



## **PUBLIC TRANSPARENCY REPORT** **2025**

**SUSI Partners AG**

Generated 24-11-2025

# About this report

PRI reporting is the largest global reporting project on responsible investment.

It was developed with investors, for investors. PRI signatories are required to report publicly on their responsible investment activities each year. In turn, they receive a number of outputs, including a public and private Transparency Report.

The public Transparency Reports, which are produced using signatories' reported information, provide accountability and support signatories to have internal discussions about their practices and to discuss these with their clients, beneficiaries, and other stakeholders. This public Transparency Report is an export of the signatory's responses to the PRI Reporting Framework during the 2025 reporting period. It includes the signatory's responses to core indicators, as well as responses to plus indicators that the signatory has agreed to make public.

In response to signatory feedback, the PRI has not summarised signatories' responses – the information in this document is presented exactly as it was reported.

For each of the indicators in this document, all options selected by the signatory are presented, including links and qualitative responses. In some indicators, all applicable options are included for additional context.

## Disclaimers

### Legal Context

PRI recognises that the laws and regulations to which signatories are subject differ by jurisdiction. We do not seek or require any signatory to take an action that is not in compliance with applicable laws. All signatory responses should therefore be understood to be subject to and informed by the legal and regulatory context in which the signatory operates.

### Responsible investment definitions

Within the PRI Reporting Framework Glossary, we provide definitions for key terms to guide reporting on responsible investment practices in the Reporting Framework. These definitions may differ from those used or proposed by other authorities and regulatory bodies due to evolving industry perspectives and changing legislative landscapes. Users of this report should be aware of these variations, as they may impact interpretations of the information provided.

### Data accuracy

This document presents information reported directly by signatories in the 2025 reporting cycle. This information has not been audited by the PRI or any other party acting on its behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented.

The PRI has taken reasonable action to ensure that data submitted by signatories in the reporting tool is reflected in their official PRI reports accurately. However, it is possible that small data inaccuracies and/or gaps remain, and the PRI shall not be responsible or liable for such inaccuracies and gaps.

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# SENIOR LEADERSHIP STATEMENT (SLS)

## SENIOR LEADERSHIP STATEMENT

### SENIOR LEADERSHIP STATEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SLS 1	CORE	N/A	N/A	PUBLIC	Senior Leadership Statement	GENERAL

#### Section 1. Our commitment

- Why does your organisation engage in responsible investment?
- What is your organisation's overall approach to responsible investment, and what major responsible investment commitment(s) have you made?

At SUSI Partners, sustainability has been a core value since our inception. Our commitment to responsible investment is rooted in the belief that integrating sustainability across all activities - investments, fiduciary duties, and company operations - drives long-term economic, environmental, and social value creation.

We view responsible investment not only as a reflection of our principles, but also as a means to enhance the value we deliver to stakeholders. By systematically assessing and underwriting our investments to ensure both financial performance and positive climate impact, we aim to contribute meaningfully to environmental and social welfare while meeting the expectations of our clients.

Our responsible investment approach is guided by a firm-wide sustainability strategy that focuses on the most material ESG topics for our business and stakeholders. This strategy builds on our existing ESG efforts and defines a clear path forward, with the vision to lead by example in creating enduring value through sustainable investing.

Key elements of our approach include:

- Integration of sustainability principles into investment strategies to strengthen decision-making and elevate investment quality;
- Leveraging ESG data and insights to identify risks and opportunities for both financial and non-financial value creation;
- A stakeholder-centric perspective that ensures long-term viability and aligns with our clients' evolving priorities.

Through our focus on the energy transition, we provide access to thematic investment strategies that combine attractive risk-adjusted returns with measurable climate impact. This dual focus generates long-term value not just for our clients, but also for the broader economy, society, and environment.

#### Section 2. Annual overview

- Discuss your organisation's progress during the reporting year on the responsible investment issue you consider most relevant or material to your organisation or its assets.
- Reflect on your performance with respect to your organisation's responsible investment objectives and targets during the reporting year. Details might include, for example, outlining your single most important achievement or describing your general progress on topics such as the following (where applicable):
  - refinement of ESG analysis and incorporation
  - stewardship activities with investees and/or with policymakers
  - collaborative engagements
  - attainment of responsible investment certifications and/or awards

In 2024, SUSI Partners made meaningful progress in advancing our responsible investment agenda, guided by our updated firm-wide sustainability strategy. This strategy, centred on the ESG topics most material to our business and stakeholders, outlines clear strategic objectives, measurable targets, and a structured action plan that spans both our investments and corporate operations. It is built around three core pillars: Performance, Impact, and Engagement.

Performance As a fiduciary, our core responsibility is to deliver attractive risk-adjusted returns while managing ESG risks and identifying opportunities for value creation. In 2024, we:

- Enhanced our ESG frameworks and assessment tools, supporting more systematic internal analysis and improved reporting to clients and regulators.

- Strengthened ESG integration across the investment lifecycle, with updated guidance, training, and oversight for investment professionals.

- Improved data coverage and quality, allowing for better-informed decisions and effective monitoring of ESG performance.

- Developed tracking mechanisms to assess the outcomes of engagement efforts, helping us measure the impact of our stewardship activities at the asset level. Our investment strategies are inherently impact-driven, focusing on climate change mitigation through investments in the broader energy transition space. In 2024, we:

Impact

- Expanded portfolio-level emissions tracking, with full coverage of Scope 1, 2, and 3 emissions across construction and operational phases.

- Worked closely with portfolio companies to improve data reliability, particularly in hard-to-measure areas such as indirect emissions and supply chain-related impacts.

- Placed a strong emphasis on responsible sourcing, particularly for critical components within the solar PV and battery energy storage system (BESS) supply chains. We actively engaged with investment partners and suppliers to ensure alignment with standards on environmental practices, labour rights, and traceability—recognising the material ESG risks associated with raw material extraction and manufacturing in these sectors.

- Supported the implementation of policies and supplier screening mechanisms that account for health and safety, labour rights, and environmental risks—especially across international and high-risk supply chains. Recognising that sustainable investing is inherently dynamic, we prioritised stakeholder dialogue and internal alignment to stay ahead of regulatory and market developments. In 2024, we:

Engagement and Organisation

- Engaged with key stakeholders, including investors, regulators, and NGOs, to gather input and respond proactively to emerging expectations.

- Worked closely with communities and local stakeholders impacted by our portfolio assets, especially during construction phases, to ensure transparent communication, address concerns early, and foster local co-benefits.

- Integrated ESG oversight into governance structures, including portfolio company boards, where our investment and asset management professionals actively represent sustainability interests.

- Launched our internal ESG Ambassador Programme, empowering employees across functions to act as sustainability champions, facilitate cross-team knowledge sharing, and further embed ESG into everyday decision-making.

- Showcased our approach to ESG integration in industry events, client meetings, and at our annual SUSI Summit, where sustainability remained a core theme.

This progress reflects our continued commitment to evolving and strengthening our responsible investment practices. By embedding ESG considerations into every level of decision-making and focusing on areas such as data, sourcing, and community impact, we aim to deliver resilient, high-quality investments that create long-term value for all stakeholders.

### Section 3. Next steps

- What specific steps has your organisation outlined to advance your commitment to responsible investment in the next two years?

At SUSI Partners, we continuously strive to enhance our ESG capabilities at both the investment and corporate levels. Each year, we define key priorities and report on our progress in our annual Sustainability Report. Looking ahead, we recognise that the understanding of material ESG risks and opportunities will continue to evolve, and we are committed to staying ahead of this curve.

We anticipate growing scrutiny and investor interest in areas such as supply chain transparency, biodiversity, robust greenhouse gas (GHG) emissions reporting, worker safety, and human capital management, including community engagement. In response, we have outlined several key initiatives for the next two years to advance our commitment to responsible investment:

#### 1. Improve ESG Data Generation and Onboarding

- Expand our ESG frameworks and formalise the ESG onboarding process for each investee, ensuring systematic coverage of material risks and KPIs.

- Enhance data quality, depth, and consistency at the asset level, enabling improved portfolio-wide performance tracking and regulatory reporting.

- Increase asset-level data generation for key metrics, including Scope 3 emissions, responsible sourcing indicators, and social KPIs.

#### 2. Refine ESG Analysis and Impact Measurement

- Continuously improve our ESG assessment tools, leveraging advanced analytics and emerging data sources to better identify material risks and value creation opportunities.

- Strengthen our impact measurement methodologies, particularly for climate mitigation metrics such as avoided emissions and carbon intensity.

- Roll out asset-class-specific updates to ESG and impact tools to ensure relevance and decision-usefulness across all investment strategies.

#### 3. Strengthen Stakeholder and Community Engagement

- Increase engagement with key stakeholders—clients, portfolio companies, regulators, and local communities—to gather feedback and align on evolving expectations.
  - Support our portfolio companies in formalising community engagement practices, particularly during development and construction phases, with a focus on local benefit sharing and early issue resolution.
  - Actively participate in regulatory consultations and industry initiatives to promote transparency and help safeguard the integrity of ESG-labelled investment products.
5. Expand ESG Training and Internal Capacity Building
- Broaden ESG training across the organisation, with tailored programmes for investment teams, asset managers, and investee company leadership.
- Promote a culture of continuous learning, ensuring all relevant teams remain equipped to meet regulatory requirements and integrate sustainability into day-to-day decisions.

#### Section 4. Endorsement

**'The Senior Leadership Statement has been prepared and/or reviewed by the undersigned and reflects our organisation-wide commitment and approach to responsible investment'.**

Name

Marco van Daele

Position

CEO

Organisation's Name

SUSI Partners AG

☒ A

**'This endorsement applies only to the Senior Leadership Statement and should not be considered an endorsement of the information reported by the above-mentioned organisation in the various modules of the Reporting Framework. The Senior Leadership Statement serves as a general overview of the above-mentioned organisation's responsible investment approach. The Senior Leadership Statement does not constitute advice and should not be relied upon as such. Further, it is not a substitute for the skill, judgement and experience of any third parties, their management, employees, advisors and/or clients when making investment and other business decisions'.**

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# OTHER RESPONSIBLE INVESTMENT REPORTING OBLIGATIONS (ORO)

## OTHER RESPONSIBLE INVESTMENT REPORTING OBLIGATIONS

### OTHER RESPONSIBLE INVESTMENT REPORTING OBLIGATIONS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ORO 1	CORE	N/A	N/A	PUBLIC	Other Responsible Investment Reporting Obligations	6

During the reporting year, to which international or regional ESG-related legislation(s) and/or regulation(s) did your organisation report?

- ☐ (A) Corporate Sustainability Reporting Directive (CSRD) [European Union]
- ☐ (B) Directive on AIFM (2011/61/EU) [European Union]
- ☐ (C) Enhancing climate-related disclosures by asset managers, life insurers and FCA-regulated pension providers (PS21/24) [United Kingdom]
- ☒ (D) EU Taxonomy Regulation [European Union]
- ☐ (E) Improving shareholder engagement and increasing transparency around stewardship (PS19/13) [United Kingdom]
- ☐ (F) IORP II (Directive 2016/2341) [European Union]
- ☐ (G) Law on Energy and Climate (Article 29) [France]
- ☒ (H) MiFID II (2017/565) [European Union]
- ☐ (I) Modern Slavery Act [United Kingdom]
- ☐ (J) PEPP Regulation (2019/1238) [European Union]
- ☒ (K) PRIIPS Regulation (2016/2340 and 2014/286) [European Union]
- ☐ (L) Regulation on the Integration of Sustainability Risks in the Governance of Insurance and Reinsurance Undertakings (2021/1256) [European Union]
- ☒ (M) SFDR Regulation (2019/2088) [European Union]
- ☐ (N) SRD II (Directive 2017/828) [European Union]
- ☐ (O) The Occupational Pension Schemes Regulation on Climate Change Governance and Reporting [United Kingdom]
- ☐ (P) Climate Risk Management (Guideline B-15) [Canada]
- ☐ (Q) Continuous Disclosure Obligations (National Instrument 51-102) [Canada]
- ☐ (R) Disposiciones de Carácter General Aplicables a los Fondos de Inversión y a las Personas que les Prestan Servicios (SIEFORE) [Mexico]
- ☐ (S) Instrucciones para la Integración de Datores ASG en Los Mecanismos de Revelación de Información para FIC (External Circular 005, updated) [Colombia]
- ☐ (T) Provides for the creation, operation, and disclosure of information of investment funds, as well as the provision of services for the funds, and revokes the regulations that specifies (CVM Resolution No. 175) [Brazil]
- ☐ (U) SEC Expansion of the Names Rule [United States of America]
- ☐ (V) SEC Pay Ratio Disclosure Rule [United States of America]
- ☐ (W) ASIC RG65 Section 1013DA Disclosure Guidelines [Australia]
- ☐ (X) Circular to Licensed Corporations: Management and Disclosure of Climate-related Risks by Fund Managers [Hong Kong SAR]
- ☐ (Y) Financial Investment Services and Capital Markets Act (FSCMA) [Republic of Korea]
- ☐ (Z) Financial Instruments and Exchange Act (FIEA) [Japan]
- ☐ (AA) Financial Markets Conduct Act [New Zealand]
- ☐ (AB) Guiding Opinions on Regulating the Asset Management Business of Financial Institutions [China]
- ☒ (AC) Guidelines on Environmental Risk Management for Asset Managers [Singapore]
- ☐ (AD) Guidelines on Sustainable and Responsible Investment Funds [Malaysia]
- ☐ (AE) Modern Slavery Act (2018) [Australia]

- ☐ (AF) Stewardship Code for all Mutual Funds and All Categories of AIFs [India]
- ☐ (AG) ADGM Sustainable Finance Regulatory Framework [United Arab Emirates]
- ☐ (AH) JSE Limited Listings Requirements [South Africa]
- ☐ (AI) Other
- ☐ (AJ) Other
- ☐ (AK) Other
- ☐ (AL) Other
- ☐ (AM) Other
- (AN) Not applicable; our organisation did not report to any ESG-related legislation and/or regulation during the reporting year.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ORO 2	CORE	N/A	N/A	PUBLIC	Other Responsible Investment Reporting Obligations	6

