

SFDR Website Disclosures

FUND: HAMILTON LANE PRIVATE MARKETS ACCESS ELTIF (the “Fund”)

LEI: N/A

ISIN: N/A

MANAGER: Fundrock LIS S.A. (the “Manager”)

LEI: 549300SFZJMMBDUEUE73

ISIN: N/A

VERSION HISTORY	PUBLICATION DATE
1.0	11/19/2024

This document sets out sustainability-related disclosures in relation to the Fund, for the purposes of Article 10 of the EU Sustainable Finance Disclosures Regulation (“SFDR”). This document is published on the Manager’s website.

For the purposes of SFDR, the Manager, and not Hamilton Lane Advisors, L.L.C. (the “Investment Manager”), is the “financial market participant” required to make pre-contractual disclosures in relation to the Fund. In these website disclosures, all references to the Investment Manager are references to the Investment Manager providing portfolio management services to the Fund as delegate of (and subject to the overall supervision and oversight of) the Manager.

The Fund is managed by the Manager. In accordance with Article 10(1) of the SFDR, this document provides information related to the Fund. The Manager and not the Investment Manager, is required to make website disclosures in relation to the Fund. In this disclosure, all references to the Investment Manager are references to the Investment Manager providing portfolio management services to the Fund as delegate of (and subject to the overall supervision and oversight of) the Manager.

a) Summary

No Sustainable Investment Objective	This Fund promotes environmental or social characteristics but does not commit to making any “sustainable investments”, for the purposes of SFDR.
Environmental or Social Characteristics of the Financial Product	The Fund looks to promote climate change mitigation with a binding commitment of the strategy not to allocate capital to investments in companies whose main operating business (as further described below) is in thermal coal, oil sands and unsustainable deforestation within the direct equity and direct credit portion of the portfolio.

<p>Investment Strategy</p>	<p>The Fund’s investment strategy is to make investments primarily as a diversified multi-asset private markets fund. The Fund’s investment objective is to achieve capital appreciation through investments in various asset classes globally, with an emphasis on Western Europe as well as exposure to North America and to a lesser extent, the rest of the world. The Fund will seek to build a well-diversified portfolio by making direct equity, debt and equity-related investments alongside leading sponsors, by acquiring secondary interests in well-regarded funds and assets, and by investing in liquid assets which may include public market investments.</p> <p>The Investment Manager evaluates the corporate governance of each of the portfolio companies in which it invests. The Investment Manager will review each portfolio company’s governance prior to making an investment and periodically thereafter over the lifecycle of each investment.</p>
<p>Proportion of Investments</p>	<p>The Fund will allocate 20% or more of its assets to category #1B investments that promote social or environmental characteristics but do not qualify as sustainable investments. The Fund may make investments that qualify as “sustainable investments”, but it is not committed to making sustainable investments.</p>
<p>Monitoring of Environmental or Social Characteristics</p>	<p>The Fund has a binding commitment of the strategy not to allocate capital to investments in companies whose main operating business is in thermal coal, oil sands, and unsustainable deforestation.</p> <p>On a pre-investment basis, the investment team confirms that the considered investment is not in an excluded business. As a post-trade check, the Risk Management Function verifies that the new investment is not in an excluded business.</p> <p>Post-investment, the Investment Manager will actively monitor the indicators and will review the progress regularly of the Fund’s exposure to excluded business, using due diligence conducted by the Investment Manager and third-party investment managers.</p>
<p>Methodologies</p>	<p>The methodologies used to measure how the environmental and social characteristics promoted by the Fund are met include the absence of exposure to companies active in an excluded business.</p>
<p>Data Sources and Processing</p>	<p>Investment teams source ESG data from a number of different sources. At the GP level these include ESG RFIs that are sent to all managers during a full fund diligence, annual surveys that are sent to all discretionary managers, and information gathered during Fund meetings and post-investment monitoring meetings.</p>

