

HARBOURVEST FUNDS REGISTERED UNDER THE SECURITIES EXCHANGE ACT OF 1934

CORPORATE GOVERNANCE GUIDELINES

The following Corporate Governance Guidelines (these “Guidelines”) have been adopted by HarbourVest GP LLC, a Delaware limited liability company (the “General Partner”) to apply to each 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 (the “Exchange Act”) (each such a fund, a “Fund”), to assist each Fund’s Board of Directors (the “Board”) in the exercise of its responsibilities.

The principles herein are guidelines and are not intended to be legally binding on the General Partner, the Board or the Fund, unless otherwise specifically noted. These Guidelines should be interpreted at all times in the context of, and subject to, the terms of the Fund’s limited partnership agreement, as amended, supplemented, restated or otherwise modified from time to time (the “Partnership Agreement”), and other relevant governance documents, in each case, as in effect at the time (collectively, the “Governance Documents”), as well as applicable laws and regulations. These Guidelines are subject to modification from time to time by the General Partner as the General Partner may deem appropriate and in the best interests of the Fund or as required by applicable laws.

THE BOARD

Role and Responsibilities of Directors

The business and affairs of the Fund shall generally be managed under the direction of the General Partner, subject to certain oversight rights held by the Board. The role of the Board is limited to the oversight of financial reporting, audit matters, certain conflicts of interest and any other matters delegated to it by the General Partner, as further described in the Partnership Agreement. A member of Board (each, a “Director”) is expected to spend the time and effort necessary to properly discharge such Director’s responsibilities. Accordingly, a Director is expected to regularly attend meetings of the Board and committees on which such Director sits and to review, prior to meetings, materials distributed in advance for such meetings. Participation by video conference, conference telephone or other communications equipment is appropriate, including, without limitation, in the event of scheduling conflicts or when the Board otherwise deems it to be necessary or desirable. A Director who is unable to attend a meeting (which, it is understood, will occur on occasion) is expected to notify the Chairperson of the Board or the chairperson of the appropriate committee in advance of such meeting.

Directors should be familiar with the Fund’s business, its financial statements and capital structure, the risks and competition it faces, to facilitate active and effective participation in the Board and committee meetings they attend. Directors should recognize that candor and the appropriate handling of conflicts in fact and perception are hallmarks of accountability owed to the Fund and its unitholders. Directors have a personal obligation to disclose personal or business interests that may involve an actual, potential or apparent conflict of interest to the Chairperson of the Board and HarbourVest’s Legal and Regulatory Compliance Department prior to any Board decision on the matter.

Directors may rely on the competence and integrity of the Fund’s officers, the General Partner and HarbourVest Partners L.P., a Delaware limited partnership and the management company of the Fund (the “Management Company”) in carrying out its responsibilities. It is the responsibility of the Fund’s officers, the General Partner and the Management Company to operate the Fund in an effective and ethical manner in order to, among other things, produce value for unitholders.

The Board shall be responsible for overseeing the Fund’s periodic reports under the Exchange Act and certain conflicts of interest related to HarbourVest in accordance with the provisions of the Fund’s Partnership Agreement and any policies of the General Partner. Specifically, the Independent Directors will (i) review and approve or disapprove any potential conflicts of interest in any transaction or relationship between the Fund and the General Partner or any employee or affiliate thereof that the General Partner determines to present to the Independent Directors and (ii) review and approve any matter (x) for which approval is required under the Investment Advisers Act of 1940, as amended, including Section 206(3) thereof, (y) as provided for under the Partnership Agreement or (z) as deemed appropriate by the General Partner.

To the extent the General Partner has not appointed Independent Directors, any matters for which the Independent Directors have authority or obligation to act pursuant to the Partnership Agreement can be effected by consent of the Board. To the extent the General Partner has not appointed a Board, any matters for which the Board has authority or obligation to act pursuant to the Partnership Agreement can be effected by consent of either the General Partner or Unitholders holding a majority of Units, which may include unitholders who are affiliated with the General Partner.

