



RI TRANSPARENCY REPORT 2018

Triton Investment Management Limited (TIML)

OO 01	Mandatory	Gateway/Peering	General
OO 01.1	Select the services and funds you offer		
	<input type="checkbox"/> Fund management <input checked="" type="checkbox"/> Fund of funds, manager of managers, sub-advised products		
	% of assets under management (AUM) in ranges		
	<input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> >50% <input type="checkbox"/> Other, specify		
OO 01.3	Additional information. [Optional]		
	Triton Investment Management Limited ("TIML") has signed up to UN PRI. References to "TIML" within this report means Triton Investment Management Limited. References to "Triton" means TIML, its associates and Triton Funds. References to "TAS" shall mean Triton Advisers (Sweden) AB and its associates, a group of companies that are independent and separate from Triton.		
OO 02	Mandatory	Peering	General
OO 02.1	Select the location of your organisation's headquarters.		
	Jersey		
OO 02.2	Indicate the number of countries in which you have offices (including your headquarters).		
	<input type="radio"/> 1 <input type="radio"/> 2-5 <input checked="" type="radio"/> 6-10 <input type="radio"/> >10		
OO 02.3	Indicate the approximate number of staff in your organisation in full-time equivalents (FTE).		
	237		
OO 02.4	Additional information. [Optional]		
	As of June 30, 2017 resources available to Triton and TAS were 237 professionals in investment advisory, fund administration, finance and controlling, investor relations, specialist and support functions. In addition Triton and its Portfolio Companies had access to to 27 part time and 6 full time Senior Industry Experts.		
OO 03	Mandatory	Descriptive	General
OO 03.1	Indicate whether you have subsidiaries within your organisation that are also PRI signatories in their own right.		
	<input type="radio"/> Yes <input checked="" type="radio"/> No		
OO 03.3	Additional information. [Optional]		
	None of the portfolio companies, owned by Funds ultimately managed by TIML, are PRI signatories, however as part of the ESG programme the funds require all controlled portfolio companies to enhance their monitoring and reporting of ESG information. The funds encourage alignment with leading frameworks such as the UN Global Compact or reporting frameworks such as the GRI.		
OO 04	Mandatory	Gateway/Peering	General
OO 04.1	Indicate the year end date for your reporting year.		
	31/12/2017		
OO 04.2	Indicate your total AUM at the end of your reporting year, Exclude subsidiaries you have chosen not to report on and any advisory/execution only assets.		
	Total AUM 7,846,639,588 EUR 9,310,012,497 USD		
OO 04.5	Additional information. [Optional]		
	For the avoidance of doubt, TIML (the signatory to UNPRI) ultimately manages all Triton Funds. Responsibility for managing each Fund is with each Fund's specific general partner, however each general partner has delegated day to day management to TIML. The answer to question 04.2 therefore reflects the capital ultimately managed by TIML via delegations from all the specific general partners. The Total AUM figure reflects initial capital remaining invested and unfunded commitments.		
OO 05	Mandatory to Report, Voluntary to Disclose	Gateway	General
OO 05.1	Provide an approximate percentage breakdown of your AUM at the end of your reporting year using the following asset classes:		

	Internally managed (%)	Externally managed (%)
Listed equity	<10%	0
Fixed income	0	0
Private equity	>50%	0
Property	0	0
Infrastructure	0	0
Commodities	0	0
Hedge funds	<10%	0
Forestry	0	0
Farmland	0	0
Inclusive finance	0	0
Cash	0	0
Other (1), specify	<10%	0
Other (2), specify	0	0

If you respond 'Other (1)', specify for Internally Managed

Public and Private Debt Investments

OO 05.2 Indicate whether your organisation uses fiduciary managers.

- Yes, we use a fiduciary manager and our response to OO 5.1 is reflective of their management of our assets.
- No, we do not use fiduciary managers.

OO 06 Mandatory Descriptive General

OO 06.1 Select how you would like to disclose your asset class mix.

- as percentage breakdown
- as broad ranges

'Other (1)' specified

Public and Private Debt Investments

OO 06.3 Provide contextual information on your AUM asset class split. [Optional]

Triton is an investment firm with Funds focused on Northern Europe and as at 31st December 2017 has sponsored seven funds with committed capital of over €8.2 Billion. These funds generally seek to invest in mid-market businesses in the Industrials, Business Services and Consumer sectors.

OO 09 Mandatory to Report, Voluntary to Disclose Peering General

OO 09.1 Indicate the breakdown of your organisation's AUM by market.

Private

OO 09.2 Additional information. [Optional]

Private

OO 10 Mandatory Gateway General

OO 10.1 Select the active ownership activities your organisation implemented in the reporting year.

Listed equity – engagement

- We engage with companies on ESG factors via our staff, collaborations or service providers.
- We do not engage directly and do not require external managers to engage with companies on ESG factors.

Listed equity – voting

- We cast our (proxy) votes directly or via dedicated voting providers
- We do not cast our (proxy) votes directly and do not require external managers to vote on our behalf

OO 11 Mandatory Gateway General

OO 11.1 Select the internally managed asset classes in which you addressed ESG incorporation into your investment decisions and/or your active ownership practices (during the reporting year).

	Listed equity
<input checked="" type="checkbox"/>	We address ESG incorporation.
<input type="checkbox"/>	We do not do ESG incorporation.
	Private equity
<input checked="" type="checkbox"/>	We address ESG incorporation.
<input type="checkbox"/>	We do not do ESG incorporation.
	Hedge funds
<input checked="" type="checkbox"/>	We address ESG incorporation.
<input type="checkbox"/>	We do not do ESG incorporation.
	Other (1)
<input checked="" type="checkbox"/>	We address ESG incorporation.
<input type="checkbox"/>	We do not do ESG incorporation.
	'Other (1)' [as defined in OO 05]
	Public and Private Debt Investments

OO 12	Mandatory	Gateway	General
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OO 12.1 Below are all applicable modules or sections you may report on. Those which are mandatory to report (asset classes representing 10% or more of your AUM) are already ticked and read-only. Those which are voluntary to report on can be opted into by ticking the box.

	Core modules
<input checked="" type="checkbox"/>	Organisational Overview
<input checked="" type="checkbox"/>	Strategy and Governance
	RI implementation directly or via service providers
	Direct - Listed Equity incorporation
<input type="checkbox"/>	Listed Equity incorporation
	Direct - Listed Equity active ownership
<input type="checkbox"/>	Engagements
<input type="checkbox"/>	(Proxy) voting
	Direct - Other asset classes with dedicated modules
<input checked="" type="checkbox"/>	Private Equity
	Closing module
<input checked="" type="checkbox"/>	Closing module

OO LE 01	Mandatory to Report, Voluntary to Disclose	Gateway	General
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OO LE 01.1 Provide a breakdown of your internally managed listed equities by passive, active - quantitative (quant), active - fundamental and active - other strategies.