<p>Limitations to Methodologies and Data</p>	<p>Limitations to the methodologies and data include, but are not limited to: limited capacity to measure or report from the portfolio companies, fraud, human error in the provision of data, misalignment in content and timing of the reporting of the portfolio companies, changes in relevance of certain data points over the course of time due to wider changes in society (including technological advancement) or changes in the portfolio over time (e.g., as a result of acquisitions and divestments).</p>
<p>Due Diligence</p>	<p>The investment teams conduct ESG due diligence on all transactions. ESG is addressed on the front line / initial diligence as part of the investment team’s typical diligence questions and screening with the GPs leading credit transactions. In each of our screening memos/write-ups, we have a matrix that details the magnitude of ESG risk present in the deal. As part of this analysis, the team ensures that a company’s main operating business is not in thermal coal, oil sands, or unsustainable deforestation.</p> <p>For Secondaries, every transaction is evaluated for ESG considerations as part of the underwriting and final recommendation.</p> <p>If something requires further scrutiny or assessment, the deal team will engage with the Responsible Investment Committee (RIC) to help make further assessments.</p>
<p>Engagement Policies</p>	<p>There are numerous channels through which the Investment Manager may be alerted to ESG-related incidents in its products and client portfolios. These may be discussed during the Investment Manager’s regular stewardship activities such as annual meetings and ad hoc calls between its teams and the management of the general partners.</p> <p>The Investment Manager has implemented RepRisk Data coverage to serve as an alert system for ESG risk events.</p>
<p>Designated Reference Benchmark</p>	<p>The Fund will not refer to a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by it.</p>

b) No Sustainable Investment Objective

This financial product does not have as its objective sustainable investment.

This Fund promotes environmental or social characteristics but does not commit to making any “sustainable investments”, for the purposes of SFDR.

In practice, the Fund may choose to make “sustainable investments” on an opportunistic basis, although it does not commit to do so to any minimum amount. If the Fund makes sustainable investments, this will be reported in the Fund’s periodic report, as required by SFDR.

c) Environmental or Social Characteristics of the Fund

The Fund looks to promote climate change mitigation with a binding commitment of the strategy not to allocate capital to investments in companies whose main operating business is in thermal coal, oil sands and unsustainable deforestation within the direct equity and direct credit portion of the portfolio.

For these purposes, “main operating business” means a business activity from which a company derives more than 50% of its total revenue, as assessed at the point of the Investment Manager’s potential investment in the company and based on the most recent financial statements of the company available to the Investment Manager.

The Fund will also look to promote the following non-binding environmental or social aspects:

- the Fund uses its best efforts to exclude investments in accordance with the Investment Manager’s responsible investment policy – which outlines industries/activities that have potentially negative environmental or social characteristics

d) Investment Strategy

Summary of investment strategy

The Fund has clearly defined investment criteria against which investment opportunities are assessed. The Fund’s investment objective is to seek to provide current income and capital appreciation over the long term through investments in various asset classes globally, with an emphasis on Western Europe as well as exposure to North America and to a lesser extent the rest of the world. The Fund will seek to build a diversified portfolio over time to avoid concentrated risk exposures and to provide sufficient liquidity for limited redemptions.

The Fund will target a portfolio of diversified investments focused on direct co-investment, secondary transactions alongside experienced, top-tier deal sponsors and liquid assets. To do so, the Investment Manager intends to leverage the relationships it has built with both generalist and specialist managers over the last 23 years to drive deal flow and gain access to opportunities that meet the investment criteria of the Fund. The Investment Manager’s experienced Investment Team will then apply rigorous asset-level underwriting and market analysis to select the best opportunities.

At a high level, it is the Fund’s goal to provide investors with a portfolio comprised of:

- Attractive diversified transactions including direct co-investments, secondary investments and limited use of primary investments.
- Balanced risk/return profile focused across buyout, growth/VC, infrastructure and potential opportunistic opportunities.
- Exposure across sectors with weightings that reflect the Investment Manager’s current view of the market.

Greenhouse gas emission, pollution, natural resource consumption and waste management are all criteria that we evaluate and consider in our investment process. The Investment Manager considers the environmental risk profile of all investments it makes, through considerations of the manager or deal sponsor’s approach, and through assessment of the relevant strategy and geography in the case of co-investments and secondary transactions. Employee diversity, workplace conditions, supply chain practices, consumer protections and broader societal impacts are criteria that the Investment Manager evaluates and considers in its investment process. As with

environmental and governance considerations, social risk factors are assessed for all investments made by the Fund. These risks are assessed for both the manager/sponsor and the underlying investments as applicable. Environmental, Social and Governance (“ESG”) factors are assessed through manager Requests for Information (“RFIs”)) and proprietary research.

To measure the attainment of the environmental and social characteristics listed above, the Fund will actively monitor the following sustainability indicators:

- The Fund’s exposure (in %) to the GICS sub-industries: Coal & Consumable Fuels and Oil & Gas Exploration & Production.
- The Fund's exposure (in %) to companies whose main operating business is in unsustainable forestry practices, using due diligence conducted by the Manager and third-party managers.

