

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Sustainability indicators** measure how the sustainable objectives of this financial product are attained.

**Product name:** Greencoat Renewables PLC (the “Company”)

**Legal entity identifier:** 635400TVSIFQOB8RB67

## Sustainable investment objective

### Does this financial product have a sustainable investment objective?

<input checked="" type="radio"/> <input checked="" type="radio"/> <input checked="" type="checkbox"/> <b>Yes</b>	<input type="radio"/> <input type="radio"/> <input type="checkbox"/> <b>No</b>
<p><input checked="" type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: 90%</b></p> <p><input type="checkbox"/> <b>90%</b> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</p> <p><input type="checkbox"/> <b>10%</b> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</p> <p><input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: ___%</b></p>	<p><input type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ___% of sustainable investments</p> <p><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</p> <p><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</p> <p><input type="checkbox"/> with a social objective</p> <p><input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b></p>



### What is the sustainable investment objective of this financial product?

The Company seeks to provide investors with an annual dividend per Ordinary Share that increases progressively while growing the capital value of its investment portfolio over the long term, through re-investment of excess cash flows and the prudent use of leverage, and to contribute to the environmental objective of climate change mitigation by making investments in euro denominated renewable energy infrastructure assets in Relevant Countries within the Eurozone.

The Company has sustainable investment as its objective within the meaning of Article 9 of the 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”). More specifically, the Company is intended to contribute to the environmental objective of climate change mitigation on the basis of the activities of the assets targeted by the Company, including assets which generate energy from renewable sources, which help to facilitate the transition to a low-carbon economy.

The Company will invest 90% of the Company's sustainable investments, in economic activities which are considered environmentally sustainable in accordance with Article 3 of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088 (the "EU Taxonomy"), including the relevant Technical Screening Criteria ("TSC") relating to the environmental objective of climate change mitigation (as applicable to the economic activity). The Taxonomy-alignment of the Company's underlying assets is calculated based on the turnover of the underlying investments.

The Company does not have a carbon reduction objective and has not designated a reference benchmark for the purpose of attaining the sustainable investment objective.

### ● **What sustainability indicators are used to measure the attainment of the sustainable investment objective of this financial product?**

The Investment Manager is responsible for determining whether an investment meets the criteria of a sustainable investment. The sustainability indicators used to measure the attainment of the sustainable investment objective of the Company are as follows:

- Renewable energy generated (GWh)
- GHG emissions (Scope 1, Scope 2, Scope 3) (tonnes of CO<sub>2</sub>e)
- Carbon avoided (tonnes of CO<sub>2</sub>e)
- Equivalent number of homes powered

Compliance with exclusions and the minimum percentage of sustainable investments is monitored on an ongoing basis via the Investment Manager's portfolio compliance framework.

### ● **How do sustainable investments not cause significant harm to any environmental or social sustainable investment objective?**

The Investment Manager seeks to ensure that the Company's investments do not cause significant harm to any other environmental or social sustainable investment objective by:

- investing in renewable energy infrastructure assets and by actively engaging and managing sustainability risks and opportunities for the Company and its investments prior to making any investment and on an ongoing basis once an investment has been made. Sustainability risks and opportunities are fully embedded in the risk management framework at both a Company and investee company level.
- At portfolio level, each investee company (commonly a Special Purpose Vehicle ("SPV")) has a register which is reviewed by the relevant board and updated at least annually or at such time as new material risks emerge. The materiality of each sustainability risk is assessed in respect of the likelihood of its occurrence and the impact of such an occurrence, on a numerical scale in line with standard industry practice. Any material risks are escalated to the Investment Manager's Risk Management Committee. The Risk Management Committee meets on a quarterly basis to discuss, amongst other matters, the risk framework of each fund and its investments including processes for identifying, assessing and managing sustainability risks.
- The Investment Committee responsible for the Company's investment decisions comprises experienced members of the Investment Manager. Whilst making investment decisions, due consideration is given to climate-related risks and opportunities identified during due diligence. A formal ESG checklist is considered by the Investment Committee in the approval process of any new investment.
- Ongoing sustainability risks for the portfolio are monitored, managed, and reported to the Company's Board (the "Board"), which has overall responsibility for the activities of the Company and its investments, including in relation to sustainability risk. The day-to-day management of the

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

business is delegated to the Investment Manager, which includes responsibility for sustainability matters. In collaboration, the Board and the Investment Manager assess how sustainability risks should be managed and the Company has developed its ESG policy (please see below - *“How have the indicators for adverse impacts on sustainability factors been taken into account?”*) which applies pre-investment and on an ongoing basis once an asset has been acquired.

