



LEA 02	Disclosures: Mandatory	Reason for Interaction	Principle: PRI 1, 2, 3
Individual/ internal staff engagements	<p><input checked="" type="checkbox"/> To support investment decision-making in a company's business</p> <p><input checked="" type="checkbox"/> To influence corporate transition or identify the need for a transition</p> <p><input checked="" type="checkbox"/> To engage internal ESG advisors</p> <p><input checked="" type="checkbox"/> To engage internal ESG advisors</p> <p><input type="checkbox"/> Other: specify</p> <p><input type="checkbox"/> We do not engage internal staff</p>	<p><input checked="" type="checkbox"/> To support investment decision-making in a company's business</p> <p><input checked="" type="checkbox"/> To influence corporate transition or identify the need for a transition</p> <p><input checked="" type="checkbox"/> To engage internal ESG advisors</p> <p><input checked="" type="checkbox"/> To engage internal ESG advisors</p> <p><input type="checkbox"/> Other: specify</p> <p><input type="checkbox"/> We do not engage internal staff</p>	
Collaborative engagements	<p><input type="checkbox"/> To support investment decision-making in a company's business</p> <p><input type="checkbox"/> To influence corporate transition or identify the need for a transition</p> <p><input type="checkbox"/> To engage internal ESG advisors</p> <p><input type="checkbox"/> To engage internal ESG advisors</p> <p><input type="checkbox"/> Other: specify</p> <p><input type="checkbox"/> We do not engage internal staff</p>	<p><input type="checkbox"/> To support investment decision-making in a company's business</p> <p><input type="checkbox"/> To influence corporate transition or identify the need for a transition</p> <p><input type="checkbox"/> To engage internal ESG advisors</p> <p><input type="checkbox"/> To engage internal ESG advisors</p> <p><input type="checkbox"/> Other: specify</p> <p><input type="checkbox"/> We do not engage internal staff</p>	
Service provider engagements	<p><input type="checkbox"/> To support investment decision-making in a company's business</p> <p><input type="checkbox"/> To influence corporate transition or identify the need for a transition</p> <p><input type="checkbox"/> To engage internal ESG advisors</p> <p><input type="checkbox"/> To engage internal ESG advisors</p> <p><input type="checkbox"/> Other: specify</p> <p><input type="checkbox"/> We do not engage internal staff</p>	<p><input type="checkbox"/> To support investment decision-making in a company's business</p> <p><input type="checkbox"/> To influence corporate transition or identify the need for a transition</p> <p><input type="checkbox"/> To engage internal ESG advisors</p> <p><input type="checkbox"/> To engage internal ESG advisors</p> <p><input type="checkbox"/> Other: specify</p> <p><input type="checkbox"/> We do not engage internal staff</p>	

# RI TRANSPARENCY REPORT

## 2020

Jade Invest

## About this report

The PRI Reporting Framework is a key step in the journey towards building a common language and industry standard for reporting responsible investment (RI) activities. This RI Transparency Report is one of the key outputs of this Framework. Its primary objective is to enable signatory transparency on RI activities and facilitate dialogue between investors and their clients, beneficiaries and other stakeholders. A copy of this report will be publicly disclosed for all reporting signatories on the [PRI website](#), ensuring accountability of the PRI Initiative and its signatories.

This report is an export of the individual Signatory organisation's response to the PRI during the 2020 reporting cycle. It includes their responses to mandatory indicators, as well as responses to voluntary indicators the signatory has agreed to make public. The information is presented exactly as it was reported. Where an indicator offers a response option that is multiple-choice, all options that were available to the signatory to select are presented in this report. Presenting the information exactly as reported is a result of signatory feedback which suggested the PRI not summarise the information. As a result, the reports can be extensive. However, to help easily locate information, there is a **Principles index** which highlights where the information can be found and summarises the indicators that signatories complete and disclose.

## Understanding the Principles Index

The Principles Index summarises the response status for the individual indicators and modules and shows how these relate to the six [Principles for Responsible Investment](#). It can be used by stakeholders as an 'at-a-glance' summary of reported information and to identify particular themes or areas of interest.

Indicators can refer to one or more Principles. Some indicators are not specific to any Principle. These are highlighted in the 'General' column. When multiple Principles are covered across numerous indicators, in order to avoid repetition, only the main Principle covered is highlighted.

All indicators within a module are presented below. The status of indicators is shown with the following symbols:

Symbol	Status
✓	The signatory has completed all mandatory parts of this indicator
☑	The signatory has completed some parts of this indicator
🔒	This indicator was not relevant for this signatory
-	The signatory did not complete any part of this indicator
Ⓜ	The signatory has flagged this indicator for internal review

Within the table, indicators marked in blue are mandatory to complete. Indicators marked in grey are voluntary to complete.

# Principles Index

Organisational Overview				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
OO TG		🔒	n/a							
OO 01	Signatory category and services	✓	Public							✓
OO 02	Headquarters and operational countries	✓	Public							✓
OO 03	Subsidiaries that are separate PRI signatories	✓	Public							✓
OO 04	Reporting year and AUM	✓	Public							✓
OO 05	Breakdown of AUM by asset class	✓	Asset mix disclosed in OO 06							✓
OO 06	How would you like to disclose your asset class mix	✓	Public							✓
OO 07	Fixed income AUM breakdown	🔒	n/a							✓
OO 08	Segregated mandates or pooled funds	✓	Private							✓
OO 09	Breakdown of AUM by market	✓	Public							✓
OO 10	Active ownership practices for listed assets	🔒	n/a							✓
OO 11	ESG incorporation practices for all assets	✓	Public							✓
OO 12	Modules and sections required to complete	✓	Public							✓
OO LE 01	Breakdown of listed equity investments by passive and active strategies	🔒	n/a							✓
OO LE 02	Reporting on strategies that are <10% of actively managed listed equities	🔒	n/a							✓
OO FI 01	Breakdown of fixed income investments by passive and active strategies	🔒	n/a							✓
OO FI 02	Reporting on strategies that are <10% of actively managed fixed income	🔒	n/a							✓
OO FI 03	Fixed income breakdown by market and credit quality	🔒	n/a							✓
OO SAM 01	Breakdown of externally managed investments by passive and active strategies	🔒	n/a							✓
OO PE 01	Breakdown of private equity investments by strategy	✓	Public							✓
OO PE 02	Typical level of ownership in private equity investments	✓	Private							✓
OO PR 01	Breakdown of property investments	🔒	n/a							✓
OO PR 02	Breakdown of property assets by management	🔒	n/a							✓
OO PR 03	Largest property types	🔒	n/a							✓
OO INF 01	Breakdown of infrastructure investments	🔒	n/a							✓
OO INF 02	Breakdown of infrastructure assets by management	🔒	n/a							✓
OO INF 03	Largest infrastructure sectors	🔒	n/a							✓
OO HF 01	Breakdown of hedge funds investments by strategies	🔒	n/a							✓
OO End	Module confirmation page	✓	-							