Private

OO LE 01.2 Additional information. [Optional]

Private

OO PE 01	Mandatory to Report, Voluntary to Disclose	Descriptive	General
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OO PE 01.1 Provide a breakdown of your organisation's internally managed private equity investments by investment strategy.

Private

OO PE 01.2 Additional information. [Optional]

Private

OO PE 02	Mandatory to Report, Voluntary to Disclose	Descriptive	General
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OO PE 02.1 Indicate the level of ownership you typically hold in your private equity investments.

Private

OO PE 02.2 Additional information. [Optional]

Private

SG 01.1 Indicate if you have an investment policy that covers your responsible investment approach.

Yes

SG 01.2 Indicate the components/types and coverage of your policy.

Policy components/types	Coverage by AUM
<input checked="" type="checkbox"/> Policy setting out your overall approach	<input checked="" type="checkbox"/> Applicable policies cover all AUM <input type="checkbox"/> Applicable policies cover a majority of AUM <input type="checkbox"/> Applicable policies cover a minority of AUM
<input checked="" type="checkbox"/> Formalised guidelines on environmental factors	
<input checked="" type="checkbox"/> Formalised guidelines on social factors	
<input checked="" type="checkbox"/> Formalised guidelines on corporate governance factors	
<input type="checkbox"/> Asset class-specific RI guidelines	
<input checked="" type="checkbox"/> Sector specific RI guidelines	
<input type="checkbox"/> Screening / exclusions policy	
<input type="checkbox"/> Engagement policy	
<input type="checkbox"/> (Proxy) voting policy	
<input type="checkbox"/> Other, specify (1)	
<input type="checkbox"/> Other, specify(2)	

SG 01.3 Indicate if the investment policy covers any of the following

- Your organisation's definition of ESG and/or responsible investment and it's relation to investments
- Your investment objectives that take ESG factors/real economy influence into account
- Time horizon of your investment
- Governance structure of organisational ESG responsibilities
- ESG incorporation approaches
- Active ownership approaches
- Reporting
- Climate change and related issues
- Other RI considerations, specify (1)
- Other RI considerations, specify (2)

SG 01.4 Describe your organisation's investment principles and overall investment strategy, and how they consider ESG factors and real economy impact.

Funds managed by Triton Investment Management Limited (the "Manager") seek the successful development of the businesses that they invest in and to be prudent stewards of investors' capital.

The key objectives of the RI Policy are:

- to ensure it is a fundamental part of the investment decision making process and that all Triton and West Park personnel are fully trained and cognisant of the policy;
- to reduce risk and enhance value in investment portfolios through focused and consistent consideration and management of ESG issues;
- to identify and manage ESG issues throughout the investment cycle: pre-investment, during ownership and at exit;
- to implement effective governance structures, training programmes and communication procedures at the fund and portfolio company levels;
- to strive for continuous improvement in relation to ESG issues; and
- to communicate to the public, Triton's focus on ESG and build that into the firm's reputation.

No

SG 02.1 Indicate which of your investment policy documents (if any) are publicly available. Provide a URL and an attachment of the document.

Policy setting out your overall approach

URL/Attachment
<input checked="" type="checkbox"/> URL http://www.triton-partners.com/responsibility/environment-social-and-governance-management/
<input type="checkbox"/> Attachment (will be made public)

- Formalised guidelines on environmental factors
- Formalised guidelines on social factors
- Formalised guidelines on corporate governance factors
- Sector specific RI guidelines
- We do not publicly disclose our investment policy documents

SG 02.2 Indicate if any of your investment policy components are publicly available. Provide URL and an attachment of the document.

Your organisation's definition of ESG and/or responsible investment and it's relation to investments

URL/Attachment	
<input checked="" type="checkbox"/> URL	http://www.triton-partners.com/responsibility/
<input type="checkbox"/> Attachment	
<input checked="" type="checkbox"/> Your investment objectives that take ESG factors/real economy influence into account	
URL/Attachment	
<input checked="" type="checkbox"/> URL	http://www.triton-partners.com/responsibility/environment-social-and-governance-management/
<input type="checkbox"/> Attachment	
<input checked="" type="checkbox"/> Time horizon of your investment	
URL/Attachment	
<input checked="" type="checkbox"/> URL	http://www.triton-partners.com/responsibility/environment-social-and-governance-management/
<input type="checkbox"/> Attachment	
<input checked="" type="checkbox"/> Governance structure of organisational ESG responsibilities	
URL/Attachment	
<input checked="" type="checkbox"/> URL	http://www.triton-partners.com/responsibility/environment-social-and-governance-management/
<input type="checkbox"/> Attachment	
<input checked="" type="checkbox"/> ESG incorporation approaches	
URL/Attachment	
<input checked="" type="checkbox"/> URL	http://www.triton-partners.com/responsibility/environment-social-and-governance-management/
<input type="checkbox"/> Attachment	
<input checked="" type="checkbox"/> Active ownership approaches	
URL/Attachment	
<input checked="" type="checkbox"/> URL	http://www.triton-partners.com/responsibility/environment-social-and-governance-management/
<input type="checkbox"/> Attachment	
<input checked="" type="checkbox"/> Reporting	
URL/Attachment	
<input checked="" type="checkbox"/> URL	http://www.triton-partners.com/responsibility/environment-social-and-governance-management/
<input type="checkbox"/> Attachment	
<input checked="" type="checkbox"/> Climate-related issues	
URL/Attachment	
<input checked="" type="checkbox"/> URL	http://www.triton-partners.com/responsibility/environment-social-and-governance-management/
<input type="checkbox"/> Attachment	
<input type="checkbox"/> We do not publicly disclose any investment policy components	

SG 02.3	Indicate if your organisation's investment principles, and overall investment strategy is publicly available
<input checked="" type="radio"/> Yes	http://www.triton-partners.com/responsibility/environment-social-and-governance-management/
<input type="radio"/> No	

SG 02.4	Additional Information [Optional].
Triton formally adopted a RI Policy on 3rd May 2012. The key aims of the policy are:	
<ul style="list-style-type: none"> to ensure it is a fundamental part of the investment decision making process and that all Triton and West Park personnel are fully trained and cognisant of the policy; to reduce risk and enhance value in investment portfolios through focused and consistent consideration and management of ESG issues; to identify and manage ESG issues throughout the investment cycle: pre-investment, during ownership and at exit; 	

- to implement effective governance structures, training programmes and communication procedures at the fund and portfolio company levels;
- to strive for continuous improvement in relation to ESG issues; and
- to communicate to the public, Triton's focus on ESG and build that into the firm's reputation.

