



Hamilton Lane Global Private Assets Fund

Website disclosure for Hamilton Lane Global Private Assets Fund (the Fund) according to SFDR Regulation 2019/2088 and Commission delegated regulation (EU) 2022/1288 dated 6 April 2022 of the EU Commission supplementing Regulation 2019/2088 SFDR.

September 2022

Summary:

No sustainable investment objective

The Fund promotes environmental or social characteristics but does not have as its objective sustainable investment.

Environmental or social characteristics of the financial product

In order to promote the environmental /social characteristics, the Fund uses its best efforts to exclude investments in accordance with Hamilton Lane's exclusion policy that outlines industries and activities that have potentially negative environmental or social characteristics.

Investment strategy

Hamilton Lane has defined investment criteria against which investment opportunities are assessed. Hamilton Lane's investment objective is to obtain capital appreciation over the medium and long term through investments in private assets globally. Hamilton Lane will seek to build a diversified portfolio over time to avoid concentrated risk exposures and to provide sufficient liquidity for limited redemptions. Hamilton Lane may gain access to private assets through a number of different approaches. Hamilton Lane considers the Fund's contractual documentation by looking at factors such as GP-LP alignment, remuneration structures, LP advisory boards, and tax compliance.

Greenhouse gas emission, pollution, natural resource consumption and waste management are all criteria that we evaluate and consider in our investment process. Hamilton Lane considers the environmental risk profile of all investments we make, through considerations of the manager or deal sponsor's approach, and through assessment of the relevant strategy and geography in the case of co-investments and secondary transactions. Employee diversity, workplace conditions, supply chain practices, consumer protections and broader societal impacts are criteria that we evaluate and consider in our investment process. As with environmental and governance considerations, social risk factors are assessed for all investments made by the Fund. These risks are assessed for both the manager/sponsor and the underlying investments as applicable. ESG factors are assessed through manager Requests for Information (RFIs) and proprietary research.

Proportion of investments

All investments of the Fund are made for the purpose of attaining the environmental and social characteristics promoted. The Fund gains exposure through direct investment in targeted investment entities or indirectly through pooled undertakings for collective investment.



Monitoring of environmental or social characteristics

To measure the attainment of the environmental and social characteristics, the Fund uses the following sustainability indicators: Principal adverse impact indicators, ESG/sustainability risk evaluation, ESG performance evaluation, specific environmental sustainability indicators and specific social sustainability indicators.

Methodologies

Firstly, ESG is assessed at the level of the General Partner that Hamilton Lane is investing in or alongside in the case of a co-investment. This assessment leverages the work of our Fund Investment Team which assigned an ESG rating to all managers whose funds have gone through full diligence. The secondary and direct investment teams will use this information and build upon it when assessing investments for GPA. The investment teams will also assess the risks associated with the jurisdiction, sector, and industry specific to potential investments, and also the specific companies themselves where applicable. Any potential ESG risk mitigants will also be assessed during full investment diligence.

Data sources and processing

Investment teams source ESG data from a number of different sources. At the GP level these include ESG RFIs that are sent to all managers during a full fund diligence, annual surveys that are sent to all discretionary managers, and information gathered during Fund meetings and post-investment monitoring meetings. Manager's track records and proposed strategies are also profiled against the S&P ESG Risk Atlas as a starting point for risk assessment. In the case of direct investment and secondary transactions, Hamilton Lane will utilize all ESG material (e.g., environmental impact reports, etc.) that are provided by the sponsor or manager in addition to our own proprietary research. The S&P Risk Atlas is also leveraged here as guidelines for risk assessment. Hamilton Lane has also recently begun using RepRisk as a tool for diligence. Our teams are able to note any risk incidents that were recorded for both the GPs and the underlying investments for further discussion. None of the data collected is estimated.

Limitations to methodologies and data

S&P ESG Risk Atlas Ratings are not updated very frequently. This can lead to some assessments being a bit stale, but ESG risk profiles do not shift dramatically overnight. RepRisk Data coverage is extensive, but it is possible that companies are not covered. This can be quickly fixed by contacting our rep and having them initiate coverage on a company. Also, many of the companies we invest in are small private enterprises that may not get much media coverage, so risk incidents can potentially slide under the radar. For secondaries and co-investment deals there are often very tight investment time-frames which can hamper our ability to have all questions answered. Such limitations do not affect how the environmental or social characteristics promoted by the Fund are met.

Due diligence

Hamilton Lane has implemented appropriate, documented and regularly updated due diligence process when investing on behalf of the Fund, according to the investment strategy, objectives and risk profile of the Fund, including internal and external controls on that due diligence.

Engagement policies

Hamilton Lane has put in place engagement policies to address principal adverse impacts. Hamilton Lane will use reasonable best efforts to monitor and report on the indicators, as set out in Table 1 of Annex I of the Regulatory Technical Standards of the Regulation, by 30th June 2023 at the latest. These indicators include, but are not limited to, GHG emissions, share of non-renewable energy consumption, ratio of female to male board members and share of investments without policies to monitor compliance with UN GC principles and OECD Guidelines. Hamilton Lane will use reasonable best efforts to take the necessary preparations to integrate the indicators into the data gathering process.

Where an index is designated as a reference benchmark to attain the environmental or social characteristics promoted by the financial product, 'designated reference benchmark'.

No index is designated to attain the environmental or social characteristics promoted by the Fund.