

Task Force on Climate-Related Financial Disclosures (TCFD) Report 2025





HarbourVest has committed to an actionable climate change strategy. Our goal is to develop a meaningful understanding of how the effects of climate change may impact our investments, enhance reporting, and determine what we can do to strengthen portfolio resiliency on behalf of our clients. We developed our strategy in line with the Recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) and have committed to report annually on our progress.

Global climate disclosure standards underwent a significant change in October 2023 when the TCFD "fulfilled its remit and disbanded".¹ The Financial Stability Board (FSB), which previously served in the oversight capacity of the TCFD, transferred responsibility of monitoring companies' climate-related disclosures to the IFRS Foundation. Just ahead of this transfer of responsibilities, in mid-2023, the International Sustainability Standards Board (ISSB) released the inaugural IFRS Sustainability Disclosure Standards, designed to be the leading sustainability standards for companies to report against. Of the two disclosure frameworks set forth within the IFRS Standards (S1 and S2), S2 represents climate-related financial disclosures and effectively assumes the recommendations set forth by the TCFD.

However, comparative research performed by Institutional Shareholder Services (ISS) has revealed that "well over three-quarters of IFRS S2 cross-industry disclosure requirements exceed TCFD recommendations", suggesting that even those with currently robust climate-related strategies and disclosure practices will need to significantly enhance their scope and efforts to align with IFRS 2.²

The study found that new requirements under IFRS 2 relative to the TCFD recommendations were mostly concentrated within Metrics & Targets, followed by Strategy and Risk Management. The Governance requirements under IFRS 2 were found to be most similar as compared to the TCFD recommendations. As an example, a new requirement under IFRS 2 within Metrics & Targets is to disclose the amount of capex, financing or investment deployed towards climate-related risks and opportunities.

We continue to assess our climate strategy against the transitioned reporting structure whilst disclosing progress against our TCFD-aligned strategy in our fifth annual TCFD report.

¹ www.fsb-tcfd.org

² corpgov.law.harvard.edu/2024/05/15/mapping-tcfd-to-the-ifrs-s2-on-climate-disclosure

HarbourVest's 5th Annual TCFD Report

We are pleased to share the fifth edition of our TCFD report, highlighting our general approach, important updates, and actions taken over the past 2–3 years. The Recommendations of the TCFD provide the framework for building consistent climate disclosures. We have organized our climate change strategy in line with the four pillars of the TCFD and our corresponding commitments are:



Governance

The first recommendation of the TCFD relates to disclosing an organization's governance structure around climate-related risks and opportunities. Such information supports evaluations of whether material climate-related issues receive appropriate board and management attention, including disclosures relating to the role an organization's board plays in overseeing climate-related issues as well as management's role in assessing and managing those issues.

TCFD recommended disclosure	HarbourVest approach	Recent updates
Describe the Board's oversight of climate-related risks and opportunities.	HarbourVest's Head of Investments provides ultimate oversight of climate-related risks and opportunities in the firm's investment and operational strategies. This is reflected in their performance objectives. The Head of Investments receives updates on an ad-hoc basis through the Sustainable Investing Council regarding potential climate-related topics that may impact the firm. HarbourVest's senior leadership has been independently active in developing its understanding and engagement on the topic, such as CEO Emeritus Peter Wilson's involvement in the Private Equity CEO Taskforce of the Sustainable Markets Initiative (SMI).	In 2023, our Sustainable Investing team provided Director training for HarbourVest Partners (Ireland) Limited, a private limited company authorized by the Central Bank as an AIFM that oversees HarbourVest's European products (alternative investment funds). In 2025, in his remit as a member of the SMI, Peter Wilson attended a briefing for His Majesty King Charles on the topic of mobilizing institutional capital for real-economy transition, with several institutional capital representatives convened by the SMI.
Describe management's role in assessing and managing climate-related risks and opportunities.	HarbourVest's Sustainable Investing Council consists of senior management across the firm and holds regular meetings throughout the year to discuss strategic sustainable investing matters which may include the firm's approach to identifying and managing climate-related risks and opportunities in investment portfolios. HarbourVest's Sustainable Investing team lead is responsible for advising management on implementing the firm's approach to climate-related risks and opportunities into the investment process. The Sustainable Investing team lead works in partnership with our investment team leads to embed and integrate climate-related considerations into the investing and diligence processes, and to provide ongoing training as the landscape develops.	As detailed in the Strategy section, the Sustainable Investing team has developed a climate transition planning guideline, with oversight and approval granted by the Sustainable Investing Council in May 2024. The Sustainable Investing team provided a progress report into the Council in December 2024 and December 2025, including an assessment of high emitting assets in the portfolio. The Sustainable Investing team provided training to the investment teams on decarbonization, hosting an in-depth discussion with one of our GPs at the annual Global Investment Forum in April 2025. The investment teams were introduced to the Private Markets Decarbonization Roadmap (PMDR) framework — see the Strategy section for more detail — and were provided with examples from the GP on how portfolio companies can leverage the low-carbon transition to create value through increased efficiency, resilience, and growth.