Funds managed by TIML strive for the successful development of the businesses that they invest with and to be prudent stewards of investors' capital. The RI policy was written and implemented in 2012 and was last reviewed in 2017 but not updated. The policy will continue to be reviewed on an annual basis going forward.

Triton's RI strategy has 4 pillars as below.

1. Sensitise / train all relevant personnel. Triton implemented the training programme in 2013 and will continue to schedule mandatory ESG training sessions for all relevant Triton and West Park employees.
2. To ensure the consideration of ESG aspects throughout the due diligence process for prospective investment opportunities.
3. To work directly with portfolio companies in implementing the RI Policy and co-ordinating reporting on ESG performance. The ESG programme has been fully rolled out to all portfolio companies with the exception of those most recently acquired where integration is ongoing as part of the 100-day plan.
4. Benchmark and report on Triton ESG performance, using both public information (including, but not only, from United Nations Principles for Responsible Investing ("UN PRI")) and information from investee companies. Triton has filed publicly available UN PRI Transparency Reports since 2014 to increase transparency and facilitate efficient benchmarking. Portfolio companies started formal ESG reporting to Triton in Q1 2016.

Responsible investing is, in its formal sense, a relatively recent development for the private equity industry as a whole and the firm's approach is continuously improved and developed. For example, Triton has recently updated the new joiner induction training programme to include a discussion of Triton's approach to responsible investment, ESG programme and compliance.

RI (or as we prefer to call it, "investing responsibly") is an agenda item at Advisory Board meetings of the Triton Funds where a Risk Report is presented and discussed.

The RI Policy of Triton and TAS was developed in alignment with the requirements of the UN Global Compact's ten principles in the areas of human rights, labour, the environment and anti-corruption, the Universal Declaration of Human Rights of the United Nations as well as the OECD guidelines for Multinational Enterprises.

The relevant General Partner Boards are responsible for our commitment to being responsible investors and have delegated this responsibility to TIML who has delegated this to the CFO/COO. Given the importance of the GP Boards and TIML training and updates are provided on a regular basis.

Responsibility for day to day implementation of the Responsible Investment (RI) strategy has been delegated to the Head of ESG, who joined in 2013 and is fully dedicated to Triton's ESG initiatives, and the Head of Compliance.

SG 03	Mandatory	Core Assessed	General
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SG 03.1	Indicate if your organisation has a policy on managing potential conflicts of interest in the investment process.
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Yes

SG 03.2	Describe your policy on managing potential conflicts of interest in the investment process.
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Relevant Triton Funds adopt Allocation Policies that regulate how investments are allocated between Funds where necessary to manage conflicts in a fair and transparent manner.

In addition there are provisions for consultation with relevant Advisory Boards to consult on conflicts.

All Triton executives and non-executive directors are required to declare any interests that may conflict with the interest of Triton and Triton Funds.

Given the increasing complexity of allocation decisions related to Triton's multi strategy approach, Triton will finalise an overarching conflicts of interest policy during 2018.

No

SG 04	Voluntary	Descriptive	General
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SG 04.1	Indicate if your organisation has a process for identifying and managing incidents that occur within portfolio companies.
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Private

SG 04.2	Describe your process on managing incidents
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Private

SG 05	Mandatory	Gateway/Core Assessed	General
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SG 05.1	Indicate if and how frequently your organisation sets and reviews objectives for its responsible investment activities.
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- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad-hoc basis
- It is not set/reviewed

SG 05.2	Additional information. [Optional]
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During 2017 performance was reviewed, as a minimum, on an annual basis. Specific initiatives may be reviewed on a more frequent basis as appropriate. Biannual ESG reporting requirements were introduced for Portfolio Companies during 2017.

SG 06	Voluntary	Descriptive	General
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SG 06.1	List the main responsible investment objectives that your organisation set for the reporting year.
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Private

SG 06.2	Additional information.
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SG 07	Mandatory	Core Assessed	General		
SG 07.1	Indicate the roles present in your organisation and for each, indicate whether they have oversight and/or implementation responsibilities for responsible investment.				
Roles present in your organisation					
<input checked="" type="checkbox"/> Board members or trustees <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Oversight/accountability for responsible investment <input checked="" type="checkbox"/> Implementation of responsible investment <input type="checkbox"/> No oversight/accountability or implementation responsibility for responsible investment 					
<input checked="" type="checkbox"/> Chief Executive Officer (CEO), Chief Investment Officer (CIO), Investment Committee <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Oversight/accountability for responsible investment <input checked="" type="checkbox"/> Implementation of responsible investment <input type="checkbox"/> No oversight/accountability or implementation responsibility for responsible investment 					
<input checked="" type="checkbox"/> Other Chief-level staff or head of department, specify Chief Financial and Operating Officer <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Oversight/accountability for responsible investment <input checked="" type="checkbox"/> Implementation of responsible investment <input type="checkbox"/> No oversight/accountability or implementation responsibility for responsible investment 					
<input type="checkbox"/> Portfolio managers					
<input type="checkbox"/> ESG portfolio manager					
<input checked="" type="checkbox"/> Investment analysts <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Oversight/accountability for responsible investment <input checked="" type="checkbox"/> Implementation of responsible investment <input type="checkbox"/> No oversight/accountability or implementation responsibility for responsible investment 					
<input checked="" type="checkbox"/> Dedicated responsible investment staff <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Oversight/accountability for responsible investment <input checked="" type="checkbox"/> Implementation of responsible investment <input type="checkbox"/> No oversight/accountability or implementation responsibility for responsible investment 					
<input type="checkbox"/> External managers or service providers					
<input type="checkbox"/> Investor relations					
<input checked="" type="checkbox"/> Other role, specify (1) <table border="1" style="width: 100%; margin-top: 5px;"> <thead> <tr> <th style="background-color: #0070c0; color: white;">Other description (1)</th> </tr> </thead> <tbody> <tr> <td>Head of Compliance</td> </tr> </tbody> </table> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Oversight/accountability for responsible investment <input checked="" type="checkbox"/> Implementation of responsible investment <input type="checkbox"/> No oversight/accountability or implementation responsibility for responsible investment 				Other description (1)	Head of Compliance
Other description (1)					
Head of Compliance					
<input type="checkbox"/> Other role, specify (2)					
SG 07.2	For the roles for which you have RI oversight/accountability or implementation responsibilities, indicate how you execute these responsibilities.				
<p>Funds managed by TIML strive for the successful development of the businesses that they invest with and to be prudent stewards of investors' capital.</p> <p>To support these initiatives Triton internalized the ESG expertise and use external consultants on a case by case basis when appropriate. The Investment Advisory Committee (IAC), TIML and the relevant General Partner Board are responsible for our commitment to being responsible investors and have delegated this responsibility to the CFO/COO.</p> <p>Responsibility for day to day implementation of the Responsible Investment (RI) strategy has been delegated to the Head of ESG, who joined in 2013 and is fully dedicated to Triton's ESG initiatives. Graeme Ards was previously a Director of Occupational Health, Safety and Environment (OHSE) and Sustainability at Amcor and prior to that he held the post of Director Environment, Health and Safety (EHS) and Sustainability at Alcan Packaging.</p> <p>Triton's Head of Compliance, Amandeep Johal, works closely with Graeme on compliance, governance and risk management issues within ESG. Amandeep is a UK practicing lawyer and has previously worked at the UK financial services regulator ("FSA") and SJ Berwin dealing with fund and regulatory matters. Amandeep joined Triton in April 2007, and has worked on legal aspects of all fundraisings, deals and portfolio companies in that time. Since 2013, Amandeep has led the dedicated internal Triton Compliance function. Amandeep also reports to Mats Eklund, Triton's CFO and COO.</p> <p>The ESG team work with Investment Professionals on each investment opportunity and are involved at the very beginning of the process. The Heads of ESG and Compliance provide regular updates to the Investment Committee on Triton's Portfolio Company ESG programme. External experts are consulted on RI / ESG matters on a case by case basis. Mats Eklund, Triton's CFO/COO, oversees the ESG team's responsibilities.</p>					
SG 07.3	Indicate the number of dedicated responsible investment staff your organisation has.				
2					
SG 07.4	Additional information. [Optional]				

