually and highlight potential ESG opportunities or areas for improvement for each portfolio company.

6-f. The changes made to the investment strategy in connection with the strategy of alignment with the Paris Agreement, and in particular the policies put in place with a view to a gradual exit from coal and hydrocarbons non-conventional loans, specifying the exit schedule adopted as well as the share of total outstanding managed or held by the entity covered by these policies BlackFin Capital Partners is not investing in any coal or hydrocarbon assets.

As of December 2022, BlackFin Capital Partners is not investing in any coal or hydrocarbon assets.

6-g. Any actions to follow up on the results and changes made

BlackFin works together with its portfolio companies when actions and follow-ups are needed and identified through the analysis of the annual ESG data collection and the portfolio's company progress on the ESG roadmap defined within one year after the investment. Such roadmap is regularly monitored and is discussed and annually updated by the board of the portfolio company.

As a concrete example, BlackFin has worked with an investee company to reduce the number of thermal vehicles and encouraged the use of electric cars, changing habits of its employees, while also allowing flexible working hours. The company has contracted leasing contracts for its entire fleet and has set targets in terms of EV share. The company also published a travel policy aiming to encourage employees to use public transport and bicycles. From 2018 to 2022, the company reduced more than 25% of its fleet related emissions, and the company set up an objective of reducing by 70% by 2025.

6-h. The frequency of the evaluation, the provisional dates of update and the relevant evolution factors retained

The evaluation is made once a year and is approved by the portfolio company board.

7) Information on the strategy for alignment with long-term objectives related to biodiversity

This section refers to the Article D. 533-16-1, III, 7° of the French Monetary and Financial Code as modified by the Decree no. 2021-663 of 27 May 2021.

7-a. A measure of compliance with the targets set out in the Convention on Biological Diversity adopted on 5 June 1992

BlackFin is not currently able to develop a strategy aligned with long-term biodiversity objectives. Monitoring the impact of the financial sector on the biodiversity loss remains a challenge today for most market players, since the data related to biological diversity impacts remains scarce. Nevertheless, biodiversity risk might not be a major risk in financial services sectors, in which BlackFin invests.

7-b. An analysis of the contribution to the reduction of the main pressures and impacts on biodiversity defined by the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services

No analysis was conducted during the year 2022 as BlackFin does not have a strategy aligned with long-term biodiversity objectives.

However, we consider our carbon footprint as an indirect impact on biodiversity, which is why BlackFin conducted the assessment of its 2022 carbon footprint for scopes 1, 2 and 3 and we strongly encourage portfolio companies to assess their carbon footprint. BlackFin has set the calculation of the carbon footprint of its buy-out investee companies, on a best effort basis, as an objective for 2023.

In addition, in 2023 BlackFin aims to make a grant to the ONF - Agir pour la forêt endowment fund, which aims to promote public forests.

7-c. Mention of the support for a biodiversity footprint indicator and, where applicable, the way in which this indicator makes it possible to measure compliance with international objectives related to biodiversity

BlackFin did not defined a biodiversity footprint indicator during the year 2022. As of 2023, BlackFin will start collecting information from its buy-out investee companies on whether they have assessed their dependencies on biodiversity.

8) Information on the procedures for taking ESG into account in risk management

This section refers to the Article D. 533-16-1, III, 8^oa of the French Monetary and Financial Code as modified by the Decree no. 2021-663 of 27 May 2021..

ESG risks are systematically integrated and managed throughout our investment process, from our Due Diligence phase for which material and sector specific risks are assessed in priority. In particular, BlackFin has defined an exclusion list which allows the exclusion of main ESG risks, by sector and countries.

During the holding period, ESG reviews are conducted to provide detailed qualitative and quantitative data regarding risks and performance, all monitored and linked to an individual ESG roadmap, per portfolio company.

ESG risks identified by our monitoring system are then addressed and updated every year at the investment committee and are presented at portfolio companies Board meetings. Hence, BlackFin stands in a position to ensure that ESG related risks and opportunities, as any conventional risk and opportunity, which could impact our portfolio companies' financial performances are integrated and monitored.

Given the sector BlackFin invests in – financial services – the main ESG risks facing its portfolio relates to governance factors, and to a more limited extent, social factors. These factors include, for instance, corporate and ESG governance, business ethics (prevention of corruption, data protection, cybersecurity), talent attraction and retention, diversity, and inclusion, etc. Environmental factors include operational eco-efficiency and climate transition.

Thus, when assessing the ESG risks and opportunities for a company, BlackFin considers the materiality of the ESG themes for such company, in order to make sure that they are tailored to the company's specific business, size, governance structure, etc. The materiality analysis takes into account, among others the SASB standards, the company's main characteristics.

BlackFin is constantly reviewing its approach to ESG, including its risk management approach. The ESG procedures are reviewed at least once a year.

Within one year after investing in a company, BlackFin works with the portfolio company to define an ESG roadmap, to be implemented by the company during the holding period. The progress on the roadmap's implementation is constantly monitored by BlackFin's ESG team and is updated at least once a year at a board meeting.

Through its participation in ESG initiatives (such as the ICI, UNPRI, etc.), as well as through the advice provided by its external experts, BlackFin is committed to monitoring the market progresses and standards that would enable the improvement of its own approach to ESG risk management, particularly regarding the quantitative estimates of the financial impact of such risks.

As a result, BlackFin decided in 2022 to recommend all its buy-out investee companies to calculate their carbon footprint and communicate it to the management company. By doing so, BlackFin helps raising awareness on climate topics, while also having a better precision of its own scope 3 emissions, particularly for the category "investments".

As described throughout this report, BlackFin works with external advisors in the integration of ESG risks, such as PwC France Sustainability. These advisors apply their specific methodology, which is informed and based on the market's best standards, for example the SASB materiality matrix for the definition of the ESG materiality for each portfolio company. Additionally, when data is available, BlackFin might use them to benchmark the ESG performance of its portfolio companies (for instance, the official and average turnover rate in a specific sector).

ESG due diligences conducted by our external advisor assess the materiality of climate issues in target companies.

As of 2023, BlackFin will start collecting information from its investee companies on whether they have assessed their dependencies on biodiversity.