



PUBLIC RI REPORT

2021 PILOT

InfraRed Capital Partners Limited

Generated 2022-08-18

About this report

The PRI Reporting Framework helps to build a common language and industry standard for reporting responsible investment activities. **Public RI Reports** provide accountability and transparency on signatories' responsible investment activities and support dialogue within signatories' organisations, as well as with their clients, beneficiaries and other stakeholders.

This **Public RI Report** is an export of the signatory's responses to the PRI Reporting Framework during the 2021 reporting period. It includes the signatory's responses to mandatory indicators, as well as responses to voluntary indicators that the signatory has agreed to make public.

The information is presented exactly as it was reported. Where an indicator offered a multiple-choice response, all options that were available to select from are included for context. While presenting the information verbatim results in lengthy reports, the approach is informed by signatory feedback that signatories prefer that the PRI does not summarise the information.

Context

In consultation with signatories, between 2018 and 2020 the PRI extensively reviewed the Reporting and Assessment processes and set the ambitious objective of launching in 2021 a completely new investor Reporting Framework, together with a new reporting tool.

We ran the new investor Reporting and Assessment process as a pilot in its first year, and such process included providing additional opportunities for signatories to provide feedback on the Reporting Framework, the online reporting tool and the resulting reports. The feedback from this pilot phase has been, and is continuing to be analysed, in order to identify any improvements that can be included in future reporting cycles.

PRI disclaimer

This document presents information reported directly by signatories in the 2021 reporting cycle. This information has not been audited by the PRI or any other party acting on its behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented.

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

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Senior Leadership Statement (SLS)

Senior leadership statement

Our commitment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SLS 1 S1	CORE	N/A	N/A	PUBLIC	Our commitment	GENERAL

- **Why does your organisation engage in responsible investment?**
- **What is your organisation's overall approach to responsible investment?**
- **What are the main differences between your organisation's approach to responsible investment in its ESG practice and in other practices, across asset classes?**

At InfraRed, we have always believed that a sustainability-led mindset is essential to delivering outperformance. It is enshrined in our DNA that creating value for all stakeholder groups – not just one – is crucial to the long-term success of any asset.

For InfraRed, sustainable investment has been central to our investment philosophy for over a decade for three key reasons:

□ Firstly, our assets touch the lives of very many people. This puts us in a privileged position where our actions and conduct impact a large number of people and the environment. With this comes an immense responsibility to act with care, consideration and integrity;

□ Secondly, many of our assets have life spans extending beyond the average life of a person. We therefore have a responsibility to create value for all stakeholders if we want to manage our assets for resilient, long-term outperformance, for current and future generations; and

□ Thirdly, we are an active owner of the investments we make, and we take pride in our active approach to asset management. Our team is immensely passionate about managing high-quality assets which have a positive impact on the communities they serve.

Sustainability is central to our corporate vision – “Investing in real assets with real purpose to create a sustainable future”. Our aim is to continue to invest in real assets which contribute positively to society, whether that be promoting social development, improving quality of life or creating a positive environmental impact, both now and for future generations. We aim to do so as a responsible manager while generating sustainable returns for our investors and attracting further capital into the sector. This drives our business and our people.

To achieve this objective, we maintain a comprehensive sustainability management system which integrates sustainability into each stage of the investment process – from the initial assessment of an investment opportunity, during the on-going management of our portfolio and through to divestment, hand back or decommissioning of an asset. Our sustainability programme is also aligned with PRI and the United Nations (UN) SDGs.

InfraRed always tries to be at the forefront of ESG and Sustainability initiatives to ensure best practices are incorporated across our investment and asset management processes.

Annual overview

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SLS 1 S2	CORE	N/A	N/A	PUBLIC	Annual overview	GENERAL

- Discuss your organisation's progress during the reporting year on the responsible investment issue you consider most relevant or material to your organisation or its assets.
- Reflect on your performance with respect to your organisation's responsible investment objectives and targets during the reporting year. This might involve e.g. outlining your single most important achievement, or describing your general progress, on topics such as the following:
 - refinement of ESG analysis and incorporation
 - stewardship activities with investees and/or with policy makers
 - collaborative engagements
 - attainment of responsible investment certifications and/or awards

We achieved some significant milestones in respect to our sustainability programme in 2020, including:

□ Investment processes:

We refined our investment processes, which included the introduction of a negative screening phase against a firm-wide exclusions list.

We also introduced sustainability searches on key counterparties to ensure we only transact with like-minded organisations.

□ Responding to COVID:

At the start of the pandemic, we published our Covid Code of Conduct ("the Code") which set out our priorities for managing our assets in response to the crisis.

During the period we have worked to maintain asset quality, availability and flexibility, particularly for healthcare and education assets.

We also implemented initiatives to support the health and wellbeing of our own staff, as well as staff working at our assets, the end-users of the assets and other stakeholders.

We also ensured we closely monitor financial performance to preserve asset value for our investors.

□ Driving climate action:

We introduced climate-related questions into our initial deal screening process to ensure the impact of climate change was considered early in the investment due diligence process.

Our infrastructure business engaged a third-party adviser to complete a climate change risk assessment for many of the assets in our infrastructure portfolio.

Our real estate business implemented climate change risk assessments as part of the pre-investment due diligence for new opportunities.

We asked our investment companies to report Scope 1 and Scope 2 GHG emission. Understanding our carbon footprint is the first step in setting quantifiable targets to achieve net zero across our portfolio.

InfraRed and its two listed funds, TRIG and HICL, became Taskforce for Climate-related Financial Disclosures (TCFD) supporters as part of our commitment to act on climate change through consistent climate-related financial disclosures.

□ Transparent reporting:

We implemented a new sustainability reporting framework to measure asset performance against a wider base of KPIs to drive asset performance and enhance our reporting.

The listed funds we manage, HICL and TRIG, progressed reporting in line with the TCFD recommendations as part of their Annual Reports.

We produced end of year update reports which communicated the progress we had made against our sustainability commitments.

□ Increased engagement:

We actively increased our engagement with the teams who are responsible for the day-to-day management of our investment.

We also increased engagement with our own staff via company-wide townhalls, team meetings and email correspondence. Our Sustainability Manager also conducted training for our investment and management teams.

□ Corporate initiatives:

We introduced sustainability performance objectives for all staff.

We became a certified carbon neutral firm in accordance with The CarbonNeutral Protocol.

We allocated £1m to promote social inclusion, health and well-being through the InfraRed Charitable Foundation.

We raised £160,000 for charities helping those impacted by COVID-19 through InfraRed's London to Sydney Virtual Charity Race.

□ Other:

TRIG, InfraRed's renewable energy listed fund, refinanced and expanded its revolving credit facility ("RCF"). This new loan is one of the first ESG-linked Sterling Overnight Index Average ("SONIA") loans of its kind.

Next steps

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SLS 1 S3	CORE	N/A	N/A	PUBLIC	Next steps	GENERAL

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

In the coming year, we will set a clear path on how we can achieve net zero carbon emissions across our portfolio using Science Based Targets. Given, the nature of our portfolio, where we do not have direct operational control of an asset, we will work with our clients to support them to achieve their own net zero journey. We are also committed to including more transparent reporting on our environmental and social impacts in line with relevant disclosure requirements such as TCFD, Sustainable Finance Disclosures Regulation (SFDR) and the EU Taxonomy. We will therefore publish our first InfraRed Sustainability Report in Q2 2021. We are also going to review our investment processes to see how we can take a more systematic approach to human rights issues.

Endorsement

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SLS 1 S4	CORE	N/A	N/A	PUBLIC	Endorsement	GENERAL

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

Name Werner von Guionneau

Position CEO

Organisation's name InfraRed Capital Partners

● This endorsement is for the Senior Leadership Statement only and is not an endorsement of the information reported by InfraRed Capital Partners Limited in the various modules of the Reporting Framework. The Senior Leadership Statement is simply provided as a general overview of InfraRed Capital Partners Limited's responsible investment approach. The Senior Leadership Statement does not constitute advice and should not be relied upon as such, and is not a substitute for the skill, judgement and experience of any third parties, their management, employees, advisors and/or clients when making investment and other business decisions.

Organisational Overview (OO)

Organisational information

Categorisation

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 1	CORE	Signatory category	Multiple, see guidance	PUBLIC	Categorisation	GENERAL

Select the type that best describes your organisation or the services you provide.

(O) Fund management

(1) This is our only (or primary) type

Subsidiary information

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

Does your organisation have subsidiaries that are also PRI signatories in their own right?

☐ (A) Yes

☒ (B) No

Reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 3	CORE	N/A	N/A	PUBLIC	Reporting year	GENERAL

Indicate the year-end date for your reporting year.

	Month	Day	Year
Reporting year end date:	December	31	2020

Assets under management

All asset classes

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 4	CORE	OO 4.1, OO 4.2	N/A	PUBLIC	All asset classes	GENERAL

What were your total assets under management (AUM) at the end of the indicated reporting year? Provide the amount in USD.

(A) AUM of your organisation, including subsidiaries	US\$ 12,332,000,000.00
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(B) AUM of subsidiaries that are PRI signatories in their own right and excluded from this submission	US\$ 0.00
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(C) AUM subject to execution, advisory, custody, or research advisory only	US\$ 572,000,000.00
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Asset breakdown

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

Provide a percentage breakdown of your total assets under management at the end of your indicated reporting year.

Percentage of AUM	
(A) Listed equity – internal	0.0%
(B) Listed equity – external	0.0%
(C) Fixed income – internal	0.0%
(D) Fixed income – external	0.0%
(E) Private equity – internal	0.0%
(F) Private equity – external	0.0%
(G) Real estate – internal	10-50%
(H) Real estate – external	0.0%
(I) Infrastructure – internal	>75%
(J) Infrastructure – external	0.0%
(K) Hedge funds – internal	0.0%
(L) Hedge funds – external	0.0%
(M) Forestry – internal	0.0%
(N) Forestry – external	0.0%
(O) Farmland – internal	0.0%

(P) Farmland – external	0.0%
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(Q) Other – internal, please specify:	0.0%
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(R) Other – external, please specify:	0.0%
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(S) Off-balance sheet – internal	0.0%
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(T) Off-balance sheet – external	0.0%
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Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.2 RE	CORE	OO 5, OO 5.1	N/A	PUBLIC	Asset breakdown	GENERAL

Provide a further breakdown of your real estate assets.

(A) Internal allocation

(1) Retail	10-50%
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(2) Office	10-50%
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(3) Industrial	10-50%
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(4) Residential	0-10%
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(5) Hotel	0.0%
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(6) Lodging, leisure and recreation	0.0%
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(7) Education	0.0%
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(8) Technology/science	0.0%
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(9) Healthcare	0.0%
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(10) Mixed use	10-50%
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(11) Other, please specify: 0-10%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.2 INF	CORE	OO 5, OO 5.1	N/A	PUBLIC	Asset breakdown	GENERAL

Provide a further breakdown of your infrastructure assets.

(A) Internal allocation

(1) Data infrastructure 0-10%

(2) Energy and water resources 0-10%

(3) Environmental services 0.0%

(4) Network utilities 0.0%

(5) Power generation (excl. renewables) 0-10%

(6) Renewable power 10-50%

(7) Social infrastructure 10-50%

(8) Transport 10-50%

(9) Other, please specify: 0.0%

Stewardship

Private equity, real estate and infrastructure

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 9 ALT	CORE	OO 5	Multiple, see guidance	PUBLIC	Private equity, real estate and infrastructure	2

Does your organisation conduct stewardship activities in the following asset classes?

	(2) Real estate	(3) Infrastructure
(A) Through service providers	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(C) Through internal staff	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(D) Collaboratively	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(E) We did not conduct stewardship activities for this asset class	<input type="checkbox"/>	<input type="checkbox"/>

ESG incorporation

Internally managed assets

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 10	CORE	Multiple, see guidance	Multiple, see guidance	PUBLIC	Internally managed assets	1

For each internally managed asset class, select whether or not you incorporate ESG into your investment decisions.

	(1) ESG incorporated into investment decisions	(2) ESG not incorporated into investment decisions
(K) Real estate	<input checked="" type="radio"/>	<input type="radio"/>
(L) Infrastructure	<input checked="" type="radio"/>	<input type="radio"/>

Voluntary reporting

Voluntary modules

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 14	CORE	Multiple, see guidance	Multiple, see guidance	PUBLIC	Voluntary modules	GENERAL

The following modules are mandatory to report on as they account for 10% or more of your total AUM or are over USD 10 billion. The ISP (Investment and Stewardship Policy) module is always applicable for reporting.

	(1) Yes, report on the module
ISP: Investment and Stewardship Policy	<input checked="" type="radio"/>

(G) Real estate



(H) Infrastructure



ESG/sustainability funds and products

Labelling and marketing

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 16	CORE	Multiple, see guidance	Multiple, see guidance	PUBLIC	Labelling and marketing	GENERAL

What percentage of your assets under management in each asset class are ESG/sustainability marketed funds or products, and/or ESG/RI certified or labelled assets? Percentage figures can be rounded to the nearest 5% and should combine internally and externally managed assets.

Percentage

(F) Real estate

50-75%

(G) Infrastructure

>75%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 16.1	CORE	OO 16	ISP 52	PUBLIC	Labelling and marketing	GENERAL

What percentage of your total assets (per asset class) carry a formal ESG/RI certification or label? Percentage figures can be rounded to the nearest 5%.

Coverage of ESG/RI certification or label:

(D) Real estate

0-25%

(E) Infrastructure 0-25%

Climate investments

Asset breakdown

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 17	CORE	N/A	N/A	PUBLIC	Asset breakdown	GENERAL

What percentage of your assets under management is in targeted low-carbon or climate-resilient investments?

25-50%

Other asset breakdowns

Geographical breakdown

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18	CORE	Multiple, see guidance	N/A	PUBLIC	Geographical breakdown	GENERAL

What is the geographical breakdown of your organisation's assets under management by investment destination (i.e. where the investments are located)?

	(7) Real estate	(8) Infrastructure
(A) Developed	50-75%	>75%
(B) Emerging	50-75%	0-25%
(C) Frontier	0.0%	0.0%
(D) Other	0.0%	0.0%

Real estate: Building type

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 24	CORE	OO 5	RE 1, RE 9, RE 10	PUBLIC	Real estate: Building type	GENERAL

What is the percentage breakdown of your direct physical real estate assets by strategy?

Percentage total of direct physical real estate AUM

(A) Standing investments 25-50%

(B) New construction 25-50%

(C) Major renovation 25-50%

Infrastructure: Strategy

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 30	CORE	OO 5	N/A	PUBLIC	Infrastructure: Strategy	GENERAL

What is the percentage breakdown of your organisation's internally managed infrastructure assets by investment strategy?

Percentage of total internally managed infrastructure AUM

(A) Core >75%

(B) Value added 0-25%

(C) Opportunistic 0.0%

Infrastructure: Type of asset

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 31	CORE	OO 5	INF 1	PUBLIC	Infrastructure: Type of asset	GENERAL

What is the percentage breakdown of your infrastructure assets by strategy?

Percentage of total internally managed infrastructure AUM

(A) Standing investments/operating assets >75%

(B) New construction 0-25%

(C) Major renovation 0.0%

Investment and Stewardship Policy (ISP)

Responsible investment policy & governance

Responsible investment policy

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 1	CORE	N/A	ISP 1.1, ISP 1.2	PUBLIC	Responsible investment policy	1

Does your organisation have a formal policy or policies covering your approach to responsible investment? Your approach to responsible investment may be set out in a standalone guideline, covered in multiple standalone guidelines or be part of a broader investment policy. Your policy may cover various responsible investment elements such as stewardship, ESG guidelines, sustainability outcomes, specific climate-related guidelines, RI governance and similar.

- ☒ (A) Yes, we do have a policy covering our approach to responsible investment
- ☐ (B) No, we do not have a policy covering our approach to responsible investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 1.1	CORE	ISP 1	Multiple, see guidance	PUBLIC	Responsible investment policy	1

What elements does your responsible investment policy cover? The responsible investment elements may be set out in one or multiple standalone guidelines, or they may be part of a broader investment policy.

- ☒ (A) Overall approach to responsible investment
- ☐ (B) Guidelines on environmental factors
- ☐ (C) Guidelines on social factors
- ☐ (D) Guidelines on governance factors
- ☒ (E) Approach to stewardship
- ☒ (F) Approach to sustainability outcomes
- ☒ (G) Approach to exclusions
- ☒ (H) Asset class-specific guidelines that describe how ESG incorporation is implemented
- ☒ (I) Definition of responsible investment and how it relates to our fiduciary duty
- ☒ (J) Definition of responsible investment and how it relates to our investment objectives
- ☒ (K) Responsible investment governance structure
- ☒ (L) Internal reporting and verification related to responsible investment
- ☒ (M) External reporting related to responsible investment
- ☐ (N) Managing conflicts of interest related to responsible investment
- ☒ (O) Other responsible investment aspects not listed here, please specify:

The Policy also sets out our Sustainability Commitment, which are the cornerstone of our Sustainability programme and includes the fact that our employees are required to have sustainability objectives.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 1.2	PLUS	ISP 1	N/A	PUBLIC	Responsible investment policy	1

What mechanisms do you have in place to ensure that your policies are implemented in an aligned and consistent way across the organisation?

InfraRed's Sustainability Manager is responsible for developing and implementing InfraRed's sustainability strategy and programme. As part of this role, the Sustainability Manager is also responsible for reviewing and updating the Sustainability Policy to ensure it is consistent with the sustainability strategy and programme. However, InfraRed's Chief Executive has overall responsibility for reviewing the Sustainability Policy periodically to ensure that it remains current and fit for purpose in the context of the wider business. The Sustainability Policy is approved by the Board of InfraRed.