CCStrategy and Governance				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
SG 01	RI policy and coverage	✓	Public							✓
SG 01 CC	Climate risk	✓	Private							✓
SG 02	Publicly available RI policy or guidance documents	✓	Public						✓	
SG 03	Conflicts of interest	✓	Public							✓
SG 04	Identifying incidents occurring within portfolios	✓	Private							✓
SG 05	RI goals and objectives	✓	Public							✓
SG 06	Main goals/objectives this year	✓	Private							✓
SG 07	RI roles and responsibilities	✓	Public							✓
SG 07 CC	Climate-issues roles and responsibilities	✓	Private							✓
SG 08	RI in performance management, reward and/or personal development	✓	Public							✓
SG 09	Collaborative organisations / initiatives	✓	Public				✓	✓		
SG 09.2	Assets managed by PRI signatories	✓	Private	✓						
SG 10	Promoting RI independently	✓	Public				✓			
SG 11	Dialogue with public policy makers or standard setters	✓	Private				✓	✓	✓	
SG 12	Role of investment consultants/fiduciary managers	✓	Public				✓			
SG 13	ESG issues in strategic asset allocation	✓	Public	✓						
SG 13 CC		🔒	n/a							✓
SG 14	Long term investment risks and opportunity	✓	Private	✓						
SG 14 CC		✓	Private							✓
SG 15	Allocation of assets to environmental and social themed areas	✓	Private	✓						
SG 16	ESG issues for internally managed assets not reported in framework	🔒	n/a							✓
SG 17	ESG issues for externally managed assets not reported in framework	🔒	n/a							✓
SG 18	Innovative features of approach to RI	✓	Public							✓
SG 19	Communication	✓	Public		✓				✓	
SG End	Module confirmation page	✓	-							

Indirect – Manager Selection, Appointment and Monitoring				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
SAM 01	ESG incorporation strategies	🔒	n/a	✓						
SAM 02	Selection processes (LE and FI)	✓	Public	✓						
SAM 03	Evaluating engagement and voting practices in manager selection (listed equity/fixed income)	🔒	n/a		✓					
SAM 04	Appointment processes (listed equity/fixed income)	✓	Public	✓						
SAM 05	Monitoring processes (listed equity/fixed income)	✓	Public	✓						
SAM 06	Monitoring on active ownership (listed equity/fixed income)	🔒	n/a	✓						
SAM 07	Percentage of (proxy) votes	🔒	n/a		✓					
SAM 08	Percentage of externally managed assets managed by PRI signatories	✓	Private	✓						
SAM 09	Examples of ESG issues in selection, appointment and monitoring processes	✓	Public	✓					✓	
SAM End	Module confirmation page	✓	-							

Direct – Private Equity				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
PE 01	Description of approach to RI	✓	Private	✓					✓	
PE 02	Investment guidelines and RI	✓	Public		✓					
PE 03	Fund placement documents and RI	✓	Public	✓			✓		✓	
PE 04	Formal commitments to RI	✓	Public				✓			
PE 05	Incorporating ESG issues when selecting investments	✓	Public	✓						
PE 06	Types of ESG information considered in investment selection	✓	Public	✓		✓				
PE 07	Encouraging improvements in investees	✓	Private	✓	✓					
PE 08	ESG issues impact in selection process	✓	Private	✓						
PE 09	Proportion of companies monitored on their ESG performance	✓	Public		✓					
PE 10	Proportion of portfolio companies with sustainability policy	✓	Public		✓					
PE 11	Actions taken by portfolio companies to incorporate ESG issues into operations	✓	Private		✓					
PE 12	Type and frequency of reports received from portfolio companies	✓	Private		✓	✓				
PE 13	Disclosure of ESG issues in pre-exit	✓	Private		✓					
PE 14	ESG issues affected financial/ESG performance	✓	Private	✓	✓					
PE 15	Examples of ESG issues that affected your PE investments	✓	Private	✓	✓					
PE 16	Approach to disclosing ESG incidents	✓	Private						✓	
PE End	Module confirmation page	✓	-							

Confidence building measures				Principle						General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
CM1 01	Assurance, verification, or review	✓	Public							✓
CM1 02	Assurance of last year`s PRI data	✓	Public							✓
CM1 03	Other confidence building measures	✓	Public							✓
CM1 04	Assurance of this year`s PRI data	✓	Public							✓
CM1 05	External assurance	🔒	n/a							✓
CM1 06	Assurance or internal audit	🔒	n/a							✓
CM1 07	Internal verification	✓	Public							✓
CM1 01 End	Module confirmation page	✓	-							

# Jade Invest

## Reported Information

### Public version

### Organisational Overview

## PRI disclaimer

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## Basic information

OO 01

Mandatory

Public

Gateway/Peering

General

OO 01.1

Select the services and funds you offer

Select the services and funds you offer	% of asset under management (AUM) in ranges
Fund management	<input type="radio"/> 0% <input type="radio"/> <10% <input checked="" type="radio"/> 10-50% <input type="radio"/> >50%
Fund of funds, manager of managers, sub-advised products	<input type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> >50%
Other	<input checked="" type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> >50%
Total 100%	

Further options (may be selected in addition to the above)

- Hedge funds
- Fund of hedge funds

OO 02

Mandatory

Public

Peering

General

OO 02.1

Select the location of your organisation's headquarters.

China

OO 02.2

Indicate the number of countries in which you have offices (including your headquarters).