**During the reporting year, to which voluntary responsible investment/ESG frameworks did your organisation report?**

- ☐ (A) Asset Owners Stewardship Code [Australia]
- ☐ (B) Código Brasileiro de Stewardship [Brazil]
- ☐ (C) New Zealand Stewardship Code
- ☐ (D) Principles for Responsible Institutional Investors (Stewardship Code) [Japan]
- ☐ (E) Stewardship Code [United Kingdom]
- ☐ (F) Stewardship Framework for Institutional Investors [United States of America]
- ☐ (G) CFA Institute ESG Disclosure Standards for Investment Products [Global]
- ☒ (H) **Guidelines on Funds' Names using ESG or Sustainability-related Terms [European Union]**
- ☐ (I) Luxflag ESG Label [Luxembourg]
- ☐ (J) RIAA Responsible Investment Certification Program [Australia]
- ☐ (K) SRI Label [France]
- ☐ (L) ANBIMA Code of Regulation and Best Practices of Investment Funds [Brazil]
- ☐ (M) Code for Institutional Investors 2022 [Malaysia]
- ☐ (N) Code for Responsible Investing in South Africa (CRISA 2) [South Africa]
- ☐ (O) Corporate Governance Guidelines [Canada]
- ☐ (P) Defined Contribution Code of Practice [United Kingdom]
- ☐ (Q) European Association for Investors in Non-Listed Real Estate Vehicles (INREV) Guidelines [Global]
- ☐ (R) Global ESG Benchmark for Real Assets (GRESB) [Global]
- ☒ (S) **Global Impact Investing Network (GIIN) Impact Reporting and Investment Standards (IRIS+) [Global]**
- ☒ (T) **OECD Guidelines for MNEs - Responsible Business Conduct for Institutional Investors [Global]**
- ☒ (U) **UN Guiding Principles (UNGP) on Business and Human Rights [Global]**
- ☐ (V) Net Zero Asset Managers (NZAM) Initiative [Global]
- ☐ (W) Net-Zero Asset Owner Alliance (NZAOA) [Global]
- ☒ (X) **Recommendations of the Taskforce for Climate-related Financial Disclosure (TCFD) [Global]**
- ☐ (Y) The Net Zero Investment Framework (NZIF) 2.0 [Global]
- ☐ (Z) Recommendations of the Taskforce for Nature-related Financial Disclosure (TNFD) [Global]
- ☒ (AA) **Global Reporting Initiative (GRI) Standards [Global]**
- ☒ (AB) **IFC Performance Standard [Global]**
- ☐ (AC) International Sustainability Standards Board (ISSB) Standards [Global]
- ☐ (AD) Sustainability Accounting Standards Board (SASB) Standards [Global]
- ☐ (AE) Other
- ☐ (AF) Other
- ☐ (AG) Other
- ☐ (AH) Other
- ☐ (AI) Other
- (AJ) Not applicable; our organisation did not report to any voluntary responsible investment/ESG frameworks during the reporting year.



# ORGANISATIONAL OVERVIEW (OO)

## ORGANISATIONAL INFORMATION

### REPORTING YEAR

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 1	CORE	N/A	N/A	PUBLIC	Reporting year	GENERAL

What is the year-end date of the 12-month period you have chosen to report for PRI reporting purposes?

	Date	Month	Year
Year-end date of the 12-month period for PRI reporting purposes:	31	12	2024

## SUBSIDIARY INFORMATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 2	CORE	N/A	OO 2.1	PUBLIC	Subsidiary information	GENERAL

Does your organisation have subsidiaries?

- ☒ (A) Yes  
☐ (B) No

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 2.1	CORE	OO 2	OO 2.2	PUBLIC	Subsidiary information	GENERAL

Are any of your organisation's subsidiaries PRI signatories in their own right?

- ☐ (A) Yes  
☒ (B) No

# ASSETS UNDER MANAGEMENT

## ALL ASSET CLASSES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 4	CORE	OO 3	N/A	PUBLIC	All asset classes	GENERAL

**What are your total assets under management (AUM) at the end of the reporting year, as indicated in [OO 1]?**

**USD**

(A) AUM of your organisation, including subsidiaries not part of row (B), and excluding the AUM subject to execution, advisory, custody, or research advisory only

US\$ 2,185,365,000.00

(B) AUM of subsidiaries that are PRI signatories in their own right and excluded from this submission, as indicated in [OO 2.2]

US\$ 0.00

(C) AUM subject to execution, advisory, custody, or research advisory only

US\$ 0.00

## ASSET BREAKDOWN

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5	CORE	OO 3	Multiple indicators	PUBLIC	Asset breakdown	GENERAL

Provide a percentage breakdown of your total AUM at the end of the reporting year as indicated in [OO 1].

	(1) Percentage of Internally managed AUM	(2) Percentage of Externally managed AUM
(A) Listed equity	0%	0%
(B) Fixed income	0%	0%
(C) Private equity	0%	0%
(D) Real estate	0%	0%
(E) Infrastructure	>75%	0%
(F) Hedge funds	0%	0%
(G) Forestry	0%	0%
(H) Farmland	0%	0%
(I) Other	0%	0%
(J) Off-balance sheet	0%	0%

## ASSET BREAKDOWN: INTERNALLY MANAGED INFRASTRUCTURE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.3 INF	CORE	OO 5	N/A	PUBLIC	Asset breakdown: Internally managed infrastructure	GENERAL

**Provide a further breakdown of your internally managed infrastructure AUM.**

(A) Data infrastructure 0%

(B) Diversified 0%

(C) Energy and water resources 0%

(D) Environmental services 0%

(E) Network utilities 0%

(F) Power generation (excl.  
renewables) 0%

(G) Renewable power >50-75%

(H) Social infrastructure 0%

(I) Transport 0%

(J) Other >10-50%

**(J) Other - Specify:**

32% other includes: Energy efficiency as well as EV charging infrastructure.

## GEOGRAPHICAL BREAKDOWN

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 7	CORE	Multiple, see guidance	N/A	PUBLIC	Geographical breakdown	GENERAL

How much of your AUM in each asset class is invested in emerging markets and developing economies?

### AUM in Emerging Markets and Developing Economies

(H) Infrastructure

(2) >0 to 10%

## STEWARDSHIP

### STEWARDSHIP

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 8	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Stewardship	GENERAL

Does your organisation conduct stewardship activities, excluding (proxy) voting, for any of your assets?

### (7) Infrastructure

(A) Yes, through internal staff



(B) Yes, through service providers



(C) Yes, through external managers



(D) We do not conduct stewardship



## ESG INCORPORATION

### INTERNALLY MANAGED ASSETS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 11	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Internally managed assets	1

For each internally managed asset class, does your organisation incorporate ESG factors, to some extent, into your investment decisions?

(1) Yes, we incorporate ESG factors into our investment decisions

(2) No, we do not incorporate ESG factors into our investment decisions

(K) Infrastructure



## ESG/SUSTAINABILITY FUNDS AND PRODUCTS

### LABELLING AND MARKETING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18	CORE	OO 11–14	OO 18.1	PUBLIC	Labelling and marketing	1

Do you explicitly market any of your products and/or funds as ESG and/or sustainable?

☒ (A) Yes, we market products and/or funds as ESG and/or sustainable

Provide the percentage of total AUM that your ESG and/or sustainability-marketed products or funds represent:

>75%

☐ (B) No, we do not offer products or funds explicitly marketed as ESG and/or sustainable

☐ (C) Not applicable; we do not offer products or funds

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18.1	CORE	OO 18	OO 18.2	PUBLIC	Labelling and marketing	1

Do any of your ESG and/or sustainability-marketed products and/or funds hold formal ESG and/or RI certification(s) or label(s) awarded by a third party?

☐ (A) Yes, our ESG and/or sustainability-marketed products and/or funds hold formal labels or certifications

☒ (B) No, our ESG and/or sustainability-marketed products and/or funds do not hold formal labels or certifications

## SUMMARY OF REPORTING REQUIREMENTS

### SUMMARY OF REPORTING REQUIREMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 21	CORE	Multiple indicators	Multiple indicators	PUBLIC	Summary of reporting requirements	GENERAL

The following table shows which modules are mandatory or voluntary to report on in the separate PRI asset class modules. Where a module is voluntary, indicate if you wish to report on it.

Applicable modules	(1) Mandatory to report (pre-filled based on previous responses)	(2.1) Voluntary to report. Yes, I want to opt-in to reporting on the module	(2.2) Voluntary to report. No, I want to opt-out of reporting on the module
Policy, Governance and Strategy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Confidence Building Measures	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(K) Infrastructure	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

## OTHER ASSET BREAKDOWNS

### INFRASTRUCTURE: OWNERSHIP LEVEL

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 27	CORE	OO 21	N/A	PUBLIC	Infrastructure: Ownership level	GENERAL

What is the percentage breakdown of your organisation's infrastructure assets by the level of ownership?

☒ (A) A majority stake (more than 50%)

Select from the list:

- ☐ (1) >0 to 10%
- ☐ (2) >10 to 50%
- ☐ (3) >50 to 75%

☒ (4) >75%

☐ (B) A significant minority stake (between 10–50%)

☐ (C) A limited minority stake (less than 10%)

## INFRASTRUCTURE: STRATEGY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 28	CORE	OO 21	N/A	PUBLIC	Infrastructure: Strategy	GENERAL

What is the investment strategy for your infrastructure assets?

- ☒ (A) Core
- ☒ (B) Value added
- ☐ (C) Opportunistic
- ☐ (D) Other

## INFRASTRUCTURE: TYPE OF ASSET

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 29	CORE	OO 21	INF 1	PUBLIC	Infrastructure: Type of asset	GENERAL

What is the asset type of your infrastructure?

- ☒ (A) Greenfield
- ☒ (B) Brownfield

## INFRASTRUCTURE: MANAGEMENT TYPE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 30	CORE	OO 21	Multiple, see guidance	PUBLIC	Infrastructure: Management type	GENERAL

Who manages your infrastructure assets?

- ☒ (A) Direct management by our organisation
- ☒ (B) Third-party infrastructure operators that our organisation appoints
- ☐ (C) Other investors, infrastructure companies or their third-party operators
- ☐ (D) Public or government entities or their third-party operators



## SUBMISSION INFORMATION

### REPORT DISCLOSURE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 32	CORE	OO 3, OO 31	N/A	PUBLIC	Report disclosure	GENERAL

How would you like to disclose the detailed percentage figures you reported throughout the Reporting Framework?

- ☐ (A) Publish as absolute numbers
- ☒ (B) Publish as ranges

# POLICY, GOVERNANCE AND STRATEGY (PGS)

## POLICY

### RESPONSIBLE INVESTMENT POLICY ELEMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 1	CORE	OO 8, OO 9	Multiple indicators	PUBLIC	Responsible investment policy elements	1, 2

Which elements are covered in your formal responsible investment policy(ies)?

- ☒ (A) Overall approach to responsible investment
- ☒ (B) Guidelines on environmental factors
- ☒ (C) Guidelines on social factors
- ☒ (D) Guidelines on governance factors
- ☒ (E) Guidelines on sustainability outcomes
- ☒ (F) Guidelines tailored to the specific asset class(es) we hold
- ☒ (G) Guidelines on exclusions
- ☐ (H) Guidelines on managing conflicts of interest related to responsible investment
- ☒ (I) Stewardship: Guidelines on engagement with investees
- ☐ (J) Stewardship: Guidelines on overall political engagement
- ☒ (K) Stewardship: Guidelines on engagement with other key stakeholders
- ☐ (M) Other responsible investment elements not listed here
  - ☐ (N) Our organisation does not have a formal responsible investment policy and/or our policy(ies) do not cover any responsible investment elements

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 2	CORE	PGS 1	Multiple, see guidance	PUBLIC	Responsible investment policy elements	1

Does your formal responsible investment policy(ies) include specific guidelines on systematic sustainability issues?

- ☒ (A) Specific guidelines on climate change (may be part of guidelines on environmental factors)
- ☒ (B) Specific guidelines on human rights (may be part of guidelines on social factors)
- ☒ (C) Specific guidelines on other systematic sustainability issues

Specify:

Health & Safety (H&S): Outlining guidelines on H&S risks for employees working on project sites during construction and operation. Inclusion of principal contractor H&S governance and responsibilities in project contracts. Implementation of H&S program during construction and operation, including H&S governance, controls, supervision, and monthly monitoring of H&S KPIs.  
Responsible Procurement (Supplier Code of Conduct): Outlining fundamental environmental, social and governance considerations and relevant requirements regarding human rights, labour standards & working conditions, health and safety—specifically for solar manufacturers and equipment suppliers.  
Human Rights: Ensuring respect for internationally recognised human rights across all project activities and business relationships. This includes embedding human rights due diligence processes in investment and procurement decisions, monitoring potential adverse impacts—particularly in relation to labour rights and supply chains—and addressing any violations through corrective actions or engagement with relevant stakeholders.

- (D) Our formal responsible investment policy(ies) does not include guidelines on systematic sustainability issues

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 3	CORE	PGS 1, PGS 2	N/A	PUBLIC	Responsible investment policy elements	6

#### Which elements of your formal responsible investment policy(ies) are publicly available?

☒ **(A) Overall approach to responsible investment**

Add link:

<https://www.susi-partners.com/en/sustainability/>

☒ **(B) Guidelines on environmental factors**

Add link:

<https://www.susi-partners.com/en/sustainability/>

☒ **(C) Guidelines on social factors**

Add link:

<https://www.susi-partners.com/en/sustainability/>

☒ **(D) Guidelines on governance factors**

Add link:

<https://www.susi-partners.com/en/sustainability/>

☒ **(E) Guidelines on sustainability outcomes**

Add link:

<https://www.susi-partners.com/en/sustainability/>

☒ **(F) Specific guidelines on climate change (may be part of guidelines on environmental factors)**

Add link:

<https://www.susi-partners.com/en/sustainability/>

☒ **(G) Specific guidelines on human rights (may be part of guidelines on social factors)**

Add link:

<https://www.susi-partners.com/en/sustainability/>

☒ **(H) Specific guidelines on other systematic sustainability issues**

Add link:

<https://www.susi-partners.com/en/sustainability/>

☐ **(I) Guidelines tailored to the specific asset class(es) we hold**

☒ **(J) Guidelines on exclusions**

Add link:

<https://www.susi-partners.com/en/sustainability/>

☒ **(L) Stewardship: Guidelines on engagement with investees**

Add link:

<https://www.susi-partners.com/en/sustainability/>

☒ **(N) Stewardship: Guidelines on engagement with other key stakeholders**

Add link:

<https://www.susi-partners.com/en/sustainability/>

- (Q) No elements of our formal responsible investment policy(ies) are publicly available

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 4	PLUS	PGS 1	N/A	PUBLIC	Responsible investment policy elements	1 – 6

**Does your formal responsible investment policy(ies) identify a link between your responsible investment activities and your fiduciary duties or equivalent obligations?**

☒ **(A) Yes**

Elaborate:

Our responsible investment approach is fundamentally anchored in our fiduciary duty to ensure long term value creation for our clients and their beneficiaries. For us, sustainability is about securing the long term viability of our investments, our fiduciary conduct, and our company as a whole, while promoting environmental integrity, economic resilience, and social well-being.