Strategy

The next recommendation of the TCFD relates to disclosing the actual and potential impacts of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning where such information is material. This includes a description of the climate-related risks and opportunities the organization has identified over the short, medium, and long term; the impact of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning; and the resilience of the organization's strategy considering different climate-related scenarios, including a 2°C or lower scenario.

TCFD recommended disclosure	HarbourVest approach	Recent updates
Describe the climate-related risks and opportunities the organization has identified over the short, medium, and long term.	HarbourVest engaged Business for Social Responsibility (BSR) in 2021 to conduct a climate scenario analysis workshop with senior leaders. The purpose of the exercise was to understand the risks and opportunities to the business and to learn about how we can consider integrating climate considerations into our firm's strategic planning.	Together with the Sustainable Investing Council, our Sustainable Investing team recently revisited our climate-related strategy and developed a climate transition planning guideline, identifying the key pathways of transition finance and where there is relevance for HarbourVest, and the relevant risks and opportunities related to climate that we should be aware of.
	In the short-term, which we measure as up to 2030, we identified the need to build our internal capacity to manage climate-related risks and opportunities. This includes our resourcing, portfolio data, and integration of climate factors into our investment analysis. We are also closely tracking climate-related regulation for the investment industry which spans various regions and perspectives on the necessity to incorporate climate risk into investment decisions. HarbourVest has an opportunity in the short-term to be a value-add partner to its investors by providing data and solutions on climate-related risks and opportunities. In the medium and long-term, beyond 2030, we believe our portfolio holdings face both risks and opportunities from a climate perspective. It is important that we continue to identify assets that may over time be at risk of being stranded during a low-carbon transition and to position our portfolios to capture the upside of the low-carbon transition.	From this process, we identified specific short-term risks such as: Lack of transparency on decarbonization efforts at GPs and portfolio companies Decarbonization activity is concentrated among a core group of GPs and nascent as a broad market practice Low-quality emissions data Physical climate and nature impacts and dependencies We also identified short-term opportunities such as: Investment returns from decarbonization and climate technology themes Capital development opportunities with clients seeking dedicated climate portfolios Relationship and reputation strengthening through service in the private markets climate industry The primary long-term risk remains loss of investment value due to physical and transition-related climate risks. On the other hand, the primary long-term opportunity is to mitigate portfolio-wide financial impacts of climate and generate returns from climate transition themes.