The Sustainability Manager serves as the coordinator and knowledge pool of InfraRed's sustainability programme. Our organisation is structured such that individual members within the business are responsible for considering sustainability aspects and implementing sustainability initiatives as part of their day-to-day role. However, this is done with the support and input from the Sustainability Manager so that the Sustainability Manager maintains full oversight of sustainability initiatives at InfraRed. This enables the Sustainability Manager to ensure that the Sustainability Policy is being implemented in a consistent and co-ordinated manner across our business.

In 2020, InfraRed updated the sustainability requirements embedded in the investment processes based on recommendations from an external sustainability consultant. As part of these changes, we introduced new templates to ensure that sustainability considerations and due diligence and were consistently reported to the Investment Committee. Training was provided to the investment and asset management teams to ensure they had a clear understanding of the new processes and the necessary templates as well as ad-hoc feedback provided by the Sustainability Manager throughout the year. These changes have helped to provide consistency on our approach to evaluate sustainability considerations as well as reporting on sustainability risks and opportunities.

In addition to training on investment processes, the Sustainability Manager regularly communicates with all staff on the importance of sustainability, how it impacts our business and the requirements of the Sustainability Policy. InfraRed also provides regular updates to staff on its sustainability initiatives at part of "Town Hall", team meetings, email correspondence or other communication formats. This usually includes a short presentation by either the Sustainability Manager or other staff members on InfraRed's approach to sustainability, sustainability best practices or sustainability initiatives which are being pursued or implemented by the organisation. InfraRed also has a dedicated ESG page on its intranet to improve training and awareness of staff.

Sustainability objectives were also implemented for all staff in 2020 to ensure staff are fully aligned with InfraRed's sustainability programme. Staff were set objectives which are reflective of their role and seniority. Adherence to the Sustainability Policy and contributions to initiatives that support sustainability will be considered in individual's performance assessments which directly impacts overall remuneration.

At an investment level, we also monitor that appropriate policies are implemented by the investment company and service providers (whichever is relevant).

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 2	CORE	ISP 1.1	N/A	PUBLIC	Responsible investment policy	6

Indicate which of your responsible investment policy elements are publicly available and provide links.

☒ (A) Overall approach to responsible investment. Add link(s):

<https://www.ircp.com/sites/default/files/2021-03/InfraRed%20Sustainability%20Policy%20December%202020.pdf>

☒ (E) Approach to stewardship. Add link(s):

<https://www.ircp.com/sites/default/files/2021-03/InfraRed%20Stewardship%20Policy%20December%202020%20final.pdf>

☒ (F) Approach to sustainability outcomes. Add link(s):

<https://www.ircp.com/sites/default/files/2021-03/InfraRed%20Sustainability%20Policy%20December%202020.pdf>

☒ (G) Approach to exclusions. Add link(s):

<https://www.ircp.com/sites/default/files/2021-03/InfraRed%20Sustainability%20Policy%20December%202020.pdf>

☒ (H) Asset class-specific guidelines that describe how ESG incorporation is implemented. Add link(s):

<https://www.ircp.com/sites/default/files/2021-03/InfraRed%20Stewardship%20Policy%20December%202020%20final.pdf>

☒ (I) Definition of responsible investment and how it relates to our fiduciary duty. Add link(s):

Sustainability Policy <https://www.ircp.com/sites/default/files/2021-03/InfraRed%20Sustainability%20Policy%20December%202020.pdf>

☒ (J) Definition of responsible investment and how it relates to our investment objectives. Add link(s):

Sustainability Policy <https://www.ircp.com/sites/default/files/2021-03/InfraRed%20Sustainability%20Policy%20December%202020.pdf>

☒ (K) Responsible investment governance structure. Add link(s):

<https://www.ircp.com/sites/default/files/2021-03/InfraRed%20Sustainability%20Policy%20December%202020.pdf>

☒ (L) Internal reporting and verification related to responsible investment. Add link(s):

Sustainability Policy <https://www.ircp.com/sites/default/files/2021-03/InfraRed%20Sustainability%20Policy%20December%202020.pdf>

☒ (M) External reporting related to responsible investment. Add link(s):

https://www.ircp.com/sites/default/files/2021-02/Sustainability%20Report%202020_v%20final.pdf and

https://www.ircp.com/sites/default/files/2020-12/RealEstateESG_Infrared_2020.pdf

☒ (O) Other responsible investment aspects [as specified] Add link(s):

<https://www.ircp.com/sustainable-investment/>

☐ (P) Our responsible investment policy elements are not publicly available

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 3	CORE	ISP 1.1	N/A	PUBLIC	Responsible investment policy	1

What percentage of your total assets under management are covered by your policy elements on overall approach to responsible investment and/or guidelines on environmental, social and governance factors?

○ (A) Overall approach to responsible investment

AUM coverage of all policy elements in total:

>75%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 4	CORE	ISP 1.1	N/A	PUBLIC	Responsible investment policy	1

Which elements does your exclusion policy include?

- ☒ (A) Legally required exclusions (e.g. those required by domestic/international law, bans, treaties or embargoes)
- ☒ (B) Exclusions based on our organisation's values or beliefs (e.g. regarding weapons, alcohol, tobacco and/or avoiding other particular sectors, products, services or regions)
- ☒ (C) Exclusions based on screening against minimum standards of business practice based on international norms (e.g. OECD guidelines, the UN Human Rights Declaration, Security Council sanctions or the UN Global Compact)

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 5	CORE	Multiple, see guidance	N/A	PUBLIC	Responsible investment policy	1

What percentage of your total assets under management are covered by your asset class-specific guidelines that describe how ESG incorporation is implemented?

AUM Coverage:

(D) Real Estate >75%

(E) Infrastructure >75%

Governance

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 6	CORE	N/A	ISP 8	PUBLIC	Governance	1

Do your organisation's board, chief-level staff, investment committee and/or head of department have formal oversight and accountability for responsible investment?

- ☐ (A) Board and/or trustees
☒ (B) Chief-level staff (e.g. Chief Executive Officer (CEO), Chief Investment Officer (CIO) or Chief Operating Officer (COO))
☒ (C) Investment committee
☐ (D) Other chief-level staff, please specify:
☒ (E) Head of department, please specify department:
 InfraRed's Sustainability Manager has overall responsibility for developing and implementing InfraRed's Sustainability programme. InfraRed's Senior Management Team of our various business areas and disciples are responsible for supporting the Sustainability Manager to oversee the development and implementation of the sustainability programme.
☐ (F) None of the above roles have oversight and accountability for responsible investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 7	CORE	N/A	ISP 8	PUBLIC	Governance	1

In your organisation, which internal or external roles have responsibility for implementing responsible investment?

- ☐ (A) Board and/or trustees
☒ (B) Chief-level staff (e.g. Chief Executive Officer (CEO), Chief Investment Officer (CIO) or Chief Operating Officer (COO))
☒ (C) Investment committee
☐ (D) Other chief-level staff [as specified]
☒ (E) Head of department [as specified]
☒ (F) Portfolio managers
☒ (G) Investment analysts
☒ (H) Dedicated responsible investment staff
☒ (I) Investor relations
☒ (J) External managers or service providers
☒ (K) Other role, please specify:
 All staff members at InfraRed have a responsibility to implement sustainability into their day-to-day role. Other than those listed above, this would also include staff in our Asset Management, Funds Management and Central Functions teams.
☐ (L) Other role, please specify:
☐ (M) We do not have roles with responsibility for implementing responsible investment.

People and capabilities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 8	CORE	ISP 6, ISP 7	ISP 8.1, ISP 8.2	PUBLIC	People and capabilities	General

What formal objectives for responsible investment do the roles in your organisation have?

	(2) Chief-level staff	(3) Investment committee	(5) Head of department [as specified]	(6) Portfolio managers	(7) Investment analysts
(A) Objective for ESG incorporation in investment activities	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Objective for contributing to the development of the organisation's ESG incorporation approach	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(C) Objective for contributing to the organisation's stewardship activities (e.g. through sharing findings from continuous ESG research or investment decisions)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(D) Objective for ESG performance	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(E) Other objective related to responsible investment [as specified]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(F) Other objective related to responsible investment [as specified]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(G) No formal objectives for responsible investment exist for this role	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	(8) Dedicated responsible investment staff	(9) Investor relations	(10) External managers or service providers	(11) Other role
(A) Objective for ESG incorporation in investment activities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Objective for contributing to the development of the organisation's ESG incorporation approach	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(C) Objective for contributing to the organisation's stewardship activities (e.g. through sharing findings from continuous ESG research or investment decisions)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(D) Objective for ESG performance	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(E) Other objective related to responsible investment [as specified]	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(F) Other objective related to responsible investment [as specified]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(G) No formal objectives for responsible investment exist for this role	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please specify for "(E) Other objective related to responsible investment".

Ensuring that fund reporting aligns with InfraRed's sustainability reporting framework and best practices

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 8.1	PLUS	ISP 8	N/A	PUBLIC	People and capabilities	General

Describe the key responsible investment performance indicators (KPIs) or benchmarks that your organisation uses to compare and assess the performance of your professionals in relation to their responsible investment objectives.

In 2020, InfraRed incorporated qualitative sustainability objectives into the performance management processes for all staff to ensure full alignment with InfraRed's sustainability programme. The sustainability objectives are reflective of an individual's role and seniority in the business. For example, the investment team is responsible for ensuring sustainability risk and opportunities are properly assessed when evaluating an investment opportunity or divestment. Whereas, the Investment Committee members are responsible for ensuring staff have adhered to the sustainability requirements as part of the investment approval process.

The Sustainability Manager has developed a guidance document in connection with the HR team that clearly describes what success looks like for each respective sustainability objective. A staff's performance against the sustainability success criterion is assessed as part of their overall performance assessment. Performance is assessed on a semi-annual basis between an individual and their line manager and performance ratings are generated. Performance ratings are moderated by the Managing Partners and line managers to ensure an equitable distribution of ratings across the business has been achieved.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 8.2	CORE	ISP 8	N/A	PUBLIC	People and capabilities	General

Which responsible investment objectives are linked to variable compensation for roles in your organisation?

RI objectives linked to variable compensation for roles in your organisation:

(2) Chief-level staff (e.g. Chief Executive Officer (CEO), Chief Investment Officer (CIO) or Chief Operating Officer (COO))

(A) Objective for ESG incorporation in investment activities ☒

(B) Objective for contributing to the development of the organisation's ESG incorporation approach ☒

(D) Objective for ESG performance ☒

(3) Investment committee

(A) Objective for ESG incorporation in investment activities ☒

(B) Objective for contributing to the development of the organisation's ESG incorporation approach ☒

(D) Objective for ESG performance ☒

(5) Head of department

(B) Objective for contributing to the development of the organisation's ESG incorporation approach ☒

(D) Objective for ESG performance ☒

(6) Portfolio managers

(A) Objective on ESG incorporation in investment activities ☒

(D) Objective for ESG performance ☒

(E) Other objective related to responsible investment (as specified in ISP 8 option E) ☒

(7) Investment analysts

(A) Objective for ESG incorporation in investment activities ☒

(D) Objective for ESG performance ☒

(8) Dedicated responsible investment staff

(A) Objective for ESG incorporation in investment activities ☒

(B) Objective for contributing to the development of the organisation's ESG incorporation approach ☒

(D) Objective for ESG performance ☒

(E) Other objective related to responsible investment (as specified in ISP 8 option E) ☒

(9) Investor relations

(D) Objective for ESG performance ☒

(E) Other objective related to responsible investment (as specified in ISP 8 option E) ☒

(10) External managers or service providers

(A) Objective for ESG incorporation in investment activities ☐

(D) Objective for ESG performance ☐

(11) Other role

(A) Objective for ESG incorporation in investment activities ☒

(B) Objective for contributing to the development of the organisation's ESG incorporation approach ☒

(D) Objective for ESG performance ☒

(E) Other objective related to responsible investment (as specified in ISP 8 option E) ☒

(G) We have not linked any RI objectives to variable compensation ☐

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 9	CORE	N/A	N/A	PUBLIC	People and capabilities	General

How frequently does your organisation assess the responsible investment capabilities and training needs among your investment professionals?

- ☐ (A) Quarterly or more frequently
- ☒ (B) Bi-annually
- ☐ (C) Annually
- ☐ (D) Less frequently than annually
- ☐ (E) On an ad hoc basis
- ☐ (F) We do not have a process for assessing the responsible investment capabilities and training needs among our investment professionals

Strategic asset allocation

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 10	CORE	N/A	ISP 10.1	PUBLIC	Strategic asset allocation	1

Does your organisation incorporate ESG factors into your strategic asset allocation?

- ☒ (A) We incorporate ESG factors into calculations for expected risks and returns of asset classes
- ☒ (B) We specifically incorporate physical, transition and regulatory changes related to climate change into calculations for expected risks and returns of asset classes
- ☐ (C) No, we do not incorporate ESG considerations into our strategic asset allocation
- ☐ (D) Not applicable, we do not have a strategic asset allocation process

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 10.1	CORE	ISP 10	N/A	PUBLIC	Strategic asset allocation	1

For what proportion of assets do you incorporate ESG factors into your strategic asset allocation process?

(A) We incorporate ESG factors into calculations for expected risks and returns of asset classes (1) for all of our assets

(B) We specifically incorporate physical, transition and regulatory changes related to climate change into calculations for expected risks and returns of asset classes (1) for all of our assets

Stewardship

Stewardship policy

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 11	CORE	Multiple, see guidance	N/A	PUBLIC	Stewardship policy	2

What percentage of your assets under management does your stewardship policy cover?

(D) Real estate >75%

(E) Infrastructure >75%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 12	CORE	ISP 1.1	ISP 12.1	PUBLIC	Stewardship policy	2

Which elements does your organisation's stewardship policy cover? The policy may be a standalone guideline or part of a wider RI policy.

- ☒ (A) Key stewardship objectives
- ☒ (B) Prioritisation approach of ESG factors and their link to engagement issues and targets
- ☐ (C) Prioritisation approach depending on entity (e.g. company or government)
- ☒ (D) Specific approach to climate-related risks and opportunities
- ☐ (E) Stewardship tool usage across the organisation, including which, if any, tools are out of scope and when and how different tools are used and by whom (e.g. specialist teams, investment teams, service providers, external investment managers or similar)
- ☒ (F) Stewardship tool usage for specific internal teams (e.g. specialist teams, investment teams or similar)
- ☒ (G) Stewardship tool usage for specific external teams (e.g. service providers, external investment managers or similar)
- ☒ (H) Approach to collaboration on stewardship
- ☒ (I) Escalation strategies
- ☒ (J) Conflicts of interest
- ☒ (K) Details on how the stewardship policy is implemented and which elements are mandatory, including how and when the policy can be overruled
- ☒ (L) How stewardship efforts and results should be communicated across the organisation to feed into investment decision-making and vice versa
- ☐ (M) None of the above elements are captured in our stewardship policy

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 12.1	PLUS	ISP 12	N/A	PUBLIC	Stewardship policy	2

Describe any additional details related to your stewardship policy elements or your overall stewardship approach.

Under the Financial Conduct Authority Rule COBS 2.2.3R, InfraRed is required to make a public disclosure in relation to the nature of its commitment to the UK Stewardship Code 2020 (the “Code”) of the UK Financial Reporting Council (“FRC”). InfraRed maintains a copy of our Stewardship Policy on our website. This policy was updated in December 2020 to align with the 12 principles of the Code, InfraRed is not yet a signatory to the Code. This is because InfraRed is not an investor in UK-listed companies, which was the focus of the Code until 2020. InfraRed will review its decision to become a signatory at the end of 2021, which corresponds with the completion of a 12-month period following the update of our Stewardship Policy and aligns with the reporting requirements for the Code.

Stewardship policy implementation

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 13	CORE	ISP 1.1	N/A	PUBLIC	Stewardship policy implementation	2

How is your stewardship policy primarily applied?

- (A) It requires our organisation to take certain actions
- (B) It describes default actions that can be overridden (e.g. by investment teams for certain portfolios)
- (C) It creates permission for taking certain measures that are otherwise exceptional
- (D) We have not developed a uniform approach to applying our stewardship policy

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 14	PLUS	Multiple, see guidance	N/A	PUBLIC	Stewardship policy implementation	2

How does your organisation ensure that its stewardship policy is implemented by external service providers? Please provide examples of the measures your organisation takes when selecting external providers, when designing engagement mandates and when monitoring the activities of external service providers.

Provide examples below:

(A) Measures taken when selecting external providers:

A key element of the selection criteria is the organisational structure of the service provider. Special attention is provided to the suitability and availability of the team's capabilities to deliver the services, as well as the governance and processes framework in place to ensure that all controls are in place.

(B) Measures taken when designing engagement mandates for external providers:

N/A

(C) Measures taken to monitor external providers' alignment with our organisation's stewardship policy:

We have created two mirror positions: - the service provider's Key Account Manager, responsible for the overall performance of the management service provider across the multiple assets under management, and - an InfraRed counterpart, in charge of coordinating the relationship with the management service provider. Quarterly Liaison meetings are held to discuss performance and ensure that all stewardships measures are in place. We also assess adherence to our stewardship compliance via quarterly and annual reporting on the asset.

Stewardship objectives

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 15	CORE	Multiple, see guidance	N/A	PUBLIC	Stewardship objectives	2

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

	(4) Real estate	(5) Infrastructure
(A) Maximise the risk-return profile of individual investments	<input type="radio"/>	<input type="radio"/>
(B) Maximise overall returns across the portfolio	<input type="radio"/>	<input type="radio"/>
(C) Maximise overall value to beneficiaries/clients	<input checked="" type="radio"/>	<input checked="" type="radio"/>
(D) Contribute to shaping specific sustainability outcomes (i.e. deliver impact)	<input type="radio"/>	<input type="radio"/>

Stewardship prioritisation

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 16	CORE	Multiple, see guidance	N/A	PUBLIC	Stewardship prioritisation	2

What key criteria does your organisation use to prioritise your engagement targets? For asset classes such as real estate, private equity and infrastructure, you may consider this as key criteria to prioritise actions taken on ESG factors for assets, portfolio companies and/or properties in your portfolio. Select up to 3 options per asset class from the list.