In carrying out its responsibilities, the Directors will comply with those requirements and obligations set forth in the Partnership Agreement and other Governance Documents.

Integrity and Confidentiality

Each Director is expected to act with integrity and to adhere to the policies in the HarbourVest Global Code of Ethics (“Code of Ethics”) and all other applicable Fund policies (including but not limited to these Guidelines).

Selection of the Chairperson of the Board

The Board does not require the separation of the offices of the Chairperson of the Board and the Chief Executive Officer. The General Partner shall be free to choose the Chairperson of the Board in any way that it deems best for the Fund at any given point in time.

Independence of the Board

The Board shall review annually the relationships that each Director has with the Fund (either directly or as a member, partner, unitholder or officer of an organization that has a relationship with the Fund), and such other times as may be necessary or advisable, based on applicable regulatory requirements and standards. Following such annual review, only those Directors whom the Board affirmatively determines have no material relationship with the Fund (either directly or as a member, partner, unitholder or officer of an organization that has a relationship with the Fund) will be considered an independent director (each of the independent directors, an “Independent

Director”), subject to additional qualifications prescribed under the listing standards of the NYSE, under applicable law, or other policy as determined by the General Partner. The Board will follow the independence standards set forth in Section 303A.02 of the NYSE Listed Company Manual, applied to both the Fund and its affiliates, or such other policy as determined by the General Partner. In making these determinations, the Board will broadly consider all relevant facts and circumstances, including information provided by the directors and the Fund with regard to each director’s business and personal activities as they may relate to the Fund and the Fund’s management. In the event that an Independent Director becomes aware of any change in circumstances that may result in such Independent Director no longer being considered independent under the applicable standards or policies, such Independent Director shall promptly inform the Chairperson of the Board. As the concern is independence from management, the Board does not view ownership of a significant amount of units, by itself, as a bar to an independence finding.

Size of the Board and Selection of New Directors

The General Partner has the authority to appoint, remove or replace any Director, including Independent Directors. In considering candidates for Director, the General Partner will take into consideration the needs of the Board and the qualifications of the candidate.

Director Qualifications

The General Partner believes that diversity of backgrounds and perspectives among Board members is important and expects that the Board will have a range of skills and expertise sufficient to provide guidance and oversight with respect to the Fund’s strategies and operations. Directors should be open and forthright, develop a deep understanding of the Fund’s business, and exercise judgment in fulfilling their oversight responsibilities. Directors should embrace the Fund’s core values and culture and should possess integrity. The Fund values diversity of occupational and personal backgrounds on the Board.

Other Directorships

Directors must advise the Fund’s Chairperson, Chief Executive Officer and HarbourVest’s Compliance department in advance of accepting an invitation to serve on the board or any audit committee or other significant committee assignment on the board of a public company. Unless approved by the Board and the General Partner, Independent Directors may not serve on more than four (4) public company boards, which number includes service on the Board. There shall be no limit upon the number of not-for-profit boards, and such other boards (or comparable governing bodies), on which an Independent Director may serve.

The Fund recognizes the substantial time commitments attendant to directorship and expects that the members of its Board be fully committed to devoting such time as is necessary to fulfill their Board responsibilities, both in terms of preparation for, and attendance and participation at, meetings.

No member of the Board’s Audit Committee may serve on more than three (3) other public company audit committees unless the Board and the General Partner shall each determine that such

simultaneous service would not impair the Director's ability to serve effectively on the Audit Committee.

Directors Who Change Their Present Job Responsibility

Because of the importance of knowledge of the Fund and of continuity, the General Partner does not believe in every instance that a Director who retires or changes the position they held when joining the Board should necessarily leave the Board. There should, however, be an opportunity for the General Partner to review the continued appropriateness of Board membership under these circumstances. As a result, every director is expected to notify the General Partner of his or her retirement, any change in employer, any other significant change in professional roles and responsibilities and any actual or potential conflict of interest. The General Partner shall determine the action, if any, to be taken.

