



PUBLIC TRANSPARENCY REPORT

2023

InfraRed Capital Partners Limited

Generated 15-12-2023

About this report

PRI reporting is the largest global reporting project on responsible investment. It was developed with investors, for investors.

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

The public Transparency Reports, which are produced using signatories' reported information, provide accountability and support signatories to have internal discussions about their practices and to discuss these with their clients, beneficiaries, and other stakeholders.

This public Transparency Report is an export of the signatory's responses to the PRI Reporting Framework during the 2023 reporting period. It includes the signatory's responses to core indicators, as well as responses to plus indicators that the signatory has agreed to make public.

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

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

Disclaimers

Responsible investment definitions

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

Data accuracy

This document presents information reported directly by signatories in the 2023 reporting cycle. This information has not been audited by the PRI or any other party acting on its behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented.

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

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SENIOR LEADERSHIP STATEMENT (SLS)

SENIOR LEADERSHIP STATEMENT

SENIOR LEADERSHIP STATEMENT

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

Section 1. Our commitment

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

As investors in essential infrastructure that sits at the heart of communities, sustainability and a focus on leveraging our assets under management to create positive impact in society is firmly embedded in our DNA. InfraRed's sustainability strategy looks beyond the inherent benefits that our assets create. It seeks to ensure that our impact is maximised across our four priorities: Climate, Environment, Communities and People. These are the areas where we believe our investments and core business can generate the greatest sustainability outcomes. By focusing on these priorities, we aim to realise long-term positive impacts, allowing us to achieve our vision of Creating Better Futures.

InfraRed's commitment to sustainability is demonstrated in five key areas:

1. ESG integration into investment processes

Investing in infrastructure projects with strong environmental and social credentials has been central to InfraRed's investment strategy since inception. Sustainability forms a fundamental component of the investment due diligence and approval process for all new investments made, irrespective of fund investment strategies or investment sectors.

2. Stewardship and engagement

InfraRed adopts an active approach to asset management. We have Board directorships on portfolio companies, enabling us to exercise governance rights and stakeholder influence to promote high ESG standards within the portfolio company itself, as well as across supply chains. We also actively seek to collaborate with government, industry associations, peers and service providers on sustainability initiatives.

3. Monitoring and disclosing ESG performance

InfraRed conducts an annual ESG survey to monitor the performance of portfolio companies against key ESG metrics. The survey output helps to identify any aspects which need to be addressed at the portfolio company to improve ESG performance. The ESG survey also enables us to provide our investors and other key stakeholders with transparent information on sustainability performance.

4. Creating company-wide responsibility

InfraRed maintains internal governance structures and clear allocation of responsibilities to ensure sustainability is upheld in our corporate and investment activities. While InfraRed has several dedicated sustainability specialists within our business, it is our firm view that it is the responsibility of all staff members to contribute to InfraRed's sustainability ambitions.

5. Sustainability within our own business

As we focus on scaling impact through our investments, we also continue to progress sustainability initiatives within our own company. These include promoting diversity, equity and inclusion within our workplace, minimising our corporate carbon footprint and maintaining the highest standards in our governance and operational activities.

Further information on InfraRed's approach to responsible investment can be found in its Sustainability and Stewardship Policies which are available on InfraRed's website.

In pursuit of delivering tangible impact across our investment and business activities, InfraRed formalised a number of targets against our four sustainability priorities (Climate, Environment, Communities and People) on pages 11-12 of its latest Sustainability Report, including:

Net Zero Targets: InfraRed published its net zero targets in November 2022, which are aligned with the Institutional Investors Group on Climate Change (IIGCC's) Net Zero Investment Framework for Infrastructure and approved by the Net Zero Asset Manager initiative which InfraRed joined in July 2021. Further detail on these targets can be found in our assessment as well as InfraRed's Net Zero Progress Report, available on our website.

Diversity Targets: InfraRed firmly believe that diversity of thought enables better decision-making as drawing on individuals with different perspectives, experiences and approaches leads to more comprehensive assessment and a broader generation of ideas which ultimately results in more informed decision making. In May 2023, InfraRed formalised diversity objectives to further advance diversity, equity and inclusion (DE&I) in our workplace. While we have a broadly balanced representation of women in our business, at 43% of all staff, our first objective is to grow their representation within our senior team from 24% to one third within five years. We have also committed to ensuring that our workforce reflects the ethnic mix of the societies in which our offices are located. Our third objective beyond progressing gender and ethnic diversity is to continue to foster diversity of age, social background, education, religious beliefs, physical ability and sexual orientation within our broader DE&I initiatives.

