

Sustainable Finance Disclosure Regulation (2019/2088) (the "Disclosure Regulation")

Bain Capital Investments (Luxembourg) S.à r.l. (the "**Firm**") makes the following disclosures in accordance with the Disclosure Regulation.

Sustainability risk policies

A sustainability risk means "an environmental, social or governance event or condition that, if it occurs, could cause an actual or potential material negative impact on the value of the investment". In the context of the Firm, sustainability risks are risks which, if they were to crystallise, would cause a material negative impact on the value of the portfolios of the Firm's funds.

Before any investment decisions are made on behalf of a Firm-managed fund, material risks associated with the proposed investment are identified and sustainability risks and considerations are integrated in investment due diligence. These risks and considerations form part of the overall investment analysis and are assessed alongside other relevant factors. Following this assessment, investment decisions are made having regard to the relevant fund's investment policy and objectives, taking into account relevant sustainability risks and considerations and Bain Capital's wider policies and procedures on responsible investing.

No Consideration of Adverse Impacts of Investment Decisions on Sustainability Factors

The Firm does not currently consider the adverse impacts of investment decisions on sustainability factors in the manner specifically defined by Article 4 of the Disclosure Regulation (the "**Principal Adverse Impact Regime**").

Bain Capital believes that long-term value is enhanced by considering sustainability risks (as defined in the Disclosure Regulation) when investing and actively improving the ESG practices of its investee companies. Embedding ESG into business strategy and responsible operations is an integral part of Bain Capital's approach to investment and portfolio management. Bain Capital is also a UN PRI signatory and a participating member of multiple ESG forums and initiatives. Under the Disclosure Regulation, the Principal Adverse Impact Regime operates in a specific manner and requires the Firm, as an alternative investment manager to aggregate data across a range of privately-held investment classes, with different levels of data availability and comparability.

There is currently no certainty that the Firm could gather, or measure, all such data that it would be obligated to gather under the Principal Adverse Impact Regime. This is in part because underlying investments are not widely obliged to, and overwhelmingly, do not currently, report by reference to the same data. This data gap is not expected to change in the short to medium term and there could be further changes to the regime in response to ongoing developments at an EU level. Even if the Firm were to be able to gather such data, there is no certainty that it could do so systematically, consistently and at a reasonable cost to investors across all of the principal adverse impact key performance indicators. Bain Capital will continue to assess this position in the light of emerging market practice and data availability.

Remuneration policy

The Firm pays its staff a combination of fixed remuneration and variable remuneration. Variable remuneration for relevant staff takes into account compliance with all of the Firm's policies and procedures, including those relating to risk management and the integration of sustainability risks.