Director Compensation

A Director who is also an officer or employee of the Fund or its affiliates shall not receive additional compensation for such service as a Director. The General Partner believes that compensation for Independent Directors should be competitive. The General Partner will periodically review the level and form of the Fund's Director compensation, including how such compensation relates to director compensation of funds of comparable size, industry and complexity. The General Partner may then make any changes to director compensation as it deems appropriate. The General Partner may seek outside expertise to determine the appropriateness and competitiveness of compensation.

Separate Sessions of Independent Directors

The Independent Directors of the Fund shall have the opportunity to meet in executive session without management on a regularly scheduled basis. The executive sessions will have such agendas and procedures as are determined by the Independent Directors, as applicable. An independent presiding director, who may be designated by the Independent Directors on the Board, will convene and preside at such sessions.

Self-Evaluation by the Board

The Board is expected to have a process for periodically assessing the Board's performance as well as the performance of each committee of the Board to determine whether the Board and the committees are functioning effectively. The assessment should include a review of any areas in which the Board or management believes the Board can make a better contribution to the Fund. A committee of the Board composed solely of independent directors is expected to be responsible for overseeing the Board and committee assessment process. The Board and General Partner will utilize the results of this self-evaluation process in assessing and determining the characteristics and critical skills required of prospective candidates for appointment to the Board and its committees.

Board Access to Management and Independent Advisers

Board members shall have access to the Fund's management, the General Partner, and, as appropriate, to any other outside advisors of the Fund. Board members shall coordinate such access through the Chief Executive Officer of the Fund and any such contact should be done in a way that is not disruptive to the business operations of the Fund. Any non-routine written communications between a director and an officer of the Fund should be copied to the Chairperson of the Board and the Chief Executive Officer of the Fund.

The Board and its committees may retain independent advisers to assist them in carrying out their duties when and as needed, and the Fund shall provide adequate resources to compensate such advisers. Board members will use their judgment to assure that this access is not distracting to the business operation of the Fund, and that independent advisers are used efficiently.

Board Materials Distributed in Advance

Information and materials that are important to the Board's understanding of the agenda items and other topics to be considered at a Board meeting should, to the extent practicable, be distributed sufficiently in advance of the meeting to permit prior review by the Directors. In the event of a pressing need for the Board to meet on short notice, or if such materials would otherwise contain highly confidential or sensitive information, it is recognized that written materials may not be available in advance of the meeting.

Board Interaction with Market Participants

The General Partner believes that management should generally speak for the Fund. The only persons authorized to communicate information concerning the Fund with market participants (which include, but are not limited to, investors, analysts, brokers, dealers, investment advisers, the press or customers) are the Fund's Chairperson, the Chief Executive Officer or their respective designee(s). Such authorized spokespersons must adhere to the Fund's Regulation FD and Disclosure Controls and Procedures Policy and all other applicable HarbourVest policies

BOARD MEETINGS

Frequency of Meetings

There shall be at least four (4) regularly scheduled meetings of the Board each year. At least one regularly scheduled meeting of the Board shall normally be held each quarter. Additional unscheduled Board meetings may be called upon appropriate notice at any time to address specific needs of the Fund. The Board may also act by unanimous written or electronic consent in lieu of holding a meeting.

COMMITTEE MATTERS

Number and Names of Board Committees

The Fund shall have one standing committee of the Board: the Audit Committee. The purpose and responsibilities for the Audit Committee shall be outlined in its committee charter adopted by the

Board. The Board may want, from time to time, to form a new committee or disband a current committee depending on circumstances. In addition, the Board may determine to form ad hoc committees from time to time and determine the composition and areas of competence of such committees.

Independence of Board Committees

The Audit Committee shall be composed entirely of Independent Directors satisfying applicable legal, regulatory and stock exchange requirements that the General Partner determines appropriate for an assignment to any such committee.

Adopted: June 18, 2026