We recognise that investing responsibly is not only aligned with, but essential to, fulfilling our obligations as a fiduciary. Integrating sustainability considerations into every phase of our investment lifecycle, from origination and due diligence to asset management and exit, enhances our ability to identify risks, seize opportunities, and deliver resilient, risk adjusted returns. This integration supports the broader transition to a low carbon, climate resilient economy and helps safeguard the enduring value of the infrastructure assets we manage.

Our approach is rooted in a stakeholder centric ethos. We understand that infrastructure investment has wide ranging impacts, from communities and workers to governments and natural ecosystems. We therefore engage proactively with stakeholders to understand and mitigate adverse impacts, support inclusive economic development, and contribute to the long term prosperity of all those affected by our activities.

Our sustainable investing strategy goes beyond allocating capital to clean energy. It is defined by rigorous ESG due diligence, science based emissions targets, active stewardship, and a robust framework for impact measurement and management. We employ key performance indicators to track environmental outcomes such as emissions reductions, resource efficiency, and biodiversity impact, alongside social indicators like job quality, health and safety, and community engagement.

In doing so, we aim not only to meet our fiduciary obligations but to continuously raise the standard for sustainable infrastructure investing, aligning financial performance with real world impact in a way that endures over time.

- (B) No

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 5	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy elements	2

**Which elements are covered in your organisation's policy(ies) or guidelines on stewardship?**

☒ **(A) Overall stewardship objectives**

- ☒ (B) Prioritisation of specific ESG factors to be advanced via stewardship activities
- ☒ (C) Criteria used by our organisation to prioritise the investees, policy makers, key stakeholders, or other entities on which to focus our stewardship efforts
- ☐ (D) How different stewardship tools and activities are used across the organisation
- ☐ (E) Approach to escalation in stewardship
- ☒ (F) Approach to collaboration in stewardship
- ☒ (G) Conflicts of interest related to stewardship
- ☒ (H) How stewardship efforts and results are communicated across the organisation to feed into investment decision-making and vice versa
- ☐ (I) Other
- ☐ (J) None of the above elements is captured in our policy(ies) or guidelines on stewardship

## RESPONSIBLE INVESTMENT POLICY COVERAGE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 8	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy coverage	1

What percentage of your total AUM is covered by the below elements of your responsible investment policy(ies)?

### Combined AUM coverage of all policy elements

(A) Overall approach to responsible investment  
 (B) Guidelines on environmental factors  
 (C) Guidelines on social factors  
 (D) Guidelines on governance factors

(7) 100%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 9	CORE	PGS 2	N/A	PUBLIC	Responsible investment policy coverage	1

What proportion of your AUM is covered by your formal policies or guidelines on climate change, human rights, or other systematic sustainability issues?

### AUM coverage

(A) Specific guidelines on climate change

(1) for all of our AUM

(B) Specific guidelines on human rights

(1) for all of our AUM

(C) Specific guidelines on other systematic sustainability issues

(1) for all of our AUM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 10	CORE	OO 8, OO 9, PGS 1	N/A	PUBLIC	Responsible investment policy coverage	2

Per asset class, what percentage of your AUM is covered by your policy(ies) or guidelines on stewardship with investees?

☒ (E) Infrastructure

(1) Percentage of AUM covered

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%

☒ (11) 100%

## GOVERNANCE

### ROLES AND RESPONSIBILITIES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11	CORE	N/A	Multiple indicators	PUBLIC	Roles and responsibilities	1

Which senior level body(ies) or role(s) in your organisation have formal oversight over and accountability for responsible investment?

☒ (A) Board members, trustees, or equivalent

☒ (B) Senior executive-level staff, or equivalent

Specify:

Executive management

☒ (C) Investment committee, or equivalent

Specify:

Investment committees of respective funds comprising internal and external members

☒ (D) Head of department, or equivalent

Specify department:

Portfolio managers of respective funds and head of ESG & Sustainability department

○ (E) None of the above bodies and roles have oversight over and accountability for responsible investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11.1	CORE	PGS 1, PGS 2, PGS 11	N/A	PUBLIC	Roles and responsibilities	1, 2

**Does your organisation's senior level body(ies) or role(s) have formal oversight over and accountability for the elements covered in your responsible investment policy(ies)?**

	(1) Board members, trustees, or equivalent	(2) Senior executive-level staff, investment committee, head of department, or equivalent
(A) Overall approach to responsible investment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Guidelines on environmental, social and/or governance factors	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(C) Guidelines on sustainability outcomes	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(D) Specific guidelines on climate change (may be part of guidelines on environmental factors)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(E) Specific guidelines on human rights (may be part of guidelines on social factors)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(F) Specific guidelines on other systematic sustainability issues	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(G) Guidelines tailored to the specific asset class(es) we hold	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(H) Guidelines on exclusions	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(J) Stewardship: Guidelines on engagement with investees	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(L) Stewardship: Guidelines on engagement with other key stakeholders	<input type="checkbox"/>	<input checked="" type="checkbox"/>

(N) This role has no formal oversight over and accountability for any of the above elements covered in our responsible investment policy(ies)

○

○

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11.2	CORE	N/A	N/A	PUBLIC	Roles and responsibilities	1 – 6

**Does your organisation have governance processes or structures to ensure that your overall political engagement is aligned with your commitment to the principles of PRI, including any political engagement conducted by third parties on your behalf?**

- (A) Yes
- (B) No
- (C) **Not applicable, our organisation does not conduct any form of political engagement directly or through any third parties**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 12	CORE	N/A	N/A	PUBLIC	Roles and responsibilities	1

**In your organisation, which internal or external roles are responsible for implementing your approach to responsible investment?**

☒ (A) **Internal role(s)**

Specify:

Dedicated ESG & Sustainability team in collaboration with investment and portfolio service teams.

☐ (B) External investment managers, service providers, or other external partners or suppliers

○ (C) We do not have any internal or external roles with responsibility for implementing responsible investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 13	CORE	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

**Does your organisation use responsible investment KPIs to evaluate the performance of your board members, trustees, or equivalent?**

- (A) Yes, we use responsible investment KPIs to evaluate the performance of our board members, trustees, or equivalent
- (B) **No, we do not use responsible investment KPIs to evaluate the performance of our board members, trustees, or equivalent**

Explain why: (Voluntary)



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 14	CORE	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

**Does your organisation use responsible investment KPIs to evaluate the performance of your senior executive-level staff (or equivalent), and are these KPIs linked to compensation?**

☒ **(A) Yes, we use responsible investment KPIs to evaluate the performance of our senior executive-level staff (or equivalent)**

Indicate whether these responsible investment KPIs are linked to compensation

☒ **(1) KPIs are linked to compensation**

- ☐ (2) KPIs are not linked to compensation as these roles do not have variable compensation
- ☐ (3) KPIs are not linked to compensation even though these roles have variable compensation

Describe: (Voluntary)

- ☐ (B) No, we do not use responsible investment KPIs to evaluate the performance of our senior executive-level staff (or equivalent)

## EXTERNAL REPORTING AND DISCLOSURES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 16	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

**What elements are included in your regular reporting to clients and/or beneficiaries for the majority of your AUM?**

- ☒ **(A) Any changes in policies related to responsible investment**
- ☒ **(B) Any changes in governance or oversight related to responsible investment**
- ☐ (C) Stewardship-related commitments
- ☐ (D) Progress towards stewardship-related commitments
- ☒ **(E) Climate-related commitments**
- ☒ **(F) Progress towards climate-related commitments**
- ☒ **(G) Human rights-related commitments**
- ☒ **(H) Progress towards human rights-related commitments**
- ☒ **(I) Commitments to other systematic sustainability issues**
- ☒ **(J) Progress towards commitments on other systematic sustainability issues**
- ☐ (K) We do not include any of these elements in our regular reporting to clients and/or beneficiaries for the majority of our AUM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 17	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

**During the reporting year, did your organisation publicly disclose climate-related information in line with the Task Force on Climate-Related Financial Disclosures' (TCFD) recommendations?**

- ☒ **(A) Yes, including governance-related recommended disclosures**

- ☒ (B) Yes, including strategy-related recommended disclosures
  - ☒ (C) Yes, including risk management-related recommended disclosures
  - ☒ (D) Yes, including applicable metrics and targets-related recommended disclosures
  - ☐ (E) None of the above
- Add link(s):

<https://www.susi-partners.com/wp-content/uploads/2025/05/SUSI-Partners-Sustainability-Report-2024-2025.pdf>

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 18	PLUS	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, to which international responsible investment standards, frameworks, or regulations did your organisation report?

- ☒ (A) Disclosures against the European Union's Sustainable Finance Disclosure Regulation (SFDR)

Link to example of public disclosures

<https://www.susi-partners.com/en/products/>

- ☒ (B) Disclosures against the European Union's Taxonomy

Link to example of public disclosures

<https://www.susi-partners.com/en/products/>

- ☐ (C) Disclosures against the CFA's ESG Disclosures Standard

- ☒ (D) Disclosures against other international standards, frameworks or regulations

Specify:

GRI

Link to example of public disclosures

<https://www.susi-partners.com/wp-content/uploads/2025/05/SUSI-Partners-Sustainability-Report-2024-2025.pdf>

- ☐ (E) Disclosures against other international standards, frameworks or regulations

- ☐ (F) Disclosures against other international standards, frameworks or regulations

- ☐ (G) Disclosures against other international standards, frameworks or regulations

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 19	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, did your organisation publicly disclose its membership in and support for trade associations, think tanks or similar bodies that conduct any form of political engagement?

- ☒ (A) Yes, we publicly disclosed all of our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement

Add link(s):

<https://www.susi-partners.com/wp-content/uploads/2025/05/SUSI-Partners-Sustainability-Report-2024-2025.pdf>

- ☐ (B) Yes, we publicly disclosed some of our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement

- (C) No, we did not publicly disclose our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement
- (D) Not applicable, we were not members in or supporters of any trade associations, think tanks, or similar bodies that conduct any form of political engagement during the reporting year

## STRATEGY

### CAPITAL ALLOCATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 20	CORE	N/A	N/A	PUBLIC	Capital allocation	1

#### Which elements do your organisation-level exclusions cover?

- ☒ (A) Exclusions based on our organisation's values or beliefs regarding particular sectors, products or services
- ☐ (B) Exclusions based on our organisation's values or beliefs regarding particular regions or countries
- ☒ (C) Exclusions based on minimum standards of business practice aligned with international norms such as the OECD Guidelines for Multinational Enterprises, the International Bill of Human Rights, UN Security Council sanctions or the UN Global Compact
- ☒ (D) Exclusions based on our organisation's climate change commitments
- ☐ (E) Other elements
- (F) Not applicable; our organisation does not have any organisation-level exclusions

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 21	CORE	N/A	N/A	PUBLIC	Capital allocation	1

#### How does your responsible investment approach influence your strategic asset allocation process?

- ☒ (A) We incorporate ESG factors into our assessment of expected asset class risks and returns  
Select from dropdown list:
  - ☒ (1) for all of our AUM subject to strategic asset allocation
  - (2) for a majority of our AUM subject to strategic asset allocation
  - (3) for a minority of our AUM subject to strategic asset allocation
- ☒ (B) We incorporate climate change-related risks and opportunities into our assessment of expected asset class risks and returns  
Select from dropdown list:
  - ☒ (1) for all of our AUM subject to strategic asset allocation
  - (2) for a majority of our AUM subject to strategic asset allocation
  - (3) for a minority of our AUM subject to strategic asset allocation
- ☒ (C) We incorporate human rights-related risks and opportunities into our assessment of expected asset class risks and returns  
Select from dropdown list:
  - ☒ (1) for all of our AUM subject to strategic asset allocation
  - (2) for a majority of our AUM subject to strategic asset allocation
  - (3) for a minority of our AUM subject to strategic asset allocation
- ☒ (D) We incorporate risks and opportunities related to other systematic sustainability issues into our assessment of expected asset class risks and returns  
Select from dropdown list:
  - (1) for all of our AUM subject to strategic asset allocation
  - ☒ (2) for a majority of our AUM subject to strategic asset allocation

- (3) for a minority of our AUM subject to strategic asset allocation  
Specify: (Voluntary)
- (E) We do not incorporate ESG factors, climate change, human rights or other systematic sustainability issues into our assessment of expected asset class risks and returns
- (F) Not applicable; we do not have a strategic asset allocation process

## STEWARDSHIP: OVERALL STEWARDSHIP STRATEGY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 22	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

**For the majority of AUM within each asset class, which of the following best describes your primary stewardship objective?**

### (5) Infrastructure

(A) Maximise our portfolio-level risk-adjusted returns. In doing so, we seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues.



(B) Maximise our individual investments' risk-adjusted returns. In doing so, we do not seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues.



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 23	PLUS	OO 5, OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

**How does your organisation, or the external service providers or external managers acting on your behalf, prioritise the investees or other entities on which to focus its stewardship efforts?**

We prioritise our stewardship efforts based on a strategic, data driven approach that aligns closely with our overarching ESG and sustainability objectives. This approach ensures that our engagement and active ownership activities are focused where they can deliver the most meaningful and measurable impact across our infrastructure investments.

**Materiality Assessment** We begin with a comprehensive materiality assessment to identify the ESG issues most relevant to our portfolio. This involves analysing sector specific risks, regulatory developments, and stakeholder expectations to determine where our stewardship can address material sustainability challenges and support long term value creation.

**Risk and Opportunity Analysis** We then evaluate each investee's ESG risk profile and potential for positive ESG contribution. Priority is given to entities with heightened exposure to sustainability related risks, such as climate transition, governance deficiencies, or social impact concerns, as well as those that offer clear opportunities for progress through targeted engagement.

