# Article 10 SFDR

# Website disclosure for an Article 9 SFDR fund

## Unigestion Climate Impact SCS-SICAV-RAIF – World ("Compartment")

| Version | Date of publication | Explanation of amendments |
| --- | --- | --- |
| 1 | 13.10.2022 | |
| 2 | 01.05.2023 | Update to reflect changes under Delegated Regulation (EU) 2023/363 (notably disclosure on fossil gas/nuclear energy related activities under EU Taxonomy) |
| 3 | 17.05.2024 | Update to clarify use of Impact Indicators and good governance and reflect adoption of Environmental Delegated Act |
| 4 | 13.08.2024 | Update to reflect enhanced impact methodology and related indicators, updated ESG Scoring process and further development of screening processes. |
| 5 | 23.04.2025 | Update to enhance the Climate Filter against the backdrop of the ESMA Guidelines on funds' names using ESG or sustainability-related terms |

**Product name: Unigestion Climate Impact Fund SCS-SICAV-RAIF – World**
**Legal entity identifier: 6354007ZKYH2PSC8GD68**

## A. Summary

For other languages, use following link: [Unigestion Climate Impact World - Summary other languages]

The sustainable investment objective of the Compartment is to address the climate challenge as fundamental environmental problem of mankind by combatting global warming, the depletion of natural resources and the destruction of ecosystems. The Compartment pursues the following environmental objectives (described in more detail in the EU Taxonomy) alongside the generation of a financial return: (i) Climate Change Mitigation, (ii) Climate Change Adaptation, (iii) Protection and Restoration of Biodiversity and Ecosystems, and (iv) Transition to a Circular Economy. The Compartment generates measurable positive real-world impact by providing capital to and engaging with private companies ("**Portfolio Companies**") whose economic activities contribute to the achievement of at least one of the Compartment's environmental objectives. The Compartment will perform a DNSH assessment for each investment opportunity. Such assessment will be performed by (i) taking into account the PAI Indicators (as defined below in "*B. No significant harm to the sustainable investment objective*") and (ii) applying a Norm-based Screening and an Exclusionary Screening (each as defined below in "*B. No significant harm to the sustainable investment objective*") to exclude Portfolio Companies falling within specific categories.

The Compartment is a private equity fund with the sustainable investment objective to address the climate challenge by making sustainable investments in Portfolio Companies whose economic activities contribute to at least one of the environmental objectives of the Compartment. Such investment objective will be achieved through Direct Investments or Secondary Investments targeting Portfolio Companies with headquarters, or with a substantial proportion of their operations located in (i) Europe and, selectively, adjacent countries, (ii) North America (the United States of America, Canada) and (iii) Asia (primarily China, India, Japan, Australia and Republic of Korea), and, selectively, adjacent countries.

The Compartment addresses the climate challenge as fundamental environmental problem of mankind through its investments in Portfolio Companies offering products and services which support combatting global warming, the depletion of natural resources and the destruction of ecosystems. The Compartment provides financial support and engages with Portfolio Companies in the context of the Net Zero Plan and the Engagement Plan (each as defined below in *"F. Monitoring of the sustainable investment objective"*) as well as the ESG Scoring (as defined below in *"D. Investment strategy"*).

To assess good governance practices of the Portfolio Companies, the Compartment will apply a Norm-based Screening and an Exclusionary Screening (as defined below in "*B. No significant harm to the sustainable investment objective*"). In addition, the Investment Manager assesses as part of the due diligence whether the Portfolio Companies have or are willing to develop adequate policies and procedures to ensure alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles for Business and Human Rights. Furthermore, at the time of the initial investment and annually during the Compartment's ownership period, the Investment Manager performs an internal ESG Scoring (as defined below in "*D. Investment strategy"*) to determine how advanced Portfolio Companies are in integrating ESG matters.

The Compartment will invest at least 97% of its NAV in Portfolio Companies via Direct Investments or Secondary investments (as defined in the Private Placement Memorandum) which qualify as sustainable investments and generate measurable positive real-world impact. The share of Portfolio Companies held via Secondary Investments may amount up to 100% of the Compartment's NAV. The Compartment does not commit to making sustainable investments which are aligned with EU Taxonomy and the minimum percentage of sustainable investments aligned with EU Taxonomy is 0%. The minimum share of investments in transitional and enabling activities is 0%. The Compartment expects a minimum of 97% of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy.

The amount of derivatives, cash and other assets (#2 Not Sustainable) kept for liquidity purposes will be up to 3% of the NAV and the use of these investments does not affect the delivery of the sustainable investment objective on a continuous basis. There are no minimum environmental or social safeguards for these investments.