- 1
- 2-5
- 6-10
- >10

**OO 02.3** Indicate the approximate number of staff in your organisation in full-time equivalents (FTE).

FTE

18

**OO 03** Mandatory Public Descriptive General

**OO 03.1** Indicate whether you have subsidiaries within your organisation that are also PRI signatories in their own right.

- Yes
- No

**OO 04** Mandatory Public Gateway/Peering General

**OO 04.1** Indicate the year end date for your reporting year.

31/12/2019

**OO 04.2** Indicate your total AUM at the end of your reporting year.

Include the AUM of subsidiaries, but exclude advisory/execution only assets, and exclude the assets of your PRI signatory subsidiaries that you have chosen not to report on in OO 03.2

	trillions	billions	millions	thousands	hundreds
Total AUM			400	000	000
Currency	USD				
Assets in USD			400	000	000

Not applicable as we are in the fund-raising process

**OO 04.4** Indicate the assets which are subject to an execution and/or advisory approach. Provide this figure based on the end of your reporting year

Not applicable as we do not have any assets under execution and/or advisory approach

**Based on your reporting above, your total AUM is between 0.1 and 0.99 US\$ billion, and therefore your 2019/20 fee will be £ 1,683. Note that your total AUM is calculated by summing all figures provided in OO 04.2, 04.3, and 04.4.**

**OO 06** Mandatory Public Descriptive General

**OO 06.1**

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

- as percentage breakdown  
 as broad ranges

	Internally managed (%)	Externally managed (%)
Listed equity	0	0
Fixed income	0	0
Private equity	10-50%	10-50%
Property	0	0
Infrastructure	0	0
Commodities	0	0
Hedge funds	0	0
Fund of hedge funds	0	0
Forestry	0	0
Farmland	0	0
Inclusive finance	0	0
Cash	0	0
Money market instruments	0	0
Other (1), specify	0	0
Other (2), specify	0	0

**OO 06.2**

Publish asset class mix as per attached image [Optional].

**OO 06.3**

Indicate whether your organisation has any off-balance sheet assets [Optional].

- Yes  
 No

**OO 06.5** 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.

<b>OO 09</b>	<b>Mandatory</b>	<b>Public</b>	<b>Peering</b>	<b>General</b>
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**OO 09.1** Indicate the breakdown of your organisation's AUM by market.

	Developed Markets				
05					
	Emerging Markets				
95					
	Frontier Markets				
0					
	Other Markets				
0					
	Total 100%				
100%					

**Asset class implementation gateway indicators**

<b>OO 11</b>	<b>Mandatory</b>	<b>Public</b>	<b>Gateway</b>	<b>General</b>
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**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).

	Private equity				

- We address ESG incorporation.
- We do not do ESG incorporation.

**OO 11.2** Select the externally managed assets classes in which you and/or your investment consultants address ESG incorporation in your external manager selection, appointment and/or monitoring processes.

Asset class	ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes
Private equity	<div style="background-color: #0070C0; color: white; padding: 5px; margin-bottom: 10px;">Private equity - ESG incorporation addressed in your external manager selection, appointment and/or monitoring processes</div> <input checked="" type="checkbox"/> We incorporate ESG into our external manager selection process <input checked="" type="checkbox"/> We incorporate ESG into our external manager appointment process <input checked="" type="checkbox"/> We incorporate ESG into our external manager monitoring process <input type="checkbox"/> We do not do ESG incorporation

**OO 11.4** Provide a brief description of how your organisation includes responsible investment considerations in your investment manager selection, appointment and monitoring processes.

RI oversight is incorporated throughout Jade Invest's organisation, and is not the responsibility of a dedicated ESG team. Identifying and resolving ESG issues require deep understanding of a portfolio company and frequent and close interaction with founders/management. This is why the ultimate responsibility for Detection and Implementation falls under the Project Manager (i.e. the team member assigned for the overall post-investment portfolio management for a given company). However, each member of Jade Invest's investment and portfolio management teams, from investment professionals to back office, has a responsibility to report any suspected, potential or confirmed ESG issues directly to the Portfolio Manager, who in turn must disclose such issues to management without delay.

OO 12	Mandatory	Public	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**

- Organisational Overview
- Strategy and Governance

**RI implementation directly or via service providers**

**Direct - Other asset classes with dedicated modules**

- Private Equity

**RI implementation via external managers**

**Indirect - Selection, Appointment and Monitoring of External Managers**

- Private Equity

Closing module

Closing module

Peering questions

OO PE 01	Mandatory	Public	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.
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Investment strategy	Percentage of your internally managed private equity holdings (in terms of AUM)
Venture capital	<input type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input checked="" type="radio"/> 0%
Growth capital	<input type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input checked="" type="radio"/> 0%
(Leveraged) buy-out	<input type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input checked="" type="radio"/> 0%
Distressed/Turnaround/Special Situations	<input type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input checked="" type="radio"/> 0%
Secondaries	<input type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input checked="" type="radio"/> 0%
Other investment strategy, specify (1)	<input checked="" type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> 0%
Other investment strategy, specify (2)	<input type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input checked="" type="radio"/> 0%
Total 100%	

Other investment strategy, specify (1)

Non-leveraged growth buyouts

Jade Invest

Reported Information

Public version

Strategy and Governance

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## Investment policy

SG 01

Mandatory

Public

Core Assessed

General

**New selection options have been added to this indicator. Please review your prefilled responses carefully.**

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.

Select all that apply

Policy components/types	Coverage by AUM
<input checked="" type="checkbox"/> Policy setting out your overall approach <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 checked="" type="checkbox"/> Fiduciary (or equivalent) duties <input checked="" type="checkbox"/> Asset class-specific RI guidelines <input type="checkbox"/> Sector specific RI guidelines <input checked="" type="checkbox"/> Screening / exclusions policy <input type="checkbox"/> Other, specify (1) <input type="checkbox"/> Other, specify(2)	<input checked="" type="radio"/> Applicable policies cover all AUM <input type="radio"/> Applicable policies cover a majority of AUM <input type="radio"/> Applicable policies cover a minority of AUM

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
- Understanding and incorporating client / beneficiary sustainability preferences
- Other RI considerations, specify (1)
- Other RI considerations, specify (2)

SG 01.4

Describe your organisation's investment principles and overall investment strategy, interpretation of fiduciary (or equivalent) duties, and how they consider ESG factors and real economy impact.

