INFORMATION FOR INVESTORS IN FUNDS MANAGED BY

TMF Fund Management (Ireland) Limited

2025

Disclosure regarding:

Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector
("SFDR")

Regulation (EU) 2020/852 of The European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment ("Taxonomy")

The SFDR lays down harmonized rules for financial market participants (including UCITS Management Companies and AIFMs) and financial advisers on transparency with regard to the integration of sustainability risks and the consideration of adverse sustainability impacts in their processes and the provision of sustainability-related information with respect to financial products.

The Taxonomy Regulation establishes an EU-wide classification system or 'framework' intended to provide businesses and investors with a common language to identify to what degree economic activities can be considered environmentally sustainable.

Principal Adverse Impacts - Products Promoting Environmental or Social Characteristics

In regard to the Regulation (EU) 2019/2088 and Regulation (EU) 2020/852, the funds listed below fall within the scope of Article 8 of SFDR, i.e. products that promote environmental or social characteristics.

- Progressive Capital Investments Sub-Fund 1
- Progressive Capital Investments Sub-Fund 2
- Goodbody Global Real Estate Fund

In relation to Regulation (EU) 2019/2088 and Regulation (EU) 2020/852, TMF Fund Management (Ireland) Limited ("TMF-FM") and/or the Investment Manager considers the adverse impacts of investment decisions on sustainability factors in line with Article 4 (1) b of the SFDR for these funds.

Further information relating to these funds can be found on the following pages.

Progressive Capital Investments Sub-Fund 1 (the "Fund")
a sub-fund of
the Progressive Capital Investments ICAV

Summary

For the purposes of Article 8 of the Sustainable Finance Disclosure Regulation ("SFDR"), the investments underlying the Fund promote environmental characteristics with an objective of climate change mitigation and climate change adaptation. This is achieved through the acquisition and ownership of real estate assets with high-grade energy performance and the improvement of less energy-efficient real estate assets through the installation, maintenance and repair of equipment and technologies that are aimed at improving energy performance and reducing carbon emissions. The Fund may also invest in sustainable forestry and bog rewetting to contribute to this objective.

The following sustainability indicators are used to measure the Fund's attainment of the environmental characteristics: exposure to fossil fuels, exposure to energy-inefficient real estate assets, energy consumption, waste production and independent building energy ratings. New investments will be screened using these indicators and metrics for the investment portfolio will be reported annually in accordance with the methodologies outlined in the SFDR Regulatory Technical Standards. The data for this reporting will be obtained from reputable independent third-party consultants and utility providers who will have the necessary access to the real estate assets to collect the data and ensure data quality.

No sustainable investment objective

This financial product promotes environmental or social characteristics but does not have as its objective sustainable investment.

Where the Fund makes sustainable investments, these will be screened in line with the indicators for adverse impacts in Annex I of the SFDR Regulatory Technical Standards that are listed as being applicable to investments in real estate assets to ensure that the investments do not significantly harm any social or environmental objectives.

Sustainable investments will be screened to ensure that they are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, to the extent that the guidelines and principles are applicable to investments in real estate assets. The Fund's real estate investments are located exclusively in Ireland and are not considered multinational enterprises. The Fund, when making sustainable investments, will comply with all applicable laws and respect internationally recognized human rights. Consideration has been given to the risk of potential adverse human rights impacts arising directly from the Fund's real estate investments and through business relationships linked to their operation. In the unlikely event that potential adverse human rights impacts are identified, priority action will be taken to prevent and mitigate those impacts in line with the UN Guiding Principles on Business and Human Rights.

Environmental or social characteristics of the financial product

The Fund promotes environmental characteristics including the efficient use of energy and water resources, the increased use of renewable energy, waste prevention and recycling, and the facilitation of sustainable transport (such as cycling and use of electric vehicles) to support climate change mitigation and climate change adaption.

Investment strategy

The investment strategy of the Fund is focused on real estate investments in the Irish property market. The Fund may invest in a portfolio of Properties in the office, industrial warehouse medical, data processing, residential, retail, retail warehouse and leisure sectors. The Fund may also invest in sustainable forestry and bog rewetting to promote environmental characteristics.

The Fund’s sustainable investments will comprise of:

i) new Properties that are LEED accredited at the time of acquisition/development
ii) properties in the top 15% of their specific property type (BER ratings A & B)
iii) properties where the Fund has invested in, or has committed within the business plan for a Property to invest in, building improvements to improve the Property’s sustainability and/or
iv) sustainable forestry and bog rewetting activities.

Proportion of investments

The Fund promotes environmental characteristics, and while it does not have as its objective sustainable investment, it will have a minimum proportion of 50% of sustainable investments with an environmental objective in activities that do not qualify as environmentally sustainable under the EU Taxonomy.

Monitoring of environmental or social characteristics

The environmental characteristics promoted by the Fund and the sustainability indicators used to measure the attainment of these characteristics are monitored throughout the life cycle of the Fund.

The objective of the sustainable investments which the Fund undertakes, is to support climate change mitigation and climate change adaption through investment in real estate. Contribution to this objective will be achieved through the acquisition and ownership of new buildings with high-grade energy performance and the improvement of less energy-efficient buildings through the installation, maintenance and repair of equipment and technologies that are aimed at improving energy performance and reducing carbon emissions. The Fund may also invest in sustainable forestry and bog rewetting to contribute to this objective. The composition of the investment portfolio will be monitored on an ongoing basis to ensure that at least 50% of the portfolio comprises sustainable investments that meet the necessary criteria.

The sustainability indicators used to measure attainment of the environmental characteristics are as follows: exposure to fossil fuels, exposure to energy-inefficient real estate assets, energy consumption, waste production, independent building energy ratings. New investments will be screened using these indicators and metrics for the sustainability indicators will be reported annually.

Methodologies

The sustainability indicators used to monitor the attainment of the Fund's environmental characteristics will be measured annually in accordance with the methodologies outlined in the SFDR Regulatory Technical Standards.

For the screening of new real estate investments, the carbon dioxide emissions indicator (kgCO2/m2/yr) and the energy consumption indicator (kWh/m2/yr) as noted on the property's BER certificate may be used as a proxy where measurement of GHG emissions and energy consumption has not yet been completed.

Data sources and processing

Data for monitoring the attainment of the environmental characteristics promoted by the Fund is obtained from independent third-party consultants and utility providers (for energy and waste). Only information provided by reputable suppliers is used to ensure data quality. The data providers have the necessary access to the real estate assets to appropriately measure the data which is then processed on secure systems by experienced personnel. No proportion of the data is estimated.

Limitations to methodologies and data

The data providers have not indicated that there are any limitations to their data collection processes or methodologies which could impact the attainment of the environmental characteristics promoted by the Fund.