The Investment Manager uses a range of sustainability indicators (as defined below in "*F. Monitoring of the sustainable investment objective*") to measure the Portfolio Company Impact and the attainment of its sustainable investment objective of the Compartment (e.g. greenhouse gas ("**GHG**") emissions intensity, GHG emissions avoidance, renewable energy consumption, energy consumption intensity, energy consumption avoidance, waste disposed (recycled/reused), Land Directly Controlled: Sustainably Managed). The Investment Manager will choose at least two indicators ("**Impact Indicators**") per Portfolio Company. The selected Impact Indicators may be supplemented on a case-by-case basis with additional indicators derived from the IRIS+ framework (IRIS Catalog of Metrics). The measurement of the Impact Indicators will also enable the Investment Manager to assess the positive contribution of each investment to the UN Sustainable Development Goals ("**SDGs**") 7 (Affordable and Clean Energy) and 13 (Climate Action) in the context of a preliminary high level qualitative assessment referencing to SDG sub-targets. To ensure that the investment in the Portfolio Companies leads to a net positive contribution to the environmental objectives pursued by the Compartment, the Investment Manager will apply a Climate Filter to any investment opportunity and exclude companies falling within specific categories (as set out below in "*F. Monitoring of the sustainable investment objective*"). Each Portfolio Company under consideration will go through a stringent investment process consisting of the following steps: (i) sourcing, (ii) preliminary review, (iii) scoring and early warning memo, (iv) modelling and due diligence, (v) investment committee decision and execution (vi) portfolio management and monitoring and (vii) exit (described in more detail below in "*F. Monitoring of the sustainable investment objective*").

Due to scarcity of the external data for private equity Portfolio Companies the Compartment uses a combination of data sources (to the extent relevant for each Portfolio Company). Prior to using external ESG data, the Investment Manager carefully assesses the data source and the methodology of the external provider and ensures that this data will never lead to a mechanistic reliance on the respective assessment. Data from all possible sources is processed and stored internally. Data related to the sustainability indicators may be based on proxy methodology or projected data if the underlying economic activities of the respective Portfolio Company have not yet become operational. There are limitations around data availability and quality for privately owned companies which need to be considered by the Compartment. Information from third party data providers is rarely available for privately held Portfolio Companies. To deal with data limitations, the Compartment may use proxy methodology or rely on data from the potential Portfolio Companies under review.

As part of the ongoing investment process, the Compartment will determine and implement an Engagement Plan for each Portfolio Company. The ESG performance of each Portfolio Company will be updated annually in the context of the ESG Scoring and considered for the purposes of the Engagement Plan together with the PAI Indicators and further elements of the DNSH assessment (for further details see below "*D. Investment strategy*"). Sustainability-related controversies will feed into the annual review of the ESG performance of each Portfolio Company in the context of the ESG Scoring. The resulting actions will be defined individually for each Portfolio Company as part of the ongoing engagement process.

No reference benchmark has been designated for the purpose of attaining the sustainable investment objective of the Compartment.

## B. No significant harm to the sustainable investment objective

The Compartment will perform a Do No Significant Harm (“**DNSH**”) assessment for each investment opportunity. Such assessment will be performed by:

(i) Taking into account the indicators relating to the principal adverse impacts on sustainability factors ("**PAI Indicators**") in Table 1 of Annex I of Commission Delegated Regulation (EU) 2022/1288 ("**SFDR RTS**") and any PAI Indicators in Tables 2 and 3 of the same Annex I relevant to the investment opportunity under review (see below "*How are the indicators for adverse impacts in Table 1 of Annex I of the RTS, and any relevant indicators in Tables 2 and 3 of that Annex, taken into account?*"); and

(ii) Applying the Norm-based Screening and the Exclusionary Screening described in more detail below (see below "*Is the sustainable investment aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?*").

### How are the indicators for adverse impacts in Table 1 of Annex I of the SFDR RTS, and any relevant indicators in Tables 2 and 3 of that Annex, taken into account?

PAI Indicators will be taken into account pre- and post-investment as follows:

(i) Pre-investment: The Investment Manager will take into account the PAI Indicators set out above by reviewing collected PAI Indicator data in the context of each investment and ensuring that investments do not significantly harm environmental or social objectives.

(ii) Post-investment: The Investment Manager will evaluate the PAI Indicators for the Compartment’s portfolio on a quarterly basis, where possible, to ensure that there will be stable and/or improving levels. In case there is an adverse move, the Investment Manager will evaluate on a case-by-case basis which consequences this change might have on the DNSH assessment and consequently on the classification of the particular investment as a sustainable investment. Reporting on PAI Indicators will be made available to investors as part of the Compartment's annual report.

The Compartment will use Best Efforts to obtain data on the PAI Indicators. "**Best Efforts**" means that the Compartment is committed to obtain data on the PAI Indicators either directly from the Portfolio Companies, or by carrying out additional research, cooperating with third party data providers or external experts or making reasonable assumptions.

