

Disclosures required under Regulation 2019/2088 on sustainability-related disclosures in the financial services sector dated 27 November 2019, as amended (“SFDR”)

• Transparency of Principal Adverse Sustainability Impacts (Article 4(1)(b))

Warburg Pincus LLC (“Warburg Pincus”) makes the following disclosure in accordance with Article 4 SFDR.

Warburg Pincus has considered, and continues to consider, ESG factors in its investment processes but it does not consider principal adverse impacts of investment decisions on sustainability factors as specifically set out in the SFDR. Warburg Pincus has chosen not to do so for the present time as it considers that its existing ESG Policy is appropriate and tailored to the investment strategies of its investment funds. Warburg Pincus continues to closely monitor regulatory developments with respect to the SFDR and other applicable ESG-focused laws and regulations, including the implementation of related and secondary legislation and regulatory guidance, and will, where required or otherwise appropriate, make changes to its existing policies and procedures.

• Transparency of Sustainability Risk Policies (Article 3(1))

Warburg Pincus established its environmental, social, and governance (ESG) program in 2014 and remains committed to responsible investing. Warburg Pincus believes that integrating ESG factors into investment analysis can provide a wider lens on risks and opportunities of potential investments.

To support deal teams and portfolio companies, Warburg Pincus has developed a set of robust internal policies and best practices, ESG expertise, and senior level oversight to set the overall strategy and integrate material ESG issues effectively throughout the investment process. This program continuously evolves as the attention to and scope of ESG considerations continues to expand.

Warburg Pincus’ ESG Policy is intended to guide consideration of material ESG issues, including sustainability risks, in the course of due diligence and monitoring of Portfolio Company investments to the extent reasonably practical under the circumstances, subject, in any event, to the provisions of the operative agreements of the funds, and in a manner consistent with its fiduciary duties to the funds’ investors. Warburg Pincus’ funds are often non-control investors in Portfolio Companies and may have a limited ability to diligence, influence and control the integration of ESG considerations in an investment. Reasonable efforts will be made to encourage these Portfolio Companies to consider relevant ESG-related principles and to support their implementation where possible.

For the purposes of Warburg Pincus’ ESG Policy, “material” ESG issues are defined as those ESG issues that Warburg Pincus, in its sole discretion, determines have, or have the potential to have, a direct and substantial impact on a respective Portfolio Company’s ability to create or preserve economic value and/or reputational risk for Warburg Pincus.

Examples of sustainability risks that Warburg Pincus seeks to incorporate into investment diligence, ownership and monitoring practices where applicable include:

Environmental	Social	Governance
<ul style="list-style-type: none"> • Climate risks and opportunities • Use of natural resources and raw materials • Pollution Control, waste and recycling • Biodiversity Impacts 	<ul style="list-style-type: none"> • Human rights, including child or forced labor • Workforce wellbeing, employee health and safety, and employee engagement • Diversity, equity, and inclusion • Quality and access to goods/services 	<ul style="list-style-type: none"> • Corporate governance • Management of legal and regulatory environment • Corporate behavior • Data security and privacy • Supply chain management

In addition, Warburg Pincus believes that certain investment opportunities may involve a higher level of ESG risk due to industry sector, location, or reputational concerns—including health and safety, human rights, and environmental factors—and increasingly, climate risks. When deemed appropriate, deal teams may engage external experts during due diligence to analyze material ESG considerations to understand a fuller picture of risks and opportunities. Through due diligence of investment opportunities, deal teams endeavor to identify the ESG-related risks and opportunities of an investment including identifying investments that present material sustainability risks. Such investment screening principles may be individually tailored to each investment strategy, as appropriate.

Furthermore, during due diligence, investment professionals may access relevant expertise through several channels, including by referencing sector-specific ESG due diligence guides created by the Warburg Pincus Sustainability Strategy Team, consulting with the Sustainability Strategy Team on deal-specific issues, and seeking advice from expert consultants and advisors. At a minimum, investment teams are generally expected to include a section in their internal investment memoranda discussing ESG issues and, to the extent possible as part of the approval process for each investment, consider material ESG issues, risks and opportunities identified during due diligence. If any material ESG findings are identified during due diligence that are determined to be manageable with post-closing actions, such post-closing actions will be addressed in the management plan for the applicable investment.

More information on Warburg Pincus' ESG Policy can be found at: <https://sustainability.warburgpincus.com/our-sustainability-strategy/>

Date of original publication: May 22, 2022

Date of last update: December 23, 2024