- The Company relies on the Investment Manager to apply appropriate policies to the investments the Company makes. The policies put in place by the Investment Manager outline the Company’s approach to responsible investing, as well as the environmental standards which it aims to meet. Responsible investing principles (including exclusion criteria with the effect of avoiding investments that the Investment Manager believes to be incompatible with a sustainable investment objective, as set out in the Company’s ESG Policy (the **“GRP ESG Policy”**), a copy of which can be found [here](#)) are applied to each of the investments made. The Investment Manager assesses compliance pre-investment and reports on an ongoing basis to the Board.
- These policies require the Company to make reasonable endeavours to procure the ongoing compliance of its portfolio companies with its policies on responsible investment.
- In respect of the Company, the Investment Manager will exclude or engage with companies and key service providers that are assessed by Schroders to have breached one or more ‘global norms’ thereby causing significant environmental or social harm; these companies comprise Schroders’ ‘global norms’ breach list. Schroders’ determination of whether a company has been involved in such a breach considers relevant principles such as those contained in the UN Global Compact (UNGC) principles, the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. The ‘global norms’ breach list may be informed by assessments performed by third party providers and by proprietary research, where relevant to a particular situation.
- In addition, the Company complies with the principles of good governance contained in the AIC Code, which ensures the Company is in accordance with the requirements of the UK Corporate Governance Code and provides a framework of best practice for listed investment companies.

### *How have the indicators for adverse impacts on sustainability factors been taken into account?*

The Investment Manager considers the principal adverse impacts (“**PAIs**”) of its investment decisions relating to the Company on sustainability factors and this informs its approach to long-term investment stewardship and stakeholder engagement.

As the Company predominantly targets investments in renewable energy infrastructure, the PAIs that are most relevant to the Company include (but are not limited to):

- Greenhouse gas emissions (Table 1 RTS: PAIs 1-6); and
- Number of days lost to injuries, accidents, fatalities or illness (Table 3 RTS: PAI 3)

The Investment Manager seeks to mitigate the impact of the PAIs and other indicators considered in relation to the Company primarily by implementing the GRP ESG Policy. The GRP ESG Policy, which has been developed in line with the Investment Manager’s ESG Policy, sets guidance and principles for integrating sustainability in the Company’s investment and asset management processes and looks to establish best practice in sustainability related risk management, reporting and transparency. It outlines areas of focus that are common to renewable energy investments including environment, workplace standards, health and safety practices, governance (including compliance with applicable laws and regulations) and local community engagement, while allowing different strategies to consider additional factors or different materiality depending on the types or stage of investments targeted. It also includes a list of exclusions applied by all Schroders Greencoat managed or advised capital and key performance indicators that are monitored and reported on (as appropriate).

Sustainability factors are considered prior to investment as part of early-stage screening, detailed due diligence and the Investment Committee’s decision-making, and managed post-acquisition in accordance with the

Investment Manager's ordinary asset management practices (as further described in the latest AIFMD Disclosures available on the Company's website).

For certain PAIs, the Investment Manager will apply quantitative thresholds to ensure no significant harm is done to its investment objective and the investment exclusions list, set out in the GRP ESG Policy, is adhered to. These thresholds will be checked at pre-investment stage and as part of ongoing management of the asset. The majority of the PAIs, however, are considered based on a qualitative assessment.

At the pre-investment stages, where potential ESG risks – including adverse impacts – are identified as part of the due diligence process, these are either (i) mitigated to an acceptable extent or (ii) where the ESG risks or impacts are sufficiently material that they cannot easily be remediated once acquired or they exceed risk tolerances, the investment will be rejected.

Post-investment, PAIs will be recorded (to the extent possible based on available data) on a regular basis and monitored by the asset management teams. The Investment Manager may engage directly with the investee companies and/or third-party service providers to better understand any principal adverse impacts identified and/or take additional steps to avoid, reduce or mitigate any social or environmental impact and financial impact. In the event of an environmental or social incident that may cause adverse impact or harm, the Investment Manager favours an active ownership approach over divestment. Active ownership includes engagement with relevant stakeholders or the implementation of action plans to address an issue should it arise.