At the core of Jade Invest's investment philosophy is the aim to combine deep local expertise and access in China with international best practice in ESG, tax and regulatory compliance. Although China suffers from a disproportionately large number of issues in these areas compared with mature markets, the upside in backing private businesses that share our views on ESG is in our view substantial. Currently, only a small minority of private businesses in China take ESG into account but the direction is clear and as an investor, being ahead of the curve of sustainable secular trends is crucial. Our strategy incorporates ESG both at the screening stage and in port-investment portfolio management and monitoring. We apply a gradual implementation approach, starting with a focus on a small number of specific areas for improvement to build understanding and trust with management, and then accelerate our efforts into a wider scope.

SG 01.5

Provide a brief description of the key elements, any variations or exceptions to your investment policy that covers your responsible investment approach. [Optional]

Jade Invest's Responsible Investment Guidelines ("RI Guidelines") are fully integrated into the firm's overall screening, due diligence and monitoring protocols and cover environment, corporate governance, labour rights, human rights as well as tax and regulatory compliance. In the pre-due diligence phase, Jade Invest conducts a top-level assessment of the potential target company to determine whether a) the the business model and industry are compatible with the RI guidelines, i.e. if it is deemed possible to reach a satisfactory level of compliance with adequate support and guidance. In the later stages of the underwriting process, a more detailed evaluation is being carried out as part of the overall risk assessment, along with an initial action plan focusing on areas of particular concern.

No

I confirm I have read and understood the Accountability tab for SG 01

I confirm I have read and understood the Accountability tab for SG 01

SG 02

Mandatory

Public

Core Assessed

PRI 6

**New selection options have been added to this indicator. Please review your prefilled responses carefully.**

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

URL

Attachment (will be made public)

Attachment

Formalised guidelines on environmental factors

URL/Attachment

- URL
- Attachment (will be made public)

Attachment

- Formalised guidelines on social factors

URL/Attachment

- URL
- Attachment (will be made public)

Attachment

- Formalised guidelines on corporate governance factors

URL/Attachment

- URL
- Attachment (will be made public)

Attachment

- Fiduciary (or equivalent) duties

URL/Attachment

- URL
- Attachment (will be made public)

Attachment

- Asset class-specific RI guidelines

- Screening / exclusions policy

URL/Attachment

- URL
- Attachment (will be made public)

Attachment

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

- URL
- Attachment

File Attachment

[RI Policy.pdf \[65KB\]](#)

- 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

URL/Attachment

- URL
- Attachment

File Attachment

[RI Policy.pdf \[65KB\]](#)

Active ownership approaches

URL/Attachment

- URL
- Attachment

File Attachment

[RI Policy.pdf \[65KB\]](#)

Reporting

URL/Attachment

- URL
- Attachment

File Attachment

[RI Policy.pdf \[65KB\]](#)

- Climate change
- Understanding and incorporating client / beneficiary sustainability preferences
- We do not publicly disclose any investment policy components

SG 03	Mandatory	Public	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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Alignment of interests with founders/management is our single most important tool for managing conflicts of interests in our portfolio. This is achieved through numerous different ways, including but not limited to 1) ensuring the founder retains a significant minority stake post-investment, 2) ensuring and validating that the founder/management is dedicated to the business (i.e. no significant outside interests) and 3) Management Incentive Programs (MIP), which may include an additional equity stake subject to certain performance targets at or before exit. Moreover, Jade Invest has put in place stringent rules regarding a range of conflict of interest issues, from outside interest and corruption to insider trading. These are included in Jade Invest's internal staff policy charter, which is signed by every member of the team.

- No

Objectives and strategies

SG 05	Mandatory	Public	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

Governance and human resources

SG 07	Mandatory	Public	Core Assessed	General
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**SG 07.1** Indicate the internal and/or external roles used by your organisation, and indicate for each whether they have oversight and/or implementation responsibilities for responsible investment.

**Roles**

- Board members or trustees
  - Oversight/accountability for responsible investment
  - Implementation of responsible investment
  - No oversight/accountability or implementation responsibility for responsible investment
- Internal Roles (triggers other options)

Select from the below internal roles

- Chief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Operating Officer (COO), Investment Committee
  - Oversight/accountability for responsible investment
  - Implementation of responsible investment
  - No oversight/accountability or implementation responsibility for responsible investment
- Other Chief-level staff or head of department, specify **CFO, senior investment team**
  - Oversight/accountability for responsible investment
  - Implementation of responsible investment
  - No oversight/accountability or implementation responsibility for responsible investment
- Portfolio managers
  - Oversight/accountability for responsible investment
  - Implementation of responsible investment
  - No oversight/accountability or implementation responsibility for responsible investment
- Investment analysts
  - Oversight/accountability for responsible investment
  - Implementation of responsible investment
  - No oversight/accountability or implementation responsibility for responsible investment
- Dedicated responsible investment staff
- Investor relations
- Other role, specify (1)
- Other role, specify (2)
- External managers or service providers

<b>SG 07.2</b>	For the roles for which you have RI oversight/accountability or implementation responsibilities, indicate how you execute these responsibilities.
----------------	---

RI oversight is incorporated throughout Jade Invest's organisation, and is not the responsibility of a dedicated ESG team. Identifying and resolving ESG issues require deep understanding of a portfolio company and frequent and close interaction with founders/management. This is why the ultimate responsibility for Detection and Implementation falls under the Project Manager (i.e. the team member assigned for the overall post-investment portfolio management for a given company). However, each member of Jade Invest's investment and portfolio management teams, from investment professionals to back office, has a responsibility to report any suspected, potential or confirmed ESG issues directly to the Portfolio Manager, who in turn must disclose such issues to management without delay.

Jade Invest works closely with portfolio company management teams to define feasible near-term goals as well as the major milestones to be achieved throughout the expected holding period. This is normally done during quarterly board meetings. Our approach emphasizes the importance of building deep commercial understanding within the portfolio company management with respect to ESG. This will include a study on the impact of ESG improvements on the company's addressable market as well as the improved exit potential that may come as a result of a higher overall level of ESG, tax and regulatory compliance, particularly in the case of an overseas strategic trade buyer.