**Performance Monitoring and Reporting** Ongoing monitoring of ESG performance, coupled with structured reporting and feedback mechanisms, allows us to track the effectiveness of our stewardship efforts. These insights inform regular recalibration of our engagement priorities, ensuring we continually align our stewardship strategy with evolving risks, opportunities, and portfolio needs.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 25	PLUS	OO 5, OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

**Rank the channels that are most important for your organisation in achieving its stewardship objectives.**

☒ **(A) Internal resources, e.g. stewardship team, investment team, ESG team, or staff**

Select from the list:

- ☒ 1
- ☐ 4
- ☐ 5

☐ (B) External investment managers, third-party operators and/or external property managers, if applicable

☐ (C) External paid specialist stewardship services (e.g. engagement overlay services or, in private markets, sustainability consultants) excluding investment managers, real assets third-party operators, or external property managers

☒ **(D) Informal or unstructured collaborations with investors or other entities**

Select from the list:

- ☒ 2
- ☐ 4
- ☐ 5

☒ **(E) Formal collaborative engagements, e.g. PRI-coordinated collaborative engagements, Climate Action 100+, or similar**

Select from the list:

- ☒ 3
- ☐ 4
- ☐ 5

☐ (F) We do not use any of these channels

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 27	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

#### How are your organisation's stewardship activities linked to your investment decision making, and vice versa?

Our stewardship activities are fully integrated into our investment decision making processes, reflecting our belief that active ownership is essential to long term value creation and risk management. This integration enables us to make informed decisions, enhance asset performance, and support sustainable outcomes across our infrastructure portfolio.

Pre-Investment Integration Stewardship considerations are embedded at the earliest stages of our investment process. During due diligence, we assess each potential investment for material ESG risks and opportunities, including the strength of governance structures, environmental compliance, and stakeholder relationships. This analysis informs investment committee decisions and helps shape post-acquisition value creation plans, including initial stewardship priorities.

Post-Investment Engagement Following investment, our stewardship efforts become a core element of active asset management. We engage with management teams, co-investors, and operating partners to address ESG risks, support continuous improvement, and align business practices with long term sustainability objectives. These engagements often focus on areas such as climate resilience, community impact, health and safety, and governance effectiveness.

Feedback into Investment Decisions Insights gained through stewardship inform ongoing investment decisions, including capital allocation, risk assessments, and exit strategies. For instance, progress (or lack thereof) on key ESG indicators may influence asset-level business plans or factor into divestment considerations. Where feasible, we also use stewardship outcomes to refine our ESG screening criteria and improve our investment frameworks.

Governance and Accountability Our investment and stewardship teams work closely together, supported by clear governance structures that promote accountability and knowledge sharing. Regular reporting ensures that ESG and stewardship considerations are visible at all levels of decision making, from asset management to board oversight.

## STEWARDSHIP: ENGAGEMENT WITH POLICY MAKERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39	CORE	OO 8, OO 9	PGS 39.1, PGS 39.2	PUBLIC	Stewardship: Engagement with policy makers	2

#### Did your organisation, or the external investment managers or service providers acting on your behalf, engage with policy makers as part of your responsible investment approach during the reporting year?

- ☐ (A) Yes, we engaged with policy makers directly
- ☒ (B) Yes, we engaged with policy makers through the leadership of or active participation in working groups or collaborative initiatives, including via the PRI
- ☒ (C) Yes, we were members of, supported, or were in another way affiliated with third party organisations, including trade associations and non-profit organisations, that engage with policy makers, excluding the PRI
- ☐ (D) We did not engage with policy makers directly or indirectly during the reporting year beyond our membership in the PRI

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39.1	CORE	PGS 39	N/A	PUBLIC	Stewardship: Engagement with policy makers	2

During the reporting year, what methods did you, or the external investment managers or service providers acting on your behalf, use to engage with policy makers as part of your responsible investment approach?

- ☒ (A) We participated in 'sign-on' letters
- ☒ (B) We responded to policy consultations
- ☐ (C) We provided technical input via government- or regulator-backed working groups
- ☐ (D) We engaged policy makers on our own initiative
- ☐ (E) Other methods

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39.2	CORE	PGS 39	N/A	PUBLIC	Stewardship: Engagement with policy makers	2

During the reporting year, did your organisation publicly disclose details of your engagement with policy makers conducted as part of your responsible investment approach, including through external investment managers or service providers?

- ☒ (A) We publicly disclosed all our policy positions

Add link(s):

<https://www.susi-partners.com/wp-content/uploads/2025/05/SUSI-Partners-Sustainability-Report-2024-2025.pdf>  
<https://www.susi-partners.com/en/sustainability/>

- ☐ (B) We publicly disclosed details of our engagements with policy makers
  - ☐ (C) No, we did not publicly disclose details of our engagement with policy makers conducted as part of our responsible investment approach during the reporting year

## STEWARDSHIP: EXAMPLES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 40	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Examples	2

Provide examples of stewardship activities that you conducted individually or collaboratively during the reporting year that contributed to desired changes in the investees, policy makers or other entities with which you interacted.

(A) Example 1:

Title of stewardship activity:

Position Paper Impact Investing in Infrastructure

(1) Led by

- ☒ (1) Internally led
- ☐ (2) External service provider led
- ☐ (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- ☐ (1) Environmental factors
- ☐ (2) Social factors
- ☒ (3) Governance factors

(3) Asset class(es)

- ☐ (1) Listed equity
- ☐ (2) Fixed income
- ☐ (3) Private equity
- ☐ (4) Real estate
- ☒ (5) Infrastructure
- ☐ (6) Hedge funds
- ☐ (7) Forestry
- ☐ (8) Farmland
- ☐ (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

[https://www.bvai.de/fileadmin/Veroeffentlichungen/BAI\\_Publikationen/Positionspapiere/BAI\\_BIII\\_Position\\_Paper\\_Impact\\_Investing\\_in\\_Infrastruktur.pdf](https://www.bvai.de/fileadmin/Veroeffentlichungen/BAI_Publikationen/Positionspapiere/BAI_BIII_Position_Paper_Impact_Investing_in_Infrastruktur.pdf)

(B) Example 2:

Title of stewardship activity:

Quantifying Potential Avoided Emissions 2024

(1) Led by

- ☒ (1) Internally led
- ☐ (2) External service provider led
- ☐ (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- ☐ (1) Environmental factors
- ☒ (2) Social factors
- ☐ (3) Governance factors

(3) Asset class(es)

- ☐ (1) Listed equity
- ☐ (2) Fixed income
- ☐ (3) Private equity
- ☐ (4) Real estate
- ☒ (5) Infrastructure
- ☐ (6) Hedge funds
- ☐ (7) Forestry
- ☐ (8) Farmland
- ☐ (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

We regularly publish relevant sustainability-related content to facilitate industry-wide alignment.

(C) Example 3:

Title of stewardship activity:

Client Engagement

(1) Led by

- ☒ (1) Internally led
- ☐ (2) External service provider led
- ☐ (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- ☒ (1) Environmental factors
- ☐ (2) Social factors
- ☐ (3) Governance factors

(3) Asset class(es)

- ☐ (1) Listed equity



- ☐ (2) Fixed income
- ☐ (3) Private equity
- ☐ (4) Real estate
- ☒ (5) Infrastructure
- ☐ (6) Hedge funds
- ☐ (7) Forestry
- ☐ (8) Farmland
- ☐ (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

We regularly provide insights into our practices through exclusive client webinars and engage on sustainability matters in meetings and dedicated client events.

(D) Example 4:

Title of stewardship activity:

- (1) Led by
  - o (1) Internally led
  - o (2) External service provider led
  - o (3) Led by an external investment manager, real assets third-party operator and/or external property manager
- (2) Primary focus of stewardship activity
  - ☐ (1) Environmental factors
  - ☐ (2) Social factors
  - ☐ (3) Governance factors
- (3) Asset class(es)
  - ☐ (1) Listed equity
  - ☐ (2) Fixed income
  - ☐ (3) Private equity
  - ☐ (4) Real estate
  - ☐ (5) Infrastructure
  - ☐ (6) Hedge funds
  - ☐ (7) Forestry
  - ☐ (8) Farmland
  - ☐ (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

(E) Example 5:

Title of stewardship activity:

- (1) Led by
  - o (1) Internally led
  - o (2) External service provider led
  - o (3) Led by an external investment manager, real assets third-party operator and/or external property manager
- (2) Primary focus of stewardship activity
  - ☐ (1) Environmental factors
  - ☐ (2) Social factors
  - ☐ (3) Governance factors
- (3) Asset class(es)
  - ☐ (1) Listed equity
  - ☐ (2) Fixed income
  - ☐ (3) Private equity
  - ☐ (4) Real estate
  - ☐ (5) Infrastructure
  - ☐ (6) Hedge funds
  - ☐ (7) Forestry
  - ☐ (8) Farmland
  - ☐ (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

## CLIMATE CHANGE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 41	CORE	N/A	PGS 41.1	PUBLIC	Climate change	General

### Has your organisation identified climate-related risks and opportunities affecting your investments?

☒ (A) Yes, within our standard planning horizon

Specify the risks and opportunities identified and your relevant standard planning horizon:

While the low-carbon transition presents investment opportunities for our clean energy infrastructure strategies, our investments can also be affected by climate-related risks. Although our investments are rarely exposed to transition risks, we consider potential risks in this category where applicable. Identifying transition opportunities is a key aspect of our clean energy infrastructure strategies. However, due to the nature of our investments, we prioritize assessing physical risks, which include potential impacts such as flooding, storms, drought, and sea level rise, and can be acute or chronic. To assess physical risks, we have implemented a predefined matrix to evaluate our portfolios. This process occurs both pre-investment and post-investment and covers the entire technical lifetime of each asset. We incorporate data from technical due diligence and environmental impact assessments to produce an aggregated risk measure for all analysed investments.

☐ (B) Yes, beyond our standard planning horizon

☐ (C) No, we have not identified climate-related risks and/or opportunities affecting our investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 41.1	CORE	PGS 41	N/A	PUBLIC	Climate change	General

### Does your organisation integrate climate-related risks and opportunities affecting your investments in its overall investment strategy, financial planning and (if relevant) products?

☒ (A) Yes, our overall investment strategy, financial planning and (if relevant) products integrate climate-related risks and opportunities

Describe how climate-related risks and opportunities have affected or are expected to affect your investment strategy, financial planning and (if relevant) products:

As a long-term investor managing multiple clean energy infrastructure funds, we recognize climate change as both a significant risk and a significant opportunity. Climate-related risks can impact us at various stages of our business. In the short and medium term, we are exposed to potential physical and transition risks during the ownership of our investments. Since 100% of our assets under management (AuM) are invested in clean energy infrastructure to support the global energy transition, we will continue to focus on this sector. A central pillar of our strategy is engaging with each asset to set tailored decarbonization plans that contribute to our overall net zero goal. We already engage with our investee companies on areas such as climate resilience through our annual ESG path questionnaire and have been measuring GHG emissions footprints since last year. In the months and years ahead, we aim to support investee companies in developing and implementing credible decarbonization plans. An integral part of our strategy involves 'walking our talk' as an organization. Since 2020, we have been measuring our own GHG emissions, taking steps to reduce them where possible, and offsetting the remainder. This comprehensive approach ensures that we address climate-related risks while capitalizing on opportunities in the clean energy sector.

☐ (B) No, our organisation has not yet integrated climate-related risks and opportunities into its investment strategy, financial planning and (if relevant) products

#### Additional context to your response(s): (Voluntary)

Additional information can be found in our TCFD disclosure as part of our annual Sustainability Report.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 42	PLUS	N/A	N/A	PUBLIC	Climate change	General

**Which sectors are covered by your organisation's strategy addressing high-emitting sectors?**

- ☐ (A) Coal
- ☐ (B) Gas
- ☐ (C) Oil
- ☐ (D) Utilities
- ☐ (E) Cement
- ☐ (F) Steel
- ☐ (G) Aviation
- ☐ (H) Heavy duty road
- ☐ (I) Light duty road
- ☐ (J) Shipping
- ☐ (K) Aluminium
- ☐ (L) Agriculture, forestry, fishery
- ☐ (M) Chemicals
- ☐ (N) Construction and buildings
- ☐ (O) Textile and leather
- ☐ (P) Water
- ☒ (Q) Other

Specify:

As we are investing within the energy transition space exclusively, as per our investment strategy we do not invest in high emitters, but rather provide financing to alternatives to high emitting sectors.

Describe your strategy:

- o (R) We do not have a strategy addressing high-emitting sectors

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 43	CORE	N/A	N/A	PUBLIC	Climate change	General

**Has your organisation assessed the resilience of its investment strategy in different climate scenarios, including one in which the average temperature rise is held to below 2 degrees Celsius (preferably to 1.5 degrees Celsius) above pre-industrial levels?**

- ☐ (A) Yes, using the Inevitable Policy Response Forecast Policy Scenario (FPS) or Required Policy Scenario (RPS)
- ☐ (B) Yes, using the One Earth Climate Model scenario
- ☒ (C) Yes, using the International Energy Agency (IEA) Net Zero scenario
- ☐ (D) Yes, using other scenarios
- o (E) No, we have not assessed the resilience of our investment strategy in different climate scenarios, including one that holds temperature rise to below 2 degrees

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 44	CORE	N/A	N/A	PUBLIC	Climate change	General

**Does your organisation have a process to identify, assess, and manage the climate-related risks (potentially) affecting your investments?**

☒ **(A) Yes, we have a process to identify and assess climate-related risks**

(1) Describe your process

The identification, measurement, and management of climate-related risks and opportunities are integral to our ESG approach and budget. Furthermore, our investment committees provide a formal opinion on investment opportunities that may have significant climate-related risk exposure. During the pre-investment due diligence phase, our ESG screening tool is applied to identify and flag potential climate-related risks. The ESG team challenges the investment teams on their identification of these risks and advises on additional due diligence to be conducted.

(2) Describe how this process is integrated into your overall risk management

Our Board of Directors and Executive Management are ultimately responsible for SUSI Partners' strategy, which encompasses climate-related risks and opportunities. Oversight is provided by the Sustainability Committee, which includes our CEO and Co-CIOs and dedicated sustainability professionals with investment and consulting expertise. This group leads our efforts to integrate the principles of sustainability into our climate strategy, continually reviewing and enhancing our frameworks, and contributing to industry discourse and thought leadership on these matters.

At the investment level, the process described above is fully integrated into our established ESG due diligence, which we perform on every investment opportunity, covering a wide array of potential risks. We believe that an integrated ESG risk assessment, which includes climate-related risks along with other potential risk factors, ultimately provides a comprehensive overall risk assessment. Climate risk can be interlinked with other potential risks and can certainly lead to financial risk over the medium to long-term horizon. Given that we invest in clean energy infrastructure with lifetime expectations of 30 years or more, we believe that addressing climate-related risks within our established risk management framework results in a comprehensive and meaningful risk assessment.