TCFD recommended disclosure	HarbourVest approach	Recent updates
Describe the impact of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning. Supplemental guidance 1: Asset managers should describe how climate-related risks and opportunities are factored into relevant products or investment strategies. Supplemental guidance 2: Asset managers should also describe how each product or investment strategy might be affected by the transition to a low-carbon economy.	At the end of the scenario analysis workshop with BSR, HarbourVest was presented with four main themes for the firm to consider that may bolster further integration of climate considerations into our strategic priorities: 1. Firm assets, including data, human capital, legal, regulatory and compliance infrastructure. 2. Fundraising, including understanding regulatory requirements and LP demand for climate-related integration or solutions. 3. Deployment, including the consideration of thematic investment opportunities in climate solutions. 4. Monitoring and servicing, including tracking and reporting on climate-related risks and opportunities to investors.	Firm assets In 2022, we added a Sustainable Investing team member with robust background in carbon accounting and initiated a partnership with Persefoni, a carbon accounting firm, to calculate estimated GHG emissions across the HarbourVest portfolio. In 2023, we started systematically collecting company-level GHG emissions data from our GPs. During this first year of data collection, we were able to obtain reported GHG emissions data for portfolio companies comprising ~11.4% of assets under management. In 2023, we hired a Sustainable Investing Portfolio Analyst to organize and maintain our growing dataset, including GHG emissions. In 2023, we hired a specialist biodiversity consultant, Pollination, to support our understanding of the nature-related risks and opportunities present within our investment portfolio, and the intersection between natural capital and climate disclosure. In 2024, we convened a cross-functional climate team to lead our climate solutions and investment approach. In 2025, we started systematically collecting company-level data on decarbonization activity from our GPs. During our first year of data collection, we were able to obtain decarbonization data on c.800 portfolio companies. Fundraising In 2022, we surveyed over 120 LPs and found that "climate change and energy transition" (81%) and "carbon neutral portfolios" (53%) were among top priorities for LPs seeking sustainability-themed portfolios. In 2023, in response to investor requests, we launched a Climate Opportunities strategy which incorporates infrastructure and private equity investments focused on managers and companies that are decarbonizing their operations and providing solutions to climate challenges. In 2024, we interviewed approximately 20 LPs as part of our strategy-setting process and discussed the emergence of natural capital as an asset class.

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		Deployment In 2022, we structured two of our infrastructure solutions to explicitly incorporate climate-related risk mitigation and opportunity-capture measures. This includes an additional due diligence step which evaluates the degree of alignment a potential investment has with a low carbon transition. Relative to private equity and private credit investments, HarbourVest views infrastructure and real assets as having attractive opportunities to invest in the physical assets that may contribute to a transitioning economy. In 2023, we built the internal infrastructure to classify climate-focused GPs according to their commitments and investment strategies.
		amount of capital that HarbourVest has committed to climate opportunities since 2008 to be \$1.3 billion. Monitoring and Servicing In 2022, we published our first fund-level greenhouse gas emissions reports. In 2023, we enhanced our greenhouse gas emissions reports by supplementing estimated emissions data with reported data and by adding weighted average carbon intensity (WACI) metric to the reports. In 2024, we enhanced the reports further by adding the carbon footprint metric to the reports.
		team presented a break-out session at our Annual General Meeting focused on "Positioning for a Low-Carbon Transition" and discussed our emissions reports at our Limited Partner Advisory Committee meetings.

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Describe the resilience of the organization's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.	As part of its exercise with BSR, HarbourVest undertook a 2030 scenario analysis to understand its risks and opportunities under different warming trajectories and subsequent market environments. Under a 2°C or lower scenario, which assumes the economy is in an orderly transition, HarbourVest needs to be aware of its partners' climate policies and prioritize investment in emerging sectors. Under a 3°C and higher scenario, the primary risk to HarbourVest would be its reputation and license to operate if it is perceived as contributing to the warming crisis. Under this scenario, there would likely be a fragmented regulatory market related to climate-related investment integration, which is a challenge for a global investor like HarbourVest.	HarbourVest has continued to incorporate TCFD-aligned metrics into its Manager Scorecard evaluation of GPs to understand how they are positioned to manage the risks and opportunities of climate change. HarbourVest invests capital in a broad range of sectors, providing diversification benefits against specific climate-related risks, whilst understanding that climate change poses systemic financial risk. We have expanded these practices, notably through our contribution toward the development of the PMDR. This framework will help us build a portfolio view of how investments are positioned for the low carbon transition, as the PMDR captures not only the decarbonization trajectory of investments, but also tags investments that are unable to align or that are climate solutions. This helps build a holistic portfolio view of all four financing strategies needed for the low carbon transition according to GFANZ (Climate Solutions, Aligned & Aligning, Managed Phaseout) needed for the low carbon transition according to GFANZ. Importantly, in 2023 we conducted engagements with approximately 200 GPs to inform them of the newly-launched PMDR, encourage them to analyze their portfolios using the framework and disclose forward to LPs. In 2024, we started requesting PMDR data from GPs through a standardized data sharing template. Finally, we have taken concrete actions to identify and communicate our understanding of the importance of integrating climate considerations into our investment decisions such as our climate-focused fund reporting to our clients, and the preparation of an annual TCFD report. Additionally, our Sustainable Investing team has a regular working relationship with our Legal, Regulatory, and Compliance team to remain aware of various regulatory regimes that have a climate focus.