### Is the sustainable investment aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?

To ensure alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles for Business and Human Rights, the Investment Manager performs a Norm-Based Screening and an Exclusionary Screening of all companies at the time of the initial investment to exclude companies falling within any of the following categories:

**Norm-based Screening (ESG Pillar I)**

The "**Norm-based Screening**" filters out any company that violated any of the following exclusion criteria:

- Minimum social safeguards: Companies identified as "non-compliant" based on UN Global Compact and OECD Guidelines for Multinational Enterprises (including the principles identified in the

Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights);

- Companies significantly involved in predatory lending (companies which are directly involved in unethical lending practices that impose unfair, deceptive and abusive loan terms on borrowers and generate >5% of revenue from these activities);
- Companies involved in controversial weapons (companies that are involved in the production or distribution of anti-personnel mines, cluster munitions, chemical and biological weapons, depleted uranium ammunitions or nuclear weapons);
- Companies significantly involved in adult entertainment production (companies that are principally engaged in the production of pornography and generate >10% of revenue from this activity);
- Tobacco companies (companies active in the cultivation or production of tobacco);

**Exclusionary Screening (ESG Pillar II)**

As part of the "**Exclusionary Screening**", the Compartment will also exclude:

- Companies with no ESG policy or no intention to develop one during the Compartment's ownership ("**ESG Policy**" means a policy under which environmental and social risks are identified and mitigated, compliance with applicable ESG regulation is ensured and the respective company's environmental and social impacts are assessed);
- Companies with major ESG related litigations.

In addition, the Investment Manager assesses as part of the due diligence whether the Portfolio Companies have or are willing to develop adequate policies and procedures to ensure alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles for Business and Human Rights.

## C. Sustainable investment objective of the financial product

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

The sustainable investment objective of the Compartment is to address the climate challenge as fundamental environmental problem of mankind by combatting global warming, the depletion of natural resources and the destruction of ecosystems. The Compartment pursues the following environmental objectives (described in more detail in the EU Taxonomy) alongside the generation of a financial return:

(i) **Climate Change Mitigation** refers to business efforts in reducing or preventing the release of greenhouse gases, which warm the atmosphere of our planet. This approach relies on the use of new technologies, making older equipment more energy efficient or profiting from changing consumer behaviour.

(ii) **Climate Change Adaptation** refers to business efforts that help reduce negative effects of current and expected effects of climate change. As certain consequences of climate change already affect the environment, new solutions help consumers and established organisations adapt to the different impacts and ensure business continuity in the face of climate-related risks.

(iii) **Protection and Restoration of Biodiversity and Ecosystems** refers to economic activities and sectors that enhance the preservation and restoration of ecosystems, or reduce pressure on natural resource consumption and production.

(iv) **Transition to a Circular Economy** refers to the shift away from a linear production and consumption model to a circular model, in which waste and pollution are minimised and the use of resources is reused and recycled, creating a closed-loop system. The traditional linear economy system is directly correlated with increased emissions of greenhouse gases, environmental pollution and depletion of finite resources. We target high growth businesses which help minimise waste and pollution, as well as enhance and develop resources that can be reused and recycled.

The Compartment generates measurable positive real-world impact by providing capital to and engaging with private companies whose economic activities contribute to the achievement of at least one of the Compartment's environmental objectives. The Investment Manager has defined the following seven "**Climate Impact Sectors**" comprising Portfolio Companies offering relevant products and services:

- **Energy Transition**: Renewable energy, energy storage and smart grids;
- **Green Mobility**: Electric vehicles, fuel cell, alternative fuels, lighter vehicles, journey avoidance;
- **Green Construction**: Low carbon construction, energy efficient buildings and technology;
- **Land Management**: Crop production, nature-based solutions, conservation, smart farming;
- **Circular Material**: Low waste packaging, waste management, materials recycling;
- **Forestry**: Reforestation; and
- **Low Carbon Manufacturing**: Low carbon technologies, supply chain optimisation, carbon capture and storage.

For each investment in a Portfolio Company, the Investment Manager determines on the basis of suitable Impact Indicators (see below "*F. Monitoring of the sustainable investment objective*") whether the Portfolio Company's economic activities positively contribute to one or more of the Compartment's environmental objectives by producing positive real-world outcomes ("**Portfolio Company Impact**") and monitors the achievement of the expected Portfolio Company Impact during the ownership period, taking appropriate measures if the Portfolio Company Impact is not achieved and sharing information on and considering the preservation of the achieved Portfolio Company Impact at exit.

In addition, the Investment Manager assesses the positive contribution of each investment to SDG 7 (Affordable and Clean Energy) and 13 (Climate Action) (see below "*F. Monitoring of the sustainable investment objective*").

## D. Investment strategy

**What is the investment strategy used to attain the sustainable investment objective?**

The Compartment is a private equity fund with the sustainable investment objective to address the climate challenge by making sustainable investments in Portfolio Companies whose economic activities contribute to at least one of the environmental objectives of the Compartment (see above "*C. Sustainable investment objective of the financial product*").

Such investment objective will be achieved through Direct Investments or Secondary Investments (as defined in the Private Placement Memorandum) targeting Portfolio Companies with headquarters, or with a substantial portion of their operations located in (i) Europe, and selectively adjacent countries, (ii) North America (the United States of America, Canada) and (iii) Asia (primarily China, India, Japan, Australia and Republic of Korea), and, selectively, adjacent countries. The Compartment may use interest and currency rate hedging for prudent portfolio management purposes and hold cash and other short-term liquid assets for liquidity purposes as well as other assets such as asset-related receivables.

