

SUSTAINABILITY-RELATED DISCLOSURES – NIC ICG IX K/S

This statement of disclosure for the financial product NIC ICG IX K/S (the “**Partnership**”), managed by ADVANTAGE Investment Partners A/S (the “**Manager**”), has been prepared in accordance with Article 10 of the Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (“**SFDR**”).

The Partnership is a closed-ended fund-of-funds, investing in ICG Europe Fund IX SCSp (the “**Main Fund**”) and any co-investment vehicles (each a “**Co-Investment Vehicle**”) established by ICG, each with ICG Europe S.à.r.l. as its alternative investment fund manager (the “**AIFM**”) and ICG Alternative Investment Limited as its portfolio manager (“**Portfolio Fund Manager**”) and any Alternative Investment Vehicles, Feeder or Parallel Funds (each as defined in the Master Fund LPAs) established in accordance with the Master Fund LPAs (collectively the “**Master Funds**”) with the principal objective of creating capital growth for the benefit of the Limited Partners.

This statement may be subject to changes or revisions, especially following the disclosure of any further legislation, guidance, or recommendations concerning the SFDR (including any delegated acts thereto) by the Danish or EU legislators and/or supervisory authorities.

A. SUMMARY

The Main Fund is a closed-ended fund that will seek to capitalise on the on the experience and insight of ICG's local investment executives by investing flexibly throughout the capital structure. ICG expects that the Main Fund will invest in a blend of senior and subordinated debt, preferred stocks and other equity-like instruments structured with the aim to deliver both a significant contractual return and an attractive overall risk-adjusted return for investors.

The Main Fund (and thus indirectly the Partnership) promotes environmental or social characteristics but does not have as its objective sustainable investment within the meaning of SFDR. The Main Fund is classified by the Portfolio Fund Manager as an Article 8 product for purposes of the SFDR, and, accordingly, the Manager has also classified the Partnership as an Article 8 product for purposes of the SFDR.

The Main Fund (and thus indirectly the Partnership) promotes the following environmental and/or social characteristics in relation to the Main Fund's investments, to the extent they are relevant to an investment: the avoidance of environmental harm; promoting environmental stewardship, including consideration of climate-related risks; mitigating climate change; promoting the safety and security of society; promoting human capital management and diversity, equity, and inclusion; and/or the avoidance of systematic human rights violations, in each case by applying the Exclusion List and ESG Assessment, as described below, and, in Relevant Investments (as defined below in Section (c)), seeking to ensure that companies representing a Relevant Investment have science-based targets approved by the Science Based Targets Initiative (“SBTi”) by 2030 or sooner.

The Main Fund (and thus indirectly the Partnership) may make one or more “sustainable investments” within the meaning of Article 2(17) of SFDR, but it does not commit to make any such investment. The Main Fund (and thus the Partnership) does not have sustainable investment as its objective.

Owing to the mandatory nature of the list of Excluded Investments (see Section (c) below) and ESG Assessment (see Section (c) below) except for Temporary Assets (as defined below) for which it is not possible to apply the Exclusion List or the ESG Assessment, a minimum of 85 % of investments made by the Main Fund will meet the environmental and/or social characteristics promoted by the Main Fund.

The Main Fund will principally monitor the attainment of its promoted characteristics through its sustainability indicators and will undertake pre-investment and ongoing / post-investment information collection exercises using relevant sources which include third party and self-reported investee company data. In some instances, the Main Fund may need to use estimates or proxy data. See Section (i) below for further detail on data limitations.

Good governance practices of investee companies are assessed both pre-investment and as part of ongoing monitoring. The nature and depth of the assessment depends on the type and structure of the investment and other factors such as the availability of relevant information. Before making investments, the Portfolio Fund Manager will conduct due diligence that it deems reasonable and appropriate based on the facts and circumstances known at that time. When conducting due diligence and making an assessment regarding an investment, the Portfolio Fund Manager will rely on the resources available to it, including information provided by third parties, including in some circumstances, third-party investigations and due diligence conducted by certain other affiliated funds, vehicles or accounts. See Section (h) below for full detail on data sources.