Due diligence

Prior to the Fund's acquisition of any Property or real estate asset, the investment manager will ensure that appropriate due diligence has been performed on the proposed investment. In doing so, it would typically rely in part on third parties to conduct a significant portion of this due diligence including providing sustainability-related property accreditations, legal reports and property valuations. There can be no assurance, however, that such due diligence examinations will reveal all of the risks associated with the investment or the full extent of such risks. Properties acquired may be subject to hidden material defects that were not apparent at the time of acquisition. To the extent that the responsible parties underestimate or fail to identify risks and liabilities associated with an investment, the Fund may be subject, inter alia, to one or more of the following risks: defects in title, prior ranking interests in a Property, third party rights affecting title to a Property having the potential to inhibit or restrict the use or development thereof, missing title documents, an inability to obtain permits enabling the Fund to use and/or develop a Property as intended, unexpected or undetected tax costs associated with acquiring a Property, environmental, structural or operational defects or liabilities requiring remediation and/or not covered by indemnities or insurance, existing structures or developments on the site having structural issues or not being in compliance with planning legislation, building control legislation, health and safety legislation or fire safety legislation and non-compliance with contractual commitments or outstanding financial contributions imposed by various planning permissions. Any of these consequences may have a material adverse effect on the Fund's investment.

Engagement policies

The Fund does not have engagement as part of its environmental investment strategy as it does not invest in investee companies.

Designated reference benchmark

A benchmark or index has not been designated for referencing the Fund's environmental characteristics.

Progressive Capital Investments Sub-Fund 2 (the "Fund")
a sub-fund of
the Progressive Capital Investments ICAV

Summary

For the purposes of Article 8 of the Sustainable Finance Disclosure Regulation ("SFDR"), the investments underlying the Fund promote environmental characteristics with an objective of climate change mitigation and climate change adaptation. This is achieved through the acquisition and ownership of real estate assets with high-grade energy performance and the improvement of less energy-efficient real estate assets through the installation, maintenance and repair of equipment and technologies that are aimed at improving energy performance and reducing carbon emissions. The Fund may also invest in sustainable forestry and bog rewetting to contribute to this objective.

The following sustainability indicators are used to measure the Fund's attainment of the environmental characteristics: exposure to fossil fuels, exposure to energy-inefficient real estate assets, energy consumption, waste production and independent building energy ratings. New investments will be screened using these indicators and metrics for the investment portfolio will be reported annually in accordance with the methodologies outlined in the SFDR Regulatory Technical Standards. The data for this reporting will be obtained from reputable independent third-party consultants and utility providers who will have the necessary access to the real estate assets to collect the data and ensure data quality.

No sustainable investment objective

This financial product promotes environmental or social characteristics but does not have as its objective sustainable investment.

Where the Fund makes sustainable investments, these will be screened in line with the indicators for adverse impacts in Annex I of the SFDR Regulatory Technical Standards that are listed as being applicable to investments in real estate assets to ensure that the investments do not significantly harm any social or environmental objectives.

Sustainable investments will be screened to ensure that they are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, to the extent that the guidelines and principles are applicable to investments in real estate assets. The Fund's real estate investments are located exclusively in Ireland and are not considered multinational enterprises. The Fund, when making sustainable investments, will comply with all applicable laws and respect internationally recognized human rights. Consideration has been given to the risk of potential adverse human rights impacts arising directly from the Fund's real estate investments and through business relationships linked to their operation. In the unlikely event that potential adverse human rights impacts are identified, priority action will be taken to prevent and mitigate those impacts in line with the UN Guiding Principles on Business and Human Rights.

Environmental or social characteristics of the financial product

The Fund promotes environmental characteristics including the efficient use of energy and water resources, the increased use of renewable energy, waste prevention and recycling, and the facilitation of sustainable transport (such as cycling and use of electric vehicles) to support climate change mitigation and climate change adaption.

Investment strategy

The investment strategy of the Fund is focused on real estate investments in the Irish property market. The Fund may invest in a portfolio of Properties in the office, industrial warehouse medical, data processing, residential, retail, retail warehouse and leisure sectors. The Fund may also invest in sustainable forestry and bog rewetting to promote environmental characteristics.

The Fund’s sustainable investments will comprise of:

i) new Properties that are LEED accredited at the time of acquisition/development
ii) properties in the top 15% of their specific property type (BER ratings A & B)
iii) properties where the Fund has invested in, or has committed within the business plan for a Property to invest in, building improvements to improve the Property’s sustainability and/or
iv) sustainable forestry and bog rewetting activities.

Proportion of investments

The Fund promotes environmental characteristics, and while it does not have as its objective sustainable investment, it will have a minimum proportion of 50% of sustainable investments with an environmental objective in activities that do not qualify as environmentally sustainable under the EU Taxonomy.

Monitoring of environmental or social characteristics

The environmental characteristics promoted by the Fund and the sustainability indicators used to measure the attainment of these characteristics are monitored throughout the life cycle of the Fund.

The objective of the sustainable investments which the Fund undertakes, is to support climate change mitigation and climate change adaption through investment in real estate. Contribution to this objective will be achieved through the acquisition and ownership of new buildings with high-grade energy performance and the improvement of less energy-efficient buildings through the installation, maintenance and repair of equipment and technologies that are aimed at improving energy performance and reducing carbon emissions. The Fund may also invest in sustainable forestry and bog rewetting to contribute to this objective. The composition of the investment portfolio will be monitored on an ongoing basis to ensure that at least 50% of the portfolio comprises sustainable investments that meet the necessary criteria.

The sustainability indicators used to measure attainment of the environmental characteristics are as follows: exposure to fossil fuels, exposure to energy-inefficient real estate assets, energy consumption, waste production, independent building energy ratings. New investments will be screened using these indicators and metrics for the sustainability indicators will be reported annually.

Methodologies

The sustainability indicators used to monitor the attainment of the Fund's environmental characteristics will be measured annually in accordance with the methodologies outlined in the SFDR Regulatory Technical Standards.

For the screening of new real estate investments, the carbon dioxide emissions indicator (kgCO2/m2/yr) and the energy consumption indicator (kWh/m2/yr) as noted on the property's BER certificate may be used as a proxy where measurement of GHG emissions and energy consumption has not yet been completed.

Data sources and processing

Data for monitoring the attainment of the environmental characteristics promoted by the Fund is obtained from independent third-party consultants and utility providers (for energy and waste). Only information provided by reputable suppliers is used to ensure data quality. The data providers have the necessary access to the real estate assets to appropriately measure the data which is then processed on secure systems by experienced personnel. No proportion of the data is estimated.

Limitations to methodologies and data

The data providers have not indicated that there are any limitations to their data collection processes or methodologies which could impact the attainment of the environmental characteristics promoted by the Fund.

Due diligence

Prior to the Fund's acquisition of any Property or real estate asset, the investment manager will ensure that appropriate due diligence has been performed on the proposed investment. In doing so, it would typically rely in part on third parties to conduct a significant portion of this due diligence including providing sustainability-related property accreditations, legal reports and property valuations. There can be no assurance, however, that such due diligence examinations will reveal all of the risks associated with the investment or the full extent of such risks. Properties acquired may be subject to hidden material defects that were not apparent at the time of acquisition. To the extent that the responsible parties underestimate or fail to identify risks and liabilities associated with an investment, the Fund may be subject, inter alia, to one or more of the following risks: defects in title, prior ranking interests in a Property, third party rights affecting title to a Property having the potential to inhibit or restrict the use or development thereof, missing title documents, an inability to obtain permits enabling the Fund to use and/or develop a Property as intended, unexpected or undetected tax costs associated with acquiring a Property, environmental, structural or operational defects or liabilities requiring remediation and/or not covered by indemnities or insurance, existing structures or developments on the site having structural issues or not being in compliance with planning legislation, building control legislation, health and safety legislation or fire safety legislation and non-compliance with contractual commitments or outstanding financial contributions imposed by various planning permissions. Any of these consequences may have a material adverse effect on the Fund's investment.