The Compartment addresses the climate challenge as fundamental environmental problem of mankind through its investments in Portfolio Companies offering products and services which support combatting global warming, the depletion of natural resources and the destruction of ecosystems. The Compartment provides financial support via Direct or Secondary Investments and engages with Portfolio Companies in the context of the Net Zero Plan and the Engagement Plan (see below " *F. Monitoring of the sustainable investment objective"*) as well as the ESG Scoring (see below "*What is the policy to assess good governance practices of the investee companies?*"). This enables Portfolio Companies to grow their products and services and improve their operations (as measured by Impact Indicators such as GHG emissions intensity, renewable energy consumption or Waste Disposed: Recycled/Reused) and thereby contribute to the decarbonization of the economy, the reduction of resource consumption and the restoration of biodiversity (as measured by Impact Indicators such as GHG emissions avoidance, energy consumption avoidance or Land Directly Controlled: Sustainably Managed). In doing so, the Compartment contributes to keeping global warming to an acceptable level and facilitates the achievement of SDG 7 (Affordable and Clean Energy) and SDG 13 (Climate Action).

The Compartment will invest at least 97% of its NAV (as defined in the Private Placement Memorandum) in Portfolio Companies via Direct Investments or Secondary investments which qualify as sustainable investments and generate measurable positive real-world impact (see above "*C. What is the sustainable investment objective of this financial product?*", "*B. No significant harm to the sustainable investment objective*" and the subsection below "*What is the policy to assess good governance practices of the investee companies?*").

**What is the policy to assess good governance practices of the investee companies, including with respect to sound management structures, employee relations, remuneration of staff and tax compliance?**

For any investment considered, the Compartment will apply the Norm-based Screening and the Exclusionary Screening (see above "*Is the sustainable investment aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?*"). In addition, the Investment Manager assesses as part of the due diligence (see below "*J. Due Diligence*"), whether the Portfolio Companies have or are willing to develop adequate policies and procedures to ensure alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles for Business and Human Rights.

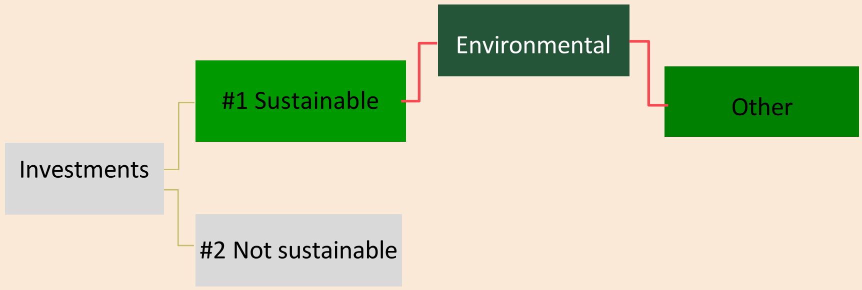
**ESG Scoring (ESG Pillar III)**

Furthermore, at the time of the initial investment and annually during the Compartment's ownership period, the Investment Manager performs an internal ESG scoring to determine how advanced Portfolio Companies are in integrating ESG matters, based on 50 qualitative and quantitative criteria ("ESG Scoring"). In the context of the ESG Scoring, the Investment Manager will use ESG KPIs such as GHG emissions, recycling quota and emission of pollutants as well as independent board members and percentage of women in senior positions. Based on the information collected in the ESG Scoring process, each Portfolio Company is rated out of 100% as follows: Under 25% "Lagger", between 25% and 50% "Beginner", between 50% and 75% "Follower" and above 75% "Leader". The outcome of the ESG Scoring is assessed during the due diligence (see below "F. Monitoring of the sustainable investment objective") by the Investment Committee.

As part of this ESG Scoring, the Investment Manager reviews the governance practices of the respective Portfolio Company (based on ESG KPIs such as existence of independent board members, implementation of governance committees, existence of key policies (whistleblowing, anti-money laundering, anti-bribery, anti-corruption, corporate code of conduct/ethics) and percentage of women in senior positions. If the Investment Manager considers that the results achieved by a Portfolio Company on governance-related ESG KPIs should be improved it will define steps for a potential improvement as part of the Engagement Plan and implement them via the ongoing engagement with the Portfolio Company (see below "K. Engagement policies").

## E. Proportion of investments

The Compartment will invest at least 97% of its NAV in sustainable investments (#1 Sustainable) contributing to environmental objectives. The Compartment's holding of cash, derivatives and other assets (#2 Not Sustainable) will amount to maximum 3% of its NAV.




**#1 Sustainable**

covers sustainable investments with environmental or social objectives.