Section 2. Annual overview

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

InfraRed has made significant progress towards its sustainability objectives over the course of 2022 and we would like to highlight the following two key achievements.

Portfolio impact strategy

By facilitating the delivery of essential services in a responsible manner, the assets InfraRed manages provide significant environmental and social benefits to more than 25 million people. We recognise, however, that by acting responsibly and applying good judgement beyond our contractual obligations, the positive impact of our assets can be multiplied. With this in mind, InfraRed has established a dedicated portfolio impact strategy, focused on strengthening relationships with our portfolio company stakeholders. The objective is to support the delivery of more targeted social impact initiatives for the communities in which our assets are located. During the year, we surveyed 66 clients across healthcare and education sectors, capturing valuable information on the challenges they face in delivering services for end-users. This has enabled us to develop bespoke initiatives to help address these challenges which we will continue to implement.

Net zero targets

A key milestone in 2022 was the announcement of our net zero targets. InfraRed has committed to: align 70% of our AUM to net zero trajectories by 2030; regularly engage with at least 90% of our portfolio companies and supply chain on reducing their emissions; and finally to have 50% of our AUM invested in climate solutions such as electrified transport and clean energy by 2025. Our 2023 sustainability report details the actions we have taken to meet these net zero targets. For example, we have achieved a 98% response rate to our annual Greenhouse Gas Questionnaire, up from 75% the prior year. We continue to fund new infrastructure to accelerate the transition, and in May, we made our first investment in EV charging, in e-mobility company JOLT Energy. Our commitment will enable it to roll out thousands of ultra-fast chargers in metropolitan areas in Germany, in turn driving the wider electrification of the transport sector forward.

In addition to the achievements outlined above, InfraRed has also summarised key progress made during 2022 against our core objectives of Climate, Environment, Communities and People in the latest Sustainability Report available on InfraRed's website.

Section 3. Next steps

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

As part of its commitment to transparency, InfraRed publicly communicates its sustainability objectives and the progress made against these as part of its annual sustainability report. These objectives are linked to InfraRed's four strategic sustainability priorities – Climate, Environment, Communities and People – which are underpinned by our governance frameworks. Where possible, these objectives are informed and measured by key sustainability indicators as outlined on page 12 and 13 of InfraRed's 2023 Sustainability Report.

In particular, the key 2023 objectives InfraRed has communicated publicly are as follows:

Climate

- Net zero integration: Revise investment processes to further integrate net zero criteria, including requiring portfolio companies to set decarbonisation targets and strategies within given timeframes and formalising an engagement roadmap
- Target greenfield climate solutions: Grow the percentage AUM invested in high impact climate solutions, through additive greenfield development of next generation technologies such as EV infrastructure and green fuels Improved monitoring of biodiversity impacts and initiatives

Environment

- Continued engagement on monitoring biodiversity impact: As we continue to engage project companies on identifying and reducing their biodiversity impact, we will look to incorporate the finalised TNFD framework on risk management for impacts and dependencies
- Water and waste metrics: We aim to build on the work we completed in 2022, to ensure that reduction plans are in place for all material sectors (medium-to high impact) and, where we have operational control, processes are put in place to measure consumption and generation

Communities

- Develop upon Portfolio Impact framework: Expand and improve data collection process to gain insights on impacts and scalable initiatives
- Expand initiatives based on insights gained from Client Insight Surveys: Use information gathered to tailor initiatives at the portfolio company level and to build on our corporate social impact strategy to address challenges identified

People

- Expand DE&I initiatives: Build on initiatives outlined in 2023 Sustainability Report to ensure we meet our diversity targets and create DE&I requirements for portfolio companies which directly employ staff
- Create portfolio company DE&I requirements and increase alignment to human rights frameworks: Increase portfolio alignment to human rights frameworks and communicate DE&I expectations for portfolio companies which directly employ staff

Governance

- Evolve ESG survey Develop ESG survey to improve data collection of our impact metrics and to align with upcoming frameworks such as TNFD and ISSB
- Target wider stakeholder engagement: Expand touchpoints with our clients and management service providers to continue to improve response rates, data quality and, ultimately, ESG performance

InfraRed's Sustainability team, with the support of InfraRed's Senior Management team and the other business departments are actively developing and progressing initiatives to achieve these objectives. As highlighted above, InfraRed will continue to transparently disclose our performance against these objectives in our annual sustainability report.

