

HARBOURVEST FUNDS REGISTERED UNDER THE SECURITIES EXCHANGE ACT OF 1934

Procedures for Reporting Concerns Regarding Accounting and Other Matters

These procedures apply to any fund managed by HarbourVest Partners, L.P. or any affiliates (collectively “HarbourVest”) whose interests are registered under the Securities Exchange Act of 1934, as amended (each such fund, a “Fund”).

In addition to any other avenue available to directors, officers or employees, any interested person (including any unitholder of a Fund or any employee of HarbourVest or of its affiliates who provide services for or on behalf of a Fund in its capacity as such) may report any Accounting Allegation,¹ Legal Allegation² or Retaliatory Act³ in the following manner:

- by using, if available, HarbourVest’s Ethicspoint portal at <https://harbourvest.ethicspoint.com>;
- by writing to the Fund’s Audit Committee or HarbourVest’s Compliance department at: HarbourVest Partners, L.P., Attention: Exchange Act Audit Committee or Compliance Department, One Lincoln Street, Suite 1700, Boston, MA 02111-2641; or
- by calling the Fund’s reporting number at 617-348-3707.

Anyone making any Accounting Allegation, Legal Allegation or Retaliatory Act must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. All reports should be factual rather than speculative or conclusory, and should contain as much specific information as possible to allow for proper assessment. In addition, all reports should contain sufficient corroborating information to support the commencement of an investigation.

Directors, officers and employees of a Fund are able to submit a report on an anonymous and confidential basis and are not required to divulge their names. Reports submitted by a unitholder or any interested party other than an employee must be accompanied by the name of the person submitting the report.

HarbourVest and each Fund prohibit retaliation against persons who report concerns as set forth above.

¹ A complaint, allegation or report of violations or potential unethical conduct related to accounting, internal accounting controls or auditing matters with respect to the Fund.

² A complaint, allegation or report related to non-compliance with applicable legal and regulatory requirements or the Fund’s Code of Ethics for Covered Persons Adopted Pursuant to the Rules Promulgated Under Section 406 of the Sarbanes-Oxley Act.

³ A complaint, allegation or report related to retaliation against persons who make, in good faith, Accounting Allegations or Legal Allegations.