B. NO SUSTAINABLE INVESTMENT OBJECTIVE

The Main Fund (and thus indirectly the Partnership) promotes environmental or social characteristics but does not have as its objective sustainable investment. The Main Fund is classified by the Portfolio Fund Manager as an article 8 product for purposes of the SFDR, and accordingly the Manager has also classified the Partnership as an Article 8 product for purposes of the SFDR.

C. ENVIRONMENTAL OR SOCIAL CHARACTERISTICS OF THE FINANCIAL PRODUCT

The Main Fund (and thus indirectly the Partnership) promotes the following environmental and/or social characteristics in relation to the Main Fund's investments, to the extent they are relevant to an investment:

- i) through the Exclusion List and ESG Assessment, as described below, the avoidance of environmental harm; promoting environmental stewardship, including consideration of climate-related risks; mitigating climate change; promoting the safety and security of society; promoting human capital and diversity, equity and inclusion; and/or the avoidance of systematic human rights violations.
- ii) through the Sustainability Engagement Strategy of ICG, as described below, promotion of decarbonisation; management of human capital and diversity, equity and inclusion; and effective sustainability governance and transparency.

The intended aim of the Exclusion List and ESG Assessment is to exclude certain investments that the Portfolio Fund Manager considers as inherently prone to having significant adverse environmental and/or social impacts that cannot be mitigated during its period of investment.

1. Exclusion List:

The Portfolio Fund Manager will make reasonable enquiry as part of its pre-investment due diligence process before making a new investment. Following that enquiry, the Portfolio Fund Manager will not knowingly make direct investments in the investments specified in the Exclusion List. The Exclusion List is contained in the Portfolio Fund Manager's Responsible Investing Policy, which is updated from time to time, and covers activities such as those relating to forced and child labour, controversial weapons, arms and ammunition, tobacco, and coal, oil and gas industries, with certain of those industries excluded by reference to revenue thresholds ("**Excluded Investments**").

2. ESG Assessment:

The Portfolio Fund Manager has created a proprietary ESG Assessment to evaluate the environmental and/or social characteristics and impacts of investments. The ESG Assessment is used to identify whether prospective investments which pass the Exclusion List should nevertheless be excluded. The ESG Assessment is mandatory and covers a range of environmental, social and governance matters, such as high-risk sectors and activities, country risk, reputational risk, climate-related risk and the maturity of the investment's approach to managing relevant sustainability factors, amongst others. The ESG Assessment will be tailored to the investments contemplated by the Main Fund. The Portfolio Fund Manager may update the ESG Assessment from time to time but will always apply it in a standardised and consistent manner. The Portfolio Fund Manager will make reasonable efforts to obtain all the information required under the ESG Assessment, noting that it is possible that not all relevant information will be available for all proposed investments. The Portfolio Fund Manager will consider such information for each proposed investment prior to making an investment decision (the "**ESG Assessment**").

3. Sustainability Engagement Strategy

The Portfolio Fund Manager will seek to pursue the Sustainability Engagement Strategy through monitoring and engagement with portfolio companies, such monitoring and engagement to be tailored to the nature of control and investment capital structure of the portfolio company. The ability of the Portfolio Fund Manager to apply the Sustainability Engagement Strategy will depend upon the factors such as its level of influence with the portfolio company and the status of its relationship with other investors in the portfolio company.

In relation to the decarbonisation characteristic, the Portfolio Fund Manager and the AIFM have, as members of the ICG Group, made commitments validated by the Science Based Targets Initiative ("**SBTi**") to ensure that 100% of "Relevant Investments" have SBTi-approved science-based targets by 2030. "**Relevant Investments**" means those investments of the Main Fund (combined with the interest of any other fund managed by the ICG Group) where the Main Fund holds at least 25% of the fully diluted shares of the investee company and at least one seat on the board, as set out by the SBTi Private Equity Sector Science-Based Target Guidance (Version 1.0, November 2021) for direct private equity investments.

In relation to the Main Fund, the Portfolio Fund Manager will seek to ensure that companies which represent a Relevant Investment will have SBTi-validated science-based targets by 2030 or sooner.