Section 4. Endorsement

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

Name

Jack Paris

Position

Chief Executive Officer

Organisation's Name

InfraRed Capital Partners Limited

☒ A

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

☐ B

ORGANISATIONAL OVERVIEW (OO)

ORGANISATIONAL INFORMATION

REPORTING YEAR

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

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

	Date	Month	Year
Year-end date of the 12-month period for PRI reporting purposes:	31	12	2022

SUBSIDIARY INFORMATION

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

Does your organisation have subsidiaries?

☒ (A) Yes

☐ (B) No

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

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

- ☐ (A) Yes
- ☒ (B) No

ASSETS UNDER MANAGEMENT

ALL ASSET CLASSES

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

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

USD

(A) AUM of your organisation, including subsidiaries, and excluding the AUM subject to execution, advisory, custody, or research advisory only

US\$ 14,157,000,000.00

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

US\$ 0.00

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

US\$ 0.00

ASSET BREAKDOWN

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

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

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

ASSET BREAKDOWN: INTERNALLY MANAGED INFRASTRUCTURE

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

Provide a further breakdown of your internally managed infrastructure AUM.

(A) Data infrastructure >0-10%

(B) Diversified 0%

(C) Energy and water resources 0%

(D) Environmental services 0%

(E) Network utilities >0-10%

(F) Power generation (excl.
renewables) >0-10%

(G) Renewable power >10-50%

(H) Social infrastructure >10-50%

(I) Transport >10-50%

(J) Other >0-10%

(J) Other - Specify:

Flexible capacity

GEOGRAPHICAL BREAKDOWN

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

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

AUM in Emerging Markets and Developing Economies

(H) Infrastructure

(2) >0 to 10%

STEWARDSHIP

STEWARDSHIP

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

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

(7) Infrastructure

(A) Yes, through internal staff

☒

(B) Yes, through service providers

☒

(C) Yes, through external managers

☐

(D) We do not conduct stewardship

☐

ESG INCORPORATION

INTERNALLY MANAGED ASSETS

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

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

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

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

(K) Infrastructure



ESG/SUSTAINABILITY FUNDS AND PRODUCTS

LABELLING AND MARKETING

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

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

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

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

>75%

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

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

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

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

SUMMARY OF REPORTING REQUIREMENTS

SUMMARY OF REPORTING REQUIREMENTS

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

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

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

OTHER ASSET BREAKDOWNS

INFRASTRUCTURE: OWNERSHIP LEVEL

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

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

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

Select from the list:

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

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

Select from the list:

- ☐ (1) >0 to 10%
- ☒ (2) >10 to 50%

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

Select from the list:

- ☒ (1) >0 to 10%
- ☐ (2) >10 to 50%

INFRASTRUCTURE: STRATEGY

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

What is the investment strategy for your infrastructure assets?

☒ (A) Core

☒ (B) Value added

☐ (C) Opportunistic

☐ (D) Other

INFRASTRUCTURE: TYPE OF ASSET

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

What is the asset type of your infrastructure?

- ☒ (A) Greenfield
- ☒ (B) Brownfield

INFRASTRUCTURE: MANAGEMENT TYPE

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

Who manages your infrastructure assets?

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

SUBMISSION INFORMATION

REPORT DISCLOSURE

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

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

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

POLICY, GOVERNANCE AND STRATEGY (PGS)

POLICY

RESPONSIBLE INVESTMENT POLICY ELEMENTS

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

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

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

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

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

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

Specify:

InfraRed has established a dedicated portfolio impact strategy, focused on strengthening relationships with our portfolio company stakeholders. The objective is to support the delivery of more targeted social impact initiatives for the communities in which our assets are located. During the year, we surveyed 66 clients across healthcare and education sectors, capturing valuable information on the challenges they face in delivering services for end-users. This has enabled us to develop bespoke initiatives to help address these challenges which we will continue to implement. In particular, InfraRed has implemented a number of initiatives to address challenges caused by the cost of living crisis such as food poverty which is a key issues associated with social mobility.

