

Triton Smaller Mid-Cap Fund II

SFDR
ARTICLE 8
DISCLOSURES

Triton Smaller Mid-Cap Fund II (“TSM II” or the “Fund”) is a financial product that promotes environmental and social characteristics but does not have sustainable investment as its objective and does not invest in sustainable investments. No reference benchmark has been designated for the purpose of attaining the environmental and social characteristics promoted by TSM II.

1. WHAT ENVIRONMENTAL AND/OR SOCIAL CHARACTERISTICS ARE PROMOTED BY THIS FINANCIAL PRODUCT?

TSM II aims at “Building Better Businesses” through professionalisation, expansion and digitalisation. This includes a strategic focus on ESG in its portfolio companies, ESG operational improvements, allocation of responsibilities for ESG and ESG programmes.

1.1. What sustainability indicators are used to measure the attainment of the environmental or social characteristics promoted by this financial product?

Strategic focus on ESG

- % of portfolio companies with board oversight of ESG (included on the rolling board agenda, person/committee overseeing ESG etc)

Management of ESG

- % of portfolio companies with a dedicated person responsible for ESG
- % of portfolio companies that have in place a programme

ESG operational improvements

- % of portfolio companies whose scope 1 & 2 GHG emissions' intensity improved
- % of portfolio companies reporting their Lost Time Injury Frequency Rate (LTIFR)
- % of portfolio companies with group-wide gender diversity targets
- % of portfolio companies with a supply chain management programme

2. WHAT INVESTMENT STRATEGY DOES THIS FINANCIAL PRODUCT FOLLOW?

2.1. What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

TSM II seeks to employ an absolute-return driven strategy of improving and expanding the companies that it invests in. This “Building Better Businesses” strategy and approach consists of three core principles:

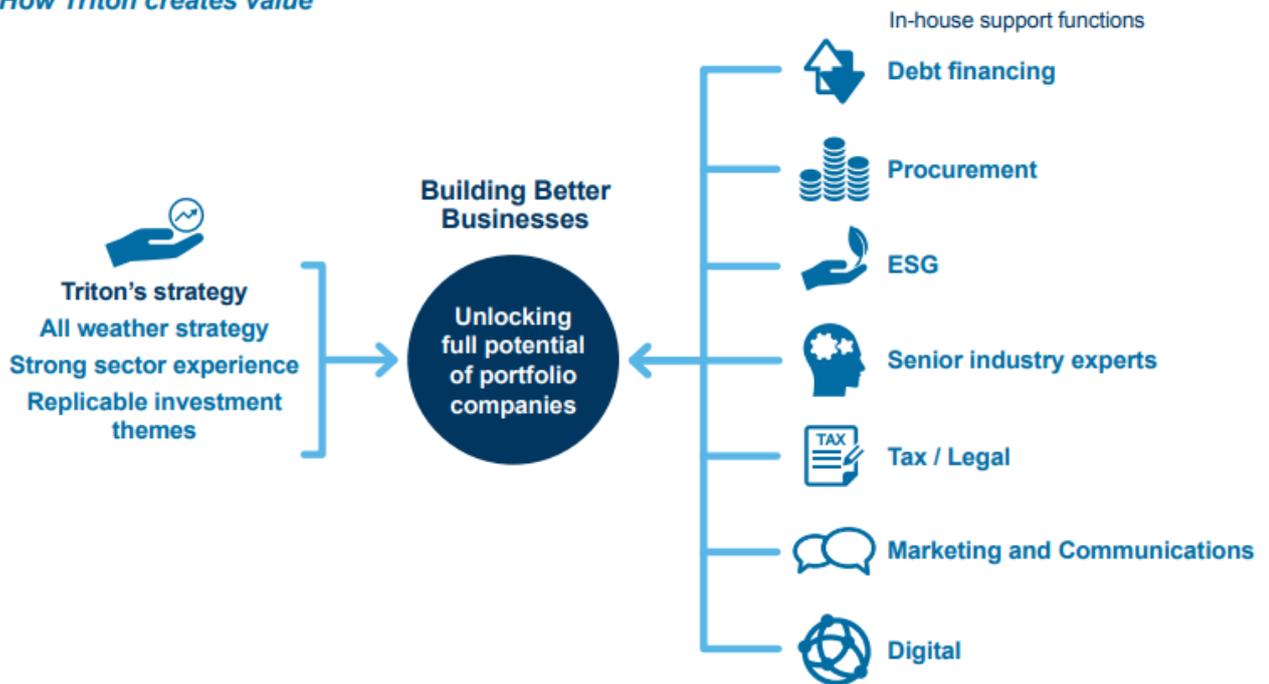
- Professionalise: strategic focus, operational improvement, management enhancement and financial control;
- Expand: organic growth, buy and build, roll-up strategies and internationalisation; and
- Digitalise: improvement of existing operations, or entry to new areas, through digitalisation of business processes.

When evaluating an investment opportunity, ESG forms an integral part of the due diligence on all potential investments. This ensures that the minimum environmental and social safeguards are part of the Investment Advisory Committee recommendations to the Fund Manager. Triton assesses ESG issues based on their financial materiality and the likelihood and scale of any adverse sustainability impact. Prior to signing any acquisition, sign-off by the Head of ESG and Legal Counsel Portfolio Governance on the Transaction Checklist is required to confirm that appropriate ESG due diligence has been conducted.

2.2. How is that strategy implemented in the investment process on a continuous basis?

ESG is a critical element of Triton’s toolkit for building better businesses, as shown on the below diagram, and we are aiming to make a positive impact on environmental, social and governance issues across all our investments.

How Triton creates value



Once a portfolio company has been acquired, Triton:

- rolls out its proprietary ESG programme as part of the full potential plan to ensure a strategic ESG focus aligned with annual portfolio-wide ESG objectives;
- ensures the appropriate allocation of responsibilities for ESG;
- works in partnership with portfolio company management to ensure the business focuses on the most material ESG factors to drive operational improvements and delivery of the ESG programme;
- provides hands-on support to portfolio companies to continuously improve their ESG performance;
- facilitates knowledge sharing between portfolio companies through calls, webinars and an annual ESG Forum;
- requires portfolio companies to report on their principal adverse impacts and ESG performance, to their Boards, and to Triton through an online ESG KPI reporting platform.

An update on ESG matters forms an integral part of the Investment Advisory Committee reviews.

2.3. What is the policy to assess good governance practices of the investee companies?

To enable the Fund to be an active owner and drive the implementation of the value creation plan, Triton will mainly pursue investments where it can reasonably expect either to acquire a position of significant influence or otherwise ensure it

has enough control to effect changes. Having the right management team and board of directors is central to Triton's investment strategy and approach.

Prior to the investment being made, Triton assesses the good governance practices of investee companies by performing due diligence on:

- Management teams (including background checks on the CEO, CFO and Chairman and a review of the organisational structure)
- Employee relations (including key union/works council representation and potential transition issues)
- Tax
- Compliance management system, anti-trust, anti-corruption, anti-money laundering, trade sanctions, export controls
- Data protection and anti-cybercrime measures

3. DOES THIS FINANCIAL PRODUCT TAKE INTO ACCOUNT PRINCIPAL ADVERSE IMPACTS ON SUSTAINABILITY FACTORS?

Yes, our Principal Adverse Impact Statement can be found in the Responsibility section of Triton's website (<https://www.triton-partners.com/responsibility/>).