	(4) Real estate	(5) Infrastructure
(A) The size of our holdings in the entity or the size of the asset, portfolio company and/or property	<input type="checkbox"/>	<input type="checkbox"/>
(B) The materiality of ESG factors on financial and/or operational performance	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(C) Specific ESG factors with systemic influence (e.g. climate or human rights)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(D) The ESG rating of the entity	<input type="checkbox"/>	<input type="checkbox"/>
(E) The adequacy of public disclosure on ESG factors/performance	<input type="checkbox"/>	<input type="checkbox"/>
(F) Specific ESG factors based on input from clients	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(G) Specific ESG factors based on input from beneficiaries	<input type="checkbox"/>	<input type="checkbox"/>
(H) Other criteria to prioritise engagement targets, please specify:	<input type="checkbox"/>	<input type="checkbox"/>

(I) We do not prioritise our engagement targets



Stewardship methods

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 17	PLUS	Multiple, see guidance	N/A	PUBLIC	Stewardship methods	2

Please rank the methods that are most important for your organisation in achieving its stewardship objectives. Ranking options: 1 = most important, 5 = least important.

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

1

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

2

(C) External paid services or initiatives other than investment managers, third-party operators and/or external property managers (paid beyond a membership fee)

We do not use this method

(D) Informal or unstructured collaborations with peers

4

(E) Formal collaborative engagements (e.g. PRI-coordinated collaborative engagements, Climate Action 100+, the Initiative Climat International (iCI) or similar)

3

Alignment and effectiveness

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 21	PLUS	Multiple, see guidance	N/A	PUBLIC	Alignment and effectiveness	2

Describe how you coordinate stewardship across your organisation to ensure that stewardship progress and results feed into investment decision-making and vice versa.

At InfraRed, accountability for stewardship activities is shared at all levels of the organisation.

The Fund Managers have a responsibility for ensuring that InfraRed's stewardship priorities are adhered to at a fund level. The Fund's Investment Committee play an important role in overseeing stewardship activities at all stage of a project (investment opportunity, asset management and asset disposal). In addition, our Risk & Compliance team and the Sustainability Manager work closely with the Fund Managers to help define and deliver on our stewardship commitments. Finally, at an investment level, the InfraRed Asset Manager is responsible of ensuring that InfraRed's stewardship principles are followed and implemented by the management service provider (MSP) or property manager.

The quarterly project reviews bring together all the parties mentioned above (Asset Managers, Fund Managers and Investment Committee members) to ensure that the processes are implemented at all levels.

As the Fund Managers and Investment Committee are involved at both the investment stage and the on-going management stage of a project, InfraRed also has internal processes in place to ensure that lessons learnt from existing assets under management are utilised to inform and enhance the investment decision-making processes for future investment opportunities.

Stewardship examples

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 22	PLUS	Multiple, see guidance	N/A	PUBLIC	Stewardship examples	2

Describe stewardship activities that you participated in during the reporting year that led to desired changes in the entity you interacted with. Include what ESG factor(s) you engaged on and whether your stewardship activities were primarily focused on managing ESG risks and opportunities or delivering sustainability outcomes.

	(1) Engagement type	(2) Primary goal of stewardship activity
(A) Example 1	b) Collaborative	c) Both managing ESG risks and delivering outcomes
(B) Example 2	a) Internally (or service provider) led	c) Both managing ESG risks and delivering outcomes

(C) Example 3	a) Internally (or service provider) led	c) Both managing ESG risks and delivering outcomes
	(3) The ESG factors you focused on in the stewardship activity	(4) Description of stewardship activity and the desired change(s) you achieved
(A) Example 1	Our infrastructure business hosted an ESG workshop for all the management teams of our investment companies. As part of this workshop, we informed the teams that we wanted to start measuring the GHG emissions of our portfolio. Following the workshop, we issued a Best Practices Guidance Document which included instructions on how to quantify Scope 1 and Scope 2 GHG emissions.	As a result of the engagement we had with the management teams, just under 50% of the infrastructure portfolio reported their Scope 1 and Scope 2 emissions for the 2020 calendar year. We are continuing to engage with the management teams on this topic so that all of our investments are measuring and reporting their GHG emissions, including Scope 3 emissions.
(B) Example 2	Over the course of the year, our real estate business conducted an ESG performance review with each of our external Managing Agents. These reviews were led by Real Estate's Head of Asset Management in collaboration with our Sustainability Manager and involved discussing the Managing Agents approach to sustainability, as well as the respective policies and processes they had in place to manage ESG risks and opportunities.	<p>The output of these performance reviews was a bespoke ESG action plan for the Managing Agent to address any deficiencies which were identified during the discussion. The asset management team worked with the Managing Agents to support them with implementing the various requirements of the ESG action plans.</p> <p>In particular, during this process, we became aware that one Managing Agent, a small, regional firm, had several policies that needed significant refinement. Over a period of two months, we worked closely with them to review and improve their governance procedures ensuring their compliance with our governance policies.</p>
(C) Example 3	InfraRed adopts an active asset management approach. On which base, we are constantly engaging with our management service providers, sub-contractors, co-shareholders and clients across our portfolio of over 250 assets on ESG risks and opportunities to produce ESG results.	This is bespoke to the underlying investment.

Engaging policymakers

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 23	CORE	N/A	Multiple, see guidance	PUBLIC	Engaging policymakers	2

How does your organisation, or the external investment managers or service providers acting on your behalf, engage with policymakers for a more sustainable financial system?

- ☒ (A) We engage with policymakers directly
- ☒ (B) We provide financial support, are members of and/or are in another way affiliated with third-party organisations, including trade associations and non-profit organisations, that engage with policymakers
- ☐ (C) We do not engage with policymakers directly or indirectly

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 23.1	CORE	ISP 23	N/A	PUBLIC	Engaging policymakers	2

What methods do you, or the external investment managers or service providers acting on your behalf, use to engage with policymakers for a more sustainable financial system?

- ☐ (A) We participate in "sign-on" letters on ESG policy topics. Describe:
- ☐ (B) We respond to policy consultations on ESG policy topics. Describe:
- ☐ (C) We provide technical input on ESG policy change. Describe:
- ☐ (D) We proactively engage financial regulators on financial regulatory topics regarding ESG integration, stewardship, disclosure or similar. Describe:
- ☒ (E) We proactively engage regulators and policymakers on other policy topics. Describe:
- In late 2020, the FCA launched a consultation on proposed policy with respect to the exercise of the FCA's powers under new Article 23D (essentially its ability to publish a synthetic LIBOR rate following cessation of the official rate). This included how to consult on exercising its new powers, definition of tough legacy contracts, scale of tough legacy contracts, and whether a smooth transition could occur without the FCA exercising its powers. InfraRed contributed as part of an industry wide response authored by Infrastructure Partnership Authority ("IPA").
- During 2020, InfraRed took an active role in contributing to the IPA working group, which resulted in the IPA submitting a response to the consultation on behalf of InfraRed and other equity investors in January 2021.
- InfraRed also contributed to the RPI consultation response to HM Treasury and Statistics Authority in September 2020.
- HICL, which InfraRed is the Investment Manager for, submitted a response to Business, Energy and Industrial Strategy Committee's Post-Pandemic Economic Growth super-inquiry in August 2020.
- ☐ (F) Other methods used to engage with policymakers. Describe:

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 23.2	CORE	ISP 23	N/A	PUBLIC	Engaging policymakers	2

Do you have governance processes in place (e.g. board accountability and oversight, regular monitoring and review of relationships) that ensure your policy activities, including those through third parties, are aligned with your position on sustainable finance and your commitment to the 6 Principles of the PRI?

● (A) Yes, we have governance processes in place to ensure that our policy activities are aligned with our position on sustainable finance and our commitment to the 6 Principles of the PRI. Describe your governance processes:

Our communications policy requires the relevant Fund Investment Committee and/or InfraRed's Governance Board members to undertake an advance review of any policy activities. This ensures that there is complete governance oversight of these policy activities and a review process to ensure these activities align with our approach to sustainability and our Sustainability Policy.

○ (B) No, we do not have these governance processes in place. Please explain why not:

Engaging policymakers – Policies

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 24	CORE	ISP 23	ISP 24.1	PUBLIC	Engaging policymakers – Policies	2

Do you have policies in place that ensure that your political influence as an organisation is aligned with your position on sustainable finance and your commitment to the 6 Principles of the PRI?

● (A) Yes, we have a policy(ies) in place. Describe your policy(ies):

As per our Global Compliance Manual, InfraRed is prohibited from making contributions to any political organisation or political candidate. By doing so, we ensure that our political influence cannot be in opposition to our sustainability goals and avoid any conflicts of interests or other concerns given related to the public sector clients in respect of our infrastructure projects.

○ (B) No, we do not a policy(ies) in place. Please explain why not:

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 24.1	CORE	ISP 24	N/A	PUBLIC	Engaging policymakers – Policies	2

Is your policy that ensures alignment between your political influence and your position on sustainable finance publicly disclosed?

- ☐ (A) Yes. Add link(s):
- ☒ (B) No, we do not publicly disclose this policy(ies)

Engaging policymakers – Transparency

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 25	CORE	ISP 23	N/A	PUBLIC	Engaging policymakers – Transparency	2

During the reporting year, did your organisation publicly disclose your policy engagement activities or those conducted on your behalf by external investment managers/service providers?

- ☐ (A) We publicly disclosed details of our policy engagement activities. Add link(s):
- ☒ (B) We publicly disclosed a list of our third-party memberships in or support for trade associations, think-tanks or similar that conduct policy engagement activities with our support or endorsement. Add link(s):
- Page 26: <https://www.hicl.com/wp-content/uploads/2020/11/HICL-Annual-Report-2020-1-1.pdf>
- ☐ (C) No, we did not publicly disclose our policy engagements activities during the reporting year. Explain why:
- ☐ (D) Not applicable, we did not conduct policy engagement activities

Climate change

Public support

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 26	CORE	N/A	N/A	PUBLIC	Public support	General

Does your organisation publicly support the Paris Agreement?

● (A) Yes, we publicly support the Paris Agreement Add link(s) to webpage or other public document/text expressing support for the Paris Agreement:

The following is included in the Sustainability Policy: InfraRed also recognises the role of the financial services sector in contributing to the 2015 Paris Agreement goals and we have taken steps to reflect this in our investment and corporate processes.

○ (B) No, we currently do not publicly support the Paris Agreement

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 27	CORE	N/A	N/A	PUBLIC	Public support	General

Does your organisation publicly support the Task Force on Climate-Related Financial Disclosures (TCFD)?

● (A) Yes, we publicly support the TCFD Add link(s) to webpage or other public document/text expressing support for the TCFD:

- Sustainability report 2020, Stated in the page 3 of the report: https://www.ircp.com/sites/default/files/2020-12/Infrared_EoY_ReportSustainability_18Dec.pdf
- In the HICL website: <https://www.hicl.com/sustainability/> and TRIG website: <https://www.trig-ltd.com/sustainability/>
- TCFD website which states that Infrared is a TCFD supporter since Oct-2020: <https://www.fsb-tcfid.org/supporters/>

○ (B) No, we currently do not publicly support the TCFD

Governance

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 28	CORE	N/A	N/A	PUBLIC	Governance	General

How does the board or the equivalent function exercise oversight over climate-related risks and opportunities?

☒ (A) By establishing internal processes through which the board or the equivalent function are informed about climate-related risks and opportunities. Specify:

Communication and reporting of climate-related risks and opportunities are incorporated within InfraRed's existing governance and reporting processes. In respect to an investment, a climate-related risk and/or opportunity would be reported in the Board packs, and where relevant, the investment Board meeting, which an InfraRed Asset Manager attends as a Board Director. This in turn would be reported to the Fund Manager and investors via InfraRed's quarterly reporting process. If that matter is of a material nature, it would be reported as a priority to both the InfraRed Asset Manager and the Fund Manager. In addition, any climate-related risks or opportunities that result in a change in the investment's business plan or is deemed to be a material change, would be communicated to the Fund's Investment Committee.

InfraRed would also ensure that any climate-related risks and opportunities in respect to its listed funds, HICL and TRIG, would be communicated to the listed fund's Board via quarterly Investment Committees. The listed Board and InfraRed representatives meet on a quarterly basis to review risks which face the Company, including risks related to climate change.

At the InfraRed corporate level, InfraRed's Sustainability Manager has overall responsibility for the development and implementation of InfraRed's sustainability programme. The Sustainability Manager prepares a sustainability programme, which sets out InfraRed's approach to monitoring and evaluating climate-related risks and opportunities, at both an investment and corporate level. This programme is reviewed by InfraRed's Chief Executive and Senior Management team. InfraRed's Chief Executive has ultimate responsibility for approving the sustainability programme. The Sustainability Manager reports on the progress of the sustainability programme, including the climate change workstreams to the Chief Executive and Senior Management team on a regular basis.

InfraRed has also established a dedicated climate change working group which includes the Sustainability Manager and representatives from InfraRed's Fund and Asset Management teams. The objective of this group is to implement processes to improve the awareness of climate-related risk and opportunities at the investment level and improve the climate resilience of InfraRed's portfolio. To that effect, the climate change working group has presented to both InfraRed's internal Asset Management teams and the third party service providers on climate change related issues in 2020.

☒ (B) By articulating internal/external roles and responsibilities related to climate. Specify:

At a corporate level, InfraRed's Sustainability Manager is responsible for the strategy and implementation of InfraRed's sustainability commitments, which includes InfraRed's approach to climate change. InfraRed's Chief Executive Officer and Senior Management Team are responsible for ensuring the InfraRed's sustainability strategy and programme aligns with InfraRed's overarching business strategy. In addition, InfraRed have an internal climate change working group, which incorporates members of InfraRed's Fund and Asset Management teams, which is responsible for leading climate change related initiatives at InfraRed.

InfraRed's Asset Managers are responsible for ensuring climate related risks and opportunities are considered by the investment companies. At an investment level, the Management Service Providers and the Directors are responsible for translating these commitments into actions.

InfraRed's Origination & Execution team is responsible for assessing climate-related risks in respect of potential transactions. They are provided with guidance notes, prepared by InfraRed's Sustainability Manager, to support their assessment; and they seek third-party advice through the due diligence process where risks are identified. Climate-related opportunities and risks are considered by the Investment Committee throughout the transaction approval process and, where necessary, transaction teams are directed to undertake further due diligence.

Further information is set out in our response to ISP 28 (A).

☐ (C) By engaging with beneficiaries to understand how their preferences are evolving with regard to climate change. Specify:

☒ (D) By incorporating climate change into investment beliefs and policies. Specify:

InfraRed's sustainability programme incorporates our commitment to support the United Nations Sustainable Development Goals (SDGs), and in particular, InfraRed has selected to prioritise our resources to make a positive contribution to SDG13 Climate Change. This commitment is included in InfraRed's Sustainability Policy and on our website, as well as being contained in majority of our corporate material. We also communicated our commitments externally in 2020 via the following formats:

- InfraRed's Chief Executive Officer and Head of Infrastructure contributed to the Infrastructure Investor sustainability edition issued in November 2020 - <https://www.ircp.com/sites/default/files/2020-11/InfraRed%20Nov%202020.pdf>.
- Climate change was a key topic of the Infrastructure ESG workshop presented to third party service providers via zoom in September 2020
- The Sustainability Manager and members of the Infrastructure and Real Estate Asset Management team participated in direct engagement with a number of our external third party service providers on climate change.

Our commitment to climate action, has been incorporated into our Sustainability Policy, which informs InfraRed's sustainability programme. For example, in 2020, InfraRed updated its investment due diligence processes, which require the Investment teams to consider the impact of physical and transition risks related to climate-change as part of the early stage deal screening process of new investment opportunities. InfraRed's Asset Management team have also been working with the third party service providers to ensure that climate-related risks and opportunities are adequately incorporated into the risk management frameworks at the investment level.

Climate change is also informing InfraRed's investment strategy, both in respect to the investment strategy of our existing funds and setting the investment strategies of the new funds we raised in 2020. An obvious example, is our continued commitment to invest in renewable energy, both in respect to operating assets and as well as developing early-stage renewable projects through our unlisted funds. However, other areas around the transition where we are investing include the storage capacity and flexible generation required to reinforce the grid. We are also looking closely at repurposing old conventional generating assets, mass market electric vehicle charging business models and other opportunities to decarbonise transportation and heating as well, in particular through hydrogen.

In 2020, we also declined to pursue a number of opportunities because they did not align with our commitment to support the transition to a low carbon economy.

☒ **(E) By monitoring progress on climate-related metrics and targets. Specify:**

InfraRed has always worked with our third party service providers to encourage initiatives which promote the reduction of energy and water consumption as well as waste and carbon emissions generated.

In 2020, HICL publicly disclosed its Scope 1, Scope 2 and Scope 3 greenhouse gas emissions ("GHG") for projects which they have operational control for and TRIG disclosed its Scope 1 and Scope 2 GHG emissions.