D. INVESTMENT STRATEGY

Investment strategy used to meet the environmental or social characteristics promoted by the Main Fund

The Main Fund is a closed-ended fund that will seek to capitalise on the experience and insight of ICG's local investment executives by investing flexibly throughout the capital structure. ICG expects that the Main Fund will invest in a blend of senior and subordinated debt, preferred stocks and other equity-like instruments structured with the aim to deliver both a significant contractual return and an attractive overall risk-adjusted return for investors.

Portfolio diversification

Diversification by investment type

ICG expects that the Main Fund will invest in a range of opportunities across Europe generally arising from a need for capital in three primary situations:

- "Corporate" situations, in which the Main Fund will seek to support:
 - management-led transactions requiring non-dilutive solutions;
 - capital reorganisations around family owners and key stakeholders; or
 - the continued organic and inorganic development of mature mid-market and upper mid-market companies.
- "Opportunity" situations, in which the Main Fund will seek to invest primarily in companies that are known to ICG (often due to its involvement in processes associated with previous rounds of investment) and that are performing well but are impeded by their capital structures. This pillar of the European strategy is designed to take advantage of significant levels of dislocation and volatility in the market. ICG intends that the Main Fund will support these companies by:
 - providing capital in support of recapitalisations led by private equity sponsors or lenders;
 - providing liquidity for key stakeholders; or
 - acquiring positions from forced sellers.
- "Sponsored LBO" situations, in which the Main Fund will seek to support private equity sponsors in financing mid-market and upper mid-market LBOs. ICG expects the Main Fund to invest in LBO transactions where it has a comparative advantage, such as a local relationship with a key stakeholder or where ICG believes that it has specific expertise relevant to the proposed investment.

To identify, monitor and engage with investments in line with the Main Fund's promoted environmental or social characteristics, the Portfolio Fund Manager on a continuous basis: (i) applies a mandatory exclusion list; (ii) considers the information attained through ESG Assessment prior to making an investment decision; and (iii) monitors and engages with portfolio companies. See Section (c) above for further detail on the Main Fund's promoted characteristics.

The policy to assess good governance practices of the investee companies, including with respect to sound management structures, employee relations, remuneration of staff and tax compliance

The AIFM and the Portfolio Fund Manager adhere to the same Good Governance Policy (the "**Policy**") which is used in relation to all potential investments to ensure that good governance is being followed within the potential investee company or issuer.

Under the Policy, the following four core pillars are highlighted as being central to the AIFM's and the Portfolio Fund Manager's assessments of good governance (and are the focus of pre-investment and ongoing due diligence): sound management structures, employee relations, remuneration of staff and tax compliance. In respect of each of the core pillars, the AIFM and/or Portfolio Fund Manager, as relevant, will seek information on a selection of key good governance metrics most relevant to the underlying investment as part of pre-investment due diligence. Examples of such metrics that may be considered, where deemed relevant by the Portfolio Fund Manager and/or the AIFM, include:

- sound management structures: board composition, independence and oversight, board gender ratio, risk and crisis management, anti-bribery and corruption ("ABC") and financial crime policies and procedures;
- employee relations: policies and procedures regarding human rights, occupational health and safety, employee grievance mechanisms, and whistle-blowing; and

- remuneration of staff: compliance with minimum wage requirements, board / senior management remuneration policies, gender or other diversity pay gap practices and/or information; and
- tax compliance: applicable tax compliance or tax risk management policies and procedures, operations in non-cooperative tax jurisdictions, governance and audit processes for tax returns.

Other alternative and/or additional and/or fewer metrics or enquiries may be used where deemed appropriate.

The Portfolio Fund Manager and the AIFM will consider, where deemed appropriate, any evidence of incidents, violations or allegations in respect of the above good governance core pillars that are considered to be so serious or persistent that they suggest an ongoing failure of good governance.

During the investment lifecycle, the Portfolio Fund Manager and/or the AIFM carries out ongoing monitoring, as detailed in the Policy. The monitoring practices are tailored to the investment nature and type.

The selection of and subsequent assessment of the relevance and weighting of the above metrics will vary according to the size, sector and geographic location of the company, issuer or asset. It will also vary based on the evidence and information available to investment teams both in respect of the above listed key metrics as well as any wider governance and/ or sustainability factors uncovered separately as part of investment due diligence. As such, no one metric will be determinative on its own and some judgement will be required to consider these both in the round and in the wider context of the transaction when reaching a good governance assessment finding both pre-investment and as part of ongoing monitoring.