**#2 Not sustainable** includes investments which do not qualify as sustainable investments.

Portfolio Companies may be held via Direct Investments or Secondary Investments (as defined in the Private Placement Memorandum). The share of Portfolio Companies held via Secondary Investments may amount up to 100% of the Compartment's NAV (as defined in the Private Placement Memorandum).

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

The Compartment does not commit to making sustainable investments which are aligned with EU Taxonomy (i.e. which meet all requirements of Art. 3 Regulation (EU) 2020/852) and the minimum percentage of sustainable investments aligned with EU Taxonomy is 0% (measured by all available key performance indicators, being turnover, capital expenditure and operating expenditure).

The Compartment takes into account EU Taxonomy alignment as one of the possible Impact Indicators for Portfolio Companies (see below "*F. Monitoring of the sustainable investment objective*") and engages with Portfolio Companies to support them in complying with the relevant EU Taxonomy technical screening criteria and the minimum safeguards in the context of the ongoing engagement process (see below "*K. Engagement policies*").

The Compartment has not appointed an auditor or third party to review the alignment of sustainable investments with the EU Taxonomy.

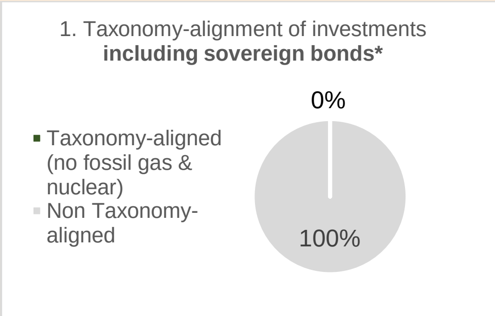
**Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[1]?**

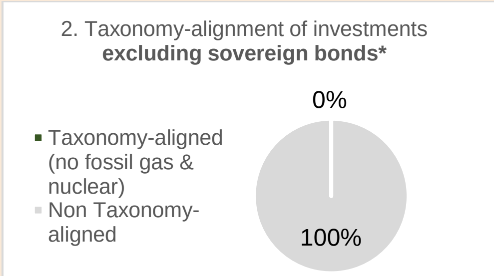
☐ **Yes:**

☐ **In fossil gas** ☐ **In nuclear energy**

☒ **No**

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




This graph represents 100% of the total investments.

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

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

The minimum share of investments in transitional and enabling activities is 0% (measured by turnover, capital expenditure and operating expenditure).

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

The Compartment expects a minimum of 97% of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy. The Compartment invests in sustainable investments with an environmental objective that are not EU Taxonomy-aligned for the following reasons: On the one hand, data to determine EU Taxonomy-alignment may be unavailable. On the other hand, underlying economic activities may not be eligible under the EU Taxonomy's available technical screening criteria or may not comply with all requirements set out in such technical screening criteria.

**What investments are included under "#2 Not Sustainable", what is their purpose and are there any minimum environmental or social safeguards?**

[1] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective. To comply with the EU Taxonomy, the criteria for fossil gas include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For nuclear energy, the criteria include comprehensive safety and waste management rules. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

Investments included under '#2 Not sustainable" include derivatives for interest and currency rate hedging, cash and other short-term liquid assets kept for liquidity purposes as well as other assets such as asset-related receivables. The amount of derivatives, cash and other assets (#2 Not Sustainable) will be up to 3% of the NAV and the use of these investments does not affect the delivery of the sustainable investment objective on a continuous basis. Cash and other assets are held as ancillary liquidity. There are no minimum environmental or social safeguards for investments included under '#2 Not sustainable'.

## F. Monitoring of the sustainable investment objective

**How are the sustainable investment objective and the sustainability indicators used to measure the attainment of the sustainable investment objective monitored throughout the lifecycle of the financial product and which are the related internal or external control mechanisms?**

The Investment Manager uses a range of sustainability indicators to measure the Portfolio Company Impact and the attainment of the sustainable investment objective of the Compartment. Per Portfolio Company, the Investment Manager will select at least two Impact Indicators. The main indicators the Investment Manager considers when choosing the specific Impact Indicators for each Portfolio Company are outlined in the table below.

| Environmental objective | Impact Indicators | Minimum contribution |
|---|---|---|
| Climate Change Mitigation | **GHG emissions intensity** (calculated in line with indicator no. 3 in Table 1 of Annex I to the SFDR RTS) | Potential for significant reduction in line with Science Based Targets ("**SBTs**") |
| Climate Change Mitigation | **GHG emissions avoidance** (IRIS+ metric PI2764) | Min. 1 tCO2 avoided in the last 12 months |
| Climate Change Mitigation | **Renewable energy consumption** (assessed on the basis of the same methodology as indicator no. 5 in Table 2 of Annex I to the SFDR RTS) | Min. 50% of total energy |
| Climate Change Mitigation | **Energy consumption intensity** (calculated on the basis of the definition in Annex I (8) to the SFDR RTS) | Subject to the economic activity; benchmarked to comparable public companies' energy consumption intensity |
| Climate Change Mitigation | **Energy consumption avoidance** (determined by the Compartment based on own methodology) | Subject to the economic activity; benchmarked to comparable public companies' energy consumption avoidance |
| Transition to a Circular Economy | **Waste Disposed: Recycled/Reused** (IRIS+ metric OI2535) | Min. 50% of total waste |
| Protection and Restoration of Biodiversity and Ecosystem | **Land Directly Controlled: Sustainably Managed** (IRIS+ metric OI6912) | Min. 50% of total land |
| All environmental objectives | **EU Taxonomy alignment** for the respective environmental objective, as determined in accordance with Delegated Regulation (EU) 2021/213 ("**Climate Delegated Act**") and/or Delegated Regulation (EU) 2023/2486 ("**Environmental Delegated Act**") | Achieve EU Taxonomy alignment |