However, in 2020, we expanded our sustainability reporting framework to request that investment companies report Scope 1 and Scope 2 GHG emissions. Whilst InfraRed encouraged investment companies to provide this information for the 2020 reporting period, it was made clear that our expectation is that all investment companies measure and report their Scope 1 and Scope 2 GHG emission for the 2021 reporting period. We will most likely look to expand this requirement to incorporate Scope 3 GHG emissions in relation to the 2022 reporting period. InfraRed's focus for 2021 is to work with our investment companies to ensure we fully understand the carbon footprint of our portfolio and identify a clear pathway to reduce GHG emissions in line with the requirements of the Paris Agreement. InfraRed also discloses its GHG emissions in accordance with Streamlined Energy and Carbon Reporting ("SECR"). In order to lead by example, InfraRed became a certified carbon neutral firm in 2020. Working with a third party adviser, we have completed an independent assessment of the direct and indirect greenhouse gas emissions from InfraRed's global corporate operations for the 2019 calendar year in accordance with The CarbonNeutral Protocol. With the help of our specialist adviser, we have developed an offsetting programme which delivers finance to emission reduction projects, which support the transition to a low carbon economy as well as making a positive contribution to InfraRed's other prioritised SDGs. InfraRed has acquired carbon credits to offset the company's actual emissions in 2019 and our forecasted emissions in 2020 (which will be reconciled at the end of the year to ensure we offset our actual emissions in 2020). All credits adhere to the International Carbon Reduction and Offset Alliance (ICROA) and have been independently verified to assure emissions reductions are occurring. Moving forward, we will continue to quantify, reduce and offset InfraRed's future greenhouse gas emissions as part of our overall commitment to minimise our company's corporate carbon footprint.

☒ **(F) By defining the link between fiduciary duty and climate risks and opportunities. Specify:**

Sustainability, and climate change, are part of a Director's responsibilities. This applies to the Directorships of InfraRed as well as investment companies and investment holding companies managed by InfraRed. This is defined in the Director's handbook which sets the InfraRed's requirements for InfraRed's Asset Managers and Board Directors. In 2020, InfraRed's Climate Change working group gave a number of internal presentations on the importance of climate related risks and opportunities. These presentations targeted the different teams (from investment to asset management), as well as external stakeholders such as third party service providers. More broadly, InfraRed also recognises our responsibility as an asset manager to understand the climate-related risk in our portfolio. For that reason, a third party consultant was engaged in 2020 to undertake a climate change risk assessment of majority of InfraRed's portfolio. The intention is that a similar climate change risk assessment would be completed for the remaining assets in 2021.

☒ (G) Other measures to exercise oversight, please specify:

In 2020, InfraRed's infrastructure business engaged a third party consultant to undertake a climate change risk assessment for a number of InfraRed's funds. This engagement included an assessment of climate-related physical and transition risks. InfraRed's real estate business also engaged a third party adviser to undertake climate change risk assessments as part of the pre-investment due diligence on potential investment opportunities.

☐ (H) The board or the equivalent function does not exercise oversight over climate-related risks and opportunities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 29	CORE	N/A	N/A	PUBLIC	Governance	General

What is the role of management in assessing and managing climate-related risks and opportunities?

☒ (A) Management is responsible for identifying climate-related risks/opportunities and reporting them back to the board or the equivalent function. Specify:

In respect to new investment opportunities, the investment team is responsible for identifying and climate-related risks and/or opportunities as part of the pre-investment due diligence. Any risks or opportunities identified would be reported to the Fund's Investment Committee via the Investment Papers as part of the investment approval process. Where necessary, the Sustainability Manager would support the investment team to complete the due diligence and summarise the findings in the Investment Papers.

In respect to InfraRed's existing investments, it is the responsibility of third party service providers to identify climate-related risks/opportunities at the investment level. Any risks or opportunities would be reported to the InfraRed Asset Manager via the investment Board packs and where relevant, the investment Board meeting. This in turn would be reported to the Fund Manager and investors via InfraRed's quarterly reporting process. If that matter is of a material nature, it would be reported as a priority to both the InfraRed Asset Manager and the Fund Manager. In addition, any climate-related risks or opportunities that result in a change in the investment's business plan or is deemed to be a material change, would be communicated to the Fund's Investment Committee.

InfraRed would also ensure that any climate-related risks and opportunities in respect to its listed funds, HICL and TRIG, would be communicated to the listed fund's Board via quarterly Investment Committee's. The listed Board and InfraRed representatives meet on a quarterly basis to review risks which face the Company, including risks related to climate change.

At a corporate level, InfraRed's Sustainability Manager has overall In respect to new investment opportunities, the investment team is responsible for identifying and climate-related risks and/or opportunities as part of the pre-investment due diligence. Any risks or opportunities identified would be reported to the Fund's Investment Committee via the Investment Papers as part of the investment approval process. Where necessary, the Sustainability Manager would support the investment team to complete the due diligence and summarise the findings in the Investment Papers.

In respect to InfraRed's existing investments, it is the responsibility of third party service providers to identify climate-related risks/opportunities at the investment level. Any risks or opportunities would be reported to the InfraRed Asset Manager via the investment Board packs and where relevant, the investment Board meeting. This in turn would be reported to the Fund Manager and investors via InfraRed's quarterly reporting process. If that matter is of a material nature, it would be reported as a priority to both the InfraRed Asset Manager and the Fund Manager. In addition, any climate-related risks or opportunities that result in a change in the investment's business plan or is deemed to be a material change, would be communicated to the Fund's Investment Committee.

InfraRed would also ensure that any climate-related risks and opportunities in respect to its listed funds, HICL and TRIG, would be communicated to the listed fund's Board via quarterly Investment Committee's. The listed Board and InfraRed representatives meet on a quarterly basis to review risks which face the Company, including risks related to climate change.

At a corporate level, InfraRed's Sustainability Manager has overall responsibility for climate change, with the support of the climate change working group. The Sustainability Manager is responsible for identifying climate related risks and opportunities which may impact InfraRed and or our portfolio. The Sustainability Manager reports on progress of the sustainability programme, including climate change, to InfraRed's Chief Executive Officer and Senior Management team on a regular basis as part of the sustainability internal governance processes.

☒ **(B) Management implements the agreed-upon risk management measures. Specify:**

Climate-related risk management measures are incorporated into the long-standing risk management framework processes at the investment, fund and corporate level.

InfraRed's Asset Managers are responsible for ensuring climate related risks and opportunities are considered by the investment companies. At an investment level, the Management Service Providers and the Directors are responsible for translating these commitments into actions. These Asset Managers present climate-related risks and management responses through their quarterly Investment Committee reporting.

InfraRed's Origination & Execution team is responsible for assessing climate-related risks in respect of potential transactions. They are provided with guidance notes, prepared by InfraRed's Sustainability Manager, to support their assessment; and they seek third-party advice through the due diligence process where risks are identified. Climate-related opportunities and risks are considered by the Investment Committee throughout the transaction approval process and, where necessary, transaction teams are directed to undertake further due diligence.

☒ **(C) Management monitors and reports on climate-related risks and opportunities. Specify:**

At an investment level, this is monitored via the project company board reporting process as well as an annual ESG survey conducted by InfraRed. At a fund level this is monitored via the quarterly reports and meetings, as well as the Investment Committee's for the listed funds. At the corporate level, this is monitored via the regular meetings between the Sustainability Manager and the Chief Executive Officer. Climate-related matters are reported on by management to investors through regular reporting frameworks, including reporting aligned with the recommendations of the Taskforce on Climate-related Financial Disclosures.

☒ **(D) Management ensures adequate resources, including staff, training and budget, are available to assess, implement and monitor climate-related risks/opportunities and measures. Specify:**

A number of measures are in place to act upon our objectives. Each investment should include a dedicated budget to pursue ESG initiatives, which incorporates climate-related aspects. This is managed by the investment company management team and the Board Directors, which includes a representative from InfraRed. At a corporate level, InfraRed has a dedicated Sustainability Manager and sustainability budget to support the delivering of the sustainability programme. The climate change working group was established in 2019 to ensure that significant resources were allocated to driving InfraRed's commitments to climate action, including raising awareness and sharing best practices amongst the assets in InfraRed's portfolio. InfraRed has also established an online tool, referred to as the Knowledge centre, which has been created to capture and share lessons learnt between projects, including mitigating climate risks and improving climate resilience of an asset. Sustainability objectives are incorporated into all staffs' annual appraisal.

☐ (E) Other roles management takes on to assess and manage climate-related risks/opportunities, please specify:

☐ (F) Our management does not have responsibility for assessing and managing climate-related risks and opportunities

Strategy

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 30	CORE	N/A	Multiple, see guidance	PUBLIC	Strategy	General

Which climate-related risks and opportunities has your organisation identified within its investment time horizon(s)?

☒ **(A) Specific financial risks in different asset classes. Specify:**

We recognise that InfraRed's portfolio is susceptible to the risk of physical damage caused by extreme weather events caused by climate change as well transition risk caused by changes to government policy and consumer behaviours to transition to a low carbon economy. Both of these risks could result in financial risks. We note however, as an investor in social, economic, renewable and low carbon energy infrastructure as well as real estate assets, InfraRed's portfolio is less susceptible to transition risk than some other funds given the portfolio does not invest in carbon-intensive sectors such mining and has limited non-renewable energy generating assets.

InfraRed considers the impact of climate-related risks for different asset classes as part of its risk management framework. This informs our investment strategy, both for short-term investment opportunities and investment strategy for new funds, as well as the steps we take to preserve and enhance value of our existing portfolio. This was a key driver in InfraRed engaging a third party adviser to undertake a climate change risk assessment for a number of our funds under management.

For example, the below reflects some of the financial risks which were identified in relation to our renewable energy portfolio. In the near and medium term, transition risks to our investments may arise from unexpected changes to government policies. There is a financial risk that the increase in renewables build-out ambition without sufficient demand side action could result in a reduction in power price forecasts for renewable energy projects that have non-contracted revenues. TRIG, managed by InfraRed, disclosed in its 2020 Annual Report the potential reduction in the fund's Net Asset Value (NAV) in the event that this scenario eventuated. Refer to page 72 of the following document: <https://www.trig-ltd.com/wp-content/uploads/2021/02/TRIG-December-2020-Annual-Report-and-Accounts.pdf>. Whereas, from a long-term perspective, there is also a financial risk that potential long-term changes to weather patterns could cause a material increase or decrease in an asset's energy yield from that expected at the time of investment.

If adverse climate change is not addressed, portfolio investments will likely be exposed to more frequent extreme weather events, increasing the risk of physical damage to on-site infrastructure and offsite transmission and distribution systems, alongside additional safety risks and operational considerations.

InfraRed's real estate business has also engaged with FourTwentySeven, a consultant, to undertake climate change risk assessments as part of this pre-investment process. The objective of this assessment is to implement measures in the business plan to address or minimise climate impact.

☒ **(B) Specific sectors and/or assets that are at risk of being stranded. Specify:**

We recognise that InfraRed's portfolio is susceptible to the risk of physical damage caused by extreme weather events caused by climate change as well transition risk caused by changes to government policy and consumer behaviours to transition to a low carbon economy. Both of these risks could result in financial risks. We note however, as an investor in social, economic, renewable and low carbon energy infrastructure as well as real estate assets, InfraRed's portfolio is less susceptible to transition risk than some other funds given the portfolio does not invest in carbon-intensive sectors such mining and has limited non-renewable energy generating assets.

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InfraRed's real estate business has also engaged with FourTwentySeven, a consultant, to undertake climate change risk assessments as part of this pre-investment process. The objective of this assessment is to implement measures in the business plan to address or minimise climate impact.

☒ **(C) Assets with exposure to direct physical climate risk. Specify:**

InfraRed primarily invests in physical assets; therefore the potential impact of physical climate risk is highly relevant. If adverse climate change is not arrested, portfolio investments will likely be exposed to more frequent and severe extreme weather events, which increases the risk of physical damage to the asset or associated infrastructure, alongside additional safety risks and operational considerations. Such weather events may acute, including: - River, coastal or flash flooding; - Hailstorm; - Wildfire; or - Storms, cyclones, tornados, lightning and high speed wind gusts. Or chronic, including: - Increased temperatures such that the thermal capacity of equipment could be exceeded; or - Changes to ground conditions from increased rain or drought conditions. InfraRed has engaged an external consultant to assess the physical climate risks of majority of its assets. The output of this assessment includes a heatmap of each underlying asset's exposure to 11 weather perils. The assessment considers the current as well as medium-to-long-term exposure under two climate scenarios (IPCC RCP2.6 scenario representing a low carbon world and IPCC RCP8.5 scenario representing high greenhouse gas emissions). The external consultant has completed the portfolio level screening, and the results of the physical risk assessment have been presented to the Fund Managers and the Board in respect to our listed fund. The results of the assessment will be distributed to the management teams of our investment companies shortly.

☒ **(D) Assets with exposure to indirect physical climate risk. Specify:**

As part of the climate change risk assessment process, we are also considering the impact of climate-change on related infrastructure such as grid connections in relation to our energy generating assets. However, we have also considered the indirect physical climate risks in respect to interruption to power supply for our core infrastructure projects.

☒ **(E) Specific sectors and/or assets that are likely to benefit under a range of climate scenarios. Specify:**

InfraRed has considered the sectors that are likely to benefit under climate scenarios as part of shaping its future investment strategies, this has been done in respect of identifying pipeline opportunities for existing funds as well as, establishing the investment strategy of our new investment funds.

For example, in respect of our existing funds, TRIG, which is managed by InfraRed, disclosed its climate-related opportunities in line with the TCFD recommendations as part of its 2020 Annual Report – refer to page 71 of the following: <https://www.trig-ltd.com/wp-content/uploads/2021/02/TRIG-December-2020-Annual-Report-and-Accounts.pdf>. In 2020, InfraRed also undertook significant research exercise on the role of hydrogen in supporting the transition to a low-carbon economy and what that could look like in terms of potential investment opportunities for InfraRed. The findings of this research were presented at InfraRed’s internal Energy Forum in September 2020. InfraRed’s Head of Infrastructure also spoke about InfraRed’s investigation into the hydrogen sector and other sectors that InfraRed believes will benefit from climate scenarios, such as decarbonisation of transport, in the interview with Infrastructure Investor which was published in November 2020. Refer to page 2 of the attached: <https://www.ircp.com/sites/default/files/2020-11/InfraRed%20Nov%202020.pdf>.

In addition, our new funds strategies have very much been driven by the macro-changes as a result of climate change and the need to transition to a low-carbon economy. This includes our continued commitment to invest in renewable energy, as well as other areas to support the transition, such as storage capacity and flexible generation required to reinforce grid stability.

☒ (F) Specific sectors and/or assets that contribute significantly to achieving our climate goals. Specify:

As highlighted above, a key component of InfraRed’s Sustainability Policy is our commitment to support the UN SDGs, in particular SDG 7 Affordable and Clean Energy and SDG 13 Climate Action. This is reflected in our investment processes to ensure that we only invest in assets which align with our climate change objectives, and we are working with the management service providers to ensure that our existing assets measure, report and implement steps to reduce their GHG emissions.

In respect of specific sectors, InfraRed remains committed to invest in renewable energy generation capacity. We have been a long-term investor in renewable energy, we made our first renewables investment back in 2006, and we launched TRIG on the London Stock Exchange in 2013. InfraRed continues to invest in both operating assets and to develop early-stage projects through our unlisted funds. In 2020, InfraRed invested in a further over 1GW of renewable energy generation capacity.

☐ (G) Other climate-related risks and opportunities identified. Specify:

☐ (H) We have not identified specific climate-related risks and opportunities within our organisation's investment time horizon

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 30.1	CORE	ISP 30	N/A	PUBLIC	Strategy	General

For each of the identified climate-related risks and opportunities, indicate within which investment time-horizon they were identified.

	(1) 3–5 months	(2) 6 months to 2 years	(3) 2–4 years	(4) 5–10 years
(A) Specific financial risks in different asset classes [as specified]	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Specific sectors and/or assets that are at risk of being stranded [as specified]	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

(C) Assets with exposure to direct physical climate risk [as specified]	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(D) Assets with exposure to indirect physical climate risk [as specified]	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(E) Specific sectors and/or assets that are likely to benefit under a range of climate scenarios [as specified]	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(F) Specific sectors and/or assets that contribute significantly to achieving our climate goals [as specified]	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	(5) 11–20 years	(6) 21–30 years	(7) >30 years	
(A) Specific financial risks in different asset classes [as specified]	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(B) Specific sectors and/or assets that are at risk of being stranded [as specified]	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(C) Assets with exposure to direct physical climate risk [as specified]	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(D) Assets with exposure to indirect physical climate risk [as specified]	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(E) Specific sectors and/or assets that are likely to benefit under a range of climate scenarios [as specified]	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(F) Specific sectors and/or assets that contribute significantly to achieving our climate goals [as specified]	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 31	CORE	N/A	N/A	PUBLIC	Strategy	General

Which climate-related risks and opportunities has your organisation identified beyond its investment time horizon(s)?

☒ **(A) Specific financial risks in different asset classes. Specify:**

InfraRed undertakes a long-term assessment of climate-related risks and opportunities for all of its assets under management, despite the investment horizon. This is because we understand that future climate-related risks and opportunities can have an impact on the current asset valuation, regardless InfraRed's investment period. We also recognise that InfraRed may be in a position to implement changes now to mitigate climate-related risks or take advantage of climate-related opportunities, both of which will improve the long-term return for our investors.

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InfraRed has many funds under management, some of which have a 'buy and hold' investment strategy and others which have a 'capital gains' investment strategy. A combination of the buy and hold funds and the capital gains funds were incorporated in the scope of the climate change risk assessment. In respect to the capital gains funds, the risk assessment was considering the climate-related risks and opportunities beyond 2040, even though InfraRed's may only hold its investment in the asset for a short period of time. We decided to take this approach so that we could be aware of our climate related risks and opportunities before we disposed of the investment. By doing so, this enables us to take further action where appropriate and improve the value achieved for investors at divestment. In some circumstances, we were assessing climate change risks for a longer period than was remaining under the asset concession period. Similarly, we elected to do so, on the basis that the risk assessment could potentially inform the hand-back requirements as well as being able to be shared with the client for their own future use.