For the avoidance of doubt, the Policy will not apply to certain investment classes, such as instruments issued by sovereign and supranational entities (including government bonds and securities), or cash, money market instruments and/or certain derivative financial instruments that the Portfolio Fund Manager causes the Main Fund to enter into for risk management (e.g., interest rate or foreign currency) purposes.

The Main Fund will only make investments where it is concluded by the Portfolio Fund Manager and/or the AIFM, as relevant, in good faith, that:

- immediately prior to the investment, the investment demonstrates good governance practices; or
- where an investment demonstrates partial alignment with good governance practices immediately prior to the investment, the Portfolio Fund Manager and/or the AIFM reasonably assess that it will be possible to remedy any deficiencies in good governance practices with the support of the Portfolio Fund Manager and/or the AIFM. However, in the case of debt-like instruments contemplated by the Main Fund, the Portfolio Fund Manager would be unlikely to invest in such circumstances under the Policy, as debt instruments (or other instruments with a similar profile in the company's or issuer's capital structure) are unlikely to enable the Portfolio Fund Manager to influence or encourage such remedial action.

Where the Portfolio Fund Manager and/or the AIFM determine, in good faith, that the pre-investment due diligence or ongoing monitoring under the Policy demonstrates evidence of material and ongoing good governance failures and the Portfolio Fund Manager and/or the AIFM would be or is unable to influence remedial action, the Portfolio Fund Manager and/or the AIFM will decide not to invest or (in a post-investment scenario) take steps to divest the investment, insofar as feasible, and all other routes to remedial action are exhausted. The manner and rate of divestment may, in some cases, be subject to how liquid the investment is.

E. PROPORTION OF INVESTMENTS

An investment will in the Main Fund (and thus indirectly in the Partnership) be treated as "#1 Aligned with E/S characteristics" where:

1. the investment is not an Excluded Investment;
2. the Portfolio Fund Manager has considered information gathered as a part of the ESG Assessment prior to making an investment decision; and
3. post-investment, the Portfolio Fund Manager has applied the Sustainability Engagement Strategy.

Owing to the mandatory nature of the list of Excluded Investments and the ESG Assessment, except for cash and certain derivative financial instruments which the Portfolio Fund Manager uses to manage the Main Fund's currency and interest rate risks, for which it is not possible to apply the Exclusion List or the ESG Assessment, the Portfolio Fund Manager anticipates all of the Main Fund's investments will meet the promoted environmental and/or social characteristics promoted under the Exclusion List and the ESG Assessment. The minimum allocation for the investments qualifying as "#1 Aligned with E/S characteristics" is 85%.

The Main Fund will generally have direct exposures to Investments and for these purposes, no distinction is made in the

asset allocation between direct exposures in investee entities and any other types of exposures to those entities.

F. MONITORING OF ENVIRONMENTAL OR SOCIAL CHARACTERISTICS

The sustainability indicators for the Main Fund (and accordingly indirectly for the Partnership) are:

Promoted characteristics	Sustainability indicators
The avoidance of environmental harm; promoting environmental stewardship, including consideration of climate-related risks; promoting the safety and security of society; and/or the avoidance of systematic human rights violations.	1. Excluded Investments: The percentage of value of investments held at the end of the reporting period which has passed the negative screen for Excluded Investments.
	2. ESG Assessment: The percentage by value of investments held at the end of the reporting period where the Portfolio Fund Manager considered the information gathered as a part of the ESG Assessment before making its investment decision.
Promotion of decarbonisation; management of human capital and diversity, equity and inclusion; and effective sustainability governance and transparency.	3. Sustainability Engagement Strategy: The percentage of Relevant Investments by value that have set SBTi-validated science- based targets at the final day of the reporting period.

Prior to investment, the Portfolio Fund Manager: (i) assesses whether an investment should be excluded as an Excluded Investment; (ii) considers the information gathered to assess whether a proposed investment under the ESG Assessment should, even if not an Excluded Investment, nevertheless still be excluded due to having significant adverse environmental and/or social impacts on the environment and society. The Excluded Investment and ESG Assessment promoted characteristics are measured by the sustainability indicators listed for those characteristics above.