A statement on PAIs, including the list of PAI indicators and associated metrics considered in relation to the Company, will be included in the Company's annual reports.

### *How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?*

The Company predominantly targets investments in European renewable energy infrastructure assets which will be held through SPVs: standalone legal entities which tend not to have any employees or management teams but instead outsource all operations and management requirements to third parties. The Investment Manager assesses the alignment of the investee companies' sustainable investments with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights (the "**Minimum Safeguards**").

The Investment Manager conducts initial due diligence and ongoing monitoring of investee companies to ensure their alignment with the Minimum Safeguards and, where possible, will impose obligations on the key service providers involved in the operations and management of the investee companies to ensure their ongoing compliance. This may be achieved by the Investment Manager's Code of Conduct Side Letter (or an equivalent standard), which requires key service providers to comply with all applicable laws, rules, regulations and overarching principles in the countries where they operate. This covers anti-bribery and corruption, financial crime, data protection and employment and health and safety laws (including those relating to human rights, human trafficking, modern slavery, and public safety). These procedures are monitored regularly by the Investment Manager's risk function.

The Investment Manager also has a clear focus on raising awareness around the potential risks of forced labour and modern slavery in the supply chains of the Company's investments. For example, in the case of solar, the Investment Manager is supporting the Solar Stewardship Initiative, an industry-wide initiative (through Solar Energy UK) to establish a supply chain framework for the solar industry to address modern slavery issues linked to polysilicon production in high-risk areas. The industry (with the help of consultants) has developed the Solar Sustainability Best Practices Benchmark to produce industry standards for improved traceability and full disclosure of environmental and social aspects in the supply chain. It is also working on producing an assurance process to map data gaps in the solar supply chain and enhance traceability.

The Investment Manager will adopt the Schrodgers Global Norms Framework and apply this to the Company, excluding or engaging with key service providers and entities that are included in the Schrodgers 'global norms' breach list which have been identified as having breached one or more global norms, thereby causing significant environmental or social harm. Schrodgers' determination of whether a company has been involved in such a breach considers relevant principles such as those contained in the Minimum Safeguards. The Schrodgers Global Norms



list may be informed by assessments performed by third party providers and by proprietary research, where relevant to a particular situation.

### Does this financial product consider principal adverse impacts on sustainability factors?

- Yes — See above “How have the indicators for adverse impacts on sustainability factors been taken into account?” for details of how the Company considers PAIs on sustainability factors. A statement on PAIs will be made available in the annual reports.
- No



### What investment strategy does this financial product follow?

In order to achieve its investment objective, the Company invests in euro denominated renewable energy infrastructure assets in Relevant Countries within the Eurozone. The Company is focused on investing in wind assets in Ireland, where it has acquired the Seed Portfolio and where the Board and the Investment Manager believe there is an attractive opportunity to consolidate onshore wind assets, and in Other Relevant Countries (being Belgium, Finland, France, Germany, Netherlands, Denmark, Norway, Sweden, Spain and Portugal), where the Board and the Investment Manager believe there is a stable and robust renewable energy policy framework.

Over time, the Company aims to achieve diversification principally through investing in a growing portfolio of assets across a number of distinct geographies and a mix of renewable energy technologies.

The Company will seek to acquire 100%, majority or minority interests in individual assets. These will usually be held through SPVs which hold underlying wind, solar or BESS assets. When investing in less than 100% of the equity share capital of an SPV, the Company will secure its shareholder rights through shareholders’ agreements and other transaction documents. The Company will invest in equity and associated debt instruments when making such acquisitions.

The Company will maintain or modify existing PPAs or seek to sign new PPAs between the individual asset SPVs in its portfolio and creditworthy off-takers or negotiate the terms of or manage PPAs on its own behalf.

The Company does not intend to employ staff but instead will engage experienced third parties to operate the assets in which it owns interests. The Company will seek to mitigate risk at the project level by investing in projects with robust contractual structures delivering long-term predictable (often inflation-linked or partially inflation-linked) cash flows with operations and maintenance contracts which, the Company intends, will usually have the following features:

- warranted levels of availability, with payments to the project for any lost revenue from technical downtime below the contracted level;
- fixed or inflation linked price, which passes the risk of any variances in maintenance costs to the supplier; and
- insurance packages that will pay out to cover the cost of any damage or theft to the projects and loss of revenue from business interruption.

