



Hamilton Lane Senior Credit Opportunities Fund S.A. SICAV RAIF

Website disclosure for Hamilton Lane Senior Credit Opportunities Fund S.A. SICAV RAIF (the “Fund”) according to SFDR Regulation 2019/2088 and Commission Delegated Regulation dated 6 April 2022 of the EU Commission supplementing Regulation 2019/2088 SFDR.

September 2022

Summary

No sustainable investment objective

The Fund promotes environmental and 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 a 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 takes into account a good governance practice that include sound management structures,

employees relations, remuneration of staff and tax compliance. As a matter of example, Hamilton Lane considers the Fund’s contractual documentation by looking at factors such as remuneration structures, limited partner 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/direct equity and credit investments.

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 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 and are subject to Hamilton Lane’s ESG investment policy and Climate Policy Statements.



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

In order to meet the social or environmental characteristic promoted by the Fund, Hamilton Lane uses (after an investment has been made), reasonable best efforts to actively monitor its investee General Partner (“GP”) with respect to ESG issues, opportunities and sustainability risks. The firm undertakes a range of such monitoring activities, including direct requests for information and, if appropriate, utilizing external data providers. Hamilton Lane monitors its investments to evaluate best practices relating to a diverse range of topics including anti-bribery and corruption, sustainable sourcing, and worker safety. Hamilton Lane also discusses ESG risks and risk-mitigation improvements through its annual ESG review process.

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 investments, HL will utilize all ESG material (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. HL 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.

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 some companies are not covered. This can be quickly fixed by contacting our rep and having them initiative 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. No limitations to HL’s comprehensive ESG rating system. For Secondaries/CI deals there are often very tight investment time-frames which can hamper our ability to have all questions answered. However, such limitations do not affect how the environmental or social characteristics promoted by the Fund are met.

Due diligence

The Fund manager has implemented an appropriate, documented and regularly updated due diligence process (including the United Nations-supported Principles for Responsible Investment (“PRI”) and the United Nations Sustainable Development Goals (“SDGs”)) 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’s ESG policy is aligned with the PRI principles applies to diligence, decision making, and post investment monitoring. Hamilton Lane will engage with managers post investment on ESG topics regularly and risk incidents as necessary.

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.