☒ **(B) Yes, we have a process to manage climate-related risks**

(1) Describe your process

Our ESG team, in collaboration with the respective investment team, is responsible for ensuring the implementation of our climate risk management procedures. Post-investment, the ESG and Asset Management teams are tasked with executing the ESG path. This includes measuring climate-related physical and transition risks using our climate change matrix, supporting assets in measuring their GHG footprint with tools and consultancy support, and actively engaging with investments on climate resilience. Additionally, the ESG team ensures that sufficient resources (tools and consultancy support) are available for climate-related risk management and provides training on climate change to the broader SUSI Partners team. This training is now a mandatory part of the onboarding process for each new employee.

(2) Describe how this process is integrated into your overall risk management

Based on the initial risk assessment described above, each investment receives a dedicated implementation plan that addresses all identified risks from the due diligence phase, along with a risk mitigation strategy. Post-investment, we collaborate with the investee to develop a specific implementation plan, supported by various internal teams, such as the ESG team and our dedicated Asset Management team. As mentioned, climate-related risks and their management are fully integrated into our established risk management procedures, which we believe provide the right framework for our investments.

☐ **(C) No, we do not have any processes to identify, assess, or manage the climate-related risks affecting our investments**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 45	CORE	N/A	N/A	PUBLIC	Climate change	General

During the reporting year, which of the following climate risk metrics or variables affecting your investments did your organisation use and publicly disclose?

☒ (A) **Exposure to physical risk**

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology
  - (1) Metric or variable used
  - (2) **Metric or variable used and disclosed**
  - (3) Metric or variable used and disclosed, including methodology
- (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

<https://www.susi-partners.com/wp-content/uploads/2025/05/SUSI-Partners-Sustainability-Report-2024-2025.pdf>

☒ (B) **Exposure to transition risk**

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology
  - (1) **Metric or variable used**
  - (2) Metric or variable used and disclosed
  - (3) Metric or variable used and disclosed, including methodology

☐ (C) Internal carbon price

☐ (D) Total carbon emissions

☐ (E) Weighted average carbon intensity

☒ (F) **Avoided emissions**

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology
  - (1) Metric or variable used
  - (2) Metric or variable used and disclosed
  - (3) **Metric or variable used and disclosed, including methodology**
- (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

<https://www.susi-partners.com/wp-content/uploads/2025/05/SUSI-Partners-Sustainability-Report-2024-2025.pdf>

☐ (G) Implied Temperature Rise (ITR)

☐ (H) Non-ITR measure of portfolio alignment with UNFCCC Paris Agreement goals

☒ (I) **Proportion of assets or other business activities aligned with climate-related opportunities**

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology
  - (1) Metric or variable used
  - (2) **Metric or variable used and disclosed**
  - (3) Metric or variable used and disclosed, including methodology
- (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

<https://www.susi-partners.com/wp-content/uploads/2025/05/SUSI-Partners-Sustainability-Report-2024-2025.pdf>

☐ (J) Other metrics or variables

- (K) Our organisation did not use or publicly disclose any climate risk metrics or variables affecting our investments during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 46	CORE	N/A	N/A	PUBLIC	Climate change	General

During the reporting year, did your organisation publicly disclose its Scope 1, Scope 2, and/or Scope 3 greenhouse gas emissions?

☒ (A) Scope 1 emissions

- (1) Indicate whether this metric was disclosed, including the methodology
  - ☒ (1) Metric disclosed
  - ☐ (2) Metric and methodology disclosed
- (2) Provide links to the disclosed metric and methodology, as applicable

<https://www.susi-partners.com/wp-content/uploads/2025/05/SUSI-Partners-Sustainability-Report-2024-2025.pdf>

☒ (B) Scope 2 emissions

- (1) Indicate whether this metric was disclosed, including the methodology
  - ☒ (1) Metric disclosed
  - ☐ (2) Metric and methodology disclosed
- (2) Provide links to the disclosed metric and methodology, as applicable

<https://www.susi-partners.com/wp-content/uploads/2025/05/SUSI-Partners-Sustainability-Report-2024-2025.pdf>

☒ (C) Scope 3 emissions (including financed emissions)

- (1) Indicate whether this metric was disclosed, including the methodology
  - ☒ (1) Metric disclosed
  - ☐ (2) Metric and methodology disclosed
- (2) Provide links to the disclosed metric and methodology, as applicable

<https://www.susi-partners.com/wp-content/uploads/2025/05/SUSI-Partners-Sustainability-Report-2024-2025.pdf>

- ☐ (D) Our organisation did not publicly disclose its Scope 1, Scope 2, or Scope 3 greenhouse gas emissions during the reporting year

## SUSTAINABILITY OUTCOMES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47	CORE	N/A	Multiple indicators	PUBLIC	Sustainability outcomes	1, 2

Has your organisation identified the intended and unintended sustainability outcomes connected to its investment activities?

- ☒ (A) Yes, we have identified one or more specific sustainability outcomes connected to our investment activities
- ☐ (B) No, we have not yet identified the sustainability outcomes connected to any of our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47.1	CORE	PGS 47	N/A	PUBLIC	Sustainability outcomes	1, 2

Which widely recognised frameworks has your organisation used to identify the intended and unintended sustainability outcomes connected to its investment activities?

- ☒ (A) The UN Sustainable Development Goals (SDGs) and targets
- ☐ (B) The UNFCCC Paris Agreement
- ☒ (C) The UN Guiding Principles on Business and Human Rights (UNGPs)
- ☒ (D) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- ☒ (E) The EU Taxonomy
- ☐ (F) Other relevant taxonomies
- ☐ (G) The International Bill of Human Rights
- ☐ (H) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- ☐ (I) The Convention on Biological Diversity
- ☐ (J) Other international framework(s)
- ☐ (K) Other regional framework(s)
- ☐ (L) Other sectoral/issue-specific framework(s)
- ☐ (M) Our organisation did not use any widely recognised frameworks to identify the intended and unintended sustainability outcomes connected to its investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47.2	CORE	PGS 47	PGS 48	PUBLIC	Sustainability outcomes	1, 2

What are the primary methods that your organisation has used to determine the most important intended and unintended sustainability outcomes connected to its investment activities?

- ☒ (A) Identify sustainability outcomes that are closely linked to our core investment activities
- ☒ (B) Consult with key clients and/or beneficiaries to align with their priorities
- ☒ (C) Assess which actual or potential negative outcomes for people are most severe based on their scale, scope, and irremediable character
- ☐ (D) Identify sustainability outcomes that are closely linked to systematic sustainability issues
- ☒ (E) Analyse the input from different stakeholders (e.g. affected communities, civil society, trade unions or similar)
- ☐ (F) Understand the geographical relevance of specific sustainability outcome objectives
- ☐ (G) Other method
- ☐ (H) We have not yet determined the most important sustainability outcomes connected to our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 48	CORE	PGS 47.2	PGS 48.1, SO 1	PUBLIC	Sustainability outcomes	1, 2

Has your organisation taken action on any specific sustainability outcomes connected to its investment activities, including to prevent and mitigate actual and potential negative outcomes?

- ☒ (A) Yes, we have taken action on some of the specific sustainability outcomes connected to our investment activities

- (B) No, we have not yet taken action on any specific sustainability outcomes connected to our investment activities

#### Additional context to your response(s): (Voluntary)

To mitigate social risks and foster positive outcomes at the local level: We work with investees to implement community engagement plans early in the project lifecycle to identify concerns, secure buy-in, and minimise resistance. We promote local employment and community benefit-sharing mechanisms, especially for projects in rural or underserved areas. Where potential adverse effects on communities are identified—such as construction-related disruptions—we monitor response plans and grievance mechanisms as part of ongoing ESG oversight.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 48.1	PLUS	PGS 48	N/A	PUBLIC	Sustainability outcomes	1, 2

#### Why has your organisation taken action on specific sustainability outcomes connected to its investment activities?

- ☒ (A) We believe that taking action on sustainability outcomes is relevant to our financial risks and returns over both short- and long-term horizons
- ☐ (B) We believe that taking action on sustainability outcomes, although not yet relevant to our financial risks and returns, will become so over a long-time horizon
- ☒ (C) We have been requested to do so by our clients and/or beneficiaries
- ☒ (D) We want to prepare for and respond to legal and regulatory developments that are increasingly addressing sustainability outcomes
- ☐ (E) We want to protect our reputation, particularly in the event of negative sustainability outcomes connected to investments
- ☐ (F) We want to enhance our social licence-to-operate (i.e. the trust of beneficiaries, clients, and other stakeholders)
- ☒ (G) We believe that taking action on sustainability outcomes in parallel to financial return goals has merit in its own right
- ☐ (H) Other

## HUMAN RIGHTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 49	PLUS	PGS 47	PGS 49.1	PUBLIC	Human rights	1, 2

#### During the reporting year, what steps did your organisation take to identify and take action on the actual and potential negative outcomes for people connected to your investment activities?

- ☐ (A) We assessed the country level context of our potential and/or existing investments to understand how this could connect our organisation to negative human rights outcomes
- ☒ (B) We assessed the sector context of our potential and/or existing investments to understand how this could connect our organisation to negative human rights outcomes

Explain how these activities were conducted:

Ensuring high ESG standards across our supply chain is a core priority of our responsible investment approach. In recognition of the critical risks associated with sourcing in the energy transition sector, we have established a dedicated Responsible Procurement Policy that sets clear expectations for traceability, human rights, and ethical business conduct. All portfolio companies are required to formally acknowledge and implement this policy. This creates a consistent baseline for managing ESG risks across both direct suppliers and extended value chains. The policy is reinforced through the integration of ESG due diligence questionnaires into all procurement processes—particularly for high-risk components such as solar panels, battery cells, and other goods linked to human rights concerns.



To further improve transparency and accountability, we have:

- Conducted comprehensive supply chain mapping to identify key ESG risk hotspots,
- Sourced external ESG data on suppliers and subcontractors, and
- Commissioned independent third-party ESG audits where appropriate.

In parallel, we are developing a robust supplier analysis and ranking framework, which will enable systematic risk scoring and help prioritise engagement with suppliers based on their ESG performance. These efforts not only mitigate reputational and operational risks but also help protect and enhance the long-term value of our investments.

By raising supply chain standards and promoting greater transparency, we aim to contribute to a more ethical, resilient, and sustainable energy transition.

- ☐ (C) We assessed the human rights performance of our potential and/or existing investments to understand how this could connect our organisation to negative human rights outcomes
- ☐ (D) We monitored severe and emerging human rights controversies to understand how this could connect our organisation to negative human rights outcomes
- ☐ (E) We took other steps to assess and manage the actual and potentially negative outcomes for people connected to our investment activities
  - (F) We did not identify and take action on the actual and potentially negative outcomes for people connected to any of our investment activities during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 49.1	PLUS	PGS 49	N/A	PUBLIC	Human rights	1, 2

**During the reporting year, which stakeholder groups did your organisation include when identifying and taking action on the actual and potential negative outcomes for people connected to your investment activities?**

☒ **(A) Workers**

Sector(s) for which each stakeholder group was included

- ☒ **(1) Energy**
- ☐ (2) Materials
- ☐ (3) Industrials
- ☐ (4) Consumer discretionary
- ☐ (5) Consumer staples
- ☐ (6) Healthcare
- ☐ (7) Finance
- ☐ (8) Information technology
- ☐ (9) Communication services
- ☐ (10) Utilities
- ☐ (11) Real estate

☒ **(B) Communities**

Sector(s) for which each stakeholder group was included

- ☒ **(1) Energy**
- ☐ (2) Materials
- ☐ (3) Industrials
- ☐ (4) Consumer discretionary
- ☐ (5) Consumer staples
- ☐ (6) Healthcare
- ☐ (7) Finance
- ☐ (8) Information technology
- ☐ (9) Communication services
- ☐ (10) Utilities
- ☐ (11) Real estate

- ☐ (C) Customers and end-users
- ☐ (D) Other stakeholder groups

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 49.2	PLUS	PGS 47	N/A	PUBLIC	Human rights	1, 2

**During the reporting year, what information sources did your organisation use to identify the actual and potential negative outcomes for people connected to its investment activities?**

- ☒ **(A) Corporate disclosures**  
Provide further detail on how your organisation used these information sources:
- ☒ **(B) Media reports**  
Provide further detail on how your organisation used these information sources:
- ☒ **(C) Reports and other information from NGOs and human rights institutions**  
Provide further detail on how your organisation used these information sources:
- ☐ (D) Country reports, for example, by multilateral institutions, e.g. OECD, World Bank
- ☐ (E) Data provider scores or benchmarks
- ☒ **(F) Human rights violation alerts**  
Provide further detail on how your organisation used these information sources:
- ☐ (G) Sell-side research
- ☐ (H) Investor networks or other investors
- ☒ **(I) Information provided directly by affected stakeholders or their representatives**  
Provide further detail on how your organisation used these information sources:
- ☐ (J) Social media analysis
- ☐ (K) Other

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 50	PLUS	PGS 47	N/A	PUBLIC	Human rights	1, 2

**During the reporting year, did your organisation, directly or through influence over investees, enable access to remedy for people affected by negative human rights outcomes connected to your investment activities?**

- ☐ (A) Yes, we enabled access to remedy directly for people affected by negative human rights outcomes we caused or contributed to through our investment activities
- ☒ **(B) Yes, we used our influence to ensure that our investees provided access to remedies for people affected by negative human rights outcomes we were linked to through our investment activities**  
Describe:
  - o (C) No, we did not enable access to remedy directly, or through the use of influence over investees, for people affected by negative human rights outcomes connected to our investment activities during the reporting year

# INFRASTRUCTURE (INF)

## POLICY

### INVESTMENT GUIDELINES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 1	CORE	OO 21, OO 29, OO 30	N/A	PUBLIC	Investment guidelines	1 to 6

What infrastructure-specific ESG guidelines are currently covered in your organisation's responsible investment policy(ies)?

- ☒ (A) Guidelines on our ESG approach tailored to each infrastructure sector and geography where we invest
- ☐ (B) Guidelines on our ESG approach to greenfield investments
- ☐ (C) Guidelines on our ESG approach to brownfield investments
- ☒ (D) Guidelines on pre-investment screening
- ☐ (E) Guidelines on our approach to ESG integration into short-term or 100-day plans (or equivalent)
- ☒ (F) Guidelines on our approach to ESG integration into long-term value-creation efforts
- ☒ (G) Guidelines on our approach to ESG reporting
- ☒ (H) Guidelines on our engagement approach related to the workforce
- ☐ (I) Guidelines on our engagement approach related to third-party operators
- ☒ (J) Guidelines on our engagement approach related to contractors
- ☒ (K) Guidelines on our engagement approach related to other external stakeholders, e.g. governments, local communities, and end-users
  - ☐ (L) Our responsible investment policy(ies) does not cover infrastructure-specific ESG guidelines

## FUNDRAISING

### COMMITMENTS TO INVESTORS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 2	CORE	OO 21	N/A	PUBLIC	Commitments to investors	1, 4

For all of the funds that you closed during the reporting year, what type of formal responsible investment commitments did you make in Limited Partnership Agreements (LPAs), side letters, or other constitutive fund documents?