Engagement policies

The Fund does not have engagement as part of its environmental investment strategy as it does not invest in investee companies.

Designated reference benchmark

A benchmark or index has not been designated for referencing the Fund's environmental characteristics.

Goodbody Global Real Estate Fund (the "Fund")
a sub-fund of
the Global Alternatives Platform ICAV

Summary

The Fund, as part of the CBRE Global Alpha Platform (consisting of the Master Fund and several other paralell funds, forming a single investment platform) ("Global Alpha") investment strategy is to invest in high quality real estate possessing strong income growth potential and ESG credentials, and which is supported by long term structural drivers. The Fund seeks to back the key investment convictions of the AIFM of the Master Fund with meaningful allocations in a focused, but globally diversified portfolio.

The Fund invests in both primary issuance real estate funds and secondary interests in real estate funds, including (but not limited to) commingled funds, co-investments, joint ventures, and other vehicles where the underlying assets are real estate. The Fund invests in Europe, the Americas and Asia Pacific across all main real estate sectors. Investments will be principally in the major commercial property types including office, retail and industrial, but will also include residential and other sectors, such as leisure and healthcare.

The portfolio is intended to comprise of at least 25 individual investments, which will provide the Master Fund with a broad diversification to geographies and property types, and a large number of underlying properties.

No sustainable investment objective

This financial product promotes environmental or social characteristics but does not have as its objective sustainable investment. The Fund is therefore not subject to the additional disclosure requirements for financial products referred to in Article 9 SFDR. Information on how environmental or social characteristics are met is disclosed in the annex to this Supplement i.e. Annex II Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852.

Environmental or social characteristics of the financial product

The Fund invests in target funds which promote environmental characteristics as outlined in the investment strategy section below, and more specifically referred to together as the "Environmental Characteristics"

Investment strategy

The Fund invests substantially all of its assets in CBRE Global Alpha Fund FCP-SIF (the "Master Fund") which promotes climate change mitigation and adaptation as part of its ESG strategy, by seeking to invest in target funds with one or more of the following characteristics:

I. promotion of climate change mitigation by targeting emissions reductions;

II. above peer group average GRESB score (GRESB being an ESG data provider); and/or in target funds invested in assets with the following characteristic:

III. physical climate risk screening performed for underlying assets of the target fund ("Underlying Assets") and Underlying Assets with high exposure to physical climate hazards have vulnerability analysis undertaken and mitigation plans in place,

(each of (I) – (III), an "Environmental Characteristic", and together, the "Environmental Characteristics").

The GGREF strategy is an indirect strategy, the Master Fund, in which the Fund invests substantially all its assets, does not have direct control over assets and can only seek to influence operating partners and underlying fund managers with respect to ESG integration. The Master Fund promotes environmental characteristics and makes the corresponding disclosures within the meaning of Article 8 SFDR but does not have Sustainable Investment as its objective for the purposes of the SFDR.

Proportion of investments

The Fund will invest substantially all of its assets in the Master Fund. The Master Fund is committed to being at least 65% invested in target funds and/or Underlying Assets which are '#1 Aligned with E/S characteristics' of which all are '#1B Other E/S characteristics'. The Master Fund understands that this is a binding commitment that should not be breached, however it is noted that there will be certain points in the Fund's life where it may not be able to meet this target commitment (such as when a significant number of Underlying Assets are in "start-up" or winding down or where a material number of redemptions have been requested).

Monitoring of environmental or social characteristics

The Fund primarily focuses on measuring the attainment of the Environmental Characteristics that it promotes. The sustainability indicators used to measure the attainment of such Environmental Characteristics shall be one or more of the following (based on Net Asset Value):

a) in relation to Environmental Characteristic (I), % of target funds with an emissions reduction commitment in place;

b) in relation to Environmental Characteristic (II), % of target funds with GRESB (Management and Performance or Management and Development components as appropriate) score above peer group average. Where a holding participates in both the Performance and Development component, above peer group average is required for both in order to attain this characteristic;for the Environmental Characteristic promoted at the level of the Underlying Assets:

c) in relation to Environmental Characteristic (III), % of Underlying Assets (x) in relation to which the manager of the relevant target fund has developed mitigation plans, or (y) which, through the completion of climate scenarios or audits by the manager of the relevant target fund, have proven not to require a mitigation plan.

Methodologies

The sustainability indicators used to monitor the attainment of the Fund's environmental characteristics will be measured annually in accordance with the methodologies outlined in the SFDR Regulatory Technical Standards. The sustainability indicators consist of the following.

- Environmental Characteristic (I), % of target funds with an emissions reduction commitment in place;

- Environmental Characteristic (II) % of target funds with GRESB (Management and Performance or Management and Development components as appropriate) score above peer group average

- Environmental Characteristic (III), % of Underlying Assets (x) in relation to which the manager of the relevant target fund has developed mitigation plans, or (y) which, through the completion of climate scenarios or audits by the manager of the relevant target fund, have proven not to require a mitigation plan.

For the purposes of calculating the percentage of investments aligned with the Environmental Characteristics, the Fund will take into account:

(a) 100% of the NAV of the target fund for target funds which meet Environmental Characteristic (I) or (II), and

(b) the percentage of Underlying Assets (calculated based on the NAV of the target fund) which meet the criteria set out in limb (c) of the section "*What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product*?", for a target fund which meets Environmental Characteristic (III),

Data sources and processing

Data for monitoring the attainment of the environmental characteristics promoted by the Fund is obtained from the master Fund. The monitoring of attainment of the environmental characteristics is monitored by the in-house research team at the master fund.

The AIFM confirms that as a more general matter ESG considerations remain of great importance, including in the context of its investment decisions. The Goodbody Global Real Estate Fund's investment strategy is an indirect strategy. The Master Fund, in which the Fund invests substantially all its assets, does not have direct control over assets and can only seek to influence operating partners and underlying fund managers with respect to ESG integration

Limitations to methodologies and data

The data providers have not indicated that there are any limitations to their data collection processes or methodologies which could impact the attainment of the environmental characteristics promoted by the Fund.

Due diligence

The AIFM of the Master Fund considers that sustainability factors, in particular climate change-related risks and opportunities, can have a material positive or negative impact on investment performance. Therefore, consideration of ESG issues is integral and constitutes a binding element to the Master Fund AIFM's investment decision making and investment management process. The following is undertaken:

- Global Alpha's dedicated team, alongside the Firm's in-house sustainability team, evaluates opportunities for sustainability improvements for each underlying fund or asset prior to acquisition and tracks performance during the hold period. To do this, prior to investment the Fund team requires that the operating partner shares their latest GRESB results and completes a proprietary sustainability questionnaire which allows an assessment to be made about achievement of the Environmental Characteristics.

- A Sustainability Scorecard is created for each investment and forms the basis of engagement with operating partners to agree actions to attain the Environmental Characteristics.
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In addition, the Firm's Insights and Intelligence team ("Research Team") provides the foundation for the construction and execution of Global Alpha's investment plan. The portfolio management team works closely with the Research Team as part of the ongoing assessment of the Fund's strategic risk framework. This process includes establishing appropriate long-term targets and bandwidths for the sectors and geographic allocation of the portfolio, monitoring developments within these targets, in addition to defining the attributes of the income exposures and property types that formulate Global Alpha's investment strategy.