Throughout the investment lifecycle, the Portfolio Fund Manager will seek to achieve the Sustainability Engagement Strategy promoted characteristic through monitoring and engagement with investee companies. The Sustainability Engagement Strategy promoted characteristic will be measured by the sustainability indicators listed for that promoted characteristic above.

The Portfolio Fund Manager carries out the relevant pre-investment due diligence and ongoing assessments for this Main Fund's promoted characteristics as per the methodologies detailed in *Section (g)* below. *Section (i)* also details the related internal and external control mechanisms.

G. METHODOLOGIES FOR ENVIRONMENTAL OR SOCIAL CHARACTERISTICS

Pre-investment process of the Main Fund: The Portfolio Fund Manager will use the data sources detailed in *Section (h)* below to assess whether a proposed investment is an Excluded Investment or not. The Portfolio Fund Manager will use those data sources to assess proposed investments in accordance with the ESG Assessment (which currently consists of a number of mandatory questions across the following themes: high risk sectors, bribery and corruption risk, country risk, reputational risk, climate risk, and ESG maturity. Exclusion screens are conducted based on information available about the underlying company and its activities (typically financial reports and/or management presentations provided by the company or its placement agents), to determine that the specified thresholds in the Exclusion List are not met. Once the ESG Assessment is completed, the data is compiled in a standard investment committee report and analysed by the Portfolio Fund Manager's investment team. Should the Portfolio Fund Manager require further information, additional due diligence is conducted. Depending on the results the investment may or may not be submitted for the ultimate investment decision by the Portfolio Fund Manager's investment committee. The percentage of value of investments held at the end of the reporting period which has passed the negative screen for Excluded Investments and where the Portfolio Fund Manager considered the information gathered as a part of the ESG Assessment before making its investment decision is reported in the Main Fund's periodic reporting.

Ongoing monitoring: The Portfolio Fund Manager will use the data sources mentioned in *section (h)* below to gather the data relevant to the relevant sustainability indicators for the Sustainability Engagement Strategy characteristic (see *section (f)* above). The Portfolio Fund Manager uses the data to monitor and engage with investee companies in a manner tailored to the nature of control the Portfolio Fund Manager has over the investee company and its investment

capital structure. The Portfolio Fund Manager will also, as relevant to the Main Fund's strategy, track data (including certain PAI data) against the Portfolio Fund Manager's internally-set key performance indicators ("KPIs") for the Main Fund to monitor progress and trends over time. The Portfolio Fund Manager will typically seek to agree and review such data with investee companies' management to ensure progress on set KPIs. Such KPIs are aligned with what the Portfolio Fund Manager regards as best in class in the respective industry and geography. Such KPIs are not included as binding elements or indicators of the Main Fund but are used as targets to guide the Portfolio Fund Manager's engagement efforts with investee companies.

H. DATA SOURCES AND PROCESSING

Data sources used to attain each of the environmental or social characteristics promoted by the Main Fund

The Portfolio Fund Manager obtains pre-investment and ongoing monitoring data through a combination of sending questionnaires to investee companies, data rooms compiled by investee companies, arranger banks and their advisers and obtaining information from third party specialist providers. In some cases where data is not available or accurate, for example in the case of specific PAI data, reasonable assumptions may be made, or estimated or proxy data used.

Post-investment the data collected as part of the ongoing monitoring and engagement is collected through dedicated questionnaires issued to investee companies.

Measures taken to ensure data quality

The Portfolio Fund Manager will, where relevant and appropriate, consider taking steps to follow-up and query data with investee companies and compare data obtained from third parties and self-reported data against historic data and comparable industry and sector data. The questionnaires sent to investee companies utilise established reporting methodologies to ensure consistency of how data is reported. Once data is received from investee companies, spot checks are performed to ensure accuracy.

Where data is not reported by investee companies, this is clearly indicated; or in the case of GHG emissions, and climate metrics, a proxy is modelled by a third-party provider utilising a range of investee company specific inputs such as revenue, key countries of operations and sector; and regression analysis based on a number of years of historic data of peer companies that publicly report their emissions. Proxy data is only utilised for scope 1 and 2 GHG emissions and is used as an interim measure in the absence of actual data. For other gaps in reported data, the Portfolio Fund Manager will engage with the investee company to request measured data. Trend analysis is also performed to spot anomalies.