<b>SG 07.3</b>	Indicate the number of dedicated responsible investment staff your organisation has.
----------------	--

Number	
--------	--

1

I confirm I have read and understood the Accountability tab for SG 07
---

I confirm I have read and understood the Accountability tab for SG 07

<b>SG 08</b>	Voluntary	Public	Additional Assessed	General
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<b>SG 08.1</b>	Indicate if your organisation's performance management, reward and/or personal development processes have a responsible investment element.
----------------	---

Board members/Board of trustees
---------------------------------

<b>SG 08.1b</b>	RI in personal development and/or training plan
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- Responsible investment included in personal development and/or training plan
- None of the above

Chief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Operating Officer (COO), Investment Committee
--

<b>SG 08.1a</b>	RI in objectives, appraisal and/or reward
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- Responsible investment KPIs and/or goals included in objectives
- Responsible investment included in appraisal process
- Variable pay linked to responsible investment performance
- None of the above

**SG 08.1b** | RI in personal development and/or training plan

- Responsible investment included in personal development and/or training plan
- None of the above

Other C-level staff or head of department

**CFO, senior investment team**

**SG 08.1a** | RI in objectives, appraisal and/or reward

- Responsible investment KPIs and/or goals included in objectives
- Responsible investment included in appraisal process
- Variable pay linked to responsible investment performance
- None of the above

**SG 08.1b** | RI in personal development and/or training plan

- Responsible investment included in personal development and/or training plan
- None of the above

Portfolio managers

**SG 08.1a** | RI in objectives, appraisal and/or reward

- Responsible investment KPIs and/or goals included in objectives
- Responsible investment included in appraisal process
- Variable pay linked to responsible investment performance
- None of the above

**SG 08.1b** | RI in personal development and/or training plan

- Responsible investment included in personal development and/or training plan
- None of the above

Investment analysts

**SG 08.1a** | RI in objectives, appraisal and/or reward

- Responsible investment KPIs and/or goals included in objectives
- Responsible investment included in appraisal process
- Variable pay linked to responsible investment performance
- None of the above



**SG 08.1b** RI in personal development and/or training plan

- Responsible investment included in personal development and/or training plan
- None of the above

**SG 08.3**

Provide any additional information on your organisation's performance management, reward and/or personal development processes in relation to responsible investment.

Jade Invest's performance assessment incorporates all aspects relevant to the long-term success of the firm and its portfolio companies, including RI. Since RI is included in Jade Invest's portfolio management / monitoring (through the "Issues Log"), it becomes a natural part of any team member's performance review. In relative terms, the bottleneck to successful RI implementation in our market is not staff training or identification of RI/ESG issues. The key challenge lies in the dialogue with portfolio company management, particularly where certain RI measures may result in a negative short-term impact on profitability. China has been a hyper-growth market for two decades and long-term strategies have until recently been associated with a negative premium to profitability and valuations. Through dialogue, case studies and detailed analysis (e.g. of exit valuation scenarios at different levels of RI implementation), Jade Invest strives to build trust and understanding with portfolio company management teams/founders regarding the significant long-term upside that can be realized through patient and systematic improvement of ESG, tax and regulatory compliance.

**Promoting responsible investment**

**SG 09**

**Mandatory**

**Public**

**Core Assessed**

**PRI 4,5**

**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.

**Select all that apply**

- Principles for Responsible Investment

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

- Basic
- Moderate
- Advanced
  
- Asian Corporate Governance Association
- Australian Council of Superannuation Investors
- AVCA: Sustainability Committee
- France Invest – La Commission ESG
- BVCA – Responsible Investment Advisory Board
- CDP Climate Change
- CDP Forests
- CDP Water
- CFA Institute Centre for Financial Market Integrity
- Climate Action 100+
- Code for Responsible Investment in SA (CRISA)
- Council of Institutional Investors (CII)
- Eumedion
- Extractive Industries Transparency Initiative (EITI)
- ESG Research Australia
- Invest Europe Responsible Investment Roundtable
- Global Investors Governance Network (GIGN)
- Global Impact Investing Network (GIIN)
- Global Real Estate Sustainability Benchmark (GRESB)
- Green Bond Principles
- HKVCA: ESG Committee
- 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 Financial Action in the 21st Century
- 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

- Other collaborative organisation/initiative, specify
- Other collaborative organisation/initiative, specify

SG 10	Mandatory	Public	Core Assessed	PRI 4
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SG 10.1	Indicate if your organisation promotes responsible investment, independently of collaborative initiatives.
---------	--

- Yes
- 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]
---------	---

We operate in a market where ESG/RI lags behind mature markets with a significant margin. Consequently, Jade Invest's primary objective is to improve ESG/RI standards within its own portfolio. Our philosophy builds on the assumption that real-life success stories around ESG/RI with commercially sound outcomes are the single most effective promotion tool for RI.

## Outsourcing to fiduciary managers and investment consultants

SG 12	Mandatory	Public	Core Assessed	PRI 4
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**New selection options have been added to this indicator. Please review your prefilled responses carefully.**

SG 12.1	Indicate whether your organisation uses investment consultants.
---------	---

- Yes, we use investment consultants
- No, we do not use investment consultants.

## ESG issues in asset allocation

SG 13	Mandatory	Public	Descriptive	PRI 1
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SG 13.1	Indicate whether the organisation carries out scenario analysis and/or modelling, and if it does, provide a description of the scenario analysis (by asset class, sector, strategic asset allocation, etc.).
---------	--

- Yes, in order to assess future ESG factors
- Yes, in order to assess future climate-related risks and opportunities
- No, our organisation does not currently carry out scenario analysis and/or modelling

## Innovation

SG 18	Voluntary	Public	Descriptive	General
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<b>SG 18.1</b>	Indicate whether any specific features of your approach to responsible investment are particularly innovative.
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Yes

<b>SG 18.2</b>	Describe any specific features of your approach to responsible investment that you believe are particularly innovative.
----------------	---

One important feature of Jade Invest's RI approach is the focus on commercially grounded dialogue with founder management teams. ESG, tax and regulatory compliance matter not only to most overseas potential trade buyers today, but also to a growing number of large domestic trade buyers. We help founder management teams to measure the impact of their addressable universe of exit routes deriving from improved compliance. In addition, we highlight emerging trends with respect to Chinese consumer preferences by comparing with mature overseas markets to help management build a more tangible understanding of the commercial upside in stronger ESG standards.