Engagement policies

There is no applicable reference benchmark index currently available for private real estate investment and therefore no reference benchmark has been designated for the purpose of attaining the environmental characteristics promoted by the Fund.

Designated reference benchmark

A benchmark or index has not been designated for referencing the Fund's environmental characteristics.

Remuneration Policy

Where appropriate, TMF-FM will consider sustainability risk as part of staff remuneration and will reflect this in its remuneration policy.

Emerald Global Energy Transformation Fund (Ireland) (the "Fund") a sub-fund of Emerald Innovation Fund ILP

Summary

The Sub-Fund promotes environmental and social characteristics within the meaning of Article 8 of Regulation (EU) 2019/2088 but does not have as its objective sustainable investment.

The Sub-Fund promotes the following environmental and social characteristics by integrating ESG considerations into its due diligence processes and its overall assessment of investment opportunities, as further detailed below: (i) good environmental practices (for example, in relation to greenhouse gas "GHG" emissions, renewable energy consumption, and having environmental policies in place), (ii) gender diversity and equality, and (iii) good governance practices.

The Sub-Fund invests in early and expansion stage companies in the energy and energy-related technology sector and predominantly invests in equity securities of unlisted companies and in certain situations, securities that are convertible into such unlisted equity.

As part of the detailed due diligence conducted on each proposed investment opportunity, the Sub-Fund considers ESG risks and opportunities and whether the potential investee company is engaged in certain activities or industries determined by the Sub-Fund to be excluded by reason of a perceived negative impact of such activities on sustainability factors (the "Exclusion List"). The Sub-Fund's Exclusion List includes, amongst other exclusions, the EU Climate Transition Benchmark exclusions outlined in Commission Delegated Regulation (EU) 2020/1818, as detailed below. Once an investment is made, the Sub-Fund engages with investee companies to encourage the continuous improvement or implementation of ESG best practices, aligned with current and evolving market standards for start-up companies.

The path to environmental transition towards a greener economy is embedded as a core component of the Sub-Fund's investment policy and strategy. The Sub-Fund's investments which are used to meet the environmental and social characteristics promoted by the Sub-Fund seek to facilitate the transition to a greener economy by enabling the reduction of GHG emissions by other companies, including producers of fossil fuels.

At least 80% of the investments of the Sub-Fund are used to meet the environmental or social characteristics promoted by the Sub-Fund in accordance with the binding elements of the investment strategy. The Sub-Fund does not commit to making investments that qualify as sustainable investments.

The Sub-Fund uses an ESG scoring system to measure the attainment of the environmental, social, and governance characteristics promoted by the Sub-Fund. Investee companies are required to complete an annual questionnaire, which is used to generate their ESG score and monitor overall ESG performance.

The ESG scoring system used by the Sub-Fund evaluates each portfolio company's overall ESG performance, as well as performance within the three ESG pillars: Environmental,

Social, and Governance. The scoring is based on a set of sustainability metrics that are individually assessed and then aggregated to calculate separate scores for Environmental, Social, and Governance performance, as well as an overall ESG score for each company. These indicators are weighted by sector-specific materiality according to the Sustainable Accounting Standards Board ("SASB") framework to calculate each company's ESG score. Data for monitoring the attainment of the environmental or social characteristics promoted by the Sub-Fund is obtained directly from investee companies. The data is collected annually at the request of the Investment Advisor and following standard ESG reporting guidelines for private markets. The data collection and processing are facilitated through an ESG platform, which enables systematic data collection, monitoring and reporting.
The Sub-Fund is aware of the limitations of data and applications of the methodology to private markets, and specifically to start-up companies, as further outlined below, including, for example, the absence of public data and dependency on investee companies to report and limited availability of appropriate benchmarks. The Sub-Fund actively collaborates with portfolio companies to support and encourage the measurement of key environmental and social indicators, acknowledging that start-ups may currently have limited capabilities for ESG data collection and reporting.

The Investment Advisor carries out ESG due diligence on all prospective investments to identify and analyze any risks of controversies or issues related to social, environmental, human rights, ethical and governance matters.

As described above, the Sub-Fund engages with investee companies to support and encourage the continuous improvement or implementation of ESG best practices, aligned with current and evolving market standards for start-up companies. In most cases, the Sub-Fund will be represented by the Investment Advisor having a representative on the investee company's board of directors, which usually allows the Sub-Fund to gain insight and exercise a certain level of influence over its investee companies. This influence is used to continuously steer companies to adopt and practice good corporate governance as well as to implement risk monitoring and management tools, in order to identify potential ESG risks and to mitigate them pro-actively.

No index has been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the Sub-Fund.

No sustainable investment objective

This Sub-Fund promotes environmental or social characteristics but does not have as its objective sustainable investment.

Environmental or social characteristics of the financial product

The Sub-Fund promotes the following environmental and social characteristics by integrating ESG considerations into its due diligence processes and its overall assessment of investment opportunities, as further detailed below: (i) good environmental practices (for example, in relation to greenhouse gas "GHG" emissions, renewable energy consumption, and having environmental policies in place), (ii) gender diversity and equality, and (iii) good governance practices.

Investment strategy

The Sub-Fund invests in early and expansion stage companies in the energy and energy-related technology sector and predominantly invests in equity securities of unlisted companies and in certain situations, securities that are convertible into such unlisted equity.

As part of the detailed due diligence conducted on each proposed investment opportunity, the Sub-Fund considers ESG risks and opportunities and whether the potential investee company is engaged in certain activities or industries determined by the Sub-Fund to be excluded by reason of a perceived negative impact of such activities on sustainability factors (the "Exclusion List"). The results of the ESG due diligence and assessment form an integral part of the Investment Advisor's investment recommendation and are considered when making investment decisions.

Once an investment is made, the Sub-Fund engages with investee companies to encourage the continuous improvement or implementation of ESG best practices, aligned with current and evolving market standards for start-up companies. In most cases, the Sub-Fund will be represented by the Investment Advisor having a representative on the investee company's board of directors, which usually allows the Sub-Fund to gain insight and exercise a certain level of influence over its investee companies. This influence is used to continuously steer companies to adopt and practice good corporate governance as well as to implement risk monitoring and management tools, in order to identify potential ESG risks and to mitigate them pro-actively.

The elements of the Sub-Fund's investment strategy which are binding are:

- Application of the Exclusion List (as further detailed above);

- Integration of ESG analysis into investment decision-making processes;
- Active ownership: through continued engagement and collaboration with portfolio companies in relation to ESG matters and board representation (as further outlined above);
- Inclusion of an ESG clause in the term sheet for proposed investments (assuming that the Sub-Fund is leading the transaction) to ensure investee companies' adherence to ESG principles and appropriate disclosure.

The Sub-Fund's Exclusion List includes, amongst other exclusions, the EU Climate Transition Benchmark exclusions outlined in Commission Delegated Regulation (EU) 2020/1818, as follows:

(a) companies involved in any activities related to controversial weapons (as referred to in international treaties and conventions, United Nations principles and, where applicable, national legislation);
(b) companies involved in the cultivation and production of tobacco;
(c) companies that the Investment Advisor (and/or benchmark administrators, where relevant) find in violation of the United Nations Global Compact (UNGC) principles or the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises.