Risk Management

The third recommendation of the TCFD is to disclose how the organization identifies, assesses, and manages climate-related risk. This includes a description of the organization's processes for each and how such processes are integrated into the organization's overall risk management function.

TCFD recommended disclosure	HarbourVest approach	Recent updates
Describe the organization's processes for identifying and assessing climate-related risks.	As an investment manager, we have identified the most significant climate-related risk to our firm to be the potential for assets in our portfolio to decline in value because of climate-related damage and transitions. To mitigate this risk, our primary approach is to assess how GPs manage climate change risks and opportunities through our proprietary Manager Scorecard which includes TCFD-aligned indicators. The TCFD indicators contribute to the GP's total Manager Scorecard rating. The Scorecard also generates an individual rating on climate change strategy specifically. Climate-specific, TCFD-aligned inputs to the Scorecard include: Does the GP have a climate change strategy? If not, are they committed to developing one? Is the GP using (or planning to use) the TCFD framework as a means of disclosing climate risk? On governance, does the GP have senior oversight and responsibility for climate change risk and TCFD objectives? Is there a climate change policy? Are there training programs in place? On strategy, does the GP conduct climate risk mapping and scenario analysis? On risk management, what is the GP's approach to climate-related due diligence? Is there an engagement program in place related to climate? On metrics and targets, does the GP conduct carbon footprint analysis of its portfolio? We also work with GHG emissions data which helps us to identify carbon intensity within the portfolio. We have been collecting GHG emissions portfolio data since 2022, at first working with a fully estimated dataset, and thereafter pulling in reported data where available from GPs since 2023.	Throughout 2023, we co-led the development of the Private Markets Decarbonization Roadmap, an industry-driven framework designed to help private markets investors track, benchmark, and communicate their decarbonization portfolio data. We have engaged with GPs to build awareness and adoption of this tool for portfolio company classification. In 2024, we contributed to the development of a standardized data sharing tool which we believe will serve as an effective portfolio monitoring tool. In 2025, we started requesting PMDR data from GPs. In 2024, we onboarded Altitude, an external climate and biodiversity tool, to our systems. Altitude models physical and transition climate risks using various scenarios and industry-recognized pathways as part of its calculation. We have begun using the technology to analyze assets and portfolios within our Infrastructure and Real Assets platform.

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Describe the organization's processes for managing climate-related risks. Supplemental guidance: Asset managers should describe how they manage material climate-related risks for each product or investment strategy.	HarbourVest invests across multiple strategies. For primaries, our Manager Scorecard is maintained as a live monitoring tool and updated regularly. The scoring data can be used to provide specific feedback to GPs on areas for improvement such as climate change, and to benchmark them to peers. For secondaries, the level of influence that HarbourVest has on managing climate-related risks depends on the structure of the transaction, with complex, concentrated transactions allowing for more engagement with the lead sponsor. For direct co-investments where we have increased exposure and may have company board or observer seats, HarbourVest representatives may engage with our lead GPs to increase discussion around sustainability topics, including climate. Across the sectors into which we invest, HarbourVest has identified our investments in infrastructure and real assets as having the most potential climate-related risk. As such, we have implemented parameters for these funds that promote investment in transition industries and limit investment in industries with potential stranded asset risk.	With the addition of Altitude, in 2024, we started including climate-specific analyses within our Infrastructure and Real Assets investment committee memos, which highlights the climate-related transition and physical risks of an asset based on its geolocation data.
Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization's overall risk management.	Sustainable Investing due diligence, including Manager Scorecards (which incorporate climate change assessments) for most strategies, is incorporated as standard into the Investment Committee (IC) materials before the Decision Required stage. The Sustainable Investing lead(s) on the investment teams provide oversight of sustainable investing due diligence discussions and deal leads can call upon the Sustainable Investing team to provide advice on any matters that prompt IC-level discussion.	In addition to training and ad hoc consultation, our Sustainable Investing team provides structured support to deal teams on sustainable investing (and climate-related analysis), participating in the weekly IC meetings and monitoring the deal pipeline. In 2022, we started by providing resource and coverage to the Direct, Credit, and Infrastructure & Real Assets teams. In 2024, we started providing resource and coverage to the Secondary team, and in 2025 to the Primary and Credit Secondary teams.