No

## Communication

<b>SG 19</b>	<b>Mandatory</b>	<b>Public</b>	<b>Core Assessed</b>	<b>PRI 2, 6</b>
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<b>SG 19.1</b>	Indicate whether your organisation typically discloses asset class specific information proactively. Select the frequency of the disclosure to clients/beneficiaries and the public, and provide a URL to the public information.
----------------	---

**Caution! The order in which asset classes are presented below has been updated in the online tool to match the Reporting Framework overview.**

If you are transferring data from an offline document, please check your response carefully.

### Selection, Appointment and Monitoring

#### 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

### 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

<b>Disclosure to clients/beneficiaries</b>	
Disclosure to clients/beneficiaries	<input type="checkbox"/> ESG information in relationship to our pre-investment activities <input checked="" type="checkbox"/> ESG information in relationship to our post-investment monitoring and ownership activities <input checked="" type="checkbox"/> Information on our portfolio companies' ESG performance <input type="checkbox"/> Other
Frequency	<input type="checkbox"/> Quarterly or more frequently <input checked="" type="checkbox"/> Biannually <input type="checkbox"/> Annually <input type="checkbox"/> Less frequently than annually <input type="checkbox"/> Ad-hoc/when requested

Jade Invest

Reported Information

Public version

Indirect – Manager Selection, Appointment and Monitoring

## PRI disclaimer

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Selection

SAM 02

Mandatory

Public

Core Assessed

PRI 1

SAM 02.1

Indicate what RI-related information your organisation typically covers in the majority of selection documentation for your external managers

										Private equity		
Your organisation's investment strategy and how ESG objectives relate to it										<input checked="" type="checkbox"/>		
ESG incorporation requirements										<input checked="" type="checkbox"/>		
ESG reporting requirements										<input checked="" type="checkbox"/>		
Other										<input type="checkbox"/>		
No RI information covered in the selection documentation										<input type="checkbox"/>		

SAM 02.2

Explain how your organisation evaluates the investment manager's ability to align between your investment strategy and their investment approach

Strategy

										Private equity		
Assess the time horizon of the investment manager's offering vs. your/beneficiaries' requirements										<input checked="" type="checkbox"/>		
Assess the quality of investment policy and its reference to ESG										<input checked="" type="checkbox"/>		
Assess the investment approach and how ESG objectives are implemented in the investment process										<input checked="" type="checkbox"/>		
Review the manager's firm-level vs. product-level approach to RI										<input checked="" type="checkbox"/>		
Assess the ESG definitions to be used										<input checked="" type="checkbox"/>		
Other										<input type="checkbox"/>		
None of the above										<input type="checkbox"/>		

ESG people/oversight

							Private equity		
Assess ESG expertise of investment teams							<input checked="" type="checkbox"/>		
Review the oversight and responsibilities of ESG implementation							<input checked="" type="checkbox"/>		
Review how is ESG implementation enforced /ensured							<input checked="" type="checkbox"/>		
Review the manager's RI-promotion efforts and engagement with the industry							<input checked="" type="checkbox"/>		
Other							<input type="checkbox"/>		
None of the above							<input type="checkbox"/>		

Process/portfolio construction/investment valuation



											Private equity		
Review the process for ensuring the quality of the ESG data used											<input checked="" type="checkbox"/>		
Review and agree the use of ESG data in the investment decision making process											<input checked="" type="checkbox"/>		
Review and agree the impact of ESG analysis on investment decisions											<input checked="" type="checkbox"/>		
Review and agree ESG objectives (e.g. risk reduction, return seeking, real-world impact)											<input checked="" type="checkbox"/>		
Review and agree manager's ESG risk framework											<input checked="" type="checkbox"/>		
Review and agree ESG risk limits at the portfolio level (portfolio construction) and other ESG objectives											<input checked="" type="checkbox"/>		
Review how ESG materiality is evaluated by the manager											<input checked="" type="checkbox"/>		
Review process for defining and communicating on ESG incidents											<input checked="" type="checkbox"/>		
Review and agree ESG reporting frequency and detail											<input checked="" type="checkbox"/>		
Other, specify											<input type="checkbox"/>		
None of the above											<input type="checkbox"/>		

**SAM 02.3**

Indicate the selection process and its ESG/RI components

- Review ESG/RI responses to RfP, RfI, DDQ etc.
- Review responses to PRI's Limited Partners' Responsible Investment Due Diligence Questionnaire (LP DDQ)
- Review publicly available information on ESG/RI
- Review assurance process on ESG/RI data and processes
- Review PRI Transparency Reports
- Request and discuss PRI Assessment Reports
- Meetings with the potential shortlisted managers covering ESG/RI themes
- Site visits to potential managers offices
- Other, specify

**SAM 02.4**

When selecting external managers does your organisation set any of the following:

							<b>Private equity</b>		
ESG performance development targets							<input checked="" type="checkbox"/>		
ESG score							<input checked="" type="checkbox"/>		
ESG weight							<input checked="" type="checkbox"/>		
Real world economy targets							<input type="checkbox"/>		
Other RI considerations							<input type="checkbox"/>		
None of the above							<input type="checkbox"/>		

## Appointment

SAM 04

Mandatory

Public

Core Assessed

PRI 1

### SAM 04.1

Indicate if in the majority of cases and where the structure of the product allows, your organisation does any of the following as part of the manager appointment and/or commitment process

- Sets standard benchmarks or ESG benchmarks
- Defines ESG objectives and/ or ESG related exclusions/restrictions
- Sets incentives and controls linked to the ESG objectives
- Requires reporting on ESG objectives
- Requires the investment manager to adhere to ESG guidelines, regulations, principles or standards
- Other, specify (1)
- Other, specify (2)
- None of the above

### SAM 04.2

Provide an example per asset class of your benchmarks, objectives, incentives/controls and reporting requirements that would typically be included in your managers' appointment.

Asset class

- Private equity

Benchmark

- Standard benchmark, specify
- ESG benchmark, specify  
MSCI range of ESG indexes

## ESG Objectives

ESG related strategy, specify

At the core of Jade Invest's investment philosophy is the firm conviction that sustainability and best practice are accretive to long-term investment returns, both through downside risk reduction and increased return potential.