- ☒ (A) We incorporated responsible investment commitments in LPAs (or equivalent) as a standard default procedure
- ☐ (B) We added responsible investment commitments in LPAs (or equivalent) upon a client's request
- ☐ (C) We added responsible investment commitments in side letters upon a client's request
- ☐ (D) We did not make any formal responsible investment commitments for the relevant reporting year
- ☐ (E) Not applicable; we have not raised funds in the last five years

## PRE-INVESTMENT

### MATERIALITY ANALYSIS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 3	CORE	OO 21	INF 3.1	PUBLIC	Materiality analysis	1

During the reporting year, how did you conduct ESG materiality analysis for your potential infrastructure investments?

☒ (A) We assessed ESG materiality at the asset level, as each case is unique

Select from dropdown list

- ☒ (1) for all of our potential infrastructure investments
  - ☐ (2) for a majority of our potential infrastructure investments
  - ☐ (3) for a minority of our potential infrastructure investments
- ☐ (B) We performed a mix of industry-level and asset-level ESG materiality analyses
- ☐ (C) We assessed ESG materiality at the industry level only
- ☐ (D) We did not conduct ESG materiality analysis for our potential infrastructure investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 3.1	CORE	INF 3	N/A	PUBLIC	Materiality analysis	1

During the reporting year, what tools, standards and data did you use in your ESG materiality analysis of potential infrastructure investments?

- ☒ (A) We used GRI standards to inform our infrastructure ESG materiality analysis
- ☐ (B) We used SASB standards to inform our infrastructure ESG materiality analysis
- ☒ (C) We used the UN Sustainable Development Goals (SDGs) to inform our infrastructure ESG materiality analysis
- ☐ (D) We used the GRESB Materiality Assessment (RC7) or similar to inform our infrastructure ESG materiality analysis
- ☒ (E) We used the environmental and social factors detailed in the IFC Performance Standards (or similar standards used by development finance institutions) in our infrastructure ESG materiality analysis
- ☒ (F) We used climate disclosures, such as the TCFD recommendations or other climate risk and/or exposure analysis tools, to inform our infrastructure ESG materiality analysis
- ☒ (G) We used the UN Guiding Principles on Business and Human Rights (UNGPs) to inform our infrastructure ESG materiality analysis
- ☐ (H) We used geopolitical and macro-economic considerations in our infrastructure ESG materiality analysis
- ☐ (I) We engaged with existing owners and/or managers (or developers for new infrastructure assets) to inform our infrastructure ESG materiality analysis
- ☐ (J) Other

## DUE DILIGENCE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
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INF 4	CORE	OO 21	N/A	PUBLIC	Due diligence	1
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During the reporting year, how did material ESG factors influence the selection of your infrastructure investments?

- ☒ (A) Material ESG factors were used to identify risks
  - Select from dropdown list
    - ☒ (1) for all of our potential infrastructure investments
    - ☐ (2) for a majority of our potential infrastructure investments
    - ☐ (3) for a minority of our potential infrastructure investments
- ☒ (B) Material ESG factors were discussed by the investment committee (or equivalent)
  - Select from dropdown list
    - ☒ (1) for all of our potential infrastructure investments
    - ☐ (2) for a majority of our potential infrastructure investments
    - ☐ (3) for a minority of our potential infrastructure investments
- ☒ (C) Material ESG factors were used to identify remedial actions for our 100-day plans (or equivalent)
  - Select from dropdown list
    - ☒ (1) for all of our potential infrastructure investments
    - ☐ (2) for a majority of our potential infrastructure investments
    - ☐ (3) for a minority of our potential infrastructure investments
- ☒ (D) Material ESG factors were used to identify opportunities for value creation
  - Select from dropdown list
    - ☒ (1) for all of our potential infrastructure investments
    - ☐ (2) for a majority of our potential infrastructure investments
    - ☐ (3) for a minority of our potential infrastructure investments
- ☒ (E) Material ESG factors informed our decision to abandon potential investments in the due diligence phase in cases where ESG risks were considered too high to mitigate
  - Select from dropdown list
    - ☒ (1) for all of our potential infrastructure investments
    - ☐ (2) for a majority of our potential infrastructure investments
    - ☐ (3) for a minority of our potential infrastructure investments
- ☒ (F) Material ESG factors impacted investments in terms of the price offered and/or paid
  - Select from dropdown list
    - ☐ (1) for all of our potential infrastructure investments
    - ☐ (2) for a majority of our potential infrastructure investments
    - ☒ (3) for a minority of our potential infrastructure investments
- ☐ (G) Material ESG factors did not influence the selection of our infrastructure investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
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INF 5	CORE	OO 21	N/A	PUBLIC	Due diligence	1
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Once material ESG factors have been identified, what processes do you use to conduct due diligence on these factors for potential infrastructure investments?

- ☒ (A) We conduct a high-level or desktop review against an ESG checklist for initial red flags
  - Select from dropdown list
    - ☒ (1) for all of our potential infrastructure investments
    - ☐ (2) for a majority of our potential infrastructure investments

- (3) for a minority of our potential infrastructure investments
- ☒ **(B) We send detailed ESG questionnaires to target assets**
  - Select from dropdown list
    - **(1) for all of our potential infrastructure investments**
    - (2) for a majority of our potential infrastructure investments
    - (3) for a minority of our potential infrastructure investments
- ☒ **(C) We hire third-party consultants to do technical due diligence on specific material ESG factors**
  - Select from dropdown list
    - **(1) for all of our potential infrastructure investments**
    - (2) for a majority of our potential infrastructure investments
    - (3) for a minority of our potential infrastructure investments
- ☒ **(D) We conduct site visits**
  - Select from dropdown list
    - **(1) for all of our potential infrastructure investments**
    - (2) for a majority of our potential infrastructure investments
    - (3) for a minority of our potential infrastructure investments
- ☒ **(E) We conduct in-depth interviews with management and/or personnel**
  - Select from dropdown list
    - **(1) for all of our potential infrastructure investments**
    - (2) for a majority of our potential infrastructure investments
    - (3) for a minority of our potential infrastructure investments
- ☒ **(F) We conduct detailed external stakeholder analyses and/or engagement**
  - Select from dropdown list
    - (1) for all of our potential infrastructure investments
    - **(2) for a majority of our potential infrastructure investments**
    - (3) for a minority of our potential infrastructure investments
- ☒ **(G) We incorporate ESG due diligence findings in all of our relevant investment process documentation in the same manner as other key due diligence, e.g. commercial, accounting and legal**
  - Select from dropdown list
    - **(1) for all of our potential infrastructure investments**
    - (2) for a majority of our potential infrastructure investments
    - (3) for a minority of our potential infrastructure investments
- ☒ **(H) Our investment committee (or an equivalent decision-making body) is ultimately responsible for ensuring all ESG due diligence is completed in the same manner as for other key due diligence, e.g. commercial, accounting and legal**
  - Select from dropdown list
    - **(1) for all of our potential infrastructure investments**
    - (2) for a majority of our potential infrastructure investments
    - (3) for a minority of our potential infrastructure investments
- ☐ (I) Other
- (J) We do not conduct due diligence on material ESG factors for potential infrastructure investments

# SELECTION, APPOINTMENT AND MONITORING OF THIRD-PARTY OPERATORS

## SELECTION PROCESS OF THIRD-PARTY OPERATORS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 6	CORE	OO 30	N/A	PUBLIC	Selection process of third-party operators	1, 4

During the reporting year, how did you include material ESG factors in all of your selections of third-party operators?

- ☒ (A) We requested information from potential third-party operators on their overall approach to material ESG factors
- ☒ (B) We requested track records and examples from potential third-party operators on how they manage material ESG factors
- ☒ (C) We requested information from potential third-party operators on their engagement process(es) with stakeholders
- ☒ (D) We requested documentation from potential third-party operators on their responsible procurement and/or contractor practices, including responsibilities, approach, and incentives
- ☐ (E) Other
- ☐ (F) We did not include material ESG factors in our selection of third-party operators

## APPOINTMENT PROCESS OF THIRD-PARTY OPERATORS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 7	CORE	OO 30	N/A	PUBLIC	Appointment process of third-party operators	1, 4

How did you include material ESG factors when appointing your current third-party operators?

- ☒ (A) We set clear and detailed expectations for incorporating material ESG factors into all relevant elements of infrastructure asset management
  - Select from dropdown list
    - ☒ (1) for all of our third-party operators
    - ☐ (2) for a majority of our third-party operators
    - ☐ (3) for a minority of our third-party operators
- ☒ (B) We set clear ESG reporting requirements
  - Select from dropdown list
    - ☒ (1) for all of our third-party operators
    - ☐ (2) for a majority of our third-party operators
    - ☐ (3) for a minority of our third-party operators
- ☒ (C) We set clear targets for material ESG factors
  - Select from dropdown list
    - ☒ (1) for all of our third-party operators
    - ☐ (2) for a majority of our third-party operators
    - ☐ (3) for a minority of our third-party operators
- ☒ (D) We set incentives related to targets on material ESG factors
  - Select from dropdown list
    - ☐ (1) for all of our third-party operators
    - ☒ (2) for a majority of our third-party operators

- (3) for a minority of our third-party operators
- ☐ (E) Other
- (F) We did not include material ESG factors when appointing third-party operators

## MONITORING PROCESS OF THIRD-PARTY OPERATORS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 8	CORE	OO 30	N/A	PUBLIC	Monitoring process of third-party operators	1, 4

### How do you include material ESG factors when monitoring current third-party operators?

- ☒ **(A) We monitor the performance of quantitative and/or qualitative targets on material environmental factors**  
Select from dropdown list
  - ☒ **(1) for all of our third-party operators**
  - (2) for a majority of our third-party operators
  - (3) for a minority of our third-party operators
- ☒ **(B) We monitor the performance of quantitative and/or qualitative targets on material social factors**  
Select from dropdown list
  - ☒ **(1) for all of our third-party operators**
  - (2) for a majority of our third-party operators
  - (3) for a minority of our third-party operators
- ☒ **(C) We monitor the performance of quantitative and/or qualitative targets on material governance factors**  
Select from dropdown list
  - ☒ **(1) for all of our third-party operators**
  - (2) for a majority of our third-party operators
  - (3) for a minority of our third-party operators
- ☒ **(D) We require formal reporting at least yearly**  
Select from dropdown list
  - ☒ **(1) for all of our third-party operators**
  - (2) for a majority of our third-party operators
  - (3) for a minority of our third-party operators
- ☒ **(E) We have discussions about material ESG factors with all relevant stakeholders at least yearly**  
Select from dropdown list
  - ☒ **(1) for all of our third-party operators**
  - (2) for a majority of our third-party operators
  - (3) for a minority of our third-party operators
- ☒ **(F) We conduct a performance review of third-party operators against targets on material ESG factors and/or a financial incentive structure linked to material ESG factors**  
Select from dropdown list
  - (1) for all of our third-party operators
  - ☒ **(2) for a majority of our third-party operators**
  - (3) for a minority of our third-party operators
- ☒ **(G) We have internal or external parties conduct site visits at least yearly**  
Select from dropdown list
  - (1) for all of our third-party operators
  - ☒ **(2) for a majority of our third-party operators**
  - (3) for a minority of our third-party operators
- ☐ (H) Other
- (I) We do not include material ESG factors in the monitoring of third-party operators



## POST-INVESTMENT

### MONITORING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 9	CORE	OO 21	INF 9.1	PUBLIC	Monitoring	1

During the reporting year, did you track one or more KPIs on material ESG factors across your infrastructure investments?

☒ (A) Yes, we tracked KPIs on environmental factors

Percentage of infrastructure assets this applies to:

- ☐ (1) >0 to 10%
- ☐ (2) >10 to 50%
- ☐ (3) >50 to 75%
- ☐ (4) >75 to 95%
- ☒ (5) >95%

☒ (B) Yes, we tracked KPIs on social factors

Percentage of infrastructure assets this applies to:

- ☐ (1) >0 to 10%
- ☐ (2) >10 to 50%
- ☐ (3) >50 to 75%
- ☐ (4) >75 to 95%
- ☒ (5) >95%

☒ (C) Yes, we tracked KPIs on governance factors

Percentage of infrastructure assets this applies to:

- ☐ (1) >0 to 10%
- ☐ (2) >10 to 50%
- ☐ (3) >50 to 75%
- ☐ (4) >75 to 95%
- ☒ (5) >95%

- ☐ (D) We did not track KPIs on material ESG factors across our infrastructure investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 9.1	PLUS	INF 9	N/A	PUBLIC	Monitoring	1

Provide examples of KPIs on material ESG factors you tracked across your infrastructure investments during the reporting year.