The two dedicated RI staff are the Head of ESG and Head of Compliance.

SG 08	Voluntary	Additional Assessed	General
SG 08.1	Indicate if your organisation's performance management, reward and/or personal development processes have a responsible investment element.		
Private			
SG 08.3	Provide any additional information on your organisation's performance management, reward and/or personal development processes in relation to responsible investment.		
Private			

SG 09	Mandatory	Core Assessed	PRI 4,5
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SG 09.1 Select the collaborative organisation and/or initiatives of which your organisation is a member or in which it participated during the reporting year, and the role you played.

Principles for Responsible Investment

Your organisation's role in the initiative during the reporting period (see definitions)

Moderate

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]

TAL became a signatory of the UNPRI on 24th May 2012. In agreement with the PRI TAL's membership was transferred to TIML in 2017.

- Triton participated as a panel member at two events at the PRI co-hosted event PEI RI Forum in Berlin.
- Triton also support in informal meetings with potential new PRI signatories.

- Asian Corporate Governance Association
- Australian Council of Superannuation Investors
- AFIC – La Commission ESG
- BVCA – Responsible Investment Advisory Board
- CDP Climate Change
- CDP Forests
- CDP Water
- CFA Institute Centre for Financial Market Integrity
- Code for Responsible Investment in SA (CRISA)
- Code for Responsible Finance in the 21st Century
- Council of Institutional Investors (CII)
- Eumedion
- Extractive Industries Transparency Initiative (EITI)
- ESG Research Australia
- EVCA – Responsible Investment Roundtable

Your organisation's role in the initiative during the reporting period (see definitions)

Moderate

Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]

The Head of ESG is an active member of the EVCA Responsible Investment Core Roundtable and is currently part of the team updating the Invest Europe "ESG Due Diligence Questionnaire for Private Equity Investors and their Portfolio Companies".

- Global Investors Governance Network (GIGN)
- Global Impact Investing Network (GIIN)
- Global Real Estate Sustainability Benchmark (GRESB)
- Green Bond Principles
- Institutional Investors Group on Climate Change (IIGCC)
- Interfaith Center on Corporate Responsibility (ICCR)
- International Corporate Governance Network (ICGN)
- Investor Group on Climate Change, Australia/New Zealand (IGCC)
- International Integrated Reporting Council (IIRC)
- Investor Network on Climate Risk (INCR)/CERES
- Local Authority Pension Fund Forum
- Principles for Sustainable Insurance
- Regional or National Social Investment Forums (e.g. UKSIF, Eurosif, ASRIA, RIAA), specify
- Responsible Finance Principles in Inclusive Finance
- Shareholder Association for Research and Education (Share)
- United Nations Environmental Program Finance Initiative (UNEP FI)
- United Nations Global Compact
- Other collaborative organisation/initiative, specify
- Other collaborative organisation/initiative, specify

BVCA

Your organisation's role in the initiative during the reporting year (see definitions)
Moderate
Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
The Head of ESG was involved in a panel presenting at the 2017 BVCA Summit on Diversity & Inclusion: <i>Challenges and opportunities and what this means for your portfolio.</i>

Other collaborative organisation/initiative, specify

FCVA

Your organisation's role in the initiative during the reporting year (see definitions)
Basic

Other collaborative organisation/initiative, specify

BVK

Your organisation's role in the initiative during the reporting year (see definitions)
Basic

SG 10

Mandatory

Core Assessed

PRI 4

SG 10.1

Indicate if your organisation promotes responsible investment, independently of collaborative initiatives.

Yes

SG 10.2

Indicate the actions your organisation has taken to promote responsible investment independently of collaborative initiatives. Provide a description of your role in contributing to the objectives of the selected action and the typical frequency of your participation/contribution.

Provided or supported education or training programmes (this includes peer to peer RI support) Your education or training may be for clients, investment managers, actuaries, broker/dealers, investment consultants, legal advisers etc.)

Description
The Head of ESG has participated at several events presenting and on panels promoting ESG including the BVCA Summit, SuperReturns ESG Day and the PEI/PRI conference.

Frequency of contribution
<input type="radio"/> Quarterly or more frequently
<input checked="" type="radio"/> Biannually
<input type="radio"/> Annually
<input type="radio"/> Less frequently than annually
<input type="radio"/> Ad hoc
<input type="radio"/> Other

Provided financial support for academic or industry research on responsible investment

Provided input and/or collaborated with academia on RI related work

Encouraged better transparency and disclosure of responsible investment practices across the investment industry

Description
The Head of ESG has participated at several events presenting and on panels promoting ESG including the BVCA Summit, SuperReturns ESG Day and the PEI/PRI conference.