Summary of policy to assess good governance practices of investee companies

The Investment Manager evaluates the corporate governance of each of the portfolio companies in which it invests. The Investment Manager will review each portfolio company’s governance prior to making an investment and periodically thereafter over the lifecycle of each investment. The investment team completes a good governance practices assessment of investee candidates. The Investment Manager assesses environmental, social, and governance considerations for co-investments at the level of (1) the lead General Partner/Sponsor (2) the sector and geography of the target company (3) the specific target company. The Investment Manager will not pursue an investment unless it is satisfied that the relevant investee company has good governance practices.

During the ownership period, the Investment Manager may seek to engage with portfolio companies on ESG issues, including good governance, through representation on their boards (where applicable and as is deemed appropriate by the Investment Manager) or through other available methods of engagement, including board observance.

e) Proportion of Investments

The Fund will allocate 20% or more of its assets in Direct Equity and Direct Credit investments to category #1B investments that promote social or environmental characteristics but do not qualify as sustainable investments. The Fund may make investments that qualify as “sustainable investments”, but it is not committed to making sustainable investments. The remaining investments will align with the broader strategy which does not promote E/S characteristics but nonetheless meets good governance practices. The remaining investments may be made by either direct or indirect investments.

f) Monitoring of Environmental or Social Characteristics

The Investment Manager measures the environmental and social characteristics promoted by the Fund through the following sustainability indicators within the direct equity and direct credit portion of the portfolio: which are related to the promoted characteristic:

- the Fund’s exposure (in %) to the GICS sub-industries: Coal & Consumable Fuels and Oil & Gas Exploration & Production; and

- the Fund's exposure (in %) to companies that have aggregate revenue from unsustainable forestry practices, using due diligence conducted by the Investment Manager and third-party managers.

The Fund has a binding commitment of the strategy not to allocate capital to investments in companies whose main operating business (as further described above) is in thermal coal, oil sands and unsustainable deforestation.

Internal control mechanisms

On a pre-investment basis, the investment team confirms that the considered investment is not in an excluded business. As a post trade check, the risk management function verifies that the new investment is not in an excluded business.

Post-investment, the Investment Manager will review on a regular basis the Fund's exposure to excluded business, using due diligence conducted by the Investment Manager and third-party investment managers.

The Investment Manager also monitors general partners and their developing portfolios and direct investment portfolio companies to ensure adherence to ESG policies and commitments. The Investment Manager has increased to annually the frequency of its ESG and Diversity data collection across all managers with whom it has placed discretionary capital. This allows the Investment Manager to identify emerging best practices and managers who may be falling behind year over year. The Investment Manager ultimately seeks to standardize ESG reporting capabilities across its platform.

External control mechanisms

The Investment Manager does not involve external audit firms in reviewing its ESG reporting processes.

g) Methodologies

The methodologies used to measure how the environmental and social characteristics promoted by the Fund are met include absence of exposure to companies active in an excluded business.

h) Data Sources and Processing

The data sources used by the Investment Manager to attain each of the environmental and social characteristics promoted by the Fund's investments include information provided through the regular monitoring of the indicators described in "Internal control mechanisms" above. This data is collected through due diligence questionnaires, as well as through annual reporting on indicators for the purposes of periodic monitoring and reporting.

Investment teams source ESG data from a number of different sources. At the GP level these include ESG RFIs that are sent to all managers during a full fund diligence, annual surveys that are sent to all discretionary managers, and information gathered during Fund meetings and post-investment monitoring meetings. Manager's track records and proposed strategies are also profiled against the S&P ESG Risk Atlas as a starting point for risk assessment. In the case of direct investment and secondary transactions, the Investment Manager will utilize all ESG material (e.g., environmental impact reports, etc.) that are provided by the sponsor or manager in addition to its own proprietary

research. The S&P Risk Atlas is also leveraged here as guidelines for risk assessment. The Investment Manager has also recently begun using RepRisk as a tool for diligence. Its teams are able to note any risk incidents that were recorded for both the GPs and the underlying investments for further discussion.

The Investment Manager prioritizes the importance of transparency of data relating to ESG issues. In an effort to improve the Fund's data relating to ESG issues, the Investment Manager assesses the available data annually, and actively seeks to improve data quality and availability, which is a challenge for private markets.