(A) ESG KPI #1

Scope 1/2/3 and 4 (avoided emissions/CO2 savings in tons)

(B) ESG KPI #2

Impact on biodiversity/MWh losses due to shut downs of assets to protect birds and bats

(C) ESG KPI #3

Health and safety/accident frequency rate

(D) ESG KPI #4

Community engagement measures/EUR spent on measures and related impacts and outcomes

(E) ESG KPI #5

Supplier Code of Conduct implementation

(F) ESG KPI #6

Anti bribery and corruption policies and procedures

(G) ESG KPI #7

Number of engagements

(H) ESG KPI #8

(I) ESG KPI #9

(J) ESG KPI #10

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 10	CORE	OO 21, OO 30	INF 10.1	PUBLIC	Monitoring	1, 2

**What processes do you have in place to support meeting your targets on material ESG factors for your infrastructure investments?**

☒ **(A) We use operational-level benchmarks to assess and analyse the performance of assets against sector performance**

Select from dropdown list

- ☒ **(1) for all of our infrastructure investments**
- ☐ (2) for a majority of our infrastructure investments
- ☐ (3) for a minority of our infrastructure investments

☒ **(B) We implement international best practice standards such as the IFC Performance Standards to guide ongoing assessments and analyses**

Select from dropdown list

- ☒ **(1) for all of our infrastructure investments**
- ☐ (2) for a majority of our infrastructure investments
- ☐ (3) for a minority of our infrastructure investments

☒ **(C) We implement certified environmental and social management systems across our portfolio**

Select from dropdown list

- ☐ (1) for all of our infrastructure investments
- ☒ **(2) for a majority of our infrastructure investments**
- ☐ (3) for a minority of our infrastructure investments

☒ **(D) We make sufficient budget available to ensure that the systems and procedures needed are established**

Select from dropdown list

- ☒ **(1) for all of our infrastructure investments**
- ☐ (2) for a majority of our infrastructure investments
- ☐ (3) for a minority of our infrastructure investments

☒ **(E) We hire external verification services to audit performance, systems, and procedures**

Select from dropdown list

- ☒ **(1) for all of our infrastructure investments**
- ☐ (2) for a majority of our infrastructure investments
- ☐ (3) for a minority of our infrastructure investments

☒ **(F) We collaborate and engage with our third-party operators to develop action plans**

Select from dropdown list

- ☒ **(1) for all of our infrastructure investments**
- ☐ (2) for a majority of our infrastructure investments
- ☐ (3) for a minority of our infrastructure investments

☒ **(G) We develop minimum health and safety standards**

Select from dropdown list

- ☒ **(1) for all of our infrastructure investments**
- ☐ (2) for a majority of our infrastructure investments
- ☐ (3) for a minority of our infrastructure investments

☒ **(H) We conduct ongoing engagement with all key stakeholders, e.g. local communities, NGOs, governments, and end-users**

Select from dropdown list

- (1) for all of our infrastructure investments
- (2) for a majority of our infrastructure investments
- (3) for a minority of our infrastructure investments
- ☐ (I) Other
- (J) We do not have processes in place to help meet our targets on material ESG factors for our infrastructure investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 10.1	PLUS	INF 10	N/A	PUBLIC	Monitoring	1, 2

**Describe up to two processes you put in place during the reporting year to support meeting your targets on material ESG factors.**

**(A) Process one**

While our clean energy infrastructure investments generally have relatively low GHG emission footprints and intensities, they still generate emissions along their value chain, predominantly during construction. To address this, we have expanded the scope of our GHG methodologies and tools, implementing the following measures: Comprehensive Emissions Tracking: We have developed and rolled out enhanced GHG tracking tools across our portfolio companies to capture emissions throughout the value chain. This includes emissions generated during construction and other indirect sources. Training and Implementation: We provided training to our portfolio companies on the new methodologies and tools to ensure accurate data collection and reporting.

**(B) Process two**

We upgraded our ESG data management system to improve the collection, analysis, and reporting of ESG-related information across our portfolio. This system has significantly improved our ability to monitor and report on our progress towards ESG targets, ensuring we remain on track to meet our sustainability objectives.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 11	CORE	OO 21	N/A	PUBLIC	Monitoring	1, 2

**Post-investment, how do you manage material ESG risks and ESG opportunities to create value during the holding period of your investments?**

☒ **(A) We develop asset-specific ESG action plans based on pre-investment research, due diligence and materiality findings**

Select from dropdown list

- (1) for all of our infrastructure investments
- (2) for a majority of our infrastructure investments
- (3) for a minority of our infrastructure investments

☒ **(B) We adjust our ESG action plans based on performance monitoring findings at least yearly**

Select from dropdown list

- (1) for all of our infrastructure investments
- (2) for a majority of our infrastructure investments
- (3) for a minority of our infrastructure investments

☒ **(C) We, or the external advisors that we hire, support our infrastructure investments with specific ESG value-creation opportunities**

Select from dropdown list

- (1) for all of our infrastructure investments
- (2) for a majority of our infrastructure investments
- (3) for a minority of our infrastructure investments

☐ **(D) Other**

- (E) We do not manage material ESG risks and opportunities post-investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
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INF 12	PLUS	OO 21	N/A	PUBLIC	Monitoring	1, 2
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**Describe how you ensure that material ESG risks are adequately addressed in the infrastructure investments where you hold a minority stake.**

We do not hold any minority stake.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
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INF 13	PLUS	OO 21	N/A	PUBLIC	Monitoring	2
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**Describe how your ESG action plans are defined, implemented and monitored throughout the investment period.**

Our ESG action plans are meticulously defined, implemented, and monitored throughout the investment period to ensure alignment with our sustainability objectives and to drive continuous improvement. We ensure that environmental and social impacts of investments are taken into account at every point in our process, from due diligence to exit, and that ESG management is firmly embedded in our investment principles, strategy, policies, and processes. The process involves the following key steps:

**Initial ESG Assessment:** Before making an investment, we conduct a thorough ESG assessment to identify material ESG factors and potential risks and opportunities associated with the investment. During due diligence, we use our proprietary ESG tool to flag potential risks and opportunities which are subsequently discussed by our investment committees. The ESG team challenges investment teams on their identification of ESG risks and, where applicable, requests additional due diligence to be conducted. Identified risks must be mitigated adequately for the investment process to proceed.

**Setting ESG Objectives and Targets:** Based on the initial assessment, we define clear ESG objectives and targets for each investment. These objectives align with our overall ESG strategy and are tailored to address the specific ESG issues identified during the assessment.

**Development of Action Plans:** We develop detailed ESG action plans outlining the steps needed to achieve the defined objectives and targets. This comprehensive ESG risk mitigation plan includes specific goals, the respective actions required, and suggestions for best practices.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
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INF 14	CORE	OO 21	INF 14.1	PUBLIC	Monitoring	1, 2
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**How do you ensure that adequate ESG-related competence exists at the asset level?**

☒ **(A) We assign our board responsibility for ESG matters**

Select from dropdown list

- ☒ **(1) for all of our infrastructure investments**
- ☐ (2) for a majority of our infrastructure investments
- ☐ (3) for a minority of our infrastructure investments

☒ **(B) We ensure that material ESG matters are discussed by our board at least yearly**

Select from dropdown list

- ☒ **(1) for all of our infrastructure investments**
- ☐ (2) for a majority of our infrastructure investments
- ☐ (3) for a minority of our infrastructure investments

☒ **(C) We provide training on ESG aspects and management best practices relevant to the asset to C-suite executives only**

Select from dropdown list

- ☐ (1) for all of our infrastructure investments
- ☒ **(2) for a majority of our infrastructure investments**
- ☐ (3) for a minority of our infrastructure investments

- ☒ (D) We provide training on ESG aspects and management best practices relevant to the asset to employees (excl. C-suite executives)
- Select from dropdown list
- ☒ (1) for all of our infrastructure investments
  - ☐ (2) for a majority of our infrastructure investments
  - ☐ (3) for a minority of our infrastructure investments
- ☒ (E) We support the asset by finding external ESG expertise, e.g. consultants or auditors
- Select from dropdown list
- ☒ (1) for all of our infrastructure investments
  - ☐ (2) for a majority of our infrastructure investments
  - ☐ (3) for a minority of our infrastructure investments
- ☒ (F) We share best practices across assets, e.g. educational sessions and the implementation of environmental and social management systems
- Select from dropdown list
- ☒ (1) for all of our infrastructure investments
  - ☐ (2) for a majority of our infrastructure investments
  - ☐ (3) for a minority of our infrastructure investments
- ☒ (G) We apply penalties or incentives to improve ESG performance in management remuneration schemes
- Select from dropdown list
- ☒ (1) for all of our infrastructure investments
  - ☐ (2) for a majority of our infrastructure investments
  - ☐ (3) for a minority of our infrastructure investments
- ☐ (H) Other
- ☐ (I) We do not ensure that adequate ESG-related competence exists at the asset level

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 14.1	PLUS	INF 14	N/A	PUBLIC	Monitoring	1, 2

**Describe up to two initiatives adopted as part of your ESG competence-building efforts at the asset level during the reporting year.**

(A) Initiative one

When implementing our responsible procurement policy, we define standards regarding the traceability of procured goods and the human rights and ethical standards that suppliers must uphold. We require all our portfolio companies to acknowledge and implement this policy, as it significantly facilitates the management of subsequent suppliers along the supply chain.

To support our investees, we have helped them select dedicated advisors to conduct traceability and factory audits, leveraging our network of advisors who have worked with us across various investments. Additionally, we provide expert knowledge and training sessions led by our in-house experts on procurement and construction.

We share best practices, including ESG questionnaires that are part of all procurement processes, particularly for goods such as solar panels and battery cells, which have been subject to serious human rights allegations. Furthermore, we conduct comprehensive supply chain mapping and procure external ESG data on suppliers and subcontractors. We share insights from this data with our investees to enhance their understanding and management of their supply chains.

Using our governance rights, we set tailored ESG goals for each portfolio company and monitor the effectiveness of the initiatives we implement. We ensure good governance through clear structures and rules, aligned incentives, knowledge sharing, and policy transfer, thereby fostering a robust framework for sustainable procurement and responsible supply chain management.

(B) Initiative two

In addition to quarterly board meetings, where ESG is a standing agenda item, we engage with our investees through weekly calls and ensure that material KPIs are reported to our dedicated asset management team on a monthly basis. This approach allows us to create a database of best practices, enabling the sharing of ideas and knowledge among stakeholders to elevate ESG standards across our portfolio companies.

Furthermore, we have established our annual Portfolio Days Summit, bringing together all our portfolio companies. This summit provides a platform for sharing best practices, lessons learned, and facilitating active exchanges. This event underscores our commitment to continuous improvement and collaboration in ESG management.

## STAKEHOLDER ENGAGEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 15	PLUS	OO 21	N/A	PUBLIC	Stakeholder engagement	1, 2

### How do you ensure that appropriate stakeholder engagement is carried out during both due diligence for potential investments and the ongoing monitoring of existing investments?

We ensure that appropriate stakeholder engagement is carried out during both due diligence for potential investments and the ongoing monitoring of existing investments through a structured and comprehensive approach. Sustainable investing is ever-evolving, and staying ahead of the curve requires continuous interaction with stakeholders. We systematically gather intelligence from our stakeholders to make sure we can react effectively to market trends and regulatory developments. Based on these inputs, we then decide what topics require further attention and can address them through relevant communication channels. Our strategy includes the following key steps:

During Due Diligence:

1. Stakeholder Mapping and Identification
2. Stakeholder Engagement Plans
3. Consultation and Feedback
4. Integration of Feedback Ongoing Monitoring:
  1. Regular Communication
  2. Stakeholder Feedback Mechanisms
  3. Community Engagement Initiatives
  4. Performance Tracking and Reporting

## EXIT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 16	CORE	OO 21	N/A	PUBLIC	Exit	4, 6

### During the reporting year, what responsible investment information was shared with potential buyers of infrastructure investments?

- ☒ (A) Our firm's high-level commitment to responsible investment, e.g. that we are a PRI signatory
  - Select from dropdown list
    - ☒ (1) for all of our infrastructure investments
    - ☐ (2) for a majority of our infrastructure investments
    - ☐ (3) for a minority of our infrastructure investments
- ☒ (B) A description of what industry and asset class standards our firm aligns with, e.g. TCFD or GRESB
  - Select from dropdown list
    - ☒ (1) for all of our infrastructure investments
    - ☐ (2) for a majority of our infrastructure investments
    - ☐ (3) for a minority of our infrastructure investments
- ☒ (C) Our firm's responsible investment policy (at minimum, a summary of key aspects and firm-specific approach)
  - Select from dropdown list
    - ☒ (1) for all of our infrastructure investments
    - ☐ (2) for a majority of our infrastructure investments
    - ☐ (3) for a minority of our infrastructure investments
- ☒ (D) Our firm's ESG risk assessment methodology (topics covered in-house and/or with external support)
  - Select from dropdown list
    - ☒ (1) for all of our infrastructure investments
    - ☐ (2) for a majority of our infrastructure investments

- (3) for a minority of our infrastructure investments
- ☒ (E) The outcome of our latest ESG risk assessment on the asset or portfolio company
  - Select from dropdown list
    - ☒ (1) for all of our infrastructure investments
    - (2) for a majority of our infrastructure investments
    - (3) for a minority of our infrastructure investments
- ☒ (F) Key ESG performance data on the asset or portfolio company being sold
  - Select from dropdown list
    - ☒ (1) for all of our infrastructure investments
    - (2) for a majority of our infrastructure investments
    - (3) for a minority of our infrastructure investments
- ☐ (G) Other
  - (H) No responsible investment information was shared with potential buyers of infrastructure investments during the reporting year
  - (I) Not applicable; we had no sales process (or control over the sales process) during the reporting year

## DISCLOSURE OF ESG PORTFOLIO INFORMATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 17	CORE	OO 21	N/A	PUBLIC	Disclosure of ESG portfolio information	6

During the reporting year, how did you report your targets on material ESG factors and related data to your investors?

- ☒ (A) We reported through a publicly-disclosed sustainability report
- ☒ (B) We reported in aggregate through formal reporting to investors
- ☐ (C) We reported at the asset level through formal reporting to investors
- ☒ (D) We reported through a limited partners advisory committee (or equivalent)
- ☒ (E) We reported at digital or physical events or meetings with investors
- ☒ (F) We had a process in place to ensure that reporting on serious ESG incidents occurred
- ☐ (G) Other
  - (H) We did not report our targets on material ESG factors and related data to our investors during the reporting year

# SUSTAINABILITY OUTCOMES (SO)

## SETTING TARGETS AND TRACKING PROGRESS

### SETTING TARGETS ON SUSTAINABILITY OUTCOMES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 1	PLUS	PGS 48	SO 2, SO 2.1, SO 3	PUBLIC	Setting targets on sustainability outcomes	1, 2

What specific sustainability outcomes connected to its investment activities has your organisation taken action on?