The path to environmental transition towards a greener economy is embedded as a core component of the Sub-Fund's investment policy and strategy. As further detailed in the Supplement, the Sub-Fund invests primarily in the energy and energy-related technology sectors, seeking investments in potentially transformative energy and energy-related technology innovations that enable entirely new products, performance improvements of existing products, new technologies, enhanced-efficiency, and/or significant cost savings in the energy and energy-related technology sectors. The Sub-Fund's investments which are used to meet the environmental and social characteristics promoted by the Sub-Fund seek to facilitate the transition to a greener economy by enabling the reduction of GHG emissions by other companies, including producers of fossil fuels. In line with the Sub-Fund's investment strategy, the Sub-Fund seeks to achieve this through investment in portfolio companies which, for example, are involved in the design and production of renewable energy sources providing sustainable alternatives to fossil fuels, and companies involved in the development of new energy technologies and solutions to assist the transition to a greener economy. The application of the Sub-Fund's investment strategy, coupled with the use of the sustainability indicators outlined above to measure the attainment of the environmental or social characteristics promoted by the Fund, ensures that the Sub-Fund's investments are on a clear and measurable path to environmental transition towards a greener economy.

The Sub-Fund has not committed to a minimum rate to reduce the scope of the investments considered prior to the application of this investment strategy.

The Sub-Fund utilizes a comprehensive due diligence questionnaire to ensure that the investment team employs a systematic approach to assess good governance in each investment opportunity. The due diligence questionnaire includes multiple sections covering different topics, each of them containing a list of relevant questions or aspects to be explored by the investment team during the due diligence. The governance aspects covered by the questionnaire include, but are not limited to:

- Organization, management and board structure and composition
- Human resources management, employee relationships and remuneration
- Supply chain management
- Financial statements, tax compliance, insurance coverage, regulatory environment, litigation schedule

The governance due diligence assessment forms an integral part of the Investment Advisor's investment recommendation. The Sub-Fund considers these practices to be crucial for maintaining an investee company's integrity and resilience, shielding investments from operational, legal, and reputational risks.

Proportion of investments

At least 80% of the investments of the Sub-Fund are used to meet the environmental or social characteristics promoted by the Sub-Fund in accordance with the binding elements of the investment strategy.

The Sub-Fund does not commit to making investments that qualify as sustainable investments.

"Other" investments, representing the remaining 20% of assets, may be comprised of leverage instruments, meaning any method by which the Sub-Fund's exposure is increased whether through borrowing of cash or securities or leverage embedded in derivative positions or by any other means. No minimum environmental or social safeguards are applied in respect of these investments.

The Sub-Fund does not use derivatives to attain the environmental or social characteristics promoted.

Monitoring of environmental or social characteristics

The Sub-Fund uses an ESG scoring system to measure the attainment of the environmental, social, and governance characteristics promoted by the Sub-Fund. Investee companies are required to complete an annual questionnaire, which is used to generate their ESG score and monitor overall ESG performance.

The ESG scoring system used by the Sub-Fund evaluates each portfolio company's overall ESG performance, as well as performance within the three ESG pillars: Environmental, Social, and Governance. The scoring is based on a set of sustainability metrics that are individually assessed and then aggregated to calculate separate scores for Environmental, Social, and Governance performance, as well as an overall ESG score for each company.

These metrics reflect critical sustainability factors and ESG-related policies that are broadly relevant across the sectors in which the Sub-Fund invests. Key metrics include, but are not limited to, greenhouse gas (GHG) emissions, renewable energy consumption, the unadjusted gender pay gap, the percentage of women employees, the percentage of women board members, and the percentage of independent board members.

Additionally, the scoring incorporates the presence of ESG-related policies in place within the portfolio company, such as an ESG policy, environmental policy, health and safety policy, diversity and inclusion policy, human rights policy, and anti-corruption policy.

The Sub-Fund aims to align its questionnaire with best practices in the private markets space, recognizing that ESG reporting is a relatively new and evolving area within the venture capital industry. The Sub-Fund reserves the right to update or modify its ESG scoring system to reflect the latest data and industry standards.

The Sub-Fund actively collaborates with portfolio companies to support and encourage the measurement of key environmental and social indicators, acknowledging that start-ups may currently have limited capabilities for ESG data collection and reporting. This collaboration is intended to help companies set and achieve ESG improvement targets over time.

The Sub-Fund uses external mechanisms to monitor the attainment of the environmental or social characteristics, which include:

- Sustainability reporting frameworks that are widely used in private markets; and
- ESG data providers to benchmark investee companies' ESG performance, whenever relevant data is available.

Methodologies

The approach used to measure the attainment of the environmental or social characteristics promoted by the Sub-Fund relies on an ESG scoring system, which considers sustainability factors and ESG-related policies as further outlined in the section above "Monitoring of Environmental or Social Characteristics". These indicators are weighted by sector-specific materiality according to the Sustainable Accounting Standards Board ("SASB") framework to calculate each company's ESG score.

Data Sources and Processing

Data for monitoring the attainment of the environmental or social characteristics promoted by the Sub-Fund is obtained directly from investee companies. The data is collected annually at the request of the Investment Advisor and following standard ESG reporting guidelines for private markets. The data collection and processing are facilitated through an ESG platform, which enables systematic data collection, monitoring and reporting. The ESG platform ensures that each reported indicator can be individually traced to its reporting source. The Investment Advisor reviews ESG data submitted by investee companies for consistency and completeness. Where data gaps exist, estimated values may be used, following recognized methodologies for sustainability reporting. In that case, the Sub-Fund will declare and specify the use of estimated data in its periodic disclosures. The Sub-Fund may engage external ESG data providers for benchmarking.

Limitations to methodologies and data

The Sub-Fund is aware of the limitations of data and applications of the methodology to private markets, and specifically to start-up companies, including the following:

- Absence of public data and dependency on investee companies to report;
- Limited availability of appropriate benchmarks;
- Limitations of applying sustainability indicators to companies that might be pre-revenue, that have very small teams, that have not started production, or that lack operational data;
- Limitations of applying sector-specific materiality according to SASB, which is best suited for well established companies operating in one sector; and
- Probable changes to evolving ESG reporting frameworks for private markets may affect historical data tracking.

The Sub-Fund will regularly review the methodologies and data used to assess the attainment of the environmental or social characteristics being promoted to ensure the most appropriate and up-to-date approach as possible is being applied. The Sub-Fund actively collaborates with portfolio companies to support and encourage the measurement of key environmental and social indicators, acknowledging that start-ups may currently have limited capabilities for ESG data collection and reporting. This collaboration is intended to help companies set and achieve ESG improvement targets over time.

Due diligence

The Investment Advisor carries out ESG due diligence on all prospective investments to identify and analyze any risks of controversies or issues related to social, environmental, human rights, ethical and governance matters, before submitting any investment proposal to the AIFM for consideration.

In the first phase of the Sub-Fund's deal assessment, the responsible investment team member of the Investment Advisor determines if a company falls within the Sub-Fund's Exclusion List. If this is the case, the deal is rejected. At this point, the investment team member also assesses on a high level if this particular investment opportunity presents higher than usual ESG risks (e.g. high risks of human rights abuse in the supply chain). On this basis, the Sub-Fund's investment committee can take potential ESG risks into consideration when deciding if the deal is approved for the next phase.