☒ **(B) Specific sectors and/or assets that are at risk of being stranded. Specify:**

An example we have identified is gas related assets. In the event that we have considered an investment opportunity that is a gas related asset or supporting a gas related asset, we have engaged specialist advisers to consider the long-term role for that gas asset in the transition to a low carbon economy.

☒ **(C) Assets with exposure to direct physical climate risk. Specify:**

We have previously considered opportunities in flood defence projects as well as researching this as a wider investment sector as part of developing our investment strategy for new funds. We also consider physical climate-related risk and opportunities beyond the investment time horizon because a lot of our assets have a useful life that goes beyond that. So, it is important that we understand those risks and opportunities so that we can support our clients to address them after we hand the investment back. We understand that it is important that we consider these longer-term risks and opportunities now, so that we can undertake necessary actions during our investment horizons to deal with these longer-term risks and opportunities. InfraRed does not only focus on its own risks but we proactive engage with our stakeholders to address the overall project risks and opportunities as part of our commitment to combating climate change.

☒ **(D) Assets with exposure to indirect physical climate risk. Specify:**

As highlighted in our response to ISP 30, we are also considering the impact of climate-change on related infrastructure such as grid connections in relation to our energy generating assets. However, we have also considered the indirect physical climate risks in respect to interruption to power supply for our core infrastructure projects. This assessment is not just limited to our investment hold period.

☒ **(E) Specific sectors and/or assets that are likely to benefit under a range of climate scenarios. Specify:**

As highlighted in our response to ISP 30, InfraRed has considered the sectors that are likely to benefit under climate scenarios as part of shaping its future investment strategies, this has been done in respect of identifying pipeline opportunities for existing funds as well as, establishing the investment strategy of our new investment funds.

As highlighted in our response to ISP 30, InfraRed has considered the sectors that are likely to benefit under climate scenarios as part of shaping its future investment strategies. This has been done in respect of identifying pipeline opportunities for existing funds as well as, establishing the investment strategy of our new investment funds.

In addition, our new funds strategies have very much been driven by the macro-changes as a result of climate change and the need to transition to a low-carbon economy. This includes our continued commitment to invest in renewable energy, as well as other areas to support the transition, such as storage capacity and flexible generation required to reinforce grid stability.

☒ (F) **Specific sectors and/or assets that contribute significantly to achieving our climate goals. Specify:**

As highlighted above, this includes our continued commitment to invest in renewable energy, as well as other areas to support the transition, such as storage capacity and flexible generation required to reinforce grid stability.

☐ (G) Other climate-related risks and opportunities identified, please specify:

☐ (H) We have not identified specific climate-related risks and opportunities beyond our organisation's investment time horizon

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 32	PLUS	N/A	N/A	PUBLIC	Strategy	General

Describe the impact of climate-related risks and opportunities on your organization's investment strategy, products (where relevant) and financial planning.

Climate-related considerations are embedded in our investment and management framework, and influence our portfolio short-medium-and-long-term management decisions:

- Investment strategy. When it comes to future investments, climate change and other sustainability considerations are becoming an integral part of the decision making process. InfraRed's investment strategy focuses on core infrastructure. These investments by their nature are embedded within communities and the broader environment, and adverse climate change has the potential to impact the portfolio. International, national and regional policies that seek to reduce the extent of adverse climate change represent opportunities as well as risks for both IRCP and the community.

- On the one hand, macro trends related to climate change inform the new fund investment strategies. We believe for example that in the short-to-medium term, the transition to a low carbon economy will be a key driver for changes, with more opportunities arising in the renewable energy sector and energy supporting infrastructure. For that reason, we are closely monitoring the evolution of the hydrogen sector to identify potential investments and partners.

- Risk and opportunities will also come as part of more structural changes that our society / economy will have to embrace. Circular economy for example, and the increase need to reuse and recycle waste, might have an impact on the structure of today's waste management sector.

- On the other hand, the local context (such as geographical location) can affect the assessment of a specific investment opportunity if the climate change physical risk exposure is high. Our pre-investment due diligence process has been reviewed to integrate ESG and climate change matters.

- Financial Planning.

o For assets under management, the objective is to identify the potential risk exposure and manage it at a project level, putting in place the adequate mitigation measures to protect the project where needed. To support investment companies in their journey towards climate change resilience, InfraRed has commissioned a risk assessment to an external consultant to identify projects' physical and financial risk exposure to climate change. As the results are shared with the investment companies, we expect the management teams to adjust the operations and financial protections accordingly.

o On the other hand, we believe that climate change can also be leveraged to create value at a project level. We ask our projects to report on climate change performance such as carbon emissions, and we support investments to lower these emissions. A number of hospital projects for example have now installed solar panels and are generating most of the energy they consume.

Strategy: Scenario analysis

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 33	CORE	N/A	ISP 33.1	PUBLIC	Strategy: Scenario analysis	General

Does your organisation use scenario analysis to assess climate-related investment risks and opportunities? Select the range of scenarios used.

- ☒ (A) An orderly transition to a 2°C or lower scenario
- ☒ (B) An abrupt transition consistent with the Inevitable Policy Response
- ☒ (C) A failure to transition, based on a 4°C or higher scenario
- ☐ (D) Other climate scenario, specify:
- ☐ (E) We do not use scenario analysis to assess climate-related investment risks and opportunities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 33.1	PLUS	ISP 33	N/A	PUBLIC	Strategy: Scenario analysis	General

Describe how climate scenario analysis is used to test the resilience of your organisation's investment strategy and inform investments in specific asset classes.

- ☒ (A) An orderly transition to a 2°C or lower scenario

In 2020, InfraRed engaged advisers to undertake climate scenario analysis to test the resilience of majority of InfraRed's assets under management. The assessment covered climate-related physical and transition risks and considered the following scenarios:

- Business As Usual Case: Representative Concentration Pathways ("RCP") 8.5 with greenhouse emissions continuing to increase causing temperatures to rise to above 4oC above pre industrial.
- Low Carbon/Net Zero Case: RCP2.6 with significant reductions in greenhouse gasses with temperatures peaking at 1.5oC above preindustrial levels.

When assessing transition risks, an abrupt and smooth transition to low carbon / net zero case was also considered.

The outputs of the climate scenario analysis included a combination of the following:

- Physical heatmap of exposures to acute and chronic weather events;
- Financial loss drivers in respect to wind and flooding exposures;
- Impact on forecast portfolio power curves;
- Identification of high risk assets which require further analysis; and
- Key transition risks and opportunities.

At a fund level, the results of the climate change risk assessments were incorporated into fund risk management considered as well as informing future investment decisions. Once completed, the results of the assessment will also be shared with the management teams of the investment companies to raise awareness within the project management teams and inform asset level risk mitigation strategies.

TRIG, the listed fund managed by InfraRed, also undertook further analysis in respect to a high transition risk scenario. Under this scenario, TRIG assumed that policy measures are put in place that accelerate the decarbonisation of energy production, including higher than expected levels of renewables deployment, and the contribution of each country where TRIG invests to net zero carbon is achieved by 2050. Physical risks from extreme weather events are less frequent and effective insurance coverage remains generally available. In a high transition risk scenario:

- There is downward pressure on forecast power prices for renewables generators due to greater decarbonisation of the energy mix from that assumed in the TRIG's valuation power price forecasts.
- This is, in part, offset by an increase in electricity demand as transport, industry and heating move away from fossil fuels.
- An increase in carbon prices is expected; however, this is likely to be offset by lower gas prices and greater periods of time when non-emitting generation is setting the prevailing power price.

Although these scenarios are very difficult to formulate, modelling undertaken suggests a possible impact of this scenario is a c.11% reduction in the forecast portfolio power curve. If no mitigating action is taken, then there could be a potential £120m to £220m (or 5p/share to 10p/share) reduction of NAV for TRIG. This impact could be reduced as a result of industry efficiencies, such as lower operating costs arising from greater competition between sub-contractors as the sector continues to scale up. One of the challenges to achieving more renewables build-out than assumed in current power price forecasts, and therefore decarbonisation, is that as long-term power price falls, this creates a feedback loop of making fewer new projects financially viable, which in turn reduces the rollout rate and therefore reduces the downward pressure on forecast power prices. As noted in TRIG's Chairman's Statement, governments across TRIG's target markets are beginning to set out detailed policies in relation to both supply and demand for renewable electricity, which may address this feedback loop, provide support to the power price and achieve the levels of renewables rollout required for net-zero carbon by 2050.

☒ **(B) An abrupt transition consistent with the Inevitable Policy Response**

Please refer to point (A)

☒ **(C) A failure to transition, based on a 4°C or higher scenario**

Please refer to point (A)

Risk management

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 34	PLUS	ISP 30	N/A	PUBLIC	Risk management	General

Which risk management processes do you have in place to identify and assess climate-related risks?

☐ (A) Internal carbon pricing. Describe:

☐ (B) Hot spot analysis. Describe:

☒ (C) **Sensitivity analysis. Describe:**

The climate change risk assessment undertaken by an external third party was the first step to manage climate related risk. It allowed the organisation to map its existing risk exposure and provided project companies with a starting point in their journey to manage climate-related risks and opportunities. The assessment not only identifies the physical risk exposure, but also quantifies the potential financial loss per type of hazard, allowing project companies to run, both operational and financial sensitivity analysis to climate change risk. In addition, TRIG, the renewable fund managed by InfraRed, has undertaken sensitivity analysis in respect to impact on power prices. For further information refer to the response for ISP 33.1.

☐ (D) TCFD reporting requirements on external investment managers where we have externally managed assets. Describe:

☐ (E) TCFD reporting requirements on companies. Describe:

☒ (F) **Other risk management processes in place, please describe:**

Investment teams are required to consider climate-related risks as part of the pre-investment due diligence processes. This includes responding to a number of set climate-related questions as part of the initial deal screening phases. The responses to these questions will be part of the due diligence to be completed prior to final approval. In addition, InfraRed's Real Estate business updated the investment processes in 2020 to include the requirement to undertake a climate change risk assessment (performed by a third party) prior to investment.

☐ (G) We do not have any risk management processes in place to identify and assess climate-related risks

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 35	PLUS	Multiple, see guidance	N/A	PUBLIC	Risk management	General

In which investment processes do you track and manage climate-related risks?

☒ (A) **In our engagements with investee entities, and/or in engagements conducted on our behalf by service providers and/or external managers. Describe:**

Climate change was a key topic which was covered in the ESG workshop that the Infrastructure business hosted for all the management teams of our investment companies in September 2020. In particular, this included an update on the climate change risk assessment that InfraRed was undertaking and what that meant for the investment companies. A further update to the investment companies was provided on the outputs of this climate change assessment / next steps in April 2021. A climate-related questions was also incorporated into the annual infrastructure ESG survey in 2020, and additional questions are expected to be added in 2021.

☐ (E) In the asset class benchmark selection process. Describe:

☐ (F) In our financial analysis process. Describe:

☒ (G) **Other investment process(es). Describe:**

As part of the pre-investment due diligence process, the investment team is required to respond to a series of climate related questions related to potential exposure to physical and transition risks. Material climate risks must then be outlined in the resulting Investment Paper. In addition, InfraRed's Real Estate business updated the investment processes in 2020 to include the requirement to undertake a climate change risk assessment (performed by a third party) prior to investment.

☐ (H) We are not tracking and managing climate-related risks in specific investment processes

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 36	PLUS	N/A	N/A	PUBLIC	Risk management	General

How are the processes for identifying, assessing and managing climate-related risks incorporated into your organisation's overall risk management?

☒ (A) The risk committee or the equivalent function is formally responsible for identifying, assessing and managing climate risks. Describe:

Climate-related risks and opportunities are a subset of the broader sustainability risks and opportunities. Each Board of the listed companies managed by InfraRed oversees climate-related risks and opportunities, with the process to identify, assess and manage the risks embedded in their risk management frameworks. InfraRed role in assessing and managing these risks is set out in our responses to ISP 34 and 35. In addition, InfraRed has established a climate related working group. The initiative brings together different disciplines across the business including fund management, portfolio management, asset management, risk and compliance, investor relations and the transaction team. The purpose of the group is to evolve InfraRed's thinking in relation to the impact of climate-related risks and opportunities on the business and its portfolio under management, and to ensure consistent application and reporting of resulting actions.

☒ (B) Climate risks are incorporated into traditional risks (e.g. credit risk, market risk, liquidity risk or operational risk). Describe:

Climate-related risks and opportunities are a subset of the broader sustainability risks and opportunities. Each Board of the listed companies managed by InfraRed oversees climate-related risks and opportunities, with the process to identify, assess and manage the risks embedded in their risk management frameworks. InfraRed role in assessing and managing these risks is set out in our responses to ISP 34 and 35. In addition, InfraRed has established a climate related working group. The initiative brings together different disciplines across the business including fund management, portfolio management, asset management, risk and compliance, investor relations and the transaction team. The purpose of the group is to evolve InfraRed's thinking in relation to the impact of climate-related risks and opportunities on the business and its portfolio under management, and to ensure consistent application and reporting of resulting actions.

☒ (C) Climate risks are prioritised based on their relative materiality, as defined by our organisation's materiality analysis. Describe:

InfraRed considered the materiality of climate-related risks as part of the climate change risk assessment. Based on the initial portfolio screening completed by the external adviser, InfraRed selected a subset of higher-risk assets to undertake further analysis on.

☐ (D) Executive remuneration is linked to climate-related KPIs. Describe:

☐ (E) Management remuneration is linked to climate-related KPIs. Describe:

☐ (F) Climate risks are included in the enterprise risk management system. Describe:

☐ (G) Other methods for incorporating climate risks into overall risk management, please describe:

☐ (H) Processes for identifying, assessing and managing climate-related risks are not integrated into our overall risk management

Metrics and targets

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 37	PLUS	N/A	ISP 37.1	PUBLIC	Metrics and targets	General

Have you set any organisation-wide targets on climate change?

- ☐ (A) Reducing carbon intensity of portfolios
- ☐ (B) Reducing exposure to assets with significant climate transition risks
- ☐ (C) Investing in low-carbon, energy-efficient climate adaptation opportunities in different asset classes
- ☐ (D) Aligning entire group-wide portfolio with net zero
- ☐ (E) Other target, please specify:
- ☒ (F) No, we have not set any climate-related targets

Metrics and targets: Transition risk

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 38	PLUS	N/A	ISP 38.1	PUBLIC	Metrics and targets: Transition risk	General

What climate-related metric(s) has your organisation identified for transition risk monitoring and management?

- ☒ (A) Total carbon emissions
- ☐ (B) Carbon footprint
- ☐ (C) Carbon intensity
- ☐ (D) Weighted average carbon intensity
- ☐ (E) Implied temperature warming
- ☐ (F) Percentage of assets aligned with the EU Taxonomy (or similar taxonomy)
- ☒ (G) Avoided emissions metrics (real assets)
- ☐ (H) Other metrics, please specify:
- ☐ (I) No, we have not identified any climate-related metrics for transition risk monitoring

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 38.1	PLUS	ISP 38	N/A	PUBLIC	Metrics and targets: Transition risk	General

Provide details about the metric(s) you have identified for transition risk monitoring and management.

(1) Coverage of AUM		(2) Purpose
(A) Total carbon emissions	(1) for all of our assets	We understand that it is important that we quantify and report the GHG emissions associated with our portfolio. This is the first step in our journey in achieving net zero across our portfolio.
(G) Avoided emissions metrics (real assets)	(3) for a minority of our assets	TRIG fund aims to generate sustainable returns from a diversified portfolio of renewables infrastructure that contribute towards a zero-carbon future.
(3) Metric unit		(4) Methodology
(A) Total carbon emissions	Tonnes of CO2e per annum	In the first instance we have asked our investment companies to report their Scope 1 and Scope 2 GHG emissions.
(G) Avoided emissions metrics (real assets)	Tonnes of CO2e per annum avoided	Values calculated in accordance with the IFI Approach to GHG Accounting for Renewable Energy. Portfolio at year end is capable of mitigating 1.3m tonnes of carbon emissions p.a.
(5) Disclosed value		

(A) Total carbon emissions

Following our request, only some of our investments were able to report their GHG emissions. Given this is the first time our assets reported this information, we are working with our investment companies to ensure the data provided is corrected. We aim to publish externally the carbon emissions for our portfolio for the 2021 reporting period.

(G) Avoided emissions metrics (real assets)

TRIG's generation capacity stands at 1.8GW, which can generate enough renewable power for one million homes and avoid approximately 1.3m tonnes of carbon emissions per annum.

Metrics and targets: Physical risk

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 39	PLUS	N/A	ISP 39.1	PUBLIC	Metrics and targets: Physical risk	General

What climate-related metric(s) has your organisation identified for physical risk monitoring and management?

☒ (A) Weather-related operational losses for real assets or the insurance business unit

☒ (B) Proportion of our property, infrastructure or other alternative asset portfolios in an area subject to flooding, heat stress or water stress

☒ (C) Other metrics, please specify:

We ask all of our assets to report severe weather event as part of our quarterly reporting process.

☒ (D) Other metrics, please specify:

As part of the climate change risk assessment completed, Willis Towers Watson has developed an overall climate hazard scoring for each project with current score and future forecast based on climate change scenarios.

☐ (E) We have not identified any metrics for physical risk monitoring

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 39.1	PLUS	ISP 39	N/A	PUBLIC	Metrics and targets: Physical risk	General

Provide details about the metric(s) you have identified for physical risk monitoring and management.