Frequency of contribution
<input type="radio"/> Quarterly or more frequently
<input checked="" type="radio"/> Biannually
<input type="radio"/> Annually
<input type="radio"/> Less frequently than annually
<input type="radio"/> Ad hoc
<input type="radio"/> Other

Spoke publicly at events and conferences to promote responsible investment

Description
The Head of ESG has participated at several events presenting and on panels promoting ESG including the BVCA Summit, SuperReturns ESG Day and the PEI/PRI conference.

Frequency of contribution
<input type="radio"/> Quarterly or more frequently
<input checked="" type="radio"/> Biannually
<input type="radio"/> Annually
<input type="radio"/> Less frequently than annually

- Ad hoc
- Other
- Wrote and published in-house research papers on responsible investment
- Encouraged the adoption of the PRI

Description
Supported PRI engagement in meetings with potential PRI Signatories.

Frequency of contribution

- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad hoc
- Other

- Responded to RI related consultations by non-governmental organisations (OECD, FSB etc.)
- Wrote and published articles on responsible investment in the media
- A member of PRI advisory committees/ working groups, specify
- On the Board of, or officially advising, other RI organisations (e.g. local SIFs)
- Other, specify

No

SG 10.3	Describe any additional actions and initiatives that your organisation has taken part in during the reporting year to promote responsible investment [Optional]
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Triton and TAS have continued to be active promoters of RI practices during 2017. Representatives spoke at various private and public events promoting its ESG initiatives referencing the fact that TIML is a committed signatory of the UN PRI. In addition TIML regularly informs the investors of the Funds it ultimately manages of its ESG programme - many of whom have had more in-depth discussions with the Heads of ESG and Compliance.

SG 11	Voluntary	Additional Assessed	PRI 4,5,6
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SG 11.1	Indicate if your organisation - individually or in collaboration with others - conducted dialogue with public policy makers or regulators in support of responsible investment in the reporting year.
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Private

SG 11.4	Provide a brief description of the main topics your organisation has engaged with public policy-makers or regulators on.
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Private

SG 12	Mandatory	Core Assessed	PRI 4
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SG 12.1	Indicate whether your organisation uses investment consultants.
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- Yes, we use investment consultants

SG 12.4	Indicate whether you use investment consultants for any the following services. Describe the responsible investment components of these services.
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- Custodial services
- Investment policy development
- Strategic asset allocation
- Investment research

Describe how responsible investment is incorporated

Triton uses a range of 3rd party advisers, typically during deal processes. This includes company and individual screening service providers, lawyers and sustainability consultants.

- Other, specify (1)
- Other, specify (2)
- Other, specify (3)
- None of the above

- No, we do not use investment consultants.

SG 13	Mandatory	Descriptive	PRI 1
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SG 13.1	Indicate if your organisation executes scenario analysis and/or modelling in which the risk profile of future ESG trends at portfolio level is calculated.
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- We execute scenario analysis which includes factors representing the investment impacts of future environmental trends
- We execute scenario analysis which includes factors representing the investment impacts of future social trends
- We execute scenario analysis which includes factors representing the investment impacts of future governance trends
- We consider scenario analysis that includes factors representing the investment impacts of future climate-related risks and opportunities

- We execute other scenario analysis, specify
- We do not execute such scenario analysis and/or modelling

SG 13.3	Additional information. [OPTIONAL]
During 2017 Triton has reviewed the recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD) taskforce and the SDGs. These are both areas where Triton expects to increase its focus during 2018. A number of Triton Portfolio Companies have used the framework of the SDGs to support their public sustainability reporting.	

SG 14	Mandatory to Report, Voluntary to Disclose	Additional Assessed	PRI 1
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SG 14.1	Describe the process used to identify short, medium and long-term risks and opportunities that could have a material impact on your organisation and its activities.
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Private

SG 14.2	Some investment risks and opportunities arise as a result of long term trends. Indicate which of the following you act on.
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Private

SG 14.6	Additional information [Optional]
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Private

SG 15	Mandatory to Report, Voluntary to Disclose	Descriptive	PRI 1
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SG 15.1	Indicate if your organisation allocates assets to, or manages, funds based on specific environmental and social themed areas.
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Private

SG 16	Mandatory	Descriptive	General
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SG 16.1	Describe how you address ESG issues for internally managed assets for which a specific PRI asset class module has yet to be developed or for which you are not required to report because your assets are below the minimum threshold.
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Asset Class	Describe what processes are in place and the outputs or outcomes achieved		
Listed equities - ESG incorporation	<p>ESG processes have been put in place with appropriate training.</p> <p>Relevant staff have been trained to involve the Heads of ESG and Compliance when assessing potential investments.</p> <p>Such processes at the initial research phase include:</p> <ul style="list-style-type: none"> a sector screen focussing on a particular industry; compliance/criminal checks so all are aware of criminal issues such as corruption, fraud or sanctions; and as due diligence progresses a more specific ESG screen of the target. <p>In respect of the latter, Triton has employed RepRisk to conduct more detailed ESG diligence with ratings analysis.</p> <p>This combined with the Head of ESG's personal involvement ensures that all investment teams and decision makers are made aware of any relevant ESG issues.</p>		
Listed equities - engagement	When appropriate the Investment Team have engaged directly with management of specific investments to discuss ESG issues.		
Listed equity - (proxy) voting	The investment team usually exercises its voting rights directly at Company General Meetings. However given the investment strategy, these are minority voting rights.		
Hedge funds - DDQ	<table border="1" style="width: 100%;"> <tr> <td style="background-color: #0070C0; color: white;">Select whether you have responded to the PRI Hedge Fund DDQ</td> </tr> <tr> <td> <input type="radio"/> Yes <input checked="" type="radio"/> No </td> </tr> </table>	Select whether you have responded to the PRI Hedge Fund DDQ	<input type="radio"/> Yes <input checked="" type="radio"/> No
Select whether you have responded to the PRI Hedge Fund DDQ			
<input type="radio"/> Yes <input checked="" type="radio"/> No			
Hedge funds	<p>ESG processes have been put in place with appropriate training.</p> <p>Relevant staff have been trained to involve the Heads of ESG and Compliance when assessing potential investments.</p> <p>Such processes at the initial research phase include:</p> <ul style="list-style-type: none"> a sector screen focusing on a particular industry; compliance/criminal checks so all are aware of criminal issues such as corruption, fraud or sanctions; and as due diligence progresses a more specific ESG screen of the target. <p>In respect of the latter, Triton has employed RepRisk to conduct more detailed ESG diligence with ratings analysis.</p> <p>This combined with the Head of ESG's personal involvement ensures that all investment teams and decision makers are made aware of any relevant ESG issues.</p>		
Other (1) [as defined in Organisational Overview module]	<p>ESG processes have been put in place with appropriate training.</p> <p>Relevant staff have been trained to involve the Heads of ESG and Compliance when assessing potential investments.</p> <p>Such processes at the initial research phase include:</p> <ul style="list-style-type: none"> a sector screen focusing on a particular industry; compliance/criminal checks so all are aware of criminal issues such as corruption, fraud or sanctions; and as due diligence progresses a more specific ESG screen of the target. <p>In respect of the latter, Triton has employed RepRisk to conduct more detailed ESG diligence with ratings analysis.</p> <p>This combined with the Head of ESG's personal involvement ensures that all investment teams and decision makers are made aware of any relevant ESG issues.</p>		