In the next phase, the Investment Advisor’s deal team will perform an in-depth assessment of the potential investee company’s credentials, which includes the assessment of ESG risks and opportunities and if the company meets standard ESG principles. The deal team will use an ESG Due Diligence Questionnaire to assess the company's ESG practices. The investment committee may ask the deal team for further ESG due diligence during the final phase of the process or impose specific conditions for an investment.

Once the deal enters the final diligence phase, the deal team provides the potential investee company with a term sheet that includes an ESG clause outlining the minimum ESG requirements the company must meet. This clause also requires potential investee companies to submit ESG reporting to the Sub-Fund. If the Sub-Fund is not leading the transaction, these ESG terms will be documented in a side letter or an equivalent agreement.

Next, the deal team addresses any outstanding issues from the previous phase, negotiates the investment terms, and structures the syndication. The team then seeks formal investment approval from the investment committee. As part of this request, the deal team presents its final assessment of any identified ESG issues and, if necessary, proposes conditions for closing or recommendations for post-investment mitigation measures.

Based on the due diligence findings, including the identified ESG risks and countermeasures, the investment committee may reject an investment at any of the decision gates.

If the proposed investment is approved by the investment committee of the Investment Advisor, an investment recommendation is then prepared and submitted by the Investment Advisor to the AIFM for due consideration and analysis and ultimately, for approval or rejection.

Engagement Policies

As described above, the Sub-Fund engages with investee companies to support and encourage the continuous improvement or implementation of ESG best practices, aligned with current and evolving market standards for start-up companies.

In most cases, the Sub-Fund will be represented by the Investment Advisor having a representative on the investee company's board of directors, which usually allows the Sub-Fund to gain insight and exercise a certain level of influence over its investee companies. This influence is used to continuously steer companies to adopt and practice good corporate governance as well as to implement risk monitoring and management tools, in order to identify potential ESG risks and to mitigate them pro-actively.

The Investment Advisor may cooperate with other shareholders in investee companies to exert influence over how ESG issues should be considered by the investee company. For engagement activities that are conducted in response to an incident or due to insufficient adaptive capacity, the Investment Advisor will engage with investee companies to support and encourage improvement.

Designated Reference Benchmark

No index has been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the Sub-Fund.

Emerald Sustainable Packaging Innovation Fund (the "Fund"), a sub-fund of Emerald Innovation Fund ILP

Summary

The Sub-Fund promotes environmental and social characteristics within the meaning of Article 8 of Regulation (EU) 2019/2088 but does not have as its objective sustainable investment.

The Sub-Fund ensures that its sustainable investments do not cause significant harm to any environmental or social sustainable investment objective by (1) Negative screening: the Sub-Fund will not consider investments in companies engaged in certain activities or industries determined in the Sub-Fund's "Exclusion List" and (2) ESG Due Diligence and Principal Adverse Impact ("PAI") indicators: the Sub-Fund performs an ESG due diligence on potential investee companies covering all relevant environmental, social and governance aspects and will gather information on the mandatory and relevant PAI indicators as part of its assessment. The Sub-Fund requires portfolio companies to apply reasonable efforts to comply with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

The Sub-Fund promotes the following environmental and social characteristics by integrating ESG considerations into its due diligence processes and its overall assessment of investment opportunities, as further detailed below: (i) good environmental practices (for example, in relation to greenhouse gas ("GHG") emissions, renewable energy consumption, and having environmental policies in place), (ii) gender diversity and equality and (iii) good governance practices.

The Sub-Fund invests predominantly in businesses in the sustainable packaging and recycling sector and predominantly invests in equity securities of unlisted companies and in certain situations, securities that are convertible into such unlisted equity.

As part of the detailed due diligence conducted on each proposed investment opportunity, the Sub-Fund considers ESG risks and opportunities and whether the potential investee company is engaged in certain activities or industries determined by the Sub-Fund to be excluded by reason of a perceived negative impact of such activities on sustainability factors (the "Exclusion List"). The Sub-Fund's Exclusion List includes, amongst other exclusions, the EU Paris-aligned Benchmark exclusions outlined in Commission Delegated Regulation (EU) 2020/1818, as detailed below. Once an investment is made, the Sub-Fund

engages with investee companies to encourage the continuous improvement or implementation of ESG best practices, aligned with current and evolving market standards for start-up companies.

At least 80% of the investments of the Sub-Fund are used to meet the environmental or social characteristics promoted by the Sub-Fund in accordance with the binding elements of the investment strategy. The minimum proportion of sustainable investments to be made by the Sub-Fund is 50%.

The Sub-Fund uses an ESG scoring system to measure the attainment of the environmental, social, and governance characteristics promoted by the Sub-Fund. Investee companies are required to complete an annual questionnaire, which is used to generate their ESG score and monitor overall ESG performance.

The ESG scoring system used by the Sub-Fund evaluates each portfolio company's overall ESG performance, as well as performance within the three ESG pillars: Environmental, Social, and Governance. The scoring is based on a set of sustainability metrics that are individually assessed and then aggregated to calculate separate scores for Environmental, Social, and Governance performance, as well as an overall ESG score for each company. These indicators are weighted by sector-specific materiality according to the Sustainable Accounting Standards Board ("**SASB**") framework to calculate each company's ESG score.

Data for monitoring the attainment of the environmental or social characteristics promoted by the Sub-Fund is obtained directly from investee companies. The data is collected annually at the request of the Investment Advisor and following standard ESG reporting guidelines for private markets. The data collection and processing are facilitated through an ESG platform, which enables systematic data collection, monitoring and reporting.

The Sub-Fund is aware of the limitations of data and applications of the methodology to private markets, and specifically to start-up companies, as further outlined below, including, for example, the absence of public data and dependency on investee companies to report and limited availability of appropriate benchmarks. The Sub-Fund actively collaborates with portfolio companies to support and encourage the measurement of key environmental and social indicators, acknowledging that start-ups may currently have limited capabilities for ESG data collection and reporting.

The Investment Advisor carries out ESG due diligence on all prospective investments to identify and analyze any risks of controversies or issues related to social, environmental, human rights, ethical and governance matters.

As described above, the Sub-Fund engages with investee companies to support and encourage the continuous improvement or implementation of ESG best practices, aligned with current and evolving market standards for start-up companies. In most cases, the Sub-Fund will be represented by the Investment Advisor having a representative on the investee company's board of directors, which usually allows the Sub-Fund to gain insight and exercise a certain level of influence over its investee companies. This influence is used to continuously steer companies to adopt and practice good corporate governance as well as to implement risk monitoring and management tools, in order to identify potential ESG risks and to mitigate them pro-actively.

No index has been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the Sub-Fund.

The ESG scoring system used by the Sub-Fund evaluates each portfolio company's overall ESG performance, as well as performance within the three ESG pillars: Environmental, Social, and Governance. The scoring is based on a set of sustainability metrics that are individually assessed and then aggregated to calculate separate scores for Environmental, Social, and Governance performance, as well as an overall ESG score for each company. These indicators are weighted by sector-specific materiality according to the Sustainable Accounting Standards Board ("**SASB**") framework to calculate each company's ESG score.