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

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

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

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

Add link:

https://www.ircp.com/wp-content/uploads/2023/06/ircp_sustainability_policy_may_2023.pdf

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

Add link:

https://www.ircp.com/wp-content/uploads/2023/06/ircp_sustainability_policy_may_2023.pdf

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

Add link:

https://www.ircp.com/wp-content/uploads/2023/06/ircp_sustainability_policy_may_2023.pdf

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

Add link:

https://www.ircp.com/wp-content/uploads/2023/06/ircp_sustainability_policy_may_2023.pdf

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

Add link:

https://www.ircp.com/wp-content/uploads/2023/06/ircp_sustainability_policy_may_2023.pdf

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

Add link:

https://www.ircp.com/wp-content/uploads/2023/06/ircp_sustainability_policy_may_2023.pdf

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

Add link:

https://www.ircp.com/wp-content/uploads/2023/06/ircp_sustainability_policy_may_2023.pdf

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

Add link:

https://www.ircp.com/wp-content/uploads/2023/06/ircp_sustainability_policy_may_2023.pdf

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

Add link:

https://www.ircp.com/wp-content/uploads/2023/06/ircp_sustainability_policy_may_2023.pdf

☒ **(J) Guidelines on exclusions**

Add link:

https://www.ircp.com/wp-content/uploads/2023/06/infrared_exclusion_policy_2022.pdf

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

Add link:

https://www.ircp.com/wp-content/uploads/2023/06/ircp_sustainability_policy_may_2023.pdf

☒ **(M) Stewardship: Guidelines on overall political engagement**

Add link:

https://www.ircp.com/wp-content/uploads/2023/06/infrared_stewardship_policy_october_2022.pdf

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

Add link:

https://www.ircp.com/wp-content/uploads/2023/06/ircp_sustainability_policy_may_2023.pdf

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

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

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

☒ **(A) Yes**

Elaborate:

Our formal policy identifies that a long-term, sustainability-led mindset is essential to delivering lasting success. InfraRed believes that by integrating environmental and social factors into our decision making we also can preserve long-term value, maintain a social licence and fulfill fiduciary duties of delivering resilient returns. That is why InfraRed employs a comprehensive sustainability investment and management framework, based on a foundation of robust guiding principles, ensuring that sustainability is integrated into each stage of the investment process. For example, our policy highlights that our sustainability due diligence findings inform any adjustments to be made to the investment valuation models as well as any risk or optimisation measures to be implemented post investment. The policy also highlights that InfraRed will not proceed with a transaction if we do not believe that there is a satisfactory solution for any ESG issues identified in our due diligence. Hence, our policy demonstrates that we consider ESG risks and opportunities in order to fulfill both of our responsible investment requirements and fiduciary duties to our investors.

- (B) No

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

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

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

RESPONSIBLE INVESTMENT POLICY COVERAGE

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

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

Combined AUM coverage of all policy elements

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

(7) 100%

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

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

AUM coverage

(A) Specific guidelines on climate change

(1) for all of our AUM

(B) Specific guidelines on human rights

(1) for all of our AUM

(C) Specific guidelines on other systematic sustainability issues

(1) for all of our AUM

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

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

☒ (E) Infrastructure

(1) Percentage of AUM covered

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

☒ (11) 100%

GOVERNANCE

ROLES AND RESPONSIBILITIES

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

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

- ☒ (A) Board members, trustees, or equivalent
☒ (B) Senior executive-level staff, or equivalent

Specify:

InfraRed's Senior Management Team, of our various business areas and disciplines, are responsible for supporting the Head of Sustainability to oversee the development and implementation of the sustainability programme. The Senior Management Team have individual sustainability objectives specific to their responsibilities. Their contributions to achieving InfraRed's sustainability objectives are considered as part of their overall annual performance which informs their discretionary remuneration.

- ☒ (C) Investment committee, or equivalent

Specify:

Each Fund's Investment Committee is responsible for reviewing sustainability due diligence considerations as part of the overall investment approval.

- ☒ (D) Head of department, or equivalent

Specify department:

InfraRed's Head of Sustainability has overall responsibility for developing and implementing InfraRed's Sustainability programme.