SG 18	Voluntary	Descriptive	General
SG 18.1	Indicate whether any specific features of your approach to responsible investment are particularly innovative.		
Private			
SG 18.3	Additional information.		
Private			

SG 19	Mandatory	Core Assessed	PRI 6
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SG 19.1 Indicate whether your organisation proactively discloses asset class specific information. Select the frequency of the disclosure to clients/beneficiaries and the public, and provide a URL to the public information.

Private equity

Do you disclose?

- We do not disclose to either clients/beneficiaries or the public.
- We disclose to clients/beneficiaries only.
- We disclose to the public

Disclosure to clients/beneficiaries

Disclosure to clients/beneficiaries

- ESG information in relationship to our pre-investment activities
- ESG information in relationship to our post-investment monitoring and ownership activities
- Information on our portfolio companies' ESG performance
- Other

Quarterly or more frequently

SG 19.2 Additional information [Optional]

Triton reports on ESG matters as part of a risk report at the Annual Investor Meeting and Advisory Board Meetings. In addition, the ESG Team provides ESG updates in QIR reports and on an ad hoc basis at individual investor meetings and regularly responds to investor queries and questionnaires.

PE 01	Voluntary	Descriptive	PRI 1-6
PE 01.1	Provide a brief overview of your organisation's approach to responsible investment in private equity.		
Private			
PE 02	Mandatory	Core Assessed	PRI 2
PE 02.1	Indicate whether your organisation's investment activities are guided by a responsible investment policy / follow responsible investment guidelines.		
<input checked="" type="checkbox"/> Our investment activities are guided by a responsible investment policy			
PE 02.2	Describe how your organisation outlines expectations on staff and portfolio companies' approach towards ESG issues in investment activities.		
<p>Triton's overall RI strategy has 4 pillars:</p> <ol style="list-style-type: none"> 1. Sensitize / train all relevant Triton staff, (i.e. investment, risk, IR, purchasing etc.). We began training in 2013 and will continue ESG training sessions which are mandatory for all frontline Triton staff. This has been 100% implemented and is a focus to update again during 2018. 2. To work directly with Triton deal teams and advisers on all ESG aspects of due diligence on prospective investment opportunities. This has been 100% implemented. 3. To work directly with portfolio companies in implementing Triton's RI policy and co-ordinating reporting to Triton on ESG performance. The programme has been rolled out to all investee companies with the exception of those most recently acquired where integration is ongoing as part of the 100-day plan. 4. Benchmark and report on Triton performance, using both public information (including, but not only, from United Nations Principles for Responsible Investment ("UN PRI") and information from portfolio companies. Triton has filed publicly available UN PRI Transparency reports since 2014 to increase transparency and facilitate efficient benchmarking. Portfolio companies started formal ESG reporting to Triton on their 2015 performance and are currently submitting their reports for 2017. 			
<input type="checkbox"/> Our investment activities are not guided by a responsible investment policy			
<input type="checkbox"/> We do not have a responsible investment policy			
PE 03	Mandatory	Core Assessed	PRI 1,4,6
PE 03.1	Indicate if your most recent fund placement documents (private placement memorandums (PPM) or similar) refer to responsible investment.		
<input checked="" type="checkbox"/> Yes			
PE 03.2	Indicate how your most recent fund placement documents (PPM or similar) refer to the following responsible investment:		
<input checked="" type="checkbox"/> Policy and commitment to responsible investment <input checked="" type="checkbox"/> Approach to ESG issues in pre-investment processes <input checked="" type="checkbox"/> Approach to ESG issues in post-investment processes <input checked="" type="checkbox"/> Approach to ESG reporting			
PE 03.3	Describe how your organisation refers to responsible investment in fund placement documents (PPMs or similar). [Optional]		
<p>The most recent Private Placement Memorandum (which summarises the investment strategy) clearly commits to responsible investment as summarised in our response to question PE01.1. Similar commitments have been made in due diligence.</p> <p>Triton is engaging proactively with all of its portfolio companies and ensuring they are aligned with Triton's ESG Programme. Triton requests that each portfolio company is aligned with the requirements of Triton's ESG/Compliance Toolkit. This programme includes:</p> <ul style="list-style-type: none"> • Triton's Portfolio Company Compliance Policy; • Triton's Portfolio Company Monitoring and Reporting Framework; • a requirement to complete Triton's ESG Self Assessment; and • a requirement to prepare an ESG Action Plan that is reviewed and approved by the Board. <p>This process ensures that both Triton and its portfolio companies will have appropriate policies, programmes and ultimately KPIs to address the ESG risks and opportunities relevant to their business activities.</p>			
<input type="checkbox"/> No			
<input type="checkbox"/> Not applicable as our organisation does not fundraise			
PE 04	Voluntary	Additional Assessed	PRI 4
PE 04.1	Indicate whether your organisation made formal commitments to responsible investment in the, Limited Partnership Agreement (LPA) of your most recent fund(s), or through side letters when requested by clients.		
Private			
PE 04.2	Additional information.		
Private			
PE 05	Mandatory	Gateway	PRI 1
PE 05.1	During due-diligence indicate if your organisation typically incorporates ESG issues when selecting private equity investments.		
<input checked="" type="checkbox"/> Yes			
PE 05.2	Describe your organisation's approach to incorporating ESG issues in private equity investment selection.		
<p>Triton adopts a systematic approach, Triton's RI Policy requires each and every potential investment to be reviewed for ESG risks and opportunities. The scope of ESG Due Diligence could include but not be limited to:</p>			

- **Environment** - Energy efficiency; Climate risk; Waste reduction; Recycling; Environmental impact; Site pollution; Sustainability.
- **Society** - Community investment; Stakeholder dialogue; Inclusion; Public perception; Social mobility; Human rights compliance.
- **Corporate Governance** - Code of ethics; Processes and procedures; Reporting; Transparency; Anti-corruption policy and practice; Stakeholder interests; Accountability; Data protection; Documentation retention.
- **Human Capital** - Staff turnover; Health & Safety; Training and Development; Absence rate; Performance management; Equality and diversity; Recruitment and retention.
- **Customer Relations** - Customer satisfaction, retention and loyalty; Reputation; Trust; Quality of service and product; Competitive positioning.
- **Innovation** - New product and process development; continuous improvement; Value of intellectual property; Investment in Research and Development.

