

– PIMCO Private Corporate Lending Fund, SCSp –

Sustainability-related disclosures

Product Name (together, the “Fund”)	LEI Number
PIMCO Private Corporate Lending Fund, SCSp	254900T8PQ2RN4U5F008
PIMCO Private Corporate Lending Fund Lux Feeder, SCSp	2549005EY23MRT3YS365
PIMCO Private Corporate Lending Fund Lux Feeder II, SCSp	254900C294HC9HXVPA14

Version History	Date	Comment
v1	October 2024	Disclosures uploaded to PIMCO’s investor portal to comply with Article 10 of the SFDR and of the Delegated Act.
v2	November 2024	Disclosures updated following Fund’s first closing.

IMPORTANT NOTICE

THIS DISCLOSURE IS PROVIDED PURSUANT TO EUROPEAN UNION REGULATORY REQUIREMENTS AND IS NOT INTENDED FOR USE BY INVESTORS OUTSIDE OF THE EUROPEAN UNION.

This disclosure is made in respect of the Fund pursuant to Article 10 of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (“**SFDR**”) as supplemented by the Commission Delegated Regulation 2022/1288 of 6 April 2022 (the “**Delegated Act**”).

THIS DOCUMENT DOES NOT CONSTITUTE AN OFFER OR AN INVITATION TO SUBSCRIBE TO INTERESTS OF THE FUND OR ANY OTHER ALTERNATIVE INVESTMENT VEHICLE FOR WHICH PACIFIC INVESTMENT MANAGEMENT COMPANY LLC, A DELAWARE LIMITED LIABILITY COMPANY (“**PIMCO**” OR THE “**INVESTMENT MANAGER**”) SERVES AS AIFM, THE PORTFOLIO MANAGER OR THE INVESTMENT MANAGER, AND THE INFORMATION PRESENTED IN THIS DOCUMENT SHOULD NOT BE RELIED UPON BECAUSE IT IS INCOMPLETE AND MAY BE SUBJECT TO CHANGE.

The term “**PIMCO**” as used in this disclosure refers to the group to which the Fund and the Investment Manager belong, together with each of their respective associates from time to time. References to “we”, “us” or “our” in this document are references to PIMCO and not, for the avoidance of doubt, to any PIMCO investment professional.

In case of inconsistencies between this document and the Memorandum of the Fund, the Memorandum of the Fund shall prevail. Defined terms not otherwise defined have the meaning given to them in the Memorandum.

(a) Summary

This financial product promotes environmental or social characteristics, and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 10% of sustainable investments.

For each prospective sustainable investment made by the Fund, PIMCO will conduct an assessment of whether the investment complies with the principle of “do no significant harm” (“**DNSH Principle**”) for the purposes of SFDR.

The Investment Manager will apply PIMCO’s ESG policy, which integrates material ESG factors into its investment research and underwriting process in order ensure that prospective sustainable investments do not cause significant harm to any environmental or social sustainable investment objectives as part of the assessment of potential sustainability risks. In particular, the Fund will not treat as sustainable, any borrower that exceeds any of the following revenue exposure thresholds to certain sectors.

- a. Oil Sands <5%
- b. Oil Exploration and Production <5%
- c. Coal <5%
- d. Conventional Oil and Gas <10%
- e. Generation - Coal <5%
- f. Generation - Liquid Fuel ≤10%
- g. Controversial Weapons: <0%
- h. Any company that is in violation of the UN Global Compact Principles and UN Guiding Principles of Business and Human Rights, as defined by the General Partner having regard to the Ten Principles of the United Nations Global Compact and third party classifications where appropriate.

*Directly manufacturing and distributing cluster munitions, landmines, depleted uranium weapons, biological/chemical weapons, binding lasers, non-detectable fragments, nuclear weapons, and incendiary weapons.

The Investment Manager will seeks to analyse the potential of prospective sustainable investments to adversely impact sustainability factors on a reasonable efforts basis subject to, for example, data availability. Where principal adverse impacts are identified within the target company’s activities and operations, these factors are integrated into the investment analysis and ongoing monitoring.

As part of its broader approach to considering whether a prospective investment satisfies the DNSH principle, relevant elements of the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights will be included.