The selected Impact Indicators may be supplemented on a case-by-case basis with additional Impact indicators derived from the IRIS+ framework (IRIS Catalog of Metrics).

The abovementioned thresholds will be reviewed against sector benchmarking derived from public companies and private companies, if available, and adjusted to the extent necessary. The Impact Indicators will be measured at the time of initial investment and the respective thresholds must be met within a 12-month period from the initial investment date. If the Compartment invests in a Portfolio Company carrying out one or more economic activities which have not yet become operational, the Investment Manager will use projected data to measure and monitor the Impact Indicators in relation to these economic activities until they become operational. In such cases, the 12-month period for meeting the Impact Indicator thresholds will begin when the relevant economic activities have become operational.

The measurement of the Impact Indicators defined for each Portfolio Company will also enable the Investment Manager to assess the positive contribution of each investment to the SDGs 7 (Affordable and Clean Energy) and 13 (Climate Action) based on a preliminary high level qualitative assessment referencing to SDG sub-targets.

To ensure that the investment in the Portfolio Companies leads to a net positive contribution to the environmental objectives pursued by the Compartment, the Investment Manager will apply a climate filter to any investment opportunity and exclude companies falling within any of the following categories ("**Climate Filter**"):

- Large emitters of greenhouse gases > 8000 tCO2e/USD $m revenue;
- Companies with significant revenues from exploration, mining, extraction, distribution or refining of hard coal and lignite, including significant thermal coal revenue exposure (≥1%);
- Companies with significant oil revenue exposure (≥10%);
- Companies with significant natural gas exposure (≥50%);
- Companies with severe physical risk;
- Companies with excessive generation of waste and/or consumption of water and/or brown energy;
- Companies with severe impact on biodiversity ecosystems; and
- Companies with significant revenues from electricity generation with a GHG intensity of more than 100 g CO2e/kWh (≥50%).

Each Portfolio Company under consideration will go through a stringent investment process consisting of the following steps:

(i) **Sourcing**: All investment opportunities will need to demonstrate potential to (a) positively contribute to one or more of the Compartment's environmental objectives set out above via its Portfolio Company Impact (see above "*C. What is the sustainable investment objective of this financial product?*") and (b) positively contribute to the SDGs 7 (Affordable and Clean Energy) or 13 (Climate Action), each based on a preliminary high level qualitative assessment performed by the Investment Manager.

(ii) **Preliminary review**: Application of (a) the Norm-based Screening and the Exclusionary Screening (see above "*Is the sustainable investment aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?*") and (b) the Climate Filter to ensure a net positive contribution (see above).

(iii) **Scoring and early warning memo**: Evaluation of requirements for sustainable investment, including (a) assessment against the Impact Indicators defined for the Portfolio Company (see above); (b) performance of the DNSH assessment (see above "*B. No significant harm to the sustainable investment objective*"); and (c) qualitative assessment of material sustainability risks (as described in the Private Placement Memorandum).

(iv) **Modelling and due diligence**: (a) Climate impact assessment aligned with SBTs to create net zero plan covering Scope 1 to 3 GHG emissions for the Portfolio Company ("**Net Zero Plan**"); (b) financial/legal/commercial due diligence (including labour relations); (c) quantitative assessment of material sustainability risks (notably financial impact); (d) ESG Scoring (see above "*D. Investment strategy*") and (e) determination of engagement plan by which the Compartment will seek to improve the ESG performance and support alignment of the Portfolio Company's economic activities with the EU Taxonomy ("**Engagement Plan**").

(v) **Investment committee decision and execution**: Approval of (a) ESG due diligence outcome; (b) Net Zero Plan; and (c) Engagement Plan.

(vi) **Portfolio management and engagement**: (a) Implementation of Net Zero Plan and Engagement Plan; (b) annual update of sustainable investment assessment and the Portfolio Company Impact (based on the Impact Indicators defined for the Portfolio Company, on the PAI Indicator data and on further elements of the DNSH assessment as set out under "*B. No significant harm to the sustainable investment objective*"); (c) annual update of ESG Scoring; and (d) quarterly reporting to investors (including references to annually determined Portfolio Company Impact and ESG performance of Portfolio Companies). If the expected Portfolio Company Impact is not achieved during the holding period, the Investment Manager engages with the Portfolio Company to agree on possible actions to achieve or adjust the expected Portfolio Company Impact in the context of a remediation plan. If the Portfolio Company remains unable to generate adequate Portfolio Company Impact, the Investment Manager may decide to exit the investment.