ESG Due Diligence ("DD") is initiated at the very beginning of the process with initial evaluation undertaken by the Deal Team and the ESG team on the ESG risks and opportunities within the industry and geographic sector. Publicly available information on the target company and any potential partners is also reviewed.

Following the initial screening, more detailed ESG assessment may be conducted which could include:

- company compliance and criminal checks using Worldcheck and/or RDC by Triton's Compliance team;
- specific ESG company checks using Reprisk by Head of ESG;
- application of Triton's ESG Index Rating System by Head of ESG where we grade ESG risks and opportunities;
- consideration of scope of local and national laws/regulations by ESG team;
- detailed DD on ESG issues and target's performance;
- assessment of LPA obligations by Head of Compliance; and
- inclusion of ESG requirements in legal documentation such as draft SPAs.

Triton uses a range of internal and external specialists to provide more detailed due diligence support on ESG issues on a case by case basis dependent on the results of the initial internal ESG review. This can include formal legal, environmental and social DD where advisers have been instructed by the ESG team on ESG red flags.

In addition, if we have cause for concern (e.g. companies share no information on their negative impacts, they are in high risk sectors, they have little insight into their relative performance/peer benchmarks, adopt a hostile attitude to external stakeholders, a major corruption or other governance risk is identified or any other warning signs), we will undertake independent research. In "low concern" situations, this will be desk based research (e.g. media search, consultation with relevant civil society and regulatory organisations) where we either do in-house or may commission from a specialist ESG service provider. If we remain concerned, we may proceed to HQ visit, either by our ESG analyst or a specialist consultancy and in some situations, we may also commission site visits.

The ESG Team assesses supply chain risk on each investment opportunity and where appropriate will investigate matters further themselves or with external advisers.

In 2015, Triton implemented a transaction checklist for all potential acquisitions that includes specific sections where sign off is required by the Heads of ESG and Compliance respectively.

The in-house team works with the investment advisory teams in respect of its findings, and ESG risks or opportunities shall be incorporated into the investment recommendation and decision-making process. Where appropriate, the in-house team attends relevant investment recommendation meetings.

No

PE 06	Mandatory	Core Assessed	PRI 1,3
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PE 06.1 Indicate what type of ESG information your organisation typically considers during your private equity investment selection process.

- Raw data from target company
- Benchmarks against other companies
- Sector level data/benchmarks
- Country level data/benchmarks
- Reporting standards, industry codes and certifications
- International initiatives, declarations or standards
- Engagements with stakeholders (e.g. customers and suppliers)
- Advice from external resources
- Other, specify
- We do not track this information

PE 06.2 Describe how this information is reported to, considered and documented by the Investment Committee or similar.

As part of the formalisation of its ESG programme, Triton has introduced a section into its decision-making papers that records the ESG assessment conducted on potential investments.

Triton evaluates each and every investment in a risk-based manner. The ESG information sources listed above are not therefore applied prescriptively on every investment but are examples of sources of information that will be referred to on a case by case basis.

ESG Due Diligence ("DD") is initiated at the very beginning of the process with initial evaluation undertaken by the Deal Team and the ESG team on the ESG risks and opportunities within the industry and geographic sector. Publicly available information on the target company and any potential partners is also reviewed.

Following the initial screening, more detailed ESG assessment may be conducted.

In 2015, Triton implemented a transaction checklist for all potential acquisitions that includes specific sections where sign off is required by the Heads of ESG and Compliance respectively.

PE 07	Voluntary	Additional Assessed	PRI 1,2
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PE 07.1 During deal structuring, what is the process for integrating ESG-related considerations into the deal documentation and/or the post-investment action plan?

Private

PE 07.3 Additional information.

PE 08	Voluntary	Additional Assessed	PRI 1
PE 08.1	Indicate how ESG issues impacted your private equity investment selection processes during the reporting year.		
Private			
PE 08.2	ESG issues were included in the post-investment action plan /100 day plan		
Private			
PE 08.3	Additional information.		
Private			

PE 09	Mandatory	Gateway/Core Assessed	PRI 2
PE 09.1	Indicate whether your organisation incorporates ESG issues in investment monitoring of portfolio companies.		
<input checked="" type="checkbox"/> Yes			
PE 09.2	Indicate the proportion of portfolio companies where your organisation included ESG performance in investment monitoring during the reporting year.		
<input checked="" type="checkbox"/> >90% of portfolio companies <input type="checkbox"/> 51-90% of portfolio companies <input type="checkbox"/> 10-50% of portfolio companies <input type="checkbox"/> <10% of portfolio companies			
PE 09.3	Indicate ESG issues for which your organisation typically sets and monitors targets (KPIs or similar) and provide examples per issue.		
<input checked="" type="checkbox"/> Environmental Portfolio Company (PC) by PC energy intensity performance PC by PC resource efficiency PC by PC environmental compliance status <input checked="" type="checkbox"/> Social PC by PC accident status PC by PC supply chain risk PC by PC product responsibility <input checked="" type="checkbox"/> Governance PC by PC % of relevant employees trained in Code of Conduct PC by PC % of relevant employees trained in Anti-Corruption PC by PC % of relevant employees trained in competition law compliance <input type="checkbox"/> We do not set and/or monitor against targets			
<input type="checkbox"/> No			
PE 09.4	Additional information. [Optional]		
<p>Triton's Responsible Investment Policy defines requirements for ESG engagement to be incorporated into the portfolio companies' plans, including specific management strategies to deal with any issues identified during due diligence. It then defines requirements for periodic monitoring and reporting on ESG matters to Triton on a defined schedule.</p> <p>An overview of Triton's ESG programme was first communicated to Triton portfolio company CEO's and Chairmen in 2013. Following this launch Triton has held ESG engagement meetings with the management teams of its portfolio companies.</p> <p>Triton's ESG KPI scorecard, which was launched in May 2015, is a key part of the ESG reporting package. The scorecard consists of both mandatory and optional ESG reporting sections assists PCs in providing correct risk prioritised metrics to Board. Annual reporting began in 2016. The Triton ESG Programme therefore tracks the proportion of PCs that have ESG/sustainability related policies and a range of ESG metrics Portfolio Company (PC) by PC.</p> <p>For the avoidance of doubt the items listed in 09.3 have been identified as some but not all the KPIs that are tracked, on a case by case basis, for portfolio companies.</p> <p>Reporting is required on an ad hoc and annual basis.</p>			