The Company intends to make prudent use of leverage to finance the acquisition of investments and to achieve target returns. As far as possible, the Company will generally avoid raising non-recourse debt by the SPVs owning individual wind farms in order to avoid the more onerous covenants required by lenders. The Company may raise debt from banks and/or capital markets. The Aggregate Group Debt will be limited to 60% of Gross Asset Value (calculated immediately following drawdown). The Average Aggregate Group Debt is expected to be approximately 40% of Gross Asset Value over the medium to long term.

There will not be any cross-financing between portfolio investments and the Company will not operate a common treasury function as between the Company and its investments.

For more information on the investment strategy of the Company and the associated investment restrictions, please refer to the Company's Investment Policy and Pre-Investment Disclosures available on the Company's website.

● ***What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?***

The following are binding elements of the investment strategy implemented in the investment process on a continuous basis to attain the sustainable investment objective:

a) Permitted investments

The Company will only invest in the assets permitted under the Company's governing documents.

b) Exclusions

New investments are screened against the Company's investment restrictions, which identify the geographies, businesses, and activities in which the Company will not invest. The Investment Manager will apply exclusion criteria or limits with the effect of avoiding investment in activities that the Investment Manager believes to be incompatible with the sustainable investment objective, as set out in the GRP ESG Policy.

c) Do not significant harm ("DNSH") assessment

The Investment Manager will conduct a DNSH assessment of each investment to ensure that it does not significantly harm any environmental or social objective (as described above in "*How do sustainable investments not cause significant harm to any environmental or social sustainable investment objective*").

d) Good governance assessment

The Investment Manager will assess investee companies (and, where it has sufficient control or influence and to the extent relevant, the key service providers involved in the operations and management of the investee companies) to ensure they follow good governance practices (as described below in "*What is the policy to assess good governance practices of the investee companies?*").

e) Taxonomy-alignment assessment

The Investment Manager will target investments in economic activities that are considered aligned with the EU Taxonomy (meeting the TSC for the relevant economic activity), such that Taxonomy-aligned activities comprise 90% of the Company's sustainable investments. The Taxonomy alignment of the Company is calculated based on the turnover of the underlying investments.

For all sustainable investments, the Investment Manager will assess new investments against the relevant TSC applicable to the economic activity, as part of normal course pre-investment ESG screening. To the extent an investment falls within the same economic activity, and is in all material respects similar to an investment that has already been assessed against the TSC, the Investment Manager will undertake a simplified assessment of the investment which focuses on any differences to the investment (to that which has already been assessed in accordance with the TSC). The Taxonomy-alignment of the Company's investments will be included in the Company's annual reports.

f) Engagement

The Investment Manager is committed to engaging with all stakeholders relevant to its portfolio to ensure the investments it manages positively impact the communities in which they operate. Sustainability-related risks and challenges are regularly discussed within the Investment Manager's asset management team, and also reported to and discussed with the Board through

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

regular meetings and specific risk register review discussions. Key sustainability factors such as those relating to health and safety, compliance with environmental standards and stakeholder relations are regularly discussed and documented.

In addition to the binding elements listed above used to attain the sustainable investment objective, the Investment Manager also integrates sustainability risks in its investment decision-making.

● **What is the policy to assess good governance practices of the investee companies?**

The Investment Manager expects its investee companies and, where it has sufficient control or influence and to the extent relevant, the key service providers involved in the operations and management of the investee companies, to practice a minimum standard of good governance in relation to sound management structures, relevant tax compliance, employee relations, remuneration and avoidance of bribery and corruption, as further described in the table below.

In particular, the Investment Manager evaluates the governance practices of prospective investments and seeks to understand those of the key service providers it appoints through due diligence prior to investment. During the holding period, representatives of the Investment Manager will typically take one or more seats on the board (or equivalent) of each investee company and therefore take part in the strategic and operational decisions. In some cases, typically in large offshore wind joint ventures, depending on the size of the stake held by the Company, the Investment Manager representative on the investee company board may not be appointed by the Company or may be jointly appointed by the Company and other funds managed by the Investment Manager. As the investments will typically be held in SPVs which do not typically have employees or management teams, any employee related social factors in relation to those investments are focused on the third-party service providers.