Metrics and Targets

The final recommendation of the TCFD is to disclose the metrics and targets used to assess and manage relevant climate-related risks and opportunities where such information is material. This includes:

- → A description of the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management processes.
- → Disclosure of Scope 1, Scope 2, and Scope 3 GHG emissions and the related risks.
- → The targets used by the organization to manage climate-related risks and opportunities and performance against targets.

TCFD recommended disclosure	HarbourVest approach	Recent updates
Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process. Supplemental guidance 1: Asset managers should describe metrics used to assess climate-related risks and opportunities in each product or investment strategy. Where relevant, asset managers should also describe how these metrics have changed over time. Where appropriate, asset managers should provide metrics considered in investment decisions and monitoring. Supplemental guidance 2: Asset managers should describe the extent to which their assets under management and products and investment strategies, where relevant, are aligned with a well below 2°C scenario, using whichever approach or metrics best suit their organizational context or capabilities. Asset managers should also indicate which asset classes are included.	Through its evaluation of GPs using our Manager Scorecard and corresponding climate-related KPIs, HarbourVest collects datapoints pertaining to our universe of GPs and their approach to managing climate-related risks and opportunities in their investment processes.	This includes the following KPIs for our manager dataset as of August 2025: GPs with a developed climate change strategy: 34% GPs with TCFD-aligned disclosures: 11% GPs that have conducted climate risk mapping of the portfolio: 18% GPs that conduct carbon footprint analysis of portfolios: 28%

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Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 GHG emissions, and the related risks. Supplemental guidance: Asset managers should disclose GHG emissions for their assets under management and the weighted average carbon intensity (WACI) for each product or investment strategy, where data and methodologies allow. These emissions should be calculated in line with the Global GHG Accounting and Reporting Standard for the Financial Industry developed by the Partnership for Carbon Accounting Financials (PCAF Standard) or a comparable methodology. In addition to WACI, asset managers should consider providing other carbon footprinting metrics they believe are useful for decision-making.	Operational emissions Since 2020, HarbourVest has proactively measured its own operational GHG emissions. The majority of the firm's annual emissions include business travel, purchased goods and services (material use), and electricity use. Portfolio emissions Since 2022, HarbourVest has measured the GHG emissions within its portfolio investments. The reporting shows financed emissions data, which is HarbourVest's share ("attributed emissions") of the emissions related to the fund investments. Financed emissions are the emissions generated as a result of financial services, investments and lending by investors, and companies that provide financial services. These types of emissions fall under scope 3, category 15, of the Greenhouse Gas Protocol. Our portfolio emissions are calculated using the Partnership for Carbon Accounting Financials (PCAF). The PCAF standards are aligned with the Greenhouse Gas Protocol (the most widely used international carbon accounting standard). Our reporting of the emissions data is aligned with the icl-ERM GHG accounting and reporting guidance for private equity which "translated" these standards for private equity practitioners into practical guidance. Using this data, we publish GHG Emissions Reports for certain funds on an annual basis, which includes the fund's financed emissions (Scope 1, 2 & 3), Weighted Average Carbon Intensity (WACI) and Carbon Footprint.	Operational emissions We measure carbon footprint across a financial year (April 2024 to March 2025). For the FY2024 year, HarbourVest produced 11,036.2 market-based tons of carbon dioxide equivalent (tCO2e) across scopes 1, 2, and 3 emissions. Our FY2024 emissions are broken out by scope below: Scope 1 = 61.4 tCO2e Scope 2 = 509.2 tCO2e Scope 3 = 11,606.8 tCO2e. Our emissions per FTE increased from 5.2 tCO2e per FTE in FY2023 to 9.1 tCO2e per FTE in FY2024. Our absolute emissions have increased by 69% when compared to FY2023; this increase is primary driven by higher emissions from purchased goods and services, and the rise is largely attributed to office renovation activities undertaken at two major sites — Boston and London. Business travel is the other main source of HarbourVest's Scope 3 emissions, which have decreased between FY2023 and FY2024. Portfolio emissions In 2022, we partnered with a third-party carbon accounting firm, Persefoni, to annually calculate estimated GHG emissions across HarbourVest investments, using proxy emissions data based on industry averages. We supplement our estimated emissions dataset with reported emissions data from companies (where available) sourced through GPs using the ESG Data Convergence Initiative (EDCI) platform. The data quality of our emissions dataaf from companies (where available) sourced through GPs using the ESG Data Convergence Initiative (EDCI) platform. The data quality of our emissions database has steadily improved over time as we have been able to collect more reported data, per the following table. 2021: Data Quality 4: 0% Data Quality 5: 100% Data Quality 4: 18% Data Quality 5: 78%