The Investment Manager collects data for the Fund's investments with varied levels of granularity, however, such underlying data may either be provided as estimates (based on assumptions by the investment team or external data) or as reported data (complete data pertaining to the year and annual cyclicity defined by the data request). Due to the timeline of the financial reports, the availability of reported data is expected to be scarce, and hence data may be estimated. The proportion of data to be estimated may vary depending on the proportion of data collected directly from investee companies.

i) Limitations to Methodologies and Data

Limitations to the methodologies and data include, but are not limited to: limited capacity to measure or report from the portfolio companies, fraud, human error in the provision of data, misalignment in content and timing of the reporting of the portfolio companies, changes in relevance of certain data points over the course of time due to wider changes in society (including technological advancement) or changes in the portfolio over time (e.g., as a result of acquisitions and divestments).

Specific to the Investment Manager's diligence and monitoring practices, certain third party risk ratings are only updated periodically. This can lead to some sector and geography risk assessments becoming stale, however ESG risk profiles do not typically change on a daily basis. RepRisk Data coverage is extensive, but it is possible that companies are not covered. This can typically be addressed by contacting the RepRisk team and request that they initiate coverage on a company. Also, many of the companies that the Investment Manager invests in are small private enterprises that may not receive significant media coverage, and as such risk incidents can potentially take longer to come to the Investment Manager's attention. For secondaries and co-investment deals, there are often very tight investment time-frames which can hamper the Investment Manager's ability to complete ESG risk assessments. Such limitations however do not affect how the environmental or social characteristics promoted by the Fund are met. The Investment Manager expects its underlying assets and managers, when commercially sensible, to improve data quality and minimize the limitations mentioned above. The Investment Manager also expects that technology solutions will help to improve data collection of private companies.

The Investment Manager expects its underlying assets and managers, when commercially sensible, to improve data quality and minimize the limitations mentioned above. The Investment Manager also expects that technology solutions will help to improve data collection of private companies.

j) Due Diligence

The Investment Manager has implemented an appropriate, documented and regularly updated due diligence process when investing on behalf of the Fund, according to the investment strategy, objectives and risk profile of the Fund, including internal and

external controls on that due diligence.

The Investment team incorporate ESG diligence of both the GP and the underlying asset into all investment decisions. All final investment memos contain a recently updated ESG Assessment page - items covered include jurisdiction, sector, and industry-specific considerations, as well as company specific ESG risk and opportunity assessments. ESG mitigants are also assessed at both the GP and company level. This assessment forms a comprehensive ESG Profile for each transaction. As part of the Investment team's typical monitoring processes, they track identified ESG considerations and inquire about progress and planning based on the initial assessment at the outset of each transaction. If something requires further scrutiny or assessment, the deal team will engage with the Responsible Investment Committee ("RIC") to help make further assessments.

For secondary investments, every transaction is evaluated for ESG considerations as part of underwriting and final recommendation. At the screening phase, the deal team is responsible for reviewing all information provided by the GP or broker, as well as internal assessments / reports on the GP and/or the asset, and flagging any material ESG considerations that will require further evaluation. During the due diligence phase, the deal team continues to evaluate any material ESG issues. If something requires further scrutiny or assessment, the deal team will engage with the RIC to help make further assessments. As such, all final IC memos include an ESG report that includes assessment of the GP's ESG practices and policies by the Fund Investment & Managed Solutions Team ("FIMS") and information at the asset level where appropriate and material. The deal teams remain in regular contact with the GP and have update calls that include updates on performance and any ESG factors. The team performs a comprehensive written review annually that provides an update on portfolio performance.

k) Engagement Policies

Due to the Investment Manager's position in the market, the Investment Manager's approach to stewardship and engagement is tailored to investing with best-in-class managers and engaging with them on ESG and other material items during its diligence and post-investment monitoring activities. There are numerous channels through which the Investment Manager may be alerted to ESG-related incidents in its products and client portfolios. These may be discussed during the Investment Manager's regular stewardship activities such as annual meetings and ad hoc calls between its teams and the management of the general partners.

The Investment Manager implemented RepRisk Data coverage to serve as an alert system for ESG risk events. RepRisk uses machine learning to scan over 100,000 public sources and stakeholders daily in 23 languages for ESG-related risk incidents tied to companies in the Investment Manager's portfolios. The Investment Manager's dedicated ESG team and Responsible Investment Committee have written procedures for its products that outline risk report materiality evaluation, escalation and engagement. Full portfolio RepRisk incident reviews will be completed quarterly for the Fund.

l) Designated Reference Benchmark

No reference benchmark has been designated for the purposes of attaining the environmental or social characteristics promoted by the financial product.