The Fund will promote environmental and/or social (“E/S”) characteristics by encouraging and assessing the borrowing base through environmental, social and governance (“ESG”) oriented diligence efforts to seek to (i) increase ESG and sustainability related reporting and transparency, (ii) implement and strengthen sustainability-related data monitoring, and (iii) by investing in loans to borrowers that contribute to defined environmental and social objectives. The Investment Manager considers that improved monitoring and reporting may indirectly contribute to improvements in the underlying ESG performance of investee companies.

Assets that produce unacceptably high negative environmental consequences, will be subject to an exclusion for Prohibited Investments, as further set out in the Memorandum.

The Fund’s investment strategy will be to seek to achieve its Target Return by investing principally in privately originated senior loans to predominantly U.S. corporate borrowers. The Fund’s investments may be newly created (and may be specifically designed for or by the Fund) or existing and may be acquired on a primary basis (including through the direct provision of capital) or on the secondary markets.

While the Fund primarily expects to invest in privately originated corporate senior loans, the Fund may take positions in other securities or financial assets that the Investment Manager believes may offer attractive trading or investment opportunities, such as preferred or common equities.

PIMCO seeks to ensure that good governance practices are followed by fostering transparency and accountability, including with respect to sustainability, for all of the Fund’s assets. Attention is paid to the contractual relationships of the Fund, taking into consideration topics that may include, to the extent available, information relating to bribery and corruption, public controversies, outstanding legal liabilities, tax strategy, working conditions, and other relevant factors.

An investment will be counted towards “#1 Aligned with E/S Characteristics” where: the investee company complies with the Fund’s exclusion list for Prohibited Investments, and either (1) the investee company meets one of the following reporting-related requirements: (a) the investee company’s loan agreement includes an ESG-related reporting requirement; or (b) the investee company has responded to the diligence template based on the ESG Integrated Disclosure Project (IDP) to the Investment Manager; or (c) the Investment Manager determines that, based on publicly available information or other ESG-related disclosures made available to the Investment Manager, the investee company has sufficient ESG disclosures to satisfy a majority of the questions under the ESG IDP template; or (2) the investee company contributes to one of the following environmental or social objectives, which form part of the contribution limb of the Fund’s definition of sustainable investments: (a) the borrower is engaged in economic activity that contributes to environmental and climate solutions; (b) the borrower is engaged in economic activity that contributes to social benefits and sustainable development; (c) the borrower’s operational procedures adhere to credible environmental or social standards, as recognised by external certifications or the borrower is implementing and has made meaningful progress against credible plans and targets to meet such standards; or (d) the Fund’s investment includes environmental or social covenants/terms in the credit agreement/loan documentation.

The Fund is committed to invest a minimum proportion of 60 % in investments falling within the “#1 Aligned with E/S characteristics” (to be measured once the Fund is fully invested, and allowing for ramp-up and ramp-down periods as applicable during the life of Fund).

Investee companies will be asked to provide data relating to selected ESG-related metrics based on the Integrated Disclosure Project ESG Questionnaire (or an equivalent industry led ESG reporting framework for private credit and syndicated loan markets) and the Fund will report to investors the percentage of companies responding to such survey.

The data collected may vary between investee companies, and the Investment Manager intends to use such data collection to encourage investee companies to improve their efforts at meeting the relevant underlying ESG-related metrics. The feasibility of this engagement and subsequent alignment with environmental and social characteristics will vary between investee companies, particularly for secondary market investees given the variety of circumstances such investees may be in and encouragement towards closer alignment with ESG characteristics will need to be on a case-by-case basis.

The Fund will rely on the data provided directly by borrowers through the Integrated Disclosure Project ESG Questionnaire (or an equivalent industry led ESG reporting framework for private credit and syndicated loan markets) and on publicly available information or other ESG-related disclosures made available to the Investment Manager through the sponsor or other counterparties, including third party vendors such as MSCI and RepRisk, where available, to assess whether the Fund’s sustainability indicators are met and to provide investors with ongoing reporting. Where appropriate, the Investment Manager will reach out directly to investee companies to confirm reliability of data provided or require further information.

The Investment Manager will apply a Fund-level exclusion list which will prevent the Fund from being invested in any “Prohibited Investment” as defined in the Memorandum.

No reference benchmark has been designated for the purpose of attaining the environmental and social characteristics promoted by the Fund.

This summary was prepared in English and is being translated to other official languages of the European Union. In case of any inconsistencies or conflict between the different versions of the summary, the English language version shall prevail.