(vii) **Exit**: (a) Share information on Portfolio Company Impact, Net Zero Plan, Engagement Plan and ESG Scoring; and (b) consider, to the extent possible and financially viable, the preservation of the achieved Portfolio Company Impact in the selection of the buyer.

The Investment Manager's portfolio management function will carry out the above steps and the Investment Manager's risk management function will check the application of the Climate Filter, the Norm-based Screening and the Exclusionary Screening as well as the assessment of material sustainability risks and the ESG Scoring independently during the due diligence of each investment opportunity and be involved in the ongoing monitoring of sustainability risks and the ESG Scoring during the investment's holding period.

## G. Methodologies

**What are the methodologies used to measure the attainment of the sustainable investment objective?**

The Compartment uses a number of sustainability indicators consisting of the relevant Impact Indicators and the Climate Filter (see above "*F. Monitoring of the sustainable investment objective*"). The Impact Indicators are oriented at the IRIS+ framework (IRIS Catalog of Metrics). The Climate Filter is based on a quantitative assessment (if available) or a qualitative assessment.

**How are the sustainability indicators to measure the attainment of that sustainable investment objective used?**

The Compartment uses the sustainability indicators at different points of the investment process (see above "*F. Monitoring of the sustainable investment objective*"). The Investment Manager assesses the Portfolio Company's potential to positively contribute to the Compartment’s environmental objectives and the SDGs 7 or 13 (Climate Action) as part of the sourcing process. During the preliminary review, the Investment Manager applies the Climate Filter to ensure a net positive contribution. As part of the early warning memo/initial review, the Investment Manager assesses a Portfolio Company under consideration against the Compartment's Impact Indicators. During modelling and due diligence, an Engagement Plan will be created to support the alignment of the Portfolio Company's economic activities with the EU Taxonomy. As part of the portfolio management and engagement during the holding period, the Investment Manager annually updates the Portfolio Company Impact based on the Impact Indicators defined for the respective Portfolio Company. If the expected Portfolio Company Impact is not achieved during the holding period, the Investment Manager takes the steps described above in "*F. Monitoring of the sustainable investment objective*" and below in "*K. Engagement policies*".

The Impact Indicators will be measured at the time of initial investment and the respective thresholds must be met within a 12-month period from the initial investment date. If the Compartment invests in a portfolio company carrying out one or more economic activities which have not yet become operational, the Investment Manager will use projected data to measure and monitor the Impact Indicators in relation to these economic activities until they become operational. In such cases, the 12-month period for meeting the Impact Indicator thresholds will begin when the relevant economic activities have become operational. During the holding period, the Portfolio Company Impact of each Portfolio Company measured by the relevant Impact Indicators will be updated annually.

## H. Data sources and processing

**What are the data sources used to attain the sustainable investment objective of the financial product?**

Due to scarcity of the external data for private equity Portfolio Companies the Compartment uses a combination of the following data sources (to the extent for each Portfolio Company):

- In-house data – notably gathered through questions that are asked during the due diligence process and post-investment engagement;
- Technical assessments performed by third parties; and
- Third-party data providers – selected on the basis of the economic activities of the Portfolio Companies.

**What are the measures taken to ensure data quality?**

Prior to using external ESG data, the Investment Manager carefully assesses the data source and the methodology of the external provider. Once it decides to use the provider of the external ESG data, this data will never lead to a mechanistic reliance on the respective assessment.

Instead, the Investment Manager uses external data as an additional, but not the sole, source for its internal assessments. Moreover, it will appoint an expert service provider to calculate and verify ESG data received from the Portfolio Companies.

**How are data processed?**

Data from all possible sources are processed and stored internally. The Investment Manager builds its ESG Scorings for portfolio companies internally with the data provided externally.

**Which proportion of that data are estimated?**

Data related to the sustainability indicators (including the relevant Impact Indicators) may be based on proxy methodology, in particular in the early stages of the investment process for a new investment (see above "*F. Monitoring of the sustainable investment objective*" and below "*J. Due Diligence*"). If the Compartment invests in a Portfolio Company carrying out one or more economic activities which have not yet become operational, the Investment Manager will use projected data to measure and monitor the Impact Indicators in relation to these economic activities until they become operational.

![UNIGESTION logo]

## I. Limitations to methodologies and data

**What are the limitations to the methodologies and data sources?**

There are limitations around data availability and quality for privately owned companies which need to be considered by the Compartment. Information from third party data providers is rarely available for privately held Portfolio Companies.