ESG related investment restrictions, specify

Our investment screening is subject to several restrictions, i.e. certain criteria that need to be fulfilled prior to initial commercial due diligence. As a result, Jade Invest will refrain from investing in the following areas:

- \* Companies that have been found to be in serious and systematic breach of environmental regulation, e.g. illegal disposal of hazardous waste or highly polluting manufacturing and/or sourcing
- \* Products or substances harmful to human health, including tobacco and alcohol
- \* Products or services in breach of fundamental Socially Responsible Investing (SRI) standards, including gambling and adult entertainment
- \* Weapons and munitions
- \* Companies involved in serious and systematic corruption, fraud or violation of local and international regulation
- \* Companies associated with activities that are violating human rights
- \* Companies engaged in business activities deemed to be in violation of international sanctions

ESG integration, specify

Jade Invest manages a highly concentrated portfolio with deep and frequent interaction with management and ESG issues are not separated out from the overall portfolio management process, but fully integrated throughout the portfolio.

Engagement, specify

Jade Invest works closely with portfolio company management teams to define feasible near-term goals as well as the major milestones to be achieved throughout the expected holding period. This is normally done during quarterly board meetings. Our approach emphasizes the importance of building deep commercial understanding within the portfolio company management with respect to ESG. This will include a study on the impact of ESG improvements on the company's addressable market as well as the improved exit potential that may come as a result of a higher overall level of ESG, tax and regulatory compliance.

Voting, specify

Promoting responsible investment

ESG specific improvements

Other, specify

ESG guidelines/regulation, principles/standards, specify

Jade Invest's Responsible Investment Guidelines are fully integrated into the firm's overall screening, due diligence and monitoring protocols and cover environment, corporate governance, labour rights, human rights as well as tax and regulatory compliance. In the pre-due diligence phase, Jade Invest conducts a top-level assessment of the potential target company to determine whether a) the business model and industry are compatible with the RI guidelines, i.e. if it is deemed possible to reach a satisfactory level of compliance with adequate support and guidance. In the later stages of the underwriting process, a more detailed evaluation is being carried out as part of the overall risk assessment, along with an initial action plan focusing on areas of particular concern.

## Incentives and controls

Fee based incentive

Communication and remedy of breaches

Termination

No fee/ breach of contract

## Reporting requirements

- Ad-hoc/when requested
- Annually
- Bi-annually
- Quarterly
- Monthly

### SAM 04.3

Indicate which of these actions your organisation might take if any of the requirements are not met

- Discuss requirements not met and set project plan to rectify
- Place investment manager on a “watch list”
- Track and investigate reason for non-compliance
- Re-negotiate fees
- Failing all actions, terminate contract with the manager
- Other, specify
- No actions are taken if any of the ESG requirements are not met

## Monitoring

SAM 05

Mandatory

Public

Core Assessed

PRI 1

### SAM 05.1

When monitoring managers, indicate which of the following types of responsible investment information your organisation typically reviews and evaluates

							Private equity		
ESG objectives linked to investment strategy (with examples)							<input checked="" type="checkbox"/>		
Evidence on how the ESG incorporation strategy(ies) affected the investment decisions and financial / ESG performance of the portfolio/fund							<input checked="" type="checkbox"/>		
Compliance with investment restrictions and any controversial investment decisions							<input checked="" type="checkbox"/>		
ESG portfolio characteristics							<input checked="" type="checkbox"/>		
How ESG materiality has been evaluated by the manager in the monitored period							<input checked="" type="checkbox"/>		
Information on any ESG incidents							<input checked="" type="checkbox"/>		
Metrics on the real economy influence of the investments							<input checked="" type="checkbox"/>		
PRI Transparency Reports							<input checked="" type="checkbox"/>		
PRI Assessment Reports							<input checked="" type="checkbox"/>		
RI-promotion and engagement with the industry to enhance RI implementation							<input checked="" type="checkbox"/>		
Changes to the oversight and responsibilities of ESG implementation							<input checked="" type="checkbox"/>		
Other general RI considerations in investment management agreements; specify							<input type="checkbox"/>		
None of the above							<input type="checkbox"/>		

**SAM 05.2**

When monitoring external managers, does your organisation set any of the following to measure compliance/progress

								<b>Private equity</b>		
ESG score								<input checked="" type="checkbox"/>		
ESG weight								<input checked="" type="checkbox"/>		
ESG performance minimum threshold								<input checked="" type="checkbox"/>		
Real world economy targets								<input type="checkbox"/>		
Other RI considerations								<input type="checkbox"/>		
None of the above								<input type="checkbox"/>		

## Outputs and outcomes

**SAM 09**

**Mandatory**

**Public**

**Additional Assessed**

**PRI 1,6**

### **SAM 09.1**

Provide examples of how ESG issues have been addressed in the manager selection, appointment and/or monitoring process for your organisation during the reporting year.

- Add Example 1
- Add Example 2
- Add Example 3
- Add Example 4
- Add Example 5
- Add Example 6
- Add Example 7
- We are not able to provide examples

Jade Invest

Reported Information

Public version

Direct – Private Equity

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## Overview

PE 02	Mandatory	Public	Core Assessed	PRI 2
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**PE 02.1** Indicate whether your organisation's investment activities are guided by a responsible investment policy / follow responsible investment guidelines.

- 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.

At the core of Jade Invest's investment philosophy is the firm conviction that sustainability and best practice are accretive to long-term investment returns, both through downside risk reduction and increased return potential.

- Our investment activities are not guided by a responsible investment policy
- We do not have a responsible investment policy

## Fundraising of private equity funds

PE 03	Mandatory	Public	Core Assessed	PRI 1,4,6
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**PE 03.1** Indicate if your most recent fund placement documents (private placement memorandums (PPM) or similar) refer to responsible investment.

- Yes

**PE 03.2** Indicate how your most recent fund placement documents (PPM or similar) refer to the following responsible investment:

- Policy and commitment to responsible investment
- Approach to ESG issues in pre-investment processes
- Approach to ESG issues in post-investment processes
- Approach to ESG reporting

**PE 03.3** Describe how your organisation refers to responsible investment in fund placement documents (PPMs or similar). [Optional]

Our RI policy is shared in our datarooms along with numerous other documents which incorporate RI, including our investment due diligence and portfolio monitoring deliverables.