Data for monitoring the attainment of the environmental or social characteristics promoted by the Sub-Fund is obtained directly from investee companies. The data is collected annually at the request of the Investment Advisor and following standard ESG reporting guidelines for private markets. The data collection and processing are facilitated through an ESG platform, which enables systematic data collection, monitoring and reporting.

The Sub-Fund is aware of the limitations of data and applications of the methodology to private markets, and specifically to start-up companies, as further outlined below, including, for example, the absence of public data and dependency on investee companies to report and limited availability of appropriate benchmarks. The Sub-Fund actively collaborates with portfolio companies to support and encourage the measurement of key environmental and social indicators, acknowledging that start-ups may currently have limited capabilities for ESG data collection and reporting.

The Investment Advisor carries out ESG due diligence on all prospective investments to identify and analyze any risks of controversies or issues related to social, environmental, human rights, ethical and governance matters.

As described above, the Sub-Fund engages with investee companies to support and encourage the continuous improvement or implementation of ESG best practices, aligned with current and evolving market standards for start-up companies. In most cases, the Sub-Fund will be represented by the Investment Advisor having a representative on the investee company's board of directors, which usually allows the Sub-Fund to gain insight and exercise a certain level of influence over its investee companies. This influence is used to continuously steer companies to adopt and practice good corporate governance as well as to implement risk monitoring and management tools, in order to identify potential ESG risks and to mitigate them pro-actively.

No index has been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the Sub-Fund.

No Sustainable Investment Objective

This Sub-Fund promotes environmental or social characteristics but does not have as its objective sustainable investment.

The Sub-Fund ensures that its sustainable investments do not cause significant harm to any environmental or social sustainable investment objective by performing the following assessments:

1. Negative screening: the Sub-Fund will not consider investments in companies engaged in certain activities or industries determined in the Sub-Fund's "**Exclusion List**".

2. ESG Due Diligence and Principal Adverse Impact ("**PAI**") indicators: the Sub-Fund performs an ESG due diligence on potential investee companies covering all relevant environmental, social and governance aspects and will gather information on the mandatory and relevant PAI indicators as part of its assessment to ensure that the sustainable investments do not cause significant harm to any environmental or social sustainable investment objective.

The Sub-Fund collects information on PAI indicators during the due diligence process and evaluates if the potential investment does not constitute significant harm to any environmental or social sustainable investment objective. If the investment team finds the potential for significant harm in any relevant PAI indicator, the investment team provides further clarification and to what extent this can be mitigated and managed by the investee company. In case no satisfactory clarification nor mitigatory measures are possible, the Sub-Fund will no longer consider the investment.

When PAI indicators are not available or applicable (for example, many start up companies have limited capacity to collect ESG data or to implement policies that would be required from larger companies) the investment team will apply qualitative assumptions.

The Sub-Fund requires portfolio companies to apply reasonable efforts to comply with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. An integral part of the ESG due diligence constitutes the assessment of governance, employee relations, and tax compliance, as well as checks of policies and mechanisms to ensure alignment with the above-mentioned standards. In addition, once an investment is made, the Sub-Fund supports portfolio companies to develop their internal policies and procedures to better align with the standards.

Environmental or Social Characteristics of the Sub-Fund

The Sub-Fund promotes the following environmental and social characteristics by integrating ESG considerations into its due diligence processes and its overall assessment of investment opportunities, as further detailed below: (i) good environmental practices (for example, in relation to greenhouse gas ("**GHG**") emissions, renewable energy consumption, and having environmental policies in place), (ii) gender diversity and equality and (iii) good governance practices.

Investment Strategy

The Sub-Fund invests predominantly in businesses in the sustainable packaging and recycling sector and predominantly invests in equity securities of unlisted companies and in certain situations, securities that are convertible into such unlisted equity.

As part of the detailed due diligence conducted on each proposed investment opportunity, the Sub-Fund considers ESG risks and opportunities and whether the potential investee company is engaged in certain activities or industries determined by the Sub-Fund to be excluded by reason of a perceived negative impact of such activities on sustainability factors (the "**Exclusion List**"). The results of the ESG due diligence and assessment form an integral part of the Investment Advisor's investment recommendation and are considered when making investment decisions.

Once an investment is made, the Sub-Fund engages with investee companies to encourage the continuous improvement or implementation of ESG best practices, aligned with current and evolving market standards for start-up companies. In most cases, the Sub-Fund will be represented by the Investment Advisor having a representative on the investee company's board of directors, which usually allows the Sub-Fund to gain insight and exercise a certain level of influence over its investee companies. This influence is used to continuously steer companies to adopt and practice good corporate governance as well as to implement risk monitoring and management tools, in order to identify potential ESG risks and to mitigate them pro-actively.

The elements of the Sub-Fund's investment strategy which are binding are:

- Application of the Exclusion List (as further detailed above);
- Integration of ESG analysis into investment decision-making processes;
- Active ownership: through continued engagement and collaboration with portfolio companies in relation to ESG matters and board representation (as further outlined above);
- Inclusion of an ESG clause in the term sheet for proposed investments (assuming that the Sub-Fund is leading the transaction) to ensure investee companies' adherence to ESG principles and appropriate disclosure.

The Sub-Fund's Exclusion List includes, amongst other exclusions, the EU Paris-aligned Benchmark exclusions outlined in Commission Delegated Regulation (EU) 2020/1818, and companies which meet the following criteria are excluded for investment by the Sub-Fund:

(a) companies involved in any activities related to controversial weapons (as referred to in international treaties and conventions, United Nations principles and, where applicable, national legislation);
(b) companies involved in the cultivation and production of tobacco;
(c) companies that the Investment Advisor (and/or benchmark administrators, where relevant) find in violation of the United Nations Global Compact (UNGC) principles or the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises;

(d) companies that derive 1% or more of their revenues from exploration, mining, extraction, distribution or refining of hard coal and lignite;
(e) companies that derive 10% or more of their revenues from the exploration, extraction, distribution or refining of oil fuels;
(f) companies that derive 50% or more of their revenues from the exploration, extraction, manufacturing or distribution of gaseous fuels;
(g) companies that derive 50% or more of their revenues from electricity generation with a greenhouse gas intensity of more than 100 g CO_2 e/kWh.

The Sub-Fund has not committed to a minimum rate to reduce the scope of the investments considered prior to the application of this investment strategy.

The Sub-Fund utilizes a comprehensive due diligence questionnaire to ensure that the investment team employs a systematic approach to assess good governance in each investment opportunity. The due diligence questionnaire includes multiple sections covering different topics, each of them containing key questions or aspects to be explored by the investment team during the due diligence. The governance aspects covered by the questionnaire include, but are not limited to:

- Organization, management and board structure and composition;
- Human resources management, employee relationships and remuneration;
- Supply chain management;
- Financial statements, tax compliance, insurance coverage, regulatory environment, litigation schedule.

The governance due diligence assessment forms an integral part of the Investment Advisor’s investment recommendation. The Sub-Fund considers these practices to be crucial for maintaining an investee company's integrity and resilience, shielding investments from operational, legal, and reputational risks.

Proportion of Investments

At least 80% of the investments of the Sub-Fund are used to meet the environmental or social characteristics promoted by the Sub-Fund in accordance with the binding elements of the investment strategy.

The minimum proportion of sustainable investments to be made by the Sub-Fund is 50%.