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

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

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

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

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

○

○

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

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

☒ (A) Yes

Describe how you do this:

InfraRed's Fund Investment Committee and/or InfraRed's Governance Board members are responsible for reviewing any political engagement activities prior to these been issued. This ensures that there is complete governance oversight of any political engagement activities and a review process to ensure these activities align with our approach to sustainability and our Sustainability Policy.

○ (B) No

○ (C) Not applicable, our organisation does not conduct any form of political engagement directly or through any third parties

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

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

☒ (A) Internal role(s)

Specify:

InfraRed has a dedicated Sustainability Team (Head of Sustainability and Sustainability Analyst), responsible for developing and implementing its sustainability strategy and programme. However, all InfraRed staff are responsible for considering sustainability in the delivery of their respective day-to-day roles, which is reflected in staff objectives.

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

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

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

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

● (A) Yes, we use responsible investment KPIs to evaluate the performance of our board members, trustees, or equivalent

Describe: (Voluntary)

InfraRed Board Directors have individual sustainability objectives specific to their responsibilities. Their contributions to achieving InfraRed's sustainability objectives are considered as part of their overall annual performance which informs their discretionary remuneration

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

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

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

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

Indicate whether these responsible investment KPIs are linked to compensation

● (1) KPIs are linked to compensation

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

Describe: (Voluntary)

Our Senior Management Team have individual sustainability objectives specific to their responsibilities. Their contributions to achieving InfraRed's sustainability objectives are considered as part of their overall annual performance which informs their discretionary remuneration.

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

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 15	PLUS	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

What responsible investment competencies do you regularly include in the training of senior-level body(ies) or role(s) in your organisation?

	(1) Board members, trustees or equivalent	(2) Senior executive-level staff, investment committee, head of department or equivalent
(A) Specific competence in climate change mitigation and adaptation	<input type="checkbox"/>	<input type="checkbox"/>
(B) Specific competence in investors' responsibility to respect human rights	<input type="checkbox"/>	<input type="checkbox"/>
(C) Specific competence in other systematic sustainability issues	<input type="checkbox"/>	<input type="checkbox"/>
(D) The regular training of this senior leadership role does not include any of the above responsible investment competencies	<input checked="" type="radio"/>	<input checked="" type="radio"/>

EXTERNAL REPORTING AND DISCLOSURES

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

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

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

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

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

- ☒ (A) Yes, including all governance-related recommended disclosures
- ☒ (B) Yes, including all strategy-related recommended disclosures
- ☒ (C) Yes, including all risk management-related recommended disclosures
- ☒ (D) Yes, including all applicable metrics and targets-related recommended disclosures

- ☐ (E) None of the above

Add link(s):

<https://www.hicl.com/wp-content/uploads/2023/05/HICL-Sustainability-Report-2023.pdf>

<https://www.trig-ltd.com/wp-content/uploads/2023/05/TRIG-2023-Sustainability-Report.pdf>

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

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

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

Link to example of public disclosures

<https://www.trig-ltd.com/wp-content/uploads/2023/06/TRIG-Article-23-Disclosure-June-2023.pdf>

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

Link to example of public disclosures

<https://www.trig-ltd.com/wp-content/uploads/2023/05/TRIG-2023-Sustainability-Report.pdf>

- ☐ (C) Disclosures against the CFA's ESG Disclosures Standard
- ☐ (D) Disclosures against other international standards, frameworks or regulations
- ☐ (E) Disclosures against other international standards, frameworks or regulations
- ☐ (F) Disclosures against other international standards, frameworks or regulations
- ☐ (G) Disclosures against other international standards, frameworks or regulations

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

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

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

Add link(s):

<https://www.ircp.com/wp-content/uploads/2023/06/InfraRed-Sustainability-Report-2023-3.pdf>

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

STRATEGY

CAPITAL ALLOCATION

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

Which elements do your organisation-level exclusions cover?

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

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

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

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

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

STEWARDSHIP: OVERALL STEWARDSHIP STRATEGY

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

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

(5) Infrastructure

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



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



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

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

At InfraRed, collaborative engagement forms the core of our strategy. As managers of infrastructure that are embedded deeply in communities and which operate with several stakeholders in tandem