



# Environmental, Social and Governance Policy



**Azalea**

## **PURPOSE**

This Environmental, Social and Governance (“**ESG**”) Policy outlines the approach adopted by Azalea Investment Management Pte. Ltd. (“**Azalea**”) in integrating the consideration and management of ESG factors in our investments and portfolio as well as our own business practices.

The Policy applies to all investments managed by Azalea, which are typically investments into private equity funds and co-investments.

## INDUSTRY ENGAGEMENT

We affirm our commitment to responsible investing and integration of ESG in our investment approach through our alliance with these associations.

Signatory of:



Azalea is a signatory to the Principles for Responsible Investment ("PRI"), the world's leading proponent of responsible investment promoting the incorporation of ESG factors into investment and ownership decisions to enhance returns and better manage risks. The PRI is supported by the United Nations.

We are a member of the Initiative Climat International, a global community of private markets investors who seek to improve the industry's understanding and management of climate change risk and opportunities.



Azalea has formally committed to the ESG Data Convergence Initiative, an industry-led initiative which aims to streamline the private investment industry's historically fragmented approach to collecting ESG data and to create a critical mass of meaningful, performance-based, comparable ESG data from private companies.

We are a signatory of the Singapore Stewardship Principles for Responsible Investors ("SSP") and agree with the spirit and principles articulated in the SSP.



Azalea is also a member of the Global Impact Investing Network. Our membership signifies a commitment to deepening our engagement in the impact investing community.

# WHAT DOES ESG MEAN AT AZALEA?

ESG covers a wide spectrum of issues. At Azalea, we consider the individual elements of ESG as follows:

## ENVIRONMENT



Issues relating to quality and functioning of the natural environment and natural systems.

Our focus:

- Climate change
- Use of raw materials, water and energy
- Waste generation

## SOCIAL



Issues relating to well-being and interests of people and communities.

Our focus:

- Financial Inclusion/Literacy
- Personal Data Safety and Privacy
- Diversity

## GOVERNANCE



Issues relating to governance of companies and other investee entities.

Our focus:

- Business Ethics / Corporate Governance
- Stakeholder Engagement and Reporting
- Cybersecurity

We consider these ESG issues as part of our investment and monitoring process. Nevertheless, we also recognize that the relevance of these issues may vary depending on factors such as the sector or geography of a portfolio company of the PE Fund.

## **ESG GOVERNANCE AT AZALEA**

We believe that strong corporate governance aligns the interests of management and our stakeholders.

The Board of Directors exercises ultimate oversight over Azalea and is responsible for approving Azalea's ESG strategy and risk management framework, which includes our approach to assessing and managing ESG risks. The Board also takes advice from the Audit and Risk Committee, which oversees compliance and risks in Azalea.

Senior Management is responsible for putting in place policies, practices and tools to monitor exposure to ESG risks.

The ESG Resource Group is a cross-functional team that is responsible for implementing Azalea's ESG commitments. The ESG Resource Group's role involves:

- Promoting and facilitating the understanding of ESG values and practices;
- Reviewing, identifying and driving improvements to Azalea's responsible investment and ESG management activities;
- Keeping abreast of market and regulatory developments;
- Developing ESG reporting and contributing to ESG product strategy; and
- Guiding the communications strategy with stakeholders in relation to ESG matters.

# **INTEGRATING ESG INTO OUR INVESTMENT PROCESS**

We hold ourselves responsible as a steward of our stakeholders' assets. As such, we integrate ESG factors and consider ESG risks and opportunities throughout the investment life cycle.

## **Climate**

With the urgent and growing focus on climate change, Azalea recognizes the importance of identifying and monitoring climate-related risks throughout the investment lifecycle. Climate-related risk arises from the potential adverse impact of changes in the environment on economic activities.

We identify sectors deemed to have high exposure to climate risks and monitor developments in General Partners' ("GP") practices with respect to the fund to assess how climate risks are being managed. Identification and monitoring of climate risks is conducted using various third-party tools and data sources, in addition to in-house developed questionnaires and surveys. We will engage GPs on potentially material climate issues.

## **Due Diligence**

The Investment Team is responsible for integrating ESG factors and considering ESG risks and opportunities during due diligence. They are supported by the ESG Resource Group which assists with the necessary ESG analyses and highlights relevant ESG risks for post-investment engagement and monitoring.

The ESG due diligence findings are formally documented in investment recommendations, with potential concerns flagged for consideration to the relevant investment committee.

## ***Primary Fund Investing***

ESG risk management forms an important component of the due diligence assessment conducted on each GP and fund. This process includes an evaluation of the following points:

- Whether the GP is a signatory of the PRI or any other ESG-related associations;
- Assessment of the GP's ESG maturity through review of its ESG policies, strategies and integration of ESG considerations into its investment process;
- Analysis of the carbon footprint of the fund's invested industries; and
- Assessment of the fund's reporting process to advisory boards and/or to Limited Partners on significant ESG risks that arise in portfolio companies.

As part of our due diligence process, we also examine if there are any recent ESG controversies relating to the GP and the fund. We use external sources, like RepRisk<sup>1</sup>, to understand the ESG risks in GPs' recent portfolios and as a source of information for qualitative ESG due diligence on the GP.

## ***Secondary Portfolio Acquisition***

For secondary portfolio acquisitions, as a fund-of-funds manager, we may have limited ability to influence the underlying composition of portfolios that we acquire. As such, we focus on engagement with the underlying GPs, evaluate their overall commitment to responsible investment and the degree to which they integrate ESG factors into their investment process. We expect the GPs and underlying portfolio companies to progress towards ESG best practices.

## ***Co-Investments***

For co-Investments into underlying portfolio companies, our due diligence considers the carbon footprint of the company's industry, potential ESG risks to which the company may be exposed to and the plan for mitigating these risks. The team also screens the company and GP for any ESG controversies and reviews the GP's own ESG due diligence on the company where available.

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<sup>1</sup> RepRisk uses AI and machine learning to screen over 100,000 public sources daily, and in 23 languages, to systematically identify any company or project associated with an ESG risk incident.

## **Post-Investment Monitoring**

After completion of its investments, Azalea will continue to monitor the GP's commitment to ESG integration and their ESG practices on an ongoing basis.

Azalea requires any serious ESG incidents involving a fund or its underlying portfolio companies that result in a material adverse environmental or social impact or a material breach of law (including financial irregularities) to be reported to Azalea in a timely manner.

We utilise a variety of tools and databases to assist us in maintaining coverage of ESG risks and exposure across our portfolios, enabling us to independently identify ESG issues in addition to being notified of any such issue by the GP.



## **CONTACT**

If you have any questions, comments or requests regarding our ESG Policy, please submit them to our ESG Resource Group by email at [esg@azalea.com.sg](mailto:esg@azalea.com.sg).

This ESG Policy may be amended, supplemented, modified and updated by Azalea from time to time.