(b) No sustainable investment objective

This financial product promotes environmental or social characteristics, and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 10% of sustainable investments.

For each prospective sustainable investment made by the Fund, PIMCO will conduct an assessment of whether the investment complies with the DNSH Principle for the purposes of SFDR.

The Investment Manager will apply PIMCO's ESG policy, which integrates material ESG factors into its investment research and underwriting process in order ensure that prospective sustainable investments do not cause significant harm to any environmental or social sustainable investment objectives as part of the assessment of potential sustainability risks.

In particular, the Fund will not treat as sustainable, any borrower that exceeds any of the following revenue exposure thresholds to certain sectors.

- a. Oil Sands <5%
- b. Oil Exploration and Production <5%
- c. Coal <5%
- d. Conventional Oil and Gas <10%
- e. Generation - Coal <5%
- f. Generation - Liquid Fuel ≤10%
- g. Controversial Weapons: <0%
- h. Any company that is in violation of the UN Global Compact Principles and UN Guiding Principles of Business and Human Rights, as defined by the General Partner having regard to the Ten Principles of the United Nations Global Compact and third party classifications where appropriate.

*Directly manufacturing and distributing cluster munitions, landmines, depleted uranium weapons, biological/chemical weapons, binding lasers, non-detectable fragments, nuclear weapons, and incendiary weapons.

The Investment Manager will consider applicable principal adverse impacts (“**PAIs**”), should information be available; however limited data coverage is expected in the short-term.

The Investment Manager will seeks to analyse the potential of prospective sustainable investments to adversely impact sustainability factors on a reasonable efforts basis subject to, for example, data availability. Where principal adverse impacts are identified within the target company's activities and operations, these factors are integrated into the investment analysis and ongoing monitoring.

Where the Investment Manager is unable to obtain reliable data with respect to a particular PAI indicator, the Investment Manager shall undertake a risk-based assessment to determine the potential for an investee company to create an adverse impact with respect to a particular PAI topic, having regard to the severity and likelihood of such impacts.

As part of its broader approach to considering whether a prospective investment satisfies the DNSH principle, and applying a risk-based approach having regard to the severity and likelihood of potential impacts, the Manager will consider whether there is evidence of failures by an investee company to comply with minimum human rights safeguards, and the Manager will monitor the alignment of the Fund's sustainable investments with the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organization on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

(c) Environmental or social characteristics of the financial product

The Fund focuses on investment through privately originated loans to predominantly US corporate borrowers, including primary originations and secondary purchases, through a range of lending and financing products and services.

The Fund will promote E/S characteristics by encouraging and assessing the borrowing base through ESG oriented diligence efforts to seek to (i) increase ESG and sustainability-related reporting and transparency, (ii) implement and strengthen sustainability-related data monitoring, and (iii) by investing in loans to borrowers that contribute to defined environmental or social objectives. The Investment Manager considers that improved monitoring and reporting may indirectly contribute to improvements in the underlying ESG performance of investee companies.

Assets that produce unacceptably high negative environmental consequences, will be subject to an exclusion for Prohibited Investments, as further set out in the Memorandum.

(d) Investment strategy

Investment Strategy

The Fund's investment strategy will be to seek to achieve its Target Return by investing principally in privately originated senior loans to predominantly U.S. corporate borrowers. The Fund's investments may be newly created (and may be specifically designed for or by the Fund) or existing and may be acquired on a primary basis (including through the direct provision of capital) or on the secondary markets.

While the Fund primarily expects to invest in privately originated corporate senior loans, the Fund may take positions in other securities or financial assets that the Investment Manager believes may offer attractive trading or investment opportunities, such as preferred or common equities.

In implementing the investment strategy of the Fund, the Investment Manager may utilize any investment, hedging, or financing techniques that the Investment Manager believes may help achieve the Fund's investment objective. The Investment Manager may also engage in activities to enhance or dispose of the Fund's investments through whatever manner or strategy it deems advisable, as further described in the "Investment Strategy" section in the Memorandum.

Policy to assess good governance practices of the investee companies.

PIMCO seeks to ensure that good governance practices are followed, as it believes that there are certain corporate activities or behaviours that it does not wish to be associated with. This is done by fostering transparency and accountability, including with respect to sustainability, for all of the Fund's assets. Attention is paid to the contractual relationships of the Fund, taking into consideration topics that may include, to the extent available, information relating to bribery and corruption, public controversies, outstanding legal liabilities, tax strategy, working conditions, and other relevant factors.

The Investment Manager will distribute a diligence template based on the ESG Integrated Disclosure Project (IDP) prior to financial close, or at any other time as determined by the Investment Manager, requesting investee companies to acknowledge receipt. Due to the limitations as an investor in credit positions particularly when investing in secondary markets, the data collected may vary between investee companies and completion of the template is at the discretion of the investee company. Consequently, it may not always be possible to receive or rely on information gathered using the template in the evaluation process. Nonetheless, the Investment Manager will take account of all available information, including relevant data collected through external vendors, the template and, the results of engagement with management and other relevant due diligence processes, as available and applicable. The Investment Manager will assess any responses provided by the borrower alongside other relevant data collected. The governance framework of potential investee companies may also be assessed as part of the pre-investment due diligence process, which includes, among other things, an ESG diligence template as described above.

Where the Investment Manager considers that the borrower does not meet PIMCO's standards of good governance based on the assessment described above, and which do not suggest potential for improvement, may not be eligible for the Fund. However, prospective investee companies which do indicate potential for improvement will still be eligible if the Investment Manager reasonably believes that engagement could lead to improved governance practices within a reasonable timeframe.

(e) Proportion of investments

As the investment strategy will include a broad mandate to invest across loan originations, loan syndications, and secondary market credit opportunities, PIMCO is likely to have limited control to direct investment companies as to their ESG integration. PIMCO will also have different degrees of influence across these different investment opportunities.

As a result, the proportion of investments which will align with the Fund's promoted E/S characteristics is expected to develop over time.

An investment will be counted towards "#1 Aligned with E/S Characteristics" where: the investee company complies with the Fund's exclusion list for Prohibited Investments, and either (1) the investee company meets one of the following reporting-related requirements: (a) the investee company's loan agreement includes an ESG-related reporting requirement; or (b) the investee company has responded to the diligence template based on the ESG Integrated Disclosure Project (IDP) to the Investment Manager; or (c) the Investment Manager determines that, based on publicly available information or other ESG-related disclosures made available to the Investment

Manager, the investee company has sufficient ESG disclosures to satisfy a majority of the questions under the ESG IDP template; or (2) the investee company contributes to one of the following environmental or social objectives, which form part of the contribution limb of the Fund's definition of sustainable investments: (a) the borrower is engaged in economic activity that contributes to environmental and climate solutions; (b) the borrower is engaged in economic activity that contributes to social benefits and sustainable development; (c) the borrower's operational procedures adhere to credible environmental or social standards, as recognised by external certifications or the borrower is implementing and has made meaningful progress against credible plans and targets to meet such standards; or (d) the Fund's investment includes environmental or social covenants/terms in the credit agreement/loan documentation.

Taking the above considerations into account, the Fund is committed to invest a minimum proportion of 60 % in investments that can be considered to promote the E/S characteristics ("**E/S investments**"), and falling within the "#1 Aligned with E/S characteristics" (to be measured once the Fund is fully invested, and allowing for ramp-up and ramp-down periods as applicable during the life of Fund).

The Fund will seek to invest at least 10% of its Invested Capital in sustainable investments (the "**Sustainable Borrower Ratio**"), allowing for the Fund's Investment Period as a ramp-up period, and a ramp-down period as the Fund's investments mature and are repaid. In the case of follow-on investments or recycling of capital after the expiry of the Investment Period, as permitted in accordance with the Fund's investment strategy, the Fund will maintain a Sustainable Borrower Ratio of at least 10%.

Investments including under #2 Other will include credit investments not meeting the criteria for inclusion in #1 Aligned above.

The Fund's assets may from time to time also include cash and cash equivalent positions held for the purposes of liquidity management or in connection with subscriptions, redemptions or the making of investments. The Fund may also hold assets, including derivatives, for the purposes of hedging risk including currency and interest rate risks. Such assets are not expected to contribute to the Fund's E/S characteristics.

The Investment Manager will apply a Fund-level screening based on the list of Prohibited Investments that precludes investment based on certain pre-determined exclusion criteria which the Investment Manager believes to have an unacceptably negative environmental and/or social impact. The Prohibited Investments list is used to determine whether a loan would carry material ESG Risk and/or carries ESG Risk which could negatively impact the returns of the Fund in a material manner, and the Fund should not therefore engage in it.