(1) Coverage of AUM		(2) Purpose
(A) Weather-related operational losses for real assets or the insurance business unit	(2) for the majority of our assets	To identify the financial loss exposure of the portfolio to windstorms and flooding events.
(B) Proportion of our property, infrastructure or other alternative asset portfolios in an area subject to flooding, heat stress or water stress	(2) for the majority of our assets	To identify exposure of the portfolio to physical risks related to climate change/extreme weather events.
(C) Other metrics [as specified]	(2) for the majority of our assets	To track the occurrence of extreme weather events across our portfolio.
(D) Other metrics [as specified]	(2) for the majority of our assets	To assess the relative physical exposure of the assets within the portfolio to identify those assets with higher exposure.
(3) Metric unit		(4) Methodology
(A) Weather-related operational losses for real assets or the insurance business unit	Monetary value	This is quantified by Willis Towers Watson as part of the climate change risk assessment.
(B) Proportion of our property, infrastructure or other alternative asset portfolios in an area subject to flooding, heat stress or water stress	Exposure is ranked on an index between 1-5 by Willis Towers Watson. The 1-5 classification is linked to the underlying weather event such as the expected depth of flooding or rise in temperature.	This is determined by Willis Towers Watson as part of the scenario modelling they completed for InfraRed.
(C) Other metrics [as specified]	Numerical count	Management teams are to report if there have been any severe weather events during the quarter.

(D) Other metrics [as specified]	Exposure is ranked on an index between 1-5 by Willis Towers Watson. This is an aggregate index based on the exposure to underlying weather events.	This is determined by Willis Towers Watson as part of the scenario modelling they completed for InfraRed.
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(5) Disclosed value

(A) Weather-related operational losses for real assets or the insurance business unit	This information is captured in our fund reporting.
(B) Proportion of our property, infrastructure or other alternative asset portfolios in an area subject to flooding, heat stress or water stress	This information is captured in our fund reporting.
(C) Other metrics [as specified]	This information is captured in our fund reporting.
(D) Other metrics [as specified]	This information is captured in our fund reporting.

Sustainability outcomes

Set policies on sustainability outcomes

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 40	CORE	ISP 1.1	N/A	PUBLIC	Set policies on sustainability outcomes	1, 2

Where is your approach to sustainability outcomes set out? Your policy/guideline may be a standalone document or part of a wider responsible investment policy.

- ☒ (A) Our approach to sustainability outcomes is set out in our responsible investment policy
- ☒ (B) Our approach to sustainability outcomes is set out in our exclusion policy
- ☐ (C) Our approach to sustainability outcomes is set out in our stewardship policy
- ☐ (D) Our approach to sustainability outcomes is set out in asset class-specific investment guidelines
- ☐ (E) Our approach to sustainability outcomes is set out in separate guidelines on specific outcomes (e.g. the SDGs, climate or human rights)

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 41	CORE	ISP 1.1	N/A	PUBLIC	Set policies on sustainability outcomes	1, 2

Which global or regionally recognised frameworks do your policies and guidelines on sustainability outcomes refer to?

- ☒ (A) The SDG goals and targets
☒ (B) The Paris Agreement
☒ (C) The UN Guiding Principles on Business and Human Rights
☐ (D) The OECD Guidelines for Multinational Enterprises, including guidance on Responsible Business Conduct for Institutional Investors
☐ (E) Other frameworks, please specify:
☐ (F) Other frameworks, please specify:

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 42	PLUS	ISP 1.1	N/A	PUBLIC	Set policies on sustainability outcomes	1, 2

What are the main reasons that your organisation has established policies or guidelines on sustainability outcomes? Select a maximum of three options.

- ☐ (A) Because we understand which potential financial risks and opportunities are likely to exist in (and during the transition to) an SDG-aligned world
☒ (B) Because we see it as a way to identify opportunities, such as through changes to business models, across supply chains and through new and expanded products and services
☐ (C) Because we want to prepare for and respond to legal and regulatory developments, including those that may lead to stranded assets
☒ (D) Because we want to protect our reputation and licence-to-operate (i.e. the trust of beneficiaries, clients and other stakeholders), particularly in the event of negative sustainability outcomes from investments
☐ (E) Because we want to meet institutional commitments on global goals (including those based on client or beneficiaries' preferences), and communicate on progress towards meeting those objectives
☐ (F) Because we consider materiality over longer time horizons to include transition risks, tail risks, financial system risks and similar
☒ (G) Because we want to minimise negative sustainability outcomes and increase positive sustainability outcomes of investments

Identify sustainability outcomes

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 43	CORE	N/A	Multiple, see guidance	PUBLIC	Identify sustainability outcomes	1

Has your organisation identified the intended and unintended sustainability outcomes from any of its activities?

- ☐ (A) No, we have not identified the sustainability outcomes from our activities
- ☒ (B) Yes, we have identified one or more sustainability outcomes from some or all of our activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 44	CORE	ISP 43	ISP 44.1	PUBLIC	Identify sustainability outcomes	1

What frameworks/tools did your organisation use to identify the sustainability outcomes from its activities? Indicate the tools or frameworks you have used to identify and map some or all of your sustainability outcomes.

- ☒ (A) The UN Sustainable Development Goals (SDGs) and targets
- ☒ (B) The Paris Agreement
- ☐ (C) The UN Guiding Principles on Business and Human Rights (UNGPs)
- ☐ (D) The OECD Guidelines for Multinational Enterprises, including guidance on Responsible Business Conduct for Institutional Investors
- ☐ (E) The EU Taxonomy
- ☐ (F) Other taxonomies (e.g. similar to the EU Taxonomy), please specify:
- ☒ (G) Other framework/tool, please specify:
 - A number of our assets have BREEAM certifications. Refer to the real estate module for further information.
- ☒ (H) Other framework/tool, please specify:
 - A number of our assets have LEED certifications. Refer to the real estate module for further information.
- ☒ (I) Other framework/tool, please specify:
 - A number of our assets meet the requirements of WIRED SCORE Refer to the real estate module for further information.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 44.1	CORE	ISP 44	N/A	PUBLIC	Identify sustainability outcomes	1

At what level(s) did your organisation identify the sustainability outcomes from its activities?

- ☒ (A) At the asset level
- ☐ (B) At the economic activity level
- ☒ (C) At the company level
- ☐ (D) At the sector level
- ☐ (E) At the country/region level
- ☐ (F) At the global level
- ☐ (G) Other level(s), please specify:
- ☐ (H) We do not track at what level(s) our sustainability outcomes were identified

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 45	CORE	ISP 43	SO 1	PUBLIC	Identify sustainability outcomes	1

How has your organisation determined your most important sustainability outcome objectives?

- ☒ (A) Identifying sustainability outcomes that are closely linked to our core investment activities
- ☐ (B) Consulting with key clients and/or beneficiaries to align with their priorities
- ☒ (C) Assessing the potential severity (e.g. probability and amplitude) of specific negative outcomes over different timeframes
- ☐ (D) Focusing on the potential for systemic impacts (e.g. due to high level of interconnectedness with other global challenges)
- ☒ (E) Evaluating the potential for certain outcome objectives to act as a catalyst/enabler to achieve a broad range of goals (e.g. gender or education)
- ☐ (F) Analysing the input from different stakeholders (e.g. affected communities, civil society or similar)
- ☐ (G) Understanding the geographical relevance of specific sustainability outcome objectives
- ☐ (H) Other method, please specify:
- ☐ (I) We have not yet determined our most important sustainability outcome objectives

Transparency & Confidence-Building Measures

Information disclosed – ESG assets

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 46	CORE	OO 16	N/A	PUBLIC	Information disclosed – ESG assets	6

For the majority of your ESG/sustainability marketed funds or products, and/or your ESG/RI certified or labelled assets, what information about your ESG approach do you (or the external investment managers/service providers acting on your behalf) include in material shared with clients, beneficiaries and/or the public? The material may be marketing material, information targeted towards existing or prospective clients or information for beneficiaries.

- ☒ (A) A commitment to responsible investment (e.g. that we are a PRI signatory)
- ☒ (B) Industry-specific and asset class-specific standards that we align with (e.g. TCFD, or GRESB for property and infrastructure)
- ☒ (C) Our responsible investment policy (at minimum a summary of our high-level approach)
- ☒ (D) A description of our investment process and how ESG is considered
- ☒ (E) ESG objectives of individual funds
- ☐ (F) Information about the ESG benchmark(s) that we use to measure fund performance
- ☒ (G) Our stewardship approach
- ☒ (H) A description of the ESG criteria applied (e.g. sectors, products, activities, ratings and similar)
- ☐ (I) The thresholds for the ESG criteria applied in our investment decisions or universe construction
- ☒ (J) A list of our main investments and holdings
- ☒ (K) ESG case study/example from existing fund(s)
- ☐ (L) We do not include our approach to ESG in material shared with clients/beneficiaries/the public for the majority of our ESG/sustainability marketed funds or products, and/or our ESG/RI certified or labelled assets

Client reporting – ESG assets

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 48	CORE	Multiple, see guidance	N/A	PUBLIC	Client reporting – ESG assets	6

What ESG information is included in your client reporting for the majority of your ESG/sustainability marketed funds or products, and/or your ESG/RI certified or labelled assets?

- ☒ (A) Qualitative analysis, descriptive examples or case studies
- ☒ (B) Quantitative analysis or key performance indicators (KPIs) related to ESG performance
- ☐ (C) Progress on our sustainability outcome objectives
- ☐ (D) Stewardship results
- ☒ (E) Information on ESG incidents, where applicable
- ☐ (F) Analysis of ESG contribution to portfolio financial performance
- ☐ (G) We do not include ESG information in client reporting for the majority of our ESG/sustainability marketed funds or products, and/or our ESG/RI certified or labelled assets

Information disclosed – All assets

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 49	CORE	N/A	N/A	PUBLIC	Information disclosed – All assets	6

For the majority of your total assets under management, what information about your ESG approach do you (or the external managers/service providers acting on your behalf) include in material shared with clients, beneficiaries and/or the public? The material may be marketing material, information targeted towards existing or prospective clients or information for beneficiaries.

- ☒ (A) A commitment to responsible investment (e.g. that we are a PRI signatory)
- ☒ (B) Industry-specific and asset class-specific standards that we align with (e.g. TCFD, or GRESB for property and infrastructure)
- ☒ (C) Our responsible investment policy (at minimum a summary of our high-level approach)
- ☒ (D) A description of our investment process and how ESG is considered
- ☒ (E) ESG objectives of individual funds
- ☐ (F) Information about the ESG benchmark(s) that we use to measure fund performance
- ☒ (G) Our stewardship approach
- ☒ (H) A description of the ESG criteria applied (e.g. sectors, products, activities, ratings and similar)
- ☐ (I) The thresholds for the ESG criteria applied in our investment decisions or universe construction
- ☒ (J) A list of our main investments and holdings
- ☒ (K) ESG case study/example from existing fund(s)

☐ (L) We do not include our approach to ESG in material shared with clients/beneficiaries/the public for the majority of our assets under management

Client reporting – All assets

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 50	CORE	Multiple, see guidance	N/A	PUBLIC	Client reporting – All assets	6

What ESG information is included in your client reporting for the majority of your assets under management?

- ☒ (A) Qualitative ESG analysis, descriptive examples or case studies
☒ (B) Quantitative analysis or key performance indicators (KPIs) related to ESG performance
☐ (C) Progress on our sustainability outcome objectives
☐ (D) Stewardship results
☒ (E) Information on ESG incidents where applicable
☐ (F) Analysis of ESG contribution to portfolio financial performance
☐ (G) We do not include ESG information in client reporting for the majority of our assets under management

Frequency of client reporting – All assets

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 51	CORE	Multiple, see guidance	N/A	PUBLIC	Frequency of client reporting – All assets	6

For the majority of each asset class, how frequently do you report ESG-related information to your clients?

(D) Real estate (1) Quarterly

(E) Infrastructure (1) Quarterly

Confidence-building measures

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 52	CORE	OO 16.1	Multiple, see guidance	PUBLIC	Confidence-building measures	6

What verification has your organisation had regarding the information you have provided in your PRI Transparency Report this year?

- ☐ (A) We received third-party independent assurance of selected processes and/or data related to our responsible investment processes, which resulted in a formal assurance conclusion
- ☐ (B) We conducted a third-party readiness review and are making changes to our internal controls/governance or processes to be able to conduct an external assurance next year
- ☐ (C) The internal audit function team performed an independent audit of selected processes/and or data related to our responsible investment processes reported in this PRI report
- ☒ (D) Our board, CEO, other C-level equivalent and/or investment committee has signed off on our PRI report
- ☒ (E) Some or all of our funds have been audited as part of the certification process against a sustainable investment/RI label
- ☐ (F) We conducted an external ESG audit of our ESG/sustainability marketed funds or products (excluding ESG/RI certified or labelled assets)
- ☒ (G) We conducted an external ESG audit of our holdings to check that our funds comply with our RI policy (e.g. exclusion list or investee companies in portfolio above certain ESG rating)
- ☐ (H) We conducted an external ESG audit of our holdings as part of risk management, engagement identification or investment decision-making
- ☒ (I) Responses related to our RI practices documented in this report have been internally reviewed before submission to the PRI
- ☐ (J) None of the above

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 58	CORE	ISP 52	N/A	PUBLIC	Confidence-building measures	6

Who has reviewed/verified the entirety of or selected data from your PRI report?

- | | |
|---|-------------------------|
| (A) Board and/or trustees | (4) report not reviewed |
| (B) Chief-level staff (e.g. Chief Executive Officer (CEO), Chief Investment Officer (CIO) or Chief Operating Officer (COO)) | (4) report not reviewed |
| (C) Investment committee | (4) report not reviewed |

(D) Other chief-level staff, please specify:

☐ No

(4) report not reviewed

(E) Head of department, please specify:

☐ No

(4) report not reviewed

(F) Compliance/risk management team

(1) the entire report

(G) Legal team

(4) report not reviewed

(H) RI/ ESG team

(1) the entire report

(I) Investment teams

(1) the entire report

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 59	CORE	ISP 52	N/A	PUBLIC	Confidence-building measures	6

Which of the following ESG/RI certifications or labels do you hold?

- ☐ (A) Commodity type label (e.g. BCI)
- ☒ (B) **GRESB**
- ☐ (C) Austrian Ecolabel (UZ49)
- ☐ (D) B Corporation
- ☒ (E) **BREEAM**
- ☐ (F) CBI Climate Bonds Standard
- ☐ (G) EU Ecolabel
- ☐ (H) EU Green Bond Standard
- ☐ (I) Febelfin label (Belgium)
- ☐ (J) FNG-Siegel Ecolabel (Germany, Austria and Switzerland)
- ☐ (K) Greenfin label (France)
- ☐ (L) ICMA Green Bond Principles
- ☐ (M) Le label ISR (French government SRI label)
- ☐ (N) Luxflag Climate Finance
- ☐ (O) Luxflag Environment
- ☐ (P) Luxflag ESG
- ☐ (Q) Luxflag Green Bond
- ☐ (R) Luxflag Microfinance
- ☐ (S) National stewardship code (e.g. UK or Japan), please specify:
- ☐ (T) Nordic Swan Ecolabel
- ☐ (U) Other SRI label based on EUROSIF SRI Transparency Code (e.g. Novethic), please specify:
- ☐ (V) People's Bank of China green bond guidelines

- ☐ (W) RIAA (Australia)
- ☐ (X) Towards Sustainability label (Belgium)
- ☒ (Y) Other, please specify:

TRIG, the renewables fund managed by InfraRed, has both the Green Economy Issuer from the London Stock Exchange and has achieved Guernsey Green Fund accreditation.

Real Estate (RE)

Policy

Investment guidelines

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 1	CORE	OO 24, OO 26	N/A	PUBLIC	Investment guidelines	1 to 6

What real estate-specific ESG guidelines are currently covered in your organisation's responsible investment policies?

- ☐ (A) Guidelines on our ESG approach to real estate depending on use (e.g. retail, education etc.)
- ☒ (B) Guidelines on our ESG approach to new construction
- ☒ (C) Guidelines on our ESG approach to major renovations
- ☒ (D) Guidelines on our ESG approach to standing real estate investments
- ☒ (E) Guidelines on our engagement approach related to property managers
- ☐ (F) Guidelines on our engagement approach related to tenants
- ☒ (G) Guidelines on our engagement approach related to construction contractors
- ☒ (H) Guidelines on excluding certain tenants based on responsible investment considerations
- ☐ (I) Our policies do not cover real estate-specific ESG guidelines

Fundraising

Commitments to investors

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

For all of your funds that you closed during the reporting year, what type of formal responsible investment commitments did you make in Limited Partnership Agreements (LPAs) or side letters? (If you did not close any funds during this reporting year, refer to the last reporting year in which you did close funds.)

- ☐ (A) We incorporated responsible investment commitments in LPAs as a standard, default procedure
- ☐ (B) We added responsible investment commitments in LPAs upon client request
- ☒ (C) We added responsible investment commitments in side letters upon client request
- ☐ (D) We did not make any formal responsible investment commitments for the relevant reporting year
- ☐ (E) Not applicable as we have never raised funds
- ☐ (F) Not applicable as we have not raised funds in the last 5 years

Pre-investment phase

Materiality analysis

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

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

- | | |
|--|---|
| (A) We assessed materiality at the asset level, as each case is unique | (1) for all of our potential real estate investments |
| (B) We performed a mix of property type and asset-level materiality analysis | (4) for none of our potential real estate investments |
| (C) We assessed materiality according to property type only | (4) for none of our potential real estate investments |

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

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

- ☐ (A) We used GRI Standards to inform our real estate materiality analysis
☐ (B) We used SASB to inform our real estate materiality analysis
☒ (C) We used climate risk disclosures such as the TCFD recommendations (or other climate risk analysis tools) to inform our real estate materiality analysis
☒ (D) We used geopolitical and macro-economic considerations in our real estate materiality analysis
☒ (E) Other, please specify:
 The company uses the UN SDGs as a key investment alignment feature, with all potential investments aligning with at least one specific SDG (either climate change, wellbeing or furthering education).