PE 10	Mandatory	Core Assessed	PRI 2
PE 10.1	Indicate if your organisation tracks the proportion of your portfolio companies that have an ESG/sustainability-related policy (or similar guidelines).		
<input checked="" type="checkbox"/> Yes			
PE 10.2	Indicate what percentage of your portfolio companies has an ESG/sustainability policy (or similar guidelines).		
<input type="checkbox"/> >90% of portfolio companies <input checked="" type="checkbox"/> 51-90% of portfolio companies <input type="checkbox"/> 10-50% of portfolio companies <input type="checkbox"/> <10% of portfolio companies			

0% of portfolio companies
 No

PE 10.3 Additional information. [Optional]
 This percentage has dropped from previous reported 90% due to Triton's acquisitions and disposals. A programme of requesting our PCs to review and update the ESG information available on their websites is ongoing.

PE 11	Voluntary	Additional Assessed	PRI 2
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PE 11.1	Indicate the types of actions taken by your portfolio companies to incorporate ESG issues into operations and what proportion of your portfolio companies have implemented these actions.		
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Private

PE 11.2	Describe how your organisation contributes to the portfolio companies' resourcing and management of ESG issues.		
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Private

PE 12	Voluntary	Descriptive	PRI 2,3
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PE 12.1	Indicate the type and frequency of reports you request and/or receive from portfolio companies covering ESG issues.		
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Private

PE 12.2	Describe what level of reporting you require from portfolio companies, and indicate what percentage of your assets are covered by ESG reporting.[OPTIONAL]		
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Private

PE 13	Voluntary	Additional Assessed	PRI 2
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PE 13.1	Indicate whether during the reporting year your organisation disclosed information on ESG issues to potential buyers prior to exit for private equity investments.		
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Private

PE 13.2	Apart from disclosure, describe how your organisation considers ESG issues at exit.		
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Private

PE 13.3	Additional information.		
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Private

PE 14	Voluntary	Additional Assessed	PRI 1,2
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PE 14.1	Indicate whether your organisation measures how your approach to responsible investment in Private Equity investments has affected financial and/or ESG performance.		
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Private

PE 14.2	Describe how you are able to determine these outcomes.		
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Private

PE 15	Mandatory to Report, Voluntary to Disclose	Descriptive	PRI 1,2
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PE 15.1	Provide examples of ESG issues that you identified in your potential and/or existing private equity investments during the reporting year.		
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Private

PE 15.2	Describe how you define and evaluate the materiality of ESG factors.		
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Private

PE 16	Mandatory to Report, Voluntary to Disclose	Descriptive	PRI 6
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PE 16.1	Describe your organisation's approach to disclosing ESG incidents in private equity investments to your investor clients (LPs).		
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Private

CM1 01.1	Mandatory	Core Assessed	General
CM1 01.1	Indicate whether the reported information you have provided for your PRI Transparency Report this year has undergone:		
<input type="checkbox"/> Third party assurance over selected responses from this year's PRI Transparency Report <input type="checkbox"/> Third party assurance over data points from other sources that have subsequently been used in your PRI responses this year <input type="checkbox"/> Third party assurance or audit of the implementation of RI processes (that have been reported to the PRI this year) <input type="checkbox"/> Internal audit conducted by internal auditors of the implementation of RI processes and/or RI data that have been reported to the PRI this year) <input checked="" type="checkbox"/> Internal verification of responses before submission to the PRI (e.g. by the CEO or the board) <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Whole PRI Transparency Report has been internally verified <input type="checkbox"/> Selected data has been internally verified <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above			
CM1 01.2 & 01.8	Mandatory	Descriptive	Planned assurance of this year's PRI Transparency Report
CM1 01.2	Do you plan to conduct third party assurance of this year's PRI Transparency report?		
<input type="radio"/> Whole PRI Transparency Report will be assured <input type="radio"/> Selected data will be assured <input checked="" type="radio"/> We do not plan to assure this year's PRI Transparency report			
CM1 01.3 & 01.9	Mandatory	Descriptive	General
CM1 01.3	We undertook third party assurance on last year's PRI Transparency Report		
<input type="radio"/> Whole PRI Transparency Report was assured last year <input type="radio"/> Selected data was assured in last year's PRI Transparency Report <input checked="" type="radio"/> We did not assure last year's PRI Transparency report, or we did not have such a report last year.			
CM1 01.4, 10-12	Mandatory	Descriptive	General
CM1 01.4	We undertake confidence building measures that are unspecific to the data contained in our PRI Transparency Report:		
<input type="checkbox"/> We adhere to an RI certification or labelling scheme <input type="checkbox"/> We carry out independent/third party assurance over a whole public report (such as a sustainability report) extracts of which are included in this year's PRI Transparency Report <input type="checkbox"/> ESG audit of holdings <input type="checkbox"/> Other, specify <input checked="" type="checkbox"/> None of the above			
CM1 01.7	Mandatory	Descriptive	General
CM1 01.7	Indicate who has reviewed/verified internally the whole - or selected data of the - PRI Transparency Report . and if this applies to selected data please specify what data was reviewed		
<input checked="" type="checkbox"/> CEO or other Chief-Level staff <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Sign-off <input checked="" type="checkbox"/> Review of responses <input checked="" type="checkbox"/> The Board <ul style="list-style-type: none"> <input type="checkbox"/> Sign-off <input checked="" type="checkbox"/> Review of responses <input type="checkbox"/> Investment Committee <input checked="" type="checkbox"/> Compliance Function <input checked="" type="checkbox"/> RI/ESG Team <input type="checkbox"/> Investment Teams <input type="checkbox"/> Legal Department <input type="checkbox"/> Other (specify)			
CM1 01.13	Additional information for all confidence building measures [OPTIONAL]		
The report has been reviewed and approved by RI/ESG Team, the Head of Compliance and COO. It will be presented to the Board for review at the next			