TCFD recommended disclosure	HarbourVest approach	Recent updates
		2023: Data Quality 1 & 2: 15% Data Quality Hybrid: 5% Data Quality 4: 29% Data Quality 5: 51% 2024: Data Quality 1 & 2: 18% Data Quality Hybrid: 8% Data Quality Hybrid: 8% Data Quality 5: 46% We have published GHG Emissions reports at the fund-level for investors in commingled funds and separately managed accounts for data since 2022 and added in new metrics over time: In our first year of reporting, we disclosed a fund's financed emissions across Scopes 1, 2, and 3. In 2023, we added a breakdown of data quality score for the emissions dataset used and the weighted average carbon intensity metric (WACI). In 2024, we added a carbon footprint metric. The breakdown of our 2024 financed emissions by scopes 1, 2, and 3 are included below: Scope 1 = 20% Scope 2 = 7% Scope 3 = 73%
Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets.	As outlined in the Risk Management section, HarbourVest primarily uses our Manager Scorecard as a way to evaluate climate-related risks and opportunities in its portfolio. As such, we seek to increase the number of GPs with climate change ratings, as well as continue to see an average increase in the climate change scores across our managers. In addition, it is critical that our understanding of portfolio emissions continues to improve through reported emissions data at the portfolio company level. We seek to engage with our GPs to generate more reported data each year.	Over the past year, we saw improvement toward each of our continuous targets including: 1. Increasing the number of GPs evaluated on efforts related to climate change from 286 in 2024 to 339 in 2025. 2. Improving the benchmark climate change score, which represents portfolio-wide progress on the management of climate factors, from 1.07 in 2024 to 1.38 in 2025. 3. Improving the quality of our emissions dataset with reported emissions data supplementing estimated emissions (see above).

Disclosure

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Certain information contained herein constitutes forward-looking statements, which can be identified by the use of terms such as "may", "will", "should", "expect", "anticipate", "project", "estimate", "intend", "continue", or "believe" (or the negatives thereof) or other variations thereof. Due to various risks and uncertainties, including those discussed above, actual events or results or actual performance may differ materially from those reflected or contemplated in such forward-looking statements. As a result, investors should not rely on such forward-looking statements in making an investment decision. Any forecast provided herein is based on HarbourVest's opinion of the market as of the date of preparation and is subject to change, dependent on future changes in the market. The principles related to sustainable and responsible investing discussed above represent general goals that will not be achieved by investment selected. These goals are not representative of current processes or outcomes for every strategy, and may not be fully realized for all products or client accounts. There can be no assurance any initiatives or anticipated developments described herein will ultimately be successful. The information provided is solely for informational purposes and should not be relied upon in connection with making any investment decision.

Sustainable Investing Risk

HarbourVest considers certain sustainable investing standards or metrics when evaluating investments as part of the larger goal of maximizing financial returns on investments. It should not be assumed that any sustainable investing initiatives, standards, or metrics utilized by HarbourVest will apply to each asset in which HarbourVest invests or that any sustainable investing initiatives, standards, or metrics were applicable to each of HarbourVest's prior investments. Sustainable investing is only one of many considerations that HarbourVest takes into account when making investment decisions, and other considerations can be expected in certain circumstances to outweigh sustainable investing considerations. Any sustainable investing initiatives, standards or metrics will be implemented with respect to a portfolio investment solely to the extent HarbourVest determines such an initiative is consistent with its broader investment goals. Accordingly, certain investments may exhibit characteristics that are inconsistent with HarbourVest's stated sustainability initiatives, standards, or metrics. Applying sustainable investing standards or metrics to investment decisions is qualitative and subjective by nature, and there is no guarantee that the criteria utilized by HarbourVest or any judgment exercised by HarbourVest in making an investment decision will reflect the sustainable investing-related beliefs or values of any particular investor or group of investors.

For additional legal and regulatory disclosures related to HarbourVest offices and countries, please refer to www.harbourvest.com/important-office-and-country-disclosures.