Due diligence

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 4	CORE	N/A	N/A	PUBLIC	Due diligence	1

During the reporting year, how did ESG factors affect the selection of your real estate investments?

- | | |
|---|---|
| (A) ESG factors helped identify risks | (1) for all of our potential real estate investments |
| (B) ESG factors were discussed by the investment committee (or equivalent) | (1) for all of our potential real estate investments |
| (C) ESG factors helped identify remedial actions for our 100-day plans (or equivalent) | (4) for none of our potential real estate investments |
| (D) ESG factors helped identify opportunities for value creation | (1) for all of our potential real estate investments |
| (E) ESG factors led to the abandonment of potential investments | (4) for none of our potential real estate investments |
| (F) ESG factors impacted investments in terms of price offered and/or paid by having an effect on revenue assumptions | (1) for all of our potential real estate investments |

(G) ESG factors impacted investments in terms of price offered and/or paid by having an effect on CAPEX assumptions

(1) for all of our potential real estate investments

(H) ESG factors impacted investments in terms of price offered and/or paid by having an effect on OPEX assumptions

(1) for all of our potential real estate investments

(I) ESG factors impacted investments in terms of price offered and/or paid by having an effect on the cost of capital or discount rate assumptions

(4) for none of our potential real estate investments

(J) Other, please specify:

na

(4) for none of our potential real estate investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 5	CORE	N/A	N/A	PUBLIC	Due diligence	1

Once material ESG factors have been identified, what processes do you use to conduct due diligence on these factors for potential investments?

(A) We do a high-level/desktop review against an ESG checklist for initial red flags

(1) for all of our potential real estate investments

(B) We send detailed ESG questionnaires to target properties

(4) for none of our potential real estate investments

(C) We hire third-party consultants to do technical due diligence on specific issues

(1) for all of our potential real estate investments

(D) We conduct site visits and in-depth interviews with management and personnel

(1) for all of our potential real estate investments

(E) We incorporate actions based on the risks and opportunities identified in the due diligence process into our post-investment plans

(1) for all of our potential real estate investments

(F) We incorporate ESG due diligence findings in all of our relevant investment process documentation in the same manner as for other key due diligence (e.g. commercial, accounting and legal)

(1) for all of our potential real estate investments

(G) Our investment committee (or an equivalent decision-making body) is ultimately responsible for ensuring all ESG due diligence is completed in the same manner as for other key due diligence (e.g. commercial, accounting and legal)

(1) for all of our potential real estate investments

(H) Other, please specify:

NA

(4) for none of our potential real estate investments

Selection, appointment and monitoring of third-party property managers

Selection process

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 6	CORE	OO 26	N/A	PUBLIC	Selection process	1, 4

During the reporting year, how did you include ESG factors in all of your selections of external property managers? (If you did not select external property managers during the reporting year, report on the most recent year in which you selected external property managers.)

- ☒ (A) We requested information from potential managers on their overall approach to ESG
- ☒ (B) We requested track records and examples from potential managers on how they manage ESG factors
- ☒ (C) We requested information from potential managers on their engagement process(es) with stakeholders
- ☐ (D) We requested documentation from potential managers on their responsible procurement practices (including responsibilities, approach and incentives)
- ☒ (E) We requested the assessment of current and planned availability and aggregation of metering data from potential managers
- ☐ (F) Other, please specify:
- ☐ (G) We did not include ESG factors in our selection of external property managers

Appointment process

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 7	CORE	OO 26	N/A	PUBLIC	Appointment process	1, 4

How did you include ESG factors in the appointment of your current external property managers?

- | | |
|--|---|
| (A) We set dedicated ESG procedures in all relevant property management phases | (1) for all of our external property managers |
| (B) We set clear ESG reporting requirements | (1) for all of our external property managers |

(C) We set clear ESG performance targets	(1) for all of our external property managers
(D) We set incentives related to ESG targets	(4) for none of our external property managers
(E) We included responsible investment clauses in property management contracts	(1) for all of our external property managers
(F) Other, please specify: n/a	(4) for none of our external property managers

Monitoring process

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 8	CORE	OO 26	N/A	PUBLIC	Monitoring process	1, 4

How do you include ESG factors in the monitoring of external property managers?

(A) We monitor performance against quantitative and/or qualitative environmental targets	(1) for all of our external property managers
(B) We monitor performance against quantitative and/or qualitative social targets	(1) for all of our external property managers
(C) We monitor performance against quantitative and/or qualitative governance targets	(1) for all of our external property managers
(D) We monitor progress reports on engagement with tenants	(4) for none of our external property managers
(E) We require formal reporting on an annual basis as a minimum	(1) for all of our external property managers
(F) We have regular discussions about ESG factors with all relevant stakeholders	(1) for all of our external property managers
(G) We conduct a performance review of key staff based on ESG alignment linked to KPIs and a financial incentive structure	(4) for none of our external property managers

(H) We have internal/external parties conduct site visits at least once a year

(1) for all of our external property managers

(I) Other, please specify:

n/a

(4) for none of our external property managers

Construction and development

Construction requirements

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 9	CORE	OO 24	N/A	PUBLIC	Construction requirements	1

What sustainability requirements do you currently have in place for all development projects and major renovations?

- ☒ (A) We require the management of waste by diverting construction and demolition materials from disposal
- ☒ (B) We require the management of waste by diverting reusable vegetation, rocks and soil from disposal
- ☒ (C) We require the minimisation of light pollution to the surrounding community
- ☒ (D) We require the minimisation of noise pollution to the surrounding community
- ☒ (E) We require the performance of an environmental site assessment
- ☒ (F) We require the protection of the air quality during construction
- ☒ (G) We require the protection and restoration of the habitat and soils disturbed during construction and/or during previous development
- ☒ (H) We require the protection of surface and ground water and aquatic ecosystems by controlling and retaining construction pollutants
- ☒ (I) We require the constant monitoring of health and safety at the construction site
- ☐ (J) Other, please specify:
- ☐ (K) We do not have sustainability requirements in place for development projects and major renovations

Minimum building requirements

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 10	CORE	OO 24	N/A	PUBLIC	Minimum building requirements	1

What minimum building requirements do you have in place for development projects and major renovations?

(A) We require the implementation of the latest available metering and IoT technology	(4) for none of our development projects and major renovations
(B) We require that the building be able to obtain a recognised green building certification for new buildings	(1) for all development projects and major renovations
(C) We require the use of certified (or labelled) sustainable building materials	(4) for none of our development projects and major renovations
(D) We require the installation of renewable energy technologies where feasible	(1) for all development projects and major renovations
(E) We require that development projects and major renovations become net-zero carbon emitters within five years of completion of the construction	(4) for none of our development projects and major renovations
(F) We require water conservation measures	(2) for the majority of our development projects and major renovations
(G) We require common occupant health and well-being measures	(1) for all development projects and major renovations
(H) Other, please specify: na	(4) for none of our development projects and major renovations

Post-investment phase

Monitoring

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 11	CORE	N/A	N/A	PUBLIC	Monitoring	1

During the reporting year, what ESG building performance data did you collect for your real estate assets?

Through metering

(A) Electricity consumption	(4) for none of our real estate assets
(B) Water consumption	(4) for none of our real estate assets
(C) Waste production	(4) for none of our real estate assets

Through another method

(A) Electricity consumption	(1) for all of our real estate assets
(B) Water consumption	(1) for all of our real estate assets
(C) Waste production	(1) for all of our real estate assets

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 12	CORE	N/A	N/A	PUBLIC	Monitoring	1

For the majority of the core KPIs that you tracked, how did you set targets across your real estate investments?

- ☒ (A) We set targets to achieve incremental improvements based on past performance
- ☐ (B) We set targets using industry benchmarks/standards
- ☐ (C) We set targets against global benchmarks or thresholds (e.g. on climate change and/or the SDGs)
- ☐ (D) We did not set targets for the core ESG KPIs that we tracked
- ☐ (E) We did not set targets as we don't track core ESG KPIs

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 13	CORE	OO 26	RE 13.1	PUBLIC	Monitoring	1, 2

What processes do you have in place to support meeting your ESG targets for your real estate investments?

- | | |
|---|---|
| (A) We use operational-level benchmarks to assess and analyse the performance of assets against sector performance | (4) for none of our real estate investments |
| (B) We implement certified environmental and social management systems across our portfolio | (1) for all of our real estate investments |
| (C) We make sufficient budget available to ensure that the systems and procedures needed to achieve the target are put in place | (1) for all of our real estate investments |
| (D) We hire external verification services to audit performance, systems and procedures | (1) for all of our real estate investments |
| (E) We collaborate and engage with our external property managers to develop action plans to achieve targets | (1) for all of our real estate investments |
| (F) We develop minimum health and safety standards | (1) for all of our real estate investments |
| (G) Other, please specify:
na | (4) for none of our real estate investments |

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 13.1	PLUS	RE 13	N/A	PUBLIC	Monitoring	1, 2

Describe up to two processes that you put in place during the reporting year to support meeting your ESG targets.

Processes to support meeting ESG targets

(A) Process 1

Our sustainability strategy has been developed through workshops engaging employees and investors, to ensure that we have business wide commitment to its delivery and its implementation not only focusses on activities InfraRed undertakes through its investment and asset management strategies, but also by leveraging the activities of its business partners, so as to maximise our collective impact. It also builds on our PRI performance, where both of InfraRed's business lines have received the highest A* rating, along with its approach to sustainability at a corporate/governance level. During 2020, we have enhanced our investment process, to further bring the assessment of sustainability opportunities and risk to the fore. In particular introducing an "overt" negative screening stage and including climate risk assessments – physical and transition. **(response continued in row below)**

Climate issues are to be assessed early on, so that the due diligence phase of an acquisition can be properly structured to address identified opportunities and risks and captured in business plan underwriting. Importantly, each Business Plan will identify initiatives to be undertaken that align to the SDGs that InfraRed is seeking to promote and which we believe will create a differentiated / best in class product, as well as maximising investment returns. This approach enables deal teams and the Investment Committee to effectively assess and optimise an asset's sustainability credentials post business plan implementation..

(B) Process 2

Over the course of the year, we have rolled out ESG training for our external Managing Agents. This process involved a training session with each external MA team and the IRCP Head of AM and Sustainability Manager to present the newly developed set of KPIs across Environmental, Social and Governance themes, that are to be applied and measured consistently across the Fund's portfolio. There was then follow up to support the MAs with aligning their policies. We are in the process of developing associated policies (energy procurement, areas, and data capture requirements,) so that we can report on a quantitative, as well as a qualitative basis. Over time, we will develop targets around these KPIs, as part of InfraRed's annual sustainability report.

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

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

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

(1) for all of our real estate investments

(B) We adjust our ESG action plans regularly based on performance monitoring findings

(1) for all of our real estate investments

(C) We hire external advisors to provide support with specific ESG value creation opportunities

(1) for all of our real estate investments

(D) Other, please specify:

na

(1) for all of our real estate investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 15	PLUS	N/A	N/A	PUBLIC	Monitoring	1, 2

Describe how your long-term ESG action plans are currently defined, implemented and monitored.

Not available at the moment.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 16	CORE	N/A	N/A	PUBLIC	Monitoring	1

What proportion of your real estate assets have obtained an ESG/RI certification or label?

- (A) All of our real estate assets have obtained an ESG/RI certification or label
- (B) The majority of our real estate assets have obtained an ESG/RI certification or label
- (C) A minority of our real estate assets have obtained an ESG/RI certification or label
- (D) None of our real estate assets have obtained an ESG/RI certification or label

Stewardship

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 17	CORE	OO 26	N/A	PUBLIC	Stewardship	1, 2

How does your property manager engage with tenants? (If you are a property manager, please report on your direct tenant engagement.)

Tenants without operational control

- | | |
|---|---|
| (A) We engage with real estate tenants through organising tenant events focused on increasing sustainability awareness, ESG training and guidance | (2) for the majority of our buildings or properties |
| (B) We engage with real estate tenants on energy and water consumption and/or waste production | (3) for a minority of our buildings or properties |
| (C) We engage with real estate tenants by offering green leases | (2) for the majority of our buildings or properties |

(D) We engage with real estate tenants through identifying collaboration opportunities that support net-zero targets	(4) for none of our buildings or properties
(E) We engage with real estate tenants by offering shared financial benefits from equipment upgrades	(3) for a minority of our buildings or properties
(F) Other, please specify: na	(4) for none of our buildings or properties

Exit

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 18	CORE	N/A	N/A	PUBLIC	Exit	4, 6

During the reporting year, what responsible investment information has your organisation shared with potential buyers of real estate investments?

(A) We shared our firm's high-level commitment to responsible investment (e.g. that we are a PRI signatory)	(1) for all of our real estate investments
(B) We shared a description of what industry and asset class standards our firm aligns with (e.g. TCFD, GRESB)	(1) for all of our real estate investments
(C) We shared our firm's responsible investment policy (at minimum, a summary of key aspects and firm-specific approach)	(1) for all of our real estate investments
(D) We shared our firm's ESG risk assessment methodology (topics covered, in-house and/or with external support)	(4) for none of our real estate investments
(E) We shared the outcome of our latest ESG risk assessment on the property(s)	(4) for none of our real estate investments
(F) We shared key ESG performance data on the property(s) being sold	(1) for all of our real estate investments
(G) Other, please specify: na	(4) for none of our real estate investments

Reporting/Disclosure

ESG portfolio information

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
RE 19	CORE	N/A	N/A	PUBLIC	ESG portfolio information	6

During the reporting year, how did you report on core ESG data and targets to your investors or beneficiaries?

- ☒ (A) We reported in aggregate through a publicly disclosed sustainability report
- ☒ (B) We reported in aggregate through formal reporting to investors or beneficiaries
- ☒ (C) We reported at the property level through formal reporting to investors or beneficiaries
- ☒ (D) We reported through a limited partners advisory committee (or equivalent)
- ☒ (E) We reported back at digital or physical events or meetings with investors or beneficiaries
- ☒ (F) We did ad hoc or informal reporting on serious ESG incidents
- ☐ (G) Other, please specify:
- ☐ (H) We did not report on core ESG data and targets to our investors or beneficiaries during the reporting year

Infrastructure (INF)

Policy

Investment guidelines

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 1	CORE	OO 31, OO 32	N/A	PUBLIC	Investment guidelines	1 to 6

What infrastructure-specific ESG guidelines are currently covered in your organisation's responsible investment policies?

- ☒ (A) Guidelines on how we adapt our ESG approach for each infrastructure sector we invest in
- ☒ (B) Guidelines on our ESG approach to new construction
- ☒ (C) Guidelines on our ESG approach to standing investments or operating assets
- ☐ (D) Guidelines on our engagement approach related to workforce
- ☒ (E) Guidelines on our engagement approach related to third-party operators
- ☒ (F) Guidelines on our engagement approach related to contractors

- ☒ (G) Guidelines on our engagement approach related to other external stakeholders (e.g. government, local communities and end-users)
- ☐ (H) Our policies do not cover infrastructure-specific ESG guidelines

Fundraising

Commitments to investors

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

For all of your funds that you closed during the reporting year, what type of formal responsible investment commitments did you make in Limited Partnership Agreements (LPAs) or side letters? (If you did not close any funds during this reporting year, refer to the last reporting year in which you did close funds.)

- ☒ (A) We incorporated responsible investment commitments in LPAs as a standard, default procedure
- ☐ (B) We added responsible investment commitments in LPAs upon client request
- ☒ (C) We added responsible investment commitments in side letters upon client request
- ☐ (D) We did not make any formal responsible investment commitments for the relevant reporting year
- ☐ (E) Not applicable as we have never raised funds
- ☐ (F) Not applicable as we have not raised funds in the last 5 years

Pre-investment phase

Materiality analysis

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

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

- (A) We assessed materiality at the asset level, as each case is unique (1) for all of our potential infrastructure investments
- (B) We performed a mix of industry-level and asset-level materiality analysis (4) for none of our potential infrastructure investments

(C) We assessed materiality at the industry level only

(4) for none of our potential infrastructure investments

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

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

- ☐ (A) We used GRI Standards to inform our infrastructure materiality analysis
- ☐ (B) We used SASB to inform our infrastructure materiality analysis
- ☐ (C) We used GRESB Materiality Assessment (RC7) or similar in our infrastructure materiality analysis
- ☐ (D) We used environmental and social factors detailed in the IFC Performance Standards (or other similar standards) in our infrastructure materiality analysis
- ☐ (E) We used climate risk disclosures such as the TCFD recommendations (or other climate risk analysis tools) to inform our infrastructure materiality analysis

☒ (F) We used geopolitical and macro-economic considerations in our infrastructure materiality analysis

☒ (G) Other, please specify:

The company uses the UN SDGs as a key investment alignment feature, with all potential investments aligning with at least one specific SDG (either climate change, wellbeing or furthering education). In addition, we also use Refinitiv Eikon to research on our counterparties.

Due diligence

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 4	CORE	N/A	N/A	PUBLIC	Due diligence	1

During the reporting year, how did ESG factors affect the selection of your infrastructure investments?