The Investment Manager will monitor the governance practices relating to each investee company on an ongoing basis through regular reviews against the criteria listed below. The extent to which the Investment Manager can enforce good governance through engagement or contractual documents will vary depending on the nature of the relationship and structure of the investment (for example, asset SPVs vs. corporate company structures, majority vs. minority stake). As such, what “good governance” looks like will also vary and some of the requirements listed below may not be relevant in all cases.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

<b>Good Governance</b>	
<b>Sound management</b>	<p><b>The Investment Manager expects the boards of all investee companies to promote the long-term success of each investee company and to act with integrity.</b></p> <p>The investee company board should demonstrate the following characteristics:</p> <ul style="list-style-type: none"> <li>• apply objective judgment and promote a culture of openness and integrity;</li> <li>• have the appropriate combination of skills, experience and knowledge;</li> <li>• understand the importance of the relationship between the company and stakeholders including the impact on the community and environment within which it operates; and</li> <li>• establish appropriate controls, audit functions and risk controls appropriate for the size of the company.</li> </ul>
<b>Tax compliance</b>	<b>Investee companies, are expected to adhere to local and international tax laws.</b>
<b>Employee relations including remuneration</b>	<p><b>Employees should be treated fairly with particular consideration given to the maintenance of proper working conditions.</b></p> <p>For investee companies with employees this would include having in place:</p> <ul style="list-style-type: none"> <li>• appropriate health and safety processes</li> </ul>

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

	<ul style="list-style-type: none"> <li>• proper remuneration practices in place whereby all employees are paid the minimum wage according to the region within which they are employed</li> <li>• policies ensuring adherence to all applicable labour laws (including the avoidance of child labour); and</li> <li>• a commitment to workforce diversity and inclusion</li> </ul> <p>For investee companies without any employees (i.e.: SPVs), this applies mainly to the key service providers involved in the operation and management of the SPV.</p>
<b>Anti-bribery and corruption</b>	<b>Investee companies should work against bribery and corruption in undertaking their corporate activities and have appropriate policies in place</b> (e.g.: Anti-Money Laundering, Bribery & Corruption, and Conflicts of Interest policies)

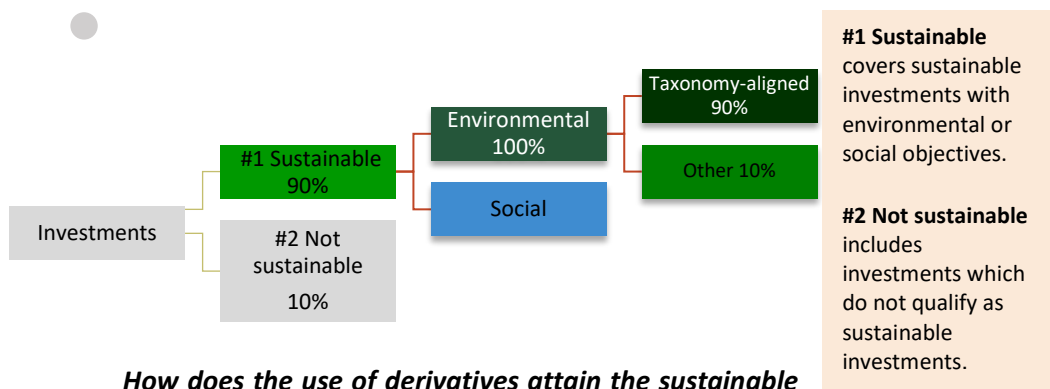
## What is the asset allocation and the minimum share of sustainable investments?

The diagram below illustrates the intended asset allocation for the Company, as at the date of this document.

The Company invests at least 90%<sup>1</sup> of its assets in sustainable investments, which means included in #1 Sustainable are investments that the Investment Manager believes will contribute towards the environmental objective of climate change mitigation, in accordance with the binding elements of the investment strategy. A minimum of 90% of the Company's sustainable investments will be EU Taxonomy-aligned, calculated based on the turnover of the underlying investments.

The allocation to #2 Not Sustainable includes investments that are treated as neutral for sustainability purposes, such as cash (to the extent not generated from sustainable investments) and the use of derivatives as described below which collectively will account for up to 10% of the Company's assets at any one time.

Please see above - "What investment strategy does the financial product follow" – for details of the specific assets in which the Company will invest.



### How does the use of derivatives attain the sustainable investment objective?

The Company and its underlying investee companies may enter into hedging arrangements (in relation to interest rates, currencies, power prices and other commodities) for the purposes of minimising or reducing risk or exposure in respect of investments but will not use derivatives or hedging transactions for speculative investment purposes (i.e. to attain the sustainable investment objective).