- No
- Not applicable as our organisation does not fundraise

PE 04	Voluntary	Public	Additional Assessed	PRI 4
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<b>PE 04.1</b>	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 investors.
----------------	--

Yes

If yes
--------

- In LPA, incorporated in the original draft as standard procedure
- In LPA, as requested by investors
- In side letter(s)
- Other

No

<b>PE 04.2</b>	Additional information. [OPTIONAL]
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This is currently not applicable to Jade Invest since its current buyout activities are being carried out on a "deal-by-deal" basis, as opposed to a fund. When Jade Invest's next fund is being launched, there will be numerous explicit commitments to RI as part of the offering documents, including the LPA.

### Pre-investment (selection)

<b>PE 05</b>	<b>Mandatory</b>	<b>Public</b>	<b>Gateway</b>	<b>PRI 1</b>
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<b>PE 05.1</b>	During due-diligence indicate if your organisation typically incorporates ESG issues when selecting private equity investments.
----------------	---

Yes

<b>PE 05.2</b>	Describe your organisation's approach to incorporating ESG issues in private equity investment selection.
----------------	---

Our investment screening is subject to several restrictions, i.e. certain criteria that need to be fulfilled prior to initial commercial due diligence. As a result, Jade Invest will refrain from investing in the following areas:

- Companies that have been found to be in serious and systematic breach of environmental regulation, e.g. illegal disposal of hazardous waste or highly polluting manufacturing and/or sourcing
- Products or substances harmful to human health, including tobacco and alcohol
- Products or services in breach of fundamental Socially Responsible Investing (SRI) standards, including gambling and adult entertainment
- Weapons and munitions
- Companies involved in serious and systematic corruption, fraud or violation of local and international regulation
- Companies associated with activities that are violating human rights
- Companies engaged in business activities deemed to be in violation of international sanctions

No

<b>PE 06</b>	<b>Mandatory</b>	<b>Public</b>	<b>Core Assessed</b>	<b>PRI 1,3</b>
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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.

RI issues are reported in the initial phase of due diligence, prior to a completed IM, and thereafter incorporated into the final IM. Every member of a deal team is responsible for the RI issues relevant to her/his specific area of responsibility and the project manager is responsible for ensuring that all RI issues are aggregated and accounted for in the final IM.

### Post-investment (monitoring)

**PE 09**

**Mandatory**

**Public**

**Gateway/Core Assessed**

**PRI 2**

**PE 09.1**

Indicate whether your organisation incorporates ESG issues in investment monitoring of portfolio companies.

- Yes

**PE 09.2**

Indicate the proportion of portfolio companies where your organisation included ESG performance in investment monitoring during the reporting year.

- >90% of portfolio companies
- 51-90% of portfolio companies
- 10-50% of portfolio companies
- <10% of portfolio companies

(in terms of total number 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.

**ESG issues**

- Environmental

List up to three example targets of environmental issues

Example 1

Environmentally friendly packaging

Example 2 (optional)

Drinking water safety and usage

Social

List up to three example targets of social issues

Example 1

Labour rights (social security compliance)

Example 2 (optional)

Working conditions

Governance

List up to three example targets of governance issues

Example 1

Management remuneration

Example 2 (optional)

Internal budget and cash controls

Example 3 (optional)

Resolving conflicts of interests (e.g. supplier relationships)

We do not set and/or monitor against targets

No

PE 10	Mandatory	Public	Core Assessed	PRI 2
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**PE 10.1** Indicate if your organisation tracks the proportion of your portfolio companies that have an ESG/sustainability-related policy (or similar guidelines).

Yes

No

**PE 10.3**

## Additional information. [Optional]

Jade Invest manages a highly concentrated portfolio with deep and frequent interaction with management and ESG issues are not separated out from the overall portfolio management process, but fully integrated throughout the portfolio. All portfolio companies are subject to Jade Invest's RI policy and PE 10.1 is therefore not relevant to Jade Invest.

Jade Invest

Reported Information

Public version

Confidence building measures

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## Confidence building measures

CM1 01	Mandatory	Public	Additional Assessed	General
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**CM1 01.1** Indicate whether the reported information you have provided for your PRI Transparency Report this year has undergone:

- Third party assurance over selected responses from this year's PRI Transparency Report
- Third party assurance over data points from other sources that have subsequently been used in your PRI responses this year
- Third party assurance or audit of the correct implementation of RI processes (that have been reported to the PRI this year)
- Internal audit of the correct implementation of RI processes and/or accuracy of RI data (that have been reported to the PRI this year)
- Internal verification of responses before submission to the PRI (e.g. by the CEO or the board)
  - Whole PRI Transparency Report has been internally verified
  - Selected data has been internally verified
- Other, specify
- None of the above

CM1 02	Mandatory	Public	Descriptive	General
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**CM1 02.1** We undertook third party assurance on last year's PRI Transparency Report

- Whole PRI Transparency Report was assured last year
- Selected data was assured in last year's PRI Transparency Report
- We did not assure last year's PRI Transparency report
- None of the above, we were in our preparation year and did not report last year.

CM1 03	Mandatory	Public	Descriptive	General
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**CM1 03.1** We undertake confidence building measures that are unspecific to the data contained in our PRI Transparency Report:

- We adhere to an RI certification or labelling scheme
- 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
- ESG audit of holdings
- Other, specify
- None of the above

CM1 04	Mandatory	Public	Descriptive	General
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**CM1 04.1**

Do you plan to conduct third party assurance of this year's PRI Transparency report?

- Whole PRI Transparency Report will be assured
- Selected data will be assured
- We do not plan to assure this year's PRI Transparency report

**CM1 07**

**Mandatory**

**Public**

**Descriptive**

**General**

**CM1 07.1**

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

**Who has conducted the verification**

- CEO or other Chief-Level staff

Sign-off or review of responses

- Sign-off
- Review of responses
- The Board
- Investment Committee
- Compliance Function
- RI/ESG Team
- Investment Teams
- Legal Department
- Other (specify)