How data is processed

The data is used in the assessment of proposed investments put forward to the investment committee of the Main Fund and, where appropriate, used in relevant calculations pertaining to the promoted characteristics and metrics of the Main Fund. Records are kept of all investment decisions of the Portfolio Fund Manager in line with regulatory requirements.

Proportion of data that is estimated

In some instances, the Main Fund may need to use estimates or proxy data. Where estimated data is used it will be based upon reasonable assumptions and appropriate comparators. The Portfolio Fund Manager will act reasonably in using estimated or proxy data. As the use of such data will vary on a case-by-case basis, it is not possible to provide an exact proportion of estimated data though it is typically a small proportion of data for fund strategies involving an engagement-related promoted characteristic.

I. LIMITATIONS TO METHODOLOGIES AND DATA

As detailed in Section (g) above, the Portfolio Fund Manager's investment team is responsible for proposing investments to the investment committee. The investment team makes its own assessment of whether the proposed investment meets the environmental and social characteristics promoted by the Main Fund. Where the investment team is not satisfied that an investment does not meet these requirements, the investment team may decide not to put forward the proposed investment to the investment committee.

Multiple data sources may be used in relation to the Main Fund's promoted characteristics and sustainability indicators. The primary limitations relate to data gaps where the nature/location of investments means that there are no or limited obligations to collect, publish or provide ESG data; the reliance on self-reported data; and, the use of assumptions or estimates / proxy data in some instances. Even where published/provided, such data may not be of a sufficiently high-quality or may be incomplete or otherwise inaccurate. The Portfolio Fund Manager may also be required to rely on data provided by third-party providers which cannot be verified. These limitations are not considered to materially limit the monitoring or attainment of the promoted characteristics as the data is generally subject to internal and external checks

(such as comparison against previous data periods or other comparable investee companies), self-reported data is usually provided in a timely fashion and the Portfolio Fund Manager will engage with portfolio investments and third party data providers where appropriate (e.g. if data is inaccurate, incomplete or needs other validation). Where estimated data is used it will typically represent the minority of data used and will be based upon reasonable assumptions and appropriate comparators.

J. DUE DILIGENCE

Potential investee companies are subject to a due diligence by the Portfolio Fund Manager and its Group to assess whether they would be Excluded Investments. Further, the due diligence includes the reasonable efforts by the Portfolio Fund Manager to complete the ESG Assessment to assess whether an investment is inherently prone to having the most significant adverse environmental and/or social impacts on the environment and society. These are in line with the promoted characteristics detailed in Sections (c) and (e) above. As set out in section (h) the due diligence carried out on the underlying assets of the Main Fund includes providing questionnaires to potential investee companies and review of responses, as well as review of data rooms compiled by potential investee companies. The Portfolio Fund Manager may also obtain and review information from third parties as part of the due diligence process.

The ESG Assessment currently consists of mandatory questions across the following themes: high risk sectors, bribery and corruption risk, country risk, reputational risk, climate risk, and ESG maturity.

The Portfolio Fund Manager also seeks information on a selection of key good governance metrics most relevant to the underlying investment as part of pre-investment and ongoing due diligence in accordance with its Policy. See details in Section (d).

The Portfolio Fund Manager's investment team uses this information to carry out an assessment of proposed investments and decide whether or not to recommend an investment to the investment committee. The Portfolio Fund Manager's investment team is required to consult with the Sustainability team if significant ESG risks are identified. Prior to making investment decisions, the investment committee considers the investment team's analysis of the proposed investment's data in relation to the Main Fund's promoted characteristics and the Policy.

K. ENGAGEMENT POLICIES

In accordance with the Main Fund's Sustainability Engagement Strategy promoted characteristic, the Main Fund seeks to engage with investee companies as appropriate to the relevant investment-types envisaged by the Main Fund's investment strategy (for example to improve performance or address controversies in so far as these may occur) and considering the Main Fund's investments' position in the investee company's capital structure. See the further information of the Main Fund's engagement policy in Section (c) above.

L. DESIGNATED REFERENCE BENCHMARK

No index has been designated as a reference benchmark to meet the characteristics.