- (A) ESG factors helped identify risks (1) for all of our infrastructure investments selected
- (B) ESG factors were discussed by the investment committee (or equivalent) (1) for all of our infrastructure investments selected
- (C) ESG factors helped identify remedial actions for our 100-day plans (or equivalent) (2) for the majority of our infrastructure investments selected
- (D) ESG factors helped identify opportunities for value creation (3) for a minority of our infrastructure investments selected

(E) ESG factors led to the abandonment of potential investments	(1) for all of our infrastructure investments selected
(F) ESG factors impacted investments in terms of price offered and/or paid by having an effect on revenue assumptions	(1) for all of our infrastructure investments selected
(G) ESG factors impacted investments in terms of price offered and/or paid by having an effect on CAPEX assumptions	(3) for a minority of our infrastructure investments selected
(H) ESG factors impacted investments in terms of price offered and/or paid by having an effect on OPEX assumptions	(3) for a minority of our infrastructure investments selected
(I) ESG factors impacted investments in terms of price offered and/or paid by having an effect on the cost of capital or discount rate assumptions	(1) for all of our infrastructure investments selected
(J) Other, please specify: na	(4) for none of our infrastructure investments selected

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 5	CORE	N/A	N/A	PUBLIC	Due diligence	1

Once material ESG factors have been identified, what processes do you use to conduct due diligence on these factors for potential investments?

(A) We do a high-level/desktop review against an ESG checklist for initial red flags	(1) for all of our potential infrastructure investments
(B) We send detailed ESG questionnaires to target assets	(4) for none of our potential infrastructure investments
(C) We hire third-party consultants to do technical due diligence on specific issues	(1) for all of our potential infrastructure investments
(D) We conduct site visits and in-depth interviews with management and personnel	(1) for all of our potential infrastructure investments
(E) We incorporate actions based on the risks and opportunities identified in the due diligence process into the 100-day plan (or equivalent)	(1) for all of our potential infrastructure investments

(F) We incorporate ESG due diligence findings in all of our relevant investment process documentation in the same manner as for other key due diligence (e.g. commercial, accounting and legal)	(1) for all of our potential infrastructure investments
(G) Our investment committee (or an equivalent decision-making body) is ultimately responsible for ensuring all ESG due diligence is completed in the same manner as for other key due diligence (e.g. commercial, accounting and legal)	(1) for all of our potential infrastructure investments
(H) Other, please specify: na	(4) for none of our potential infrastructure investments

Selection, appointment and monitoring of third-party operators

Selection process

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 6	CORE	OO 32	N/A	PUBLIC	Selection process	1, 4

During the reporting year, how did you include ESG factors in all of your selections of external operators? (If you did not select external operators during the reporting year, report on the most recent year in which you selected external/third-party infrastructure operators.)

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

Appointment process

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 7	CORE	OO 32	N/A	PUBLIC	Appointment process	1, 4

How did you include ESG factors in the appointment of your current external operators?

(A) We set clear and detailed expectations for incorporating ESG factors into all relevant elements of infrastructure asset management	(1) for all of our external operators
(B) We set clear ESG reporting requirements	(1) for all of our external operators
(C) We set clear ESG performance targets	(1) for all of our external operators
(D) We set incentives related to ESG targets	(4) for none of our external operators
(E) Other, please specify: na	(4) for none of our external operators

Monitoring process

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 8	CORE	OO 32	N/A	PUBLIC	Monitoring process	1, 4

How do you include ESG factors in the monitoring of external operators?

(A) We monitor performance against quantitative and/or qualitative environmental targets	(1) for all of our external operators
(B) We monitor performance against quantitative and/or qualitative social targets	(1) for all of our external operators
(C) We monitor performance against quantitative and/or qualitative governance targets	(1) for all of our external operators

(D) We have regular discussions about ESG factors with all relevant stakeholders	(1) for all of our external operators
(E) We conduct a performance review of key staff based on ESG alignment linked to KPIs and a financial incentive structure	(4) for none of our external operators
(F) We have internal/external parties conduct site visits at least once a year	(1) for all of our external operators
(G) Other, please specify: na	(4) for none of our external operators

Post-investment phase

Monitoring

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

During the reporting year, did you track one or more core ESG KPIs across all your infrastructure investments?

- ☒ (A) Yes, we tracked environmental KPIs
- ☒ (B) Yes, we tracked social KPIs
- ☒ (C) Yes, we tracked governance KPIs
- ☐ (D) We did not track ESG KPIs across our infrastructure investments

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

Provide examples of the core ESG KPIs you tracked across all of your infrastructure investments.

- ☒ (A) ESG KPI #1
Governance - Does the board meet regularly? Is the Board provided with a Board Pack?
- ☒ (B) ESG KPI #2
Governance - Is the level of decision-making authority delegated to the management team documented?
- ☒ (C) ESG KPI #3

Governance -Is there a Health & Safety policy in place for each of: the Project Company, MSA Provider, Project Company's direct subcontractors?

☒ (D) ESG KPI #4

Social - Has the Project Company/Company made a voluntary contribution to an E or S activity?

☒ (E) ESG KPI #5

Social - Were any initiatives implemented that related to SDG3 Good Health and Well-being?

☒ (F) ESG KPI #6

Social - Were any initiatives implemented that related to SDG4 Quality Education?

☒ (G) ESG KPI #7

Environmental - Is the project's energy usage monitored and reported? Is there an active energy reduction programme in effect?

☒ (H) ESG KPI #8

Environmental - Is the project's water usage monitored and reported? Is there an active water reduction programme in effect?

☒ (I) ESG KPI #9

Environmental - Does the project measure the amount of waste generated? Is there an active waste reduction programme in effect?

☐ (J) ESG KPI #10

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

For the majority of the core KPIs that you tracked, how did you set targets across your infrastructure investments?

☒ (A) We set targets to achieve incremental improvements based on past performance

☐ (B) We set targets using industry benchmarks or standards

☐ (C) We set targets against global benchmarks or thresholds (e.g. on climate change and/or the SDGs)

☐ (D) We did not set targets for the core ESG KPIs that we track

☐ (E) We did not set targets as we don't track core ESG KPIs

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 11	CORE	OO 32	INF 11.1	PUBLIC	Monitoring	1,2

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

(A) We use operational-level benchmarks to assess and analyse the performance of assets against sector performance 4/ For none of our infrastructure investments

(B) We implement international best practice standards such as the IFC Performance Standards to guide ongoing assessment and analysis 4/ For none of our infrastructure investments

(C) We implement certified environmental and social management systems across our portfolio 4/ For none of our infrastructure investments

(D) We make sufficient budget available to ensure that the systems and procedures needed to achieve the target are put in place 1/ For all of our infrastructure investments

(E) We hire external verification services to audit performance, systems and procedures 1/ For all of our infrastructure investments

(F) We collaborate and engage with our external operators to develop action plans to achieve targets 2/ For the majority of our infrastructure investments

(G) We develop minimum health and safety standards 1/ For all of our infrastructure investments

(H) We conduct ongoing engagement with all key stakeholders (e.g. local communities, NGOs, governments and end-users) 1/ For all of our infrastructure investments

(I) Other, please specify:
na 4/ For none of our infrastructure investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 11.1	PLUS	INF 11	N/A	PUBLIC	Monitoring	1,2

Describe up to two processes that you put in place during the reporting year to support meeting your ESG targets.

Processes to support meeting ESG targets

(A) Process 1

ESG Survey

Since 2014, we have developed an annual ESG survey, which was expanded in 2020 to capture data against a wider set of ESG KPIs. The questionnaire is composed of 38 questions, of which 28 are scored, and 10 are un-scored. We capture both quantitative and qualitative information.

There are multiple objectives to this survey:

- It enables us to assess performance of each individual asset against our minimum ESG standards. We are then able to review the results and identify areas for improvement for each asset. This is done via direct engagement with the project companies. **(response continued in row below)**

This ensures we can drive best ESG practices across our portfolio. By expanding the survey questions in 2020, we were also able to drive continuous improvement across the portfolio.

- It also helps us to set a baseline in respect of key metrics. For example, in the 2020 survey we introduced questions on energy and water consumed, waste generated and Scope 1 and Scope 2 GHG emissions. This enables us to track reductions against the baseline moving forward. **(response continued in row below)**

It is noted that, in addition to this annual survey, we also ask our MSP to report on ESG performance quarterly during the Board meetings.

There are multiple objectives to this survey:

- It first aims at setting the baseline in terms of ESG performance across the portfolio. We now have 2 years of full data (2019 and 2020) and can confirm that the actions from 2020 have improved our baseline results in many areas. We are now able to better report on our performance, and the new questions introduced in 2020 will allow the organisation to define and commit to clear targets over the next years.

- It also serves as an engagement tool, where all our management service providers (MSPs) are accountable for their results. It facilitates the discussion with project companies to achieve better results and implement concrete actions to improve their scores.

It is noted that, in addition to this annual survey, we ask our MSP to report on ESG performance quarterly during the Board meetings..

(B) Process 2

Climate Change initiative

IRCP has commissioned a consultant to conduct a Climate Change risk assessment for majority of its infrastructure funds. In total, around 140 assets were assessed.

The scope of the work included:

- the assessment of the potential exposure to physical damage, both under the current climate conditions, and under two scenarios of future climate conditions (the IPCC scenarios RCP2.6 and RCP8.5).
- the assessment of the transitional risk related to a shift to a low carbon economy.
- the identification of climate-related opportunities both at a sector level and project level.

A more detailed assessment was undertaken on the top 20 riskier assets to take into account the specificities of the asset and the existing mitigation measures.

Once the climate change risk assessment is completed, the intention is to engage with the project companies to ensure the identified risks and opportunities are factored into the project's business and financial planning. **(response continued in row below)**

In the meantime, we have hosted a number of virtual workshops with the management teams of the project companies to raise awareness of the impact of climate change on the infrastructure sector..

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 12	CORE	N/A	N/A	PUBLIC	Monitoring	1, 2

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

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

(1) for all of our infrastructure investments

(B) We adjust our ESG action plans regularly based on performance monitoring findings

(1) for all of our infrastructure investments

(C) We hire external advisors to provide support with specific ESG value creation opportunities

(1) for all of our infrastructure investments

(D) Other, please specify:

na

(4) for none of our infrastructure investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 13	PLUS	N/A	N/A	PUBLIC	Monitoring	2

Describe how your long-term ESG action plans are currently defined, implemented and monitored.

InfraRed is an investment manager/adviser to a number of private funds and two listed funds focused on infrastructure investment. Each fund has its own investment policy but, in all cases, these are aligned with InfraRed's Sustainability policy.

These policies are the overarching documents that inform the rest of the organisation's plans and processes, throughout the whole lifecycle of a project, from the investment phase to the post-acquisition and operational phases. The Sustainability Manager is responsible for developing InfraRed's sustainability programme with input and oversight from the senior management team. The Sustainability Manager is responsible for implementing the sustainability programme, in collaboration with other individuals at InfraRed, for example the Climate Change Risk initiative was delivered by in conjunction with the Asset Management team.

At an asset level, each project has its own Sustainability Policy and ESG Action plans. The later consists of initiatives to address project specific needs and opportunities as well as the requirements from IRCP's portfolio wide ESG initiatives. They are developed by the General Manager of each project, with the support and guidance of the IRCP Director sitting at the Board as a representative of the investment company. Directors have all the necessary voting rights and reserved matters, to ensure the appropriate levels of control and protection are in place allowing effective management of all aspects of the investment including operational performance and ESG matters.

In order to monitor the performance of the assets, IRCP has developed an annual ESG survey that captures qualitative and quantitative data for each asset. The objective of the annual survey is to monitor performance and drive continuous improvement through engagement with the management teams of the project companies on the survey results.

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

(A) We assign the board responsibility for ESG matters	(1) for all of our infrastructure investments
(B) We mandate that material ESG matters are discussed by the board at least once a year	(1) for all of our infrastructure investments
(C) We provide training on ESG aspects and management best practices relevant to the asset to C-suite executives only	(1) for all of our infrastructure investments
(D) We provide training on ESG aspects and management best practices relevant to the asset to employees (excl. C-suite executives)	(4) for none of our infrastructure investments
(E) We support the asset in developing and implementing its ESG strategy	(1) for all of our infrastructure investments
(F) We support the asset by finding external ESG expertise (e.g. consultants or auditors)	(1) for all of our infrastructure investments
(G) We share best practices across assets (e.g. educational sessions, implementation of environmental and social management systems)	(1) for all of our infrastructure investments
(H) We include incentives to improve ESG performance in management remuneration schemes	(4) for none of our infrastructure investments

(I) Other, please specify:

na

(4) for none of our infrastructure investments

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

Describe up to two initiatives taken as part of your ESG competence-building efforts during the reporting year.

ESG competence-building initiatives

(A) Initiative 1

Since the creation of a new Sustainability Manager position in 2019 to consolidate the implementation of sustainability strategies in the business, number of our internal processes now formally include ESG requirements and are fully aligned with our sustainability policy. This has allowed us to drive the cultural shift necessary to achieve our ambitions in terms of sustainability and respond to the new expectations of our investors. From this year, all IRCP employees have sustainability related objectives and are incentivised to adopt and promote ESG best practices.

With the support of an external consultant, the Sustainability Manager has started to build our internal sustainability system, from updating the IRCP sustainability policy, to standardising the integration of ESG criteria in the investment phase (in particular during the due diligence process), as well as structuring the ESG expectations (roles and responsibilities, objectives and reporting metrics) in the operations of our assets. **(response continued in row below)**

Part of our strategy has been to expand and build on our ESG survey. This annual survey has allowed us to capture ESG related data across all our portfolio and establish the baseline to identify future improvement opportunities. More details about the survey are provided in the open question 11.1..

(B) Initiative 2

n parallel of the restructuring of our processes, the Sustainability Manager has led a communication plan to raise awareness and engage internal and external stakeholders with the sustainability objectives. Internally, key staff members of each team (investment team, portfolio management team, investor relations, asset management, fund management) were part of the workshops led by the external consultants to define the company's sustainability vision and implementation plans. This allowed us to train team champions for sustainability in all the stages of the deal lifecycle. In addition, the communication plan included formal communications addressed all members of staff, via information workshops, team meetings or official email from top management. **(response continued in row below)**

The engagement from the leadership team, and in particular the CEO, has reinforced the importance of sustainability for the organisation. Externally, IRCP relies on Management Service Provides for the day-to-day operations of the assets. With the support of the Key Account Managers for each MSP, the Sustainability Manager has directly engaged with all General Managers, through workshops or direct meetings. A number of tools (ESG Guidance and Best Practices shared via our online IRCP the Knowledge Centre) were developed to support the teams in the implementation of sustainability objectives in the asset daily operations..

Exit

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 15	CORE	N/A	N/A	PUBLIC	Exit	4, 6

During the reporting year, what responsible investment information has your organisation shared with potential buyers of infrastructure investments?

(A) We shared our firm's high-level commitment to responsible investment (e.g. that we are a PRI signatory)	(1) for all of our infrastructure investments
(B) We shared a description of what industry and asset class standards our firm aligns with (e.g. TCFD or GRESB)	(1) for all of our infrastructure investments
(C) We shared our firm's responsible investment policy (at minimum, a summary of key aspects and firm-specific approach)	(1) for all of our infrastructure investments

(D) We shared our firm's ESG risk assessment methodology (topics covered, in-house and/or with external support)	(4) for none of our infrastructure investments
(E) We shared the outcome of our latest ESG risk assessment on the asset or portfolio company	(4) for none of our infrastructure investments
(F) We shared key ESG performance data on the asset or portfolio company being sold	(1) for all of our infrastructure investments
(G) Other, please specify: na	(4) for none of our infrastructure investments

Reporting/Disclosure

ESG portfolio information

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 16	CORE	N/A	N/A	PUBLIC	ESG portfolio information	6

During the reporting year, how did you report on core ESG data and targets to your investors or beneficiaries?

- ☒ (A) We reported in aggregate through a publicly disclosed sustainability report
- ☒ (B) We reported in aggregate through formal reporting to investors or beneficiaries
- ☒ (C) We reported on the asset level through formal reporting to investors or beneficiaries
- ☒ (D) We reported through a limited partners advisory committee (or equivalent)
- ☒ (E) We reported back at digital or physical events or meetings with investors or beneficiaries
- ☒ (F) We did adhoc or informal reporting on serious ESG incidents
- ☐ (G) Other, please specify:
- ☐ (H) We did not report on core ESG data and targets to our investors or beneficiaries during the reporting year

Sustainability Outcomes (SO)

Set targets on sustainability outcomes

Outcome objectives

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 1	PLUS	ISP 45	SO 1.1, SO 2	PUBLIC	Outcome objectives	1

Has your organisation chosen to shape any specific sustainability outcomes?

- ☒ (A) Yes
☐ (B) No

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 2	PLUS	SO 1	SO 3	PUBLIC	Outcome objectives	1

Please list up to 10 of the specific sustainability outcomes that your organisation has chosen to shape.

Sustainability outcomes

(A) Sustainability Outcome #1	SDG 3 – Good Health & Well-being
(B) Sustainability Outcome #2	SDG 4 – Quality Education
(C) Sustainability Outcome #3	SDG 7 – Affordable and Clean Energy
(D) Sustainability Outcome #4	SDG 9 – Industry, Innovation and Infrastructure
(E) Sustainability Outcome #5	SDG11 – Sustainability Cities and Communities
(F) Sustainability Outcome #6	SDG 13 – Climate Action / Aligning with the Paris

Target-setting process

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 3	PLUS	SO 2	SO 3.1	PUBLIC	Target-setting process	1

Have you set any targets for your sustainability outcomes? Indicate how many targets you have set for each sustainability outcome.

(A) Sustainability Outcome #1: (1) No target

(B) Sustainability Outcome #2: (1) No target

(C) Sustainability Outcome #3: (1) No target

(D) Sustainability Outcome #4: (1) No target

(E) Sustainability Outcome #5: (1) No target

(F) Sustainability Outcome #6: (1) No target