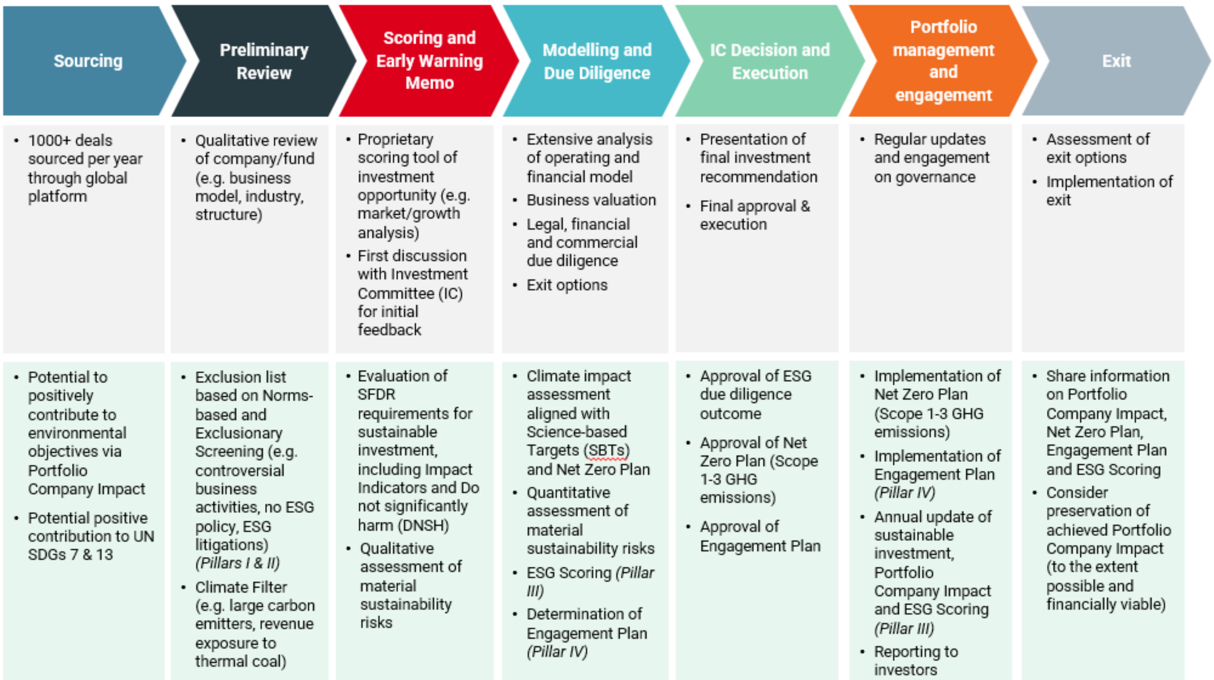
**Why do such limitations not affect the attainment of the sustainable investment objective?**

To deal with data limitations, the Compartment will use proxy methodology or rely on data from the potential Portfolio Companies under review to ensure that these limitations do not affect the attainment of the sustainable investment objective.

## J. Due diligence

**How is the due diligence carried out on the underlying assets of the financial product and which are the internal and external controls on that due diligence?**

The below chart illustrates the general investment due diligence process applied to any investment opportunity of the Compartment.




Please also refer to the investment process description (see above "*F. Monitoring of the sustainable investment objective*").

The Investment Manager's risk management function will check the application of the Climate Filter, the Norm-based Screening and the Exclusionary Screening as well as the assessment of material sustainability risks and the ESG Scoring independently during the due diligence of each investment opportunity and be involved in the ongoing monitoring of sustainability risks and the ESG Scoring during the investment's holding period.

## K. Engagement policies

**Is engagement part of the sustainable investment objective and which are the engagement policies? Are there any management procedures applicable to sustainability-related controversies in investee companies?**

As part of the ongoing investment process, the Compartment will determine and implement an engagement plan for each Portfolio Company by which the Compartment will seek to improve the Portfolio Company's ESG performance and support alignment of the Portfolio Company's economic activities with the EU Taxonomy (see above " *F. Monitoring of the sustainable investment objective*"). The ESG performance of each Portfolio Company will be updated annually in the context of the ESG Scoring (see above "*D. Investment strategy*") and considered for the purposes of the Engagement Plan together with the PAI Indicators and further elements of the DNSH assessment (see above "*B. No significant harm to the sustainable investment objective*"). The specific level of engagement and the resulting actions will be defined individually for each Portfolio Company. If the expected Portfolio Company Impact is not achieved during the holding period, the Investment Manager engages with the Portfolio Company to agree on possible actions to achieve or adjust the expected Portfolio Company Impact in the context of a remediation plan. If the Portfolio Company remains unable to generate adequate Portfolio Company Impact, the Investment Manager may decide to exit the investment.

**Are there any management procedures applicable to sustainability-related controversies in investee companies?**

Sustainability-related controversies will feed into the annual review of the ESG performance of each Portfolio Company in the context of the ESG Scoring. The resulting actions will be defined individually for each Portfolio Company as part of the ongoing engagement process.

## L. Attainment of the sustainable investment objective

No reference benchmark has been designated for the purpose of attaining the sustainable investment objective of the Compartment.