☒ **(A) Sustainability outcome #1**

(1) Widely recognised frameworks used to guide action on this sustainability outcome

☒ **(1) The UN Sustainable Development Goals (SDGs) and targets**

☐ (2) The UNFCCC Paris Agreement

☐ (3) The UN Guiding Principles on Business and Human Rights (UNGPs)

☐ (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors

☐ (5) The EU Taxonomy

☐ (6) Other relevant taxonomies

☐ (7) The International Bill of Human Rights

☐ (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions

☐ (9) The Convention on Biological Diversity

☐ (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

☒ **(1) Environmental**

☒ **(2) Social**

☐ (3) Governance-related

☐ (4) Other

(3) Sustainability outcome name

Definition of SDGs supported by the individual investment

(4) Number of targets set for this outcome

☐ (1) No target

☒ **(2) One target**

☐ (3) Two or more targets

☒ **(B) Sustainability outcome #2**

(1) Widely recognised frameworks used to guide action on this sustainability outcome

☐ (1) The UN Sustainable Development Goals (SDGs) and targets

☐ (2) The UNFCCC Paris Agreement

☒ **(3) The UN Guiding Principles on Business and Human Rights (UNGPs)**

☐ (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors

☐ (5) The EU Taxonomy

☐ (6) Other relevant taxonomies

☐ (7) The International Bill of Human Rights

☐ (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions

☐ (9) The Convention on Biological Diversity

☐ (10) Other international, regional, sector-based or issue-specific framework(s)



(2) Classification of sustainability outcome

- ☐ (1) Environmental
- ☒ (2) **Social**
- ☐ (3) Governance-related
- ☐ (4) Other

(3) Sustainability outcome name

Integration of human rights risk into supplier analysis

(4) Number of targets set for this outcome

- ☐ (1) No target
- ☒ (2) **One target**
- ☐ (3) Two or more targets

☒ (C) **Sustainability outcome #3**

(1) Widely recognised frameworks used to guide action on this sustainability outcome

- ☐ (1) The UN Sustainable Development Goals (SDGs) and targets
- ☐ (2) The UNFCCC Paris Agreement
- ☐ (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
- ☐ (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- ☒ (5) **The EU Taxonomy**
- ☐ (6) Other relevant taxonomies
- ☐ (7) The International Bill of Human Rights
- ☐ (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- ☐ (9) The Convention on Biological Diversity
- ☐ (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

- ☒ (1) **Environmental**
- ☐ (2) Social
- ☐ (3) Governance-related
- ☐ (4) Other

(3) Sustainability outcome name

Alignment with the EU Taxonomy

(4) Number of targets set for this outcome

- ☐ (1) No target
- ☒ (2) **One target**
- ☐ (3) Two or more targets

- ☐ (D) Sustainability outcome #4
- ☐ (E) Sustainability outcome #5
- ☐ (F) Sustainability outcome #6
- ☐ (G) Sustainability outcome #7
- ☐ (H) Sustainability outcome #8
- ☐ (I) Sustainability outcome #9
- ☐ (J) Sustainability outcome #10

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 2	PLUS	SO 1	SO 2.1, SO 4, SO 5	PUBLIC	Setting targets on sustainability outcomes	1

For each sustainability outcome, provide details of up to two of your nearest-term targets.

#### (A1) Sustainability Outcome #1: Target details

(A1) Sustainability Outcome #1: Definition of SDGs supported by the individual investment

(1) Target name Quantitative measurement of target achievement

(2) Baseline year 2022

(3) Target to be met by 2025

(4) Methodology

(5) Metric used (if relevant)

(6) Absolute or intensity-based (if relevant)

(7) Baseline level or amount (if relevant):

(8) Target level or amount (if relevant)

(9) Percentage of total AUM covered in your baseline year for target setting

(10) Do you also have a longer-term target for this?

#### (B1) Sustainability Outcome #2: Target details

(B1) Sustainability Outcome #2: Integration of human rights risk into supplier analysis

(1) Target name Implementation of Supplier Code of Conduct

(2) Baseline year 2022

(3) Target to be met by 2025

(4) Methodology

(5) Metric used (if relevant)

(6) Absolute or intensity-based (if relevant)

(7) Baseline level or amount (if relevant):

(8) Target level or amount (if relevant)

(9) Percentage of total AUM covered in your baseline year for target setting

(10) Do you also have a longer-term target for this?

#### **(C1) Sustainability Outcome #3: Target details**

(C1) Sustainability Outcome #3: Alignment with the EU Taxonomy

(1) Target name Alignment with the EU Taxonomy

(2) Baseline year 2022

(3) Target to be met by 2025

(4) Methodology

(5) Metric used (if relevant)

(6) Absolute or intensity-based (if relevant)

(7) Baseline level or amount (if relevant):

(8) Target level or amount (if relevant)

(9) Percentage of total AUM covered in your baseline year for target setting

(10) Do you also have a longer-term target for this?

## TRACKING PROGRESS AGAINST TARGETS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 4	PLUS	SO 2	SO 4.1	PUBLIC	Tracking progress against targets	1

**Does your organisation track progress against your nearest-term sustainability outcomes targets?**

### (A1) Sustainability outcome #1:

(A1) Sustainability outcome #1: Definition of SDGs supported by the individual investment

Target name: Quantitative measurement of target achievement

Does your organisation track progress against your nearest-term sustainability outcome targets? (1) Yes

### (B1) Sustainability outcome #2:

(B1) Sustainability outcome #2: Integration of human rights risk into supplier analysis

Target name: Implementation of Supplier Code of Conduct

Does your organisation track progress against your nearest-term sustainability outcome targets? (1) Yes

### (C1) Sustainability outcome #3:

(C1) Sustainability outcome #3: Alignment with the EU Taxonomy

Target name: Alignment with the EU Taxonomy

Does your organisation track progress against your nearest-term sustainability outcome targets?

(1) Yes

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 4.1	PLUS	SO 4	N/A	PUBLIC	Tracking progress against targets	1

**During the reporting year, what qualitative or quantitative progress did your organisation achieve against your nearest-term sustainability outcome targets?**

**(A1) Sustainability Outcome #1: Target details**

(A1) Sustainability Outcome #1:	Definition of SDGs supported by the individual investment
(1) Target name	Quantitative measurement of target achievement
(2) Target to be met by	2025
(3) Metric used (if relevant)	
(4) Current level or amount (if relevant)	All of our investments acquired during the reporting year have measured (quantitatively) their support towards relevant SDGs
(5) Other qualitative or quantitative progress	
(6) Methodology for tracking progress	

**(B1) Sustainability Outcome #2: Target details**

(B1) Sustainability Outcome #2:	Integration of human rights risk into supplier analysis
(1) Target name	Implementation of Supplier Code of Conduct
(2) Target to be met by	2025
(3) Metric used (if relevant)	
(4) Current level or amount (if relevant)	All of our investments acquired during the reporting year have implemented a Supplier Code of Conduct

(5) Other qualitative or quantitative progress

(6) Methodology for tracking progress

### (C1) Sustainability Outcome #3: Target details

(C1) Sustainability Outcome #3: Alignment with the EU Taxonomy

(1) Target name Alignment with the EU Taxonomy

(2) Target to be met by 2025

(3) Metric used (if relevant)

(4) Current level or amount (if relevant) Current alignment with the EU Taxonomy is above minimum requirements committed to in pre-contractual documentations.

(5) Other qualitative or quantitative progress

(6) Methodology for tracking progress

## INDIVIDUAL AND COLLABORATIVE INVESTOR ACTION ON OUTCOMES

### LEVERS USED TO TAKE ACTION ON SUSTAINABILITY OUTCOMES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 5	PLUS	SO 2	Multiple	PUBLIC	Levers used to take action on sustainability outcomes	1, 2, 5

During the reporting year, which of the following levers did your organisation use to take action on sustainability outcomes, including to prevent and mitigate actual and potential negative outcomes?

- ☒ (A) Stewardship with investees, including engagement, (proxy) voting, and direct influence with privately held assets  
Select from drop down list:  
☒ (1) Individually  
☐ (2) With other investors or stakeholders
- ☐ (B) Stewardship: engagement with external investment managers
- ☐ (C) Stewardship: engagement with policy makers
- ☒ (D) Stewardship: engagement with other key stakeholders  
Select from drop down list:  
☒ (1) Individually

- ☐ (2) With other investors or stakeholders
- ☐ (E) Capital allocation
- ☐ (F) Our organisation did not use any of the above levers to take action on sustainability outcomes during the reporting year

## STEWARDSHIP WITH INVESTEEES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 8	PLUS	SO 5	N/A	PUBLIC	Stewardship with investees	2

**During the reporting year, how did your organisation use stewardship with investees to take action on sustainability outcomes, including preventing and mitigating actual and potential negative outcomes?**

### (A) Across all sustainability outcomes

#### (1) Describe your approach

At SUSI Partners, stewardship is embedded in how we work with our investees to drive sustainability outcomes and minimise potential adverse impacts. Partnership is a core value, and we apply this principle through close, long-term collaboration with our portfolio companies and investment partners. Our sustainability standards are a key factor in partner selection, ensuring alignment from the outset.

During the reporting year, we actively used our influence particularly through board representation and ongoing engagement with portfolio management teams to take action on material sustainability outcomes.

This included efforts to prevent and mitigate both actual and potential negative impacts related to environmental, social, and governance factors.

Our investment and portfolio professionals hold seats on portfolio company boards, where they provide strategic guidance and ensure ESG policies are fully embedded into business practices. This includes oversight of health and safety, emissions reduction, community engagement, and supply chain compliance.

By maintaining open and ongoing communication with key personnel at our investees, we are able to identify emerging risks early, assess their potential impact, and work together to implement effective mitigation measures. This has proven particularly valuable in navigating ESG risks during project development and construction phases. Our collaborative approach helps ensure that sustainability outcomes extend beyond regulatory compliance.

Through active ownership, strategic board participation, and close day-to-day engagement, we use our stewardship role to align portfolio company behaviour with our sustainability objectives. This collaborative approach enables us to both deliver positive impact and reduce the likelihood of negative outcomes across our investments.

#### (2) Stewardship tools or activities used

- (1) Engagement
- (4) Nominating directors to the board
- (6) Taking roles on investee boards
- (7) Working directly with portfolio companies and/or real asset management teams

#### (3) Example

**(B) Sustainability Outcome #1:**

(B) Sustainability Outcome #1: Definition of SDGs supported by the individual investment

(1) Describe your approach

(2) Stewardship tools or activities used

(3) Example

**(C) Sustainability Outcome #2:**

(C) Sustainability Outcome #2: Integration of human rights risk into supplier analysis

(1) Describe your approach

(2) Stewardship tools or activities used

(3) Example

**(D) Sustainability Outcome #3:**

(D) Sustainability Outcome #3: Alignment with the EU Taxonomy

(1) Describe your approach

(2) Stewardship tools or activities used

(3) Example

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 9	PLUS	SO 5	N/A	PUBLIC	Stewardship with investees	2

**How does your organisation prioritise the investees you conduct stewardship with to take action on sustainability outcomes, including preventing and mitigating actual and potential negative outcomes?**

☒ **(A) We prioritise the most strategically important companies in our portfolio.**

Describe how you do this:

Select from the list:

☒ 1

☐ 4

☒ **(B) We prioritise the companies in our portfolio most significantly connected to sustainability outcomes.**



Describe how you do this:

Select from the list:

☒ 2

☐ 4

☒ (C) We prioritise the companies in our portfolio to ensure that we cover a certain proportion of the sustainability outcomes we are taking action on.

Describe how you do this:

Select from the list:

☒ 3

☐ 4

☐ (D) Other

## STEWARDSHIP: ENGAGEMENT WITH OTHER KEY STAKEHOLDERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 12	PLUS	SO 5	N/A	PUBLIC	Stewardship: Engagement with other key stakeholders	2, 5

Does your organisation engage with other key stakeholders to support the development of financial products, services, research, and/or data aligned with global sustainability goals and thresholds?

### (A) Across all sustainability outcomes

(1) Key stakeholders engaged

(1) Standard setters  
(2) Reporting bodies  
(5) Auditors  
(8) NGOs

(2) Provide further detail on your engagement

### (B) Sustainability Outcome #1:

(B) Sustainability Outcome #1:

Definition of SDGs supported by the individual investment

(1) Key stakeholders engaged

(1) Standard setters

(2) Provide further detail on your engagement

### (C) Sustainability Outcome #2:

(C) Sustainability Outcome #2:

Integration of human rights risk into supplier analysis

(1) Key stakeholders engaged

(1) Standard setters

(2) Provide further detail on your engagement

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**(D) Sustainability Outcome #3:**

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(D) Sustainability Outcome #3:      Alignment with the EU Taxonomy

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(1) Key stakeholders engaged

(2) Reporting bodies  
(5) Auditors

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(2) Provide further detail on your engagement

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# CONFIDENCE-BUILDING MEASURES (CBM)

## CONFIDENCE-BUILDING MEASURES

### APPROACH TO CONFIDENCE-BUILDING MEASURES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 1	CORE	N/A	Multiple indicators	PUBLIC	Approach to confidence-building measures	6

How did your organisation verify the information submitted in your PRI report this reporting year?

- ☐ (A) We conducted independent third-party assurance of selected processes and/or data related to the responsible investment processes reported in our PRI report, which resulted in a formal assurance conclusion
- ☐ (B) We conducted a third-party readiness review and are making changes to our internal controls or governance processes to be able to conduct independent third-party assurance next year
- ☒ (C) We conducted an internal audit of selected processes and/or data related to the responsible investment processes reported in our PRI report
- ☒ (D) Our board, trustees (or equivalent), senior executive-level staff (or equivalent), and/or investment committee (or equivalent) signed off on our PRI report
- ☒ (E) Our responses in selected sections and/or the entirety of our PRI report were internally reviewed before submission to the PRI
- ☐ (F) We did not verify the information submitted in our PRI report this reporting year

## INTERNAL AUDIT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 4	CORE	OO 21, CBM 1	N/A	PUBLIC	Internal audit	6

What responsible investment processes and/or data were audited through your internal audit function?

- ☒ (A) Policy, governance and strategy  
Select from dropdown list:
  - ☐ (1) Data internally audited
  - ☐ (2) Processes internally audited
  - ☒ (3) Processes and data internally audited
- ☒ (G) Infrastructure  
Select from dropdown list:
  - ☐ (1) Data internally audited
  - ☐ (2) Processes internally audited
  - ☒ (3) Processes and data internally audited

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 5	PLUS	CBM 1	N/A	PUBLIC	Internal audit	6

**Provide details of the internal audit process regarding the information submitted in your PRI report.**

As part of our overall risk framework, we have established a comprehensive ICS (internal control system) which also conducts quarterly controls on relevant responsible investment processes and data inputs used for our potential avoided emission calculations. The outcome and any red flags resulting from those controls are being presented to the board on a quarterly basis. This process is being led by our dedicated and independent internal risk and compliance team.

## INTERNAL REVIEW

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 6	CORE	CBM 1	N/A	PUBLIC	Internal review	6

**Who in your organisation reviewed the responses submitted in your PRI report this year?**

- ☐ (A) Board, trustees, or equivalent
- ☒ **(B) Senior executive-level staff, investment committee, head of department, or equivalent**
  - Sections of PRI report reviewed
    - ☒ **(1) the entire report**
    - ☐ (2) selected sections of the report
  - ☐ (C) None of the above internal roles reviewed selected sections or the entirety of the responses submitted in our PRI report this year