

Global (opt-in) Exclusion Policy

Issued by: Executive Team

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Area of Validity: Partners Group products and mandates with a first close on or before

31.03.2024.1

Partners Group products (which, for these purposes includes products managed or advised by Partners Group) that elect to be subject to this Global (opt-in) Exclusion Policy (the "**Policy**") by reference in its

constituent documents.

Partners Group products that disclose under "Article 8" of the European Sustainable Finance Disclosure Regulation, as amended

(the "SFDR").

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¹ Excluding: Partners Group Private Equity (Master Fund), LLC; Partners Group Private Equity II, LLC; Partners Group Private Credit Strategy (Master Fund), LLC; Partners Group Direct Infra-structure IV (USD) A, L.P.; Partners Group Secondary VIII (USD) A, L.P.;; Partners Group Infrastructure Secondary (USD) A, L.P.; and Partners Group Private Equity Insurance Dedicated Fund I (a series of Partners Group Insurance Dedicated Fund, L.P.)



This Policy is applicable to the products described in the 'Area of Validity' defined on the cover page of the Policy and is to be read in conjunction with Partners Group's global directives and policies, such as Partners Group's Global Sustainability Directive, Partner Group's Investment and Divestment Policy Private Markets and Investment Policy Liquid Private Markets, as well as applicable local sustainability related directives. For the avoidance of doubt, this Policy does not modify the Global Sustainability Directive or direct how investments are made for funds that are not included in the Area of Validity.

<u>Subject to as set out below and the detailed terms set out in a product's documents, products in the Area of Validity exclude investments in businesses or assets:</u>

- which breach applicable legal or regulatory sanctions laws, particularly those issued by the
 United States Office of Foreign Assets Control, the United Kingdom's HM Treasury Office
 for Financial Sanctions Implementation, the European Union through its Common Foreign
 and Security Policy, the Australia Department of Foreign Affairs and Trade, United Nations
 Security Council and other governments or international bodies in jurisdictions in which
 Partners Group operates.
- which are involved with landmines and/or cluster bombs, in adherence with legal restrictions and international conventions.
- responsible for violations to human rights, as defined by the UN Human Rights Declaration², which cannot be remediated during ownership.
- which make any portion of revenue from: (i) the direct manufacturing and/or sales of controversial weapons and munitions of mass destruction, (ii) the deforestation or burning of natural ecosystems for the purpose of land clearance, (iii) the production of asbestos fibers, (iv) prostitution.
- which make any material portion of revenue³ from: (i) tobacco, (ii) pornography, (iii) production and/or distribution of palm oil and/or wood pulp, (iv) controversial/predatory lending⁴, and/or (v) gambling⁵
- whose main business relates to certain activities connected with the fossil fuels industry (in particular, in relation to thermal coal, crude oil, Canadian oil sands and the coal and oil upstream industry). The particular terms of such exclusion (including the types of excluded activity, any tolerated de minimis thresholds, types of permitted activities or sectors (if any), and/or any other qualifications or provisos (as applicable) including those further detailed below, will depend on the product's investment strategy. The details of such exclusion will set be set out in the product's documents accordingly.
- in respect of "controlled investments" in real estate assets, which are unable to make any improvement to the resource consumption and/or carbon footprint of the relevant building, unless such asset is already best in class.

² As included in the SASB material issues on labour.

³ The material portion of revenue is defined as exceeding 5% annually.

⁴ Controversial/predatory lending means the practice of deceptively convincing borrowers to agree to unfair and abusive loan terms, or systematically violating those terms in ways that make it difficult for the borrower to defend against.

⁵ For gambling (the operation of gambling establishments or platforms) the material portion is defined as 20% of revenue ⁶ For these purposes, "controlled investment" means direct investments in which the product, alone or in combination with any other product, entity

⁶ For these purposes, "controlled investment" means direct investments in which the product, alone or in combination with any other product, entity or vehicle managed and/or advised by Partners Group holds a controlling interest, directly or indirectly, of more than 50%.



For the avoidance of doubt, Partners Group:

- considers natural gas as a means to achieving low-carbon targets, and therefore, it is not subject to any general investment restrictions and is not included in the fossil fuelconnected exclusion, referred to above.
- recognizes that chemical companies may use oil derivatives as raw materials. Investments
 in such assets may therefore not be excluded; provided, that there is a plan in place to
 develop safer and/or more sustainable chemicals.
- strives to create long-term value and supports the transition to a low carbon economy, which includes investing in, and the transformation of assets exposed to carbon-intense industries/sectors.

Further details of the exclusions that are relevant to a product's specific investment strategy can be set out in the product's documents. For clients with specific sustainability requirements for their investments, which cannot be accommodated within a pooled fund, a separate mandate structure can be set up to incorporate these requirements.

Where Partners Group products in the Area of Validity make primary investments or secondary investments, Partners Group and/or its affiliates do not exercise active control of the underlying investments and do not have the sole primary responsibility for driving value creation initiatives in the underlying investments. For the avoidance of doubt, the details of, and extent to which, exclusions apply to a product's primary investments or secondary investments, can be set out in such product's documents.