"Other" investments, representing the remaining 20% of assets, may be comprised of leverage instruments, meaning any method by which the Sub-Fund's exposure is increased whether through borrowing of cash or securities or leverage embedded in derivative positions or by any other means. No minimum environmental or social safeguards are applied in respect of these investments.

The Sub-Fund does not use derivatives to attain the environmental or social characteristics promoted.

Monitoring of Environmental or Social Characteristics

The Sub-Fund uses an ESG scoring system to measure the attainment of the environmental, social, and governance characteristics promoted by the Sub-Fund. Investee companies are required to complete an annual questionnaire, which is used to generate their ESG score and monitor overall ESG performance.

The ESG scoring system used by the Sub-Fund evaluates each portfolio company's overall ESG performance, as well as performance within the three ESG pillars: Environmental, Social, and Governance. The scoring is based on a set of sustainability metrics that are individually assessed and then aggregated to calculate separate scores for Environmental, Social, and Governance performance, as well as an overall ESG score for each company.

These metrics reflect critical sustainability factors and ESG-related policies that are broadly relevant across the sectors in which the Sub-Fund invests. Key metrics include, but are not limited to, greenhouse gas (GHG) emissions, renewable energy consumption, the unadjusted gender pay gap, the percentage of women employees, the percentage of women board members, and the percentage of independent board members.
Additionally, the scoring incorporates the presence of ESG-related policies in place within the portfolio company, such as an ESG policy, environmental policy, health and safety policy, diversity and inclusion policy, human rights policy, and anti-corruption policy.

The Sub-Fund aims to align its questionnaire with best practices in the private markets space, recognizing that ESG reporting is a relatively new and evolving area within the venture capital industry. The Sub-Fund reserves the right to update or modify its ESG scoring system to reflect the latest data and industry standards.

The Sub-Fund actively collaborates with portfolio companies to support and encourage the measurement of key environmental and social indicators, acknowledging that start-ups may currently have limited capabilities for ESG data collection and reporting. This collaboration is intended to help companies set and achieve ESG improvement targets over time.

The Sub-Fund uses external mechanisms to monitor the attainment of the environmental or social characteristics, which include:

- Sustainability reporting frameworks that are widely used in private markets; and
- ESG data providers to benchmark investee companies' ESG performance, whenever relevant data is available

Methodologies

The approach used to measure the attainment of the environmental or social characteristics promoted by the Sub-Fund relies on an ESG scoring system, which considers sustainability factors and ESG-related policies as further outlined in the section above "Monitoring of Environmental or Social Characteristics". These indicators are weighted by sector-specific materiality according to the Sustainable Accounting Standards Board ("**SASB**") framework to calculate each company's ESG score.

Data Sources and Processing

Data for monitoring the attainment of the environmental or social characteristics promoted by the Sub-Fund is obtained directly from investee companies. The data is collected annually at the request of the Investment Advisor and following standard ESG reporting guidelines for private markets. The data collection and processing are facilitated through an ESG platform, which enables systematic data collection, monitoring and reporting. The ESG platform ensures that each reported indicator can be individually traced to its reporting source. The Investment Advisor reviews ESG data submitted by investee companies for consistency and completeness. Where data gaps exist, estimated values may be used, following recognized methodologies for sustainability reporting. In that case, the Sub-Fund will declare and specify the use of estimated data in its periodic disclosures. The Sub-Fund may engage external ESG data providers for benchmarking.

Limitations to Methodologies and Data

The Sub-Fund is aware of the limitations of data and applications of the methodology to private markets, and specifically to start-up companies, including the following:

- Absence of public data and dependency on investee companies to report;
- Limited availability of appropriate benchmarks;
- Limitations of applying PAI or other sustainability indicators to companies that might be pre-revenue, that have very small teams, that have not started production, or that lack operational data;

- Limitations of applying sector-specific materiality according to SASB, which is best suited for well established companies operating in one sector; and
- Probable changes to evolving ESG reporting frameworks for private markets may affect historical data tracking.

The Sub-Fund will regularly review the methodologies and data used to assess the attainment of the environmental or social characteristics being promoted to ensure the most appropriate and up-to-date approach as possible is being applied. The Sub-Fund actively collaborates with portfolio companies to support and encourage the measurement of key environmental and social indicators, acknowledging that start-ups may currently have limited capabilities for ESG data collection and reporting. This collaboration is intended to help companies set and achieve ESG improvement targets over time.

Due Diligence

The Investment Advisor carries out ESG due diligence on all prospective investments to identify and analyze any risks of controversies or issues related to social, environmental, human rights, ethical and governance matters, before submitting any investment proposal to the AIFM for consideration.

In the first phase of the Sub-Fund's deal assessment, the responsible investment team member of the Investment Advisor determines if a company falls within the Sub-Fund's Exclusion List. If this is the case, the deal is rejected. At this point, the investment team member also assesses on a high level if this particular investment opportunity presents higher than usual ESG risks (e.g. high risks of human rights abuse in the supply chain). On this basis, the Sub-Fund's investment committee can take potential ESG risks into consideration when deciding if the deal is approved for the next phase.

In the next phase, the Investment Advisor’s deal team will perform an in-depth assessment of the potential investee company’s credentials, which includes the assessment of ESG risks and opportunities and if the company meets standard ESG principles. The deal team will use an ESG Due Diligence Questionnaire to assess the company's ESG practices. The investment committee may ask the deal team for further ESG due diligence during the final phase of the process or impose specific conditions for an investment.

Once the deal enters the final diligence phase, the deal team provides the potential investee company with a term sheet that includes an ESG clause outlining the minimum ESG requirements the company must meet. This clause also requires potential investee companies to submit ESG reporting to the Sub-Fund. If the Sub-Fund is not leading the transaction, these ESG terms will be documented in a side letter or an equivalent agreement.

Next, the deal team addresses any outstanding issues from the previous phase, negotiates the investment terms, and structures the syndication. The team then seeks formal investment approval from the investment committee. As part of this request, the deal team presents its final assessment of any identified ESG issues and, if necessary, proposes conditions for closing or recommendations for post-investment mitigation measures.

Based on the due diligence findings, including the identified ESG risks and countermeasures, the investment committee may reject an investment at any of the decision gates.

If the proposed investment is approved by the investment committee of the Investment Advisor, an investment recommendation is then prepared and submitted by the Investment Advisor to the AIFM for due consideration and analysis and ultimately, for approval or rejection.

Engagement Policies

As described above, the Sub-Fund engages with investee companies to support and encourage the continuous improvement or implementation of ESG best practices, aligned with current and evolving market standards for start-up companies.

In most cases, the Sub-Fund will be represented by the Investment Advisor having a representative on the investee company's board of directors, which usually allows the Sub-Fund to gain insight and exercise a certain level of influence over its investee companies. This influence is used to continuously steer companies to adopt and practice good corporate governance as well as to implement risk monitoring and management tools, in order to identify potential ESG risks and to mitigate them pro-actively.

The Investment Advisor may cooperate with other shareholders in investee companies to exert influence over how ESG issues should be considered by the investee company. For engagement activities that are conducted in response to an incident or due to insufficient adaptive capacity, the Investment Advisor will engage with investee companies to support and encourage improvement.

Designated Reference Benchmark

No index has been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the Sub-Fund.