(f) Monitoring of environmental or social characteristics

Investee companies will be asked to provide data relating to selected ESG-related metrics based on the Integrated Disclosure Project ESG Questionnaire (or an equivalent industry led ESG reporting framework for private credit and syndicated loan markets) and the Fund will report to investors the percentage of companies responding to such survey.

For loan agreements originated by the Investment Manager, and for syndicated and secondary market transactions on a reasonable efforts basis, post-investment, the Investment Manager will engage with investee companies' management with the intention to encourage ESG data collection and reporting by the borrower, based on the Integrated Disclosure Project ESG Questionnaire.

The data collected may vary between investee companies, and the Investment Manager intends to use such data collection to encourage investee companies to improve their efforts at meeting the relevant underlying ESG-related metrics. The feasibility of this engagement and subsequent alignment with environmental and social characteristics will vary between investee companies, particularly for secondary market investees given the variety of circumstances such investees may be in and encouragement towards closer alignment with ESG characteristics will need to be on a case-by-case basis.

(g) Methodologies

The following sustainability indicator will be employed to measure the attainment of the E/S characteristics discussed above.

- % of investments reporting selected ESG-related metrics.

Investee companies will be asked to provide data relating to selected ESG-related metrics based on the Integrated Disclosure Project ESG Questionnaire (or an equivalent industry led ESG reporting framework for private credit and syndicated loan markets). Completion of the template is at the discretion of the investee company and the Fund will report to investors the percentage of companies responding to such survey.

(h) Data sources and processing

The Fund will rely on the data provided directly by borrowers through the Integrated Disclosure Project ESG Questionnaire (or an equivalent industry led ESG reporting framework for private credit and syndicated loan markets) and on publicly available information or other ESG-related disclosures made available to the Investment Manager through the sponsor or other counterparties, including third party vendors such as MSCI and RepRisk, where available, to assess whether the Fund's sustainability indicators are met and to provide investors with ongoing reporting.

The data will be assessed in-house by the Investment Manager considering, for example, publicly available information, engagement with management and other relevant internal due diligence processes.

The Investment Manager will not estimate data when actual data for a particular metric is not provided by certain borrowers.

(i) Limitations to methodologies and data

Borrowers may not be subject to ESG disclosure requirements or have in place internal ESG reporting mechanisms. Where possible, the Investment Manager will engage with investee companies' management to provide guidance and support with the intention of encouraging borrowers to strengthen their reporting mechanisms. However, as an investor in credit positions,

PIMCO will have limited control to direct investee companies on their ESG reporting mechanisms, and any encouragement towards close alignment with ESG characteristics will need to be on a case-by-case basis.

The Investment Manager will rely on the information provided to it from investee companies and other sources enumerated above which, in most cases, may not be externally verified. Where appropriate, the Investment Manager will reach out directly to investee companies to confirm reliability of data provided or require further information.

(j) Due diligence

The Investment Manager will apply a Fund-level exclusion list which will prevent the Fund from being invested in any “Prohibited Investment” as defined in the Memorandum.

The Investment Manager confirms that the Fund does not invest in high emitting assets (above threshold of carbon emissions intensity in excess of 100 tons of carbon dioxide equivalent of the underlying borrower, under reasonable interpretation by the investment manager) unless the underlying asset/investee company is 1.5 degree Celsius aligned or commits to being so within two years.

(k) Engagement policies

As part of the data collection and monitoring processes, for loan agreements originated by the Investment Manager, and for syndicated and secondary market transactions on a reasonable efforts basis, post-investment, the Investment Manager will engage with investee companies’ management with the intention to encourage ESG data collection and reporting by the borrower, based on the Integrated Disclosure Project ESG Questionnaire.

The data collected may vary between investee companies, and the Investment Manager intends to use such data collection to encourage investee companies to improve their efforts at meeting the relevant underlying ESG-related metrics. The feasibility of this engagement and subsequent alignment with environmental and social characteristics will vary between investee companies, particularly for secondary market investees given the variety of circumstances such investees may be in and encouragement towards closer alignment with ESG characteristics will need to be on a case-by-case basis.

(l) Designated reference benchmark

No reference benchmark has been designated for the purpose of attaining the environmental and social characteristics promoted by the Fund