<sup>1</sup> Excluding cash and derivatives

## **To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?**

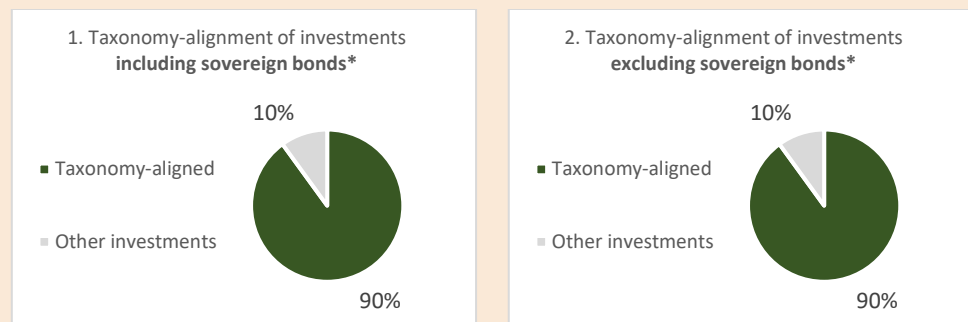
The Company aims to ensure that 90% of its sustainable investments with an environmental objective are aligned with the EU Taxonomy, and that all sustainable investments meet the do no significant harm and good governance requirements. The Taxonomy-alignment of the Company's underlying assets is calculated based on the turnover of the underlying investments. These investments will align with the requirements laid down in Article 3 of the EU Taxonomy, including the relevant TSC relating to the environmental objectives to which the underlying assets of the Company will contribute.

The Investment Manager will assess investments against the TSC applicable to the environmental objective of climate change mitigation and the relevant economic activity. The TSC for economic activities supporting the remaining environmental objectives of the EU Taxonomy have either not yet been developed or do not include certain economic activities. As the regulation develops, it may be determined that the Company's investments also contribute to other environmental objectives of the EU Taxonomy. The Taxonomy-alignment of the Company's investments will be included in the Company's annual reports. The Investment Manager does not presently intend to seek assurance of its Taxonomy-alignment assessments by a third-party provider but may do so in the future.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>2</sup>?**

- Yes
- In fossil gas     In nuclear energy
- No

*The two graphs<sup>3</sup> below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.*



*\*For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures*

● **What is the minimum share of investments in transitional and enabling activities?**

There is no minimum share of investments in transitional and enabling activities.



**What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?**

As outlined above, the Fund's minimum share of sustainable investments with an environmental objective is 90%. Where a minimum share of 10% of these will be sustainable investments with an environmental objective that are not aligned with the EU Taxonomy. However, as outlined in the Fund's binding criteria, every new investment will be assessed against the relevant TSC applicable to the economic activity, as part of normal course pre-investment ESG screening.




<sup>2</sup> Fossil gas and/or nuclear related activities will only comply with the ERU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in the Commission Delegated Regulation (EU) 2022/1214.

<sup>3</sup> These graphs represent the Company's commitment to a minimum Taxonomy alignment of 90% of the Company's *sustainable* investments (rather than all investments), calculated based on the turnover of the underlying investments.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

 are environmentally sustainable investments that **do not take into account the criteria** for environmentally sustainable economic activities under the EU

## What is the minimum share of sustainable investments with a social objective?

There is no minimum share of sustainable investments with a social objective. Further, a taxonomy of socially sustainable economic activities has not yet been developed. Once those rules are developed, it may be determined that the Company's investments are considered socially sustainable economic activities.

**Reference benchmarks** are indexes to measure whether the financial product attains the sustainable investment objective.



## What investments are included under “#2 Not sustainable”, what is their purpose and are there any minimum environmental or social safeguards?

The investments included under “#2 Not sustainable” are treated as neutral for sustainability purposes, and may comprise cash reserves (to the extent not generated from sustainable investments) and the use of derivatives or hedging arrangements (including in relation to interest rates, currencies, power and other commodities) for the purposes of minimising or reducing risk or exposure in respect of investments. Given the purpose of these investments, there are no minimum environmental and social safeguards applied to such investments.



## Is a specific index designated as a reference benchmark to meet the sustainable investment objective?

No, the Company does not have a carbon reduction objective and will not be managed against a reference benchmark.



## Where can I find more product specific information online?

**More product-specific information can be found on the website:** More product-specific information can be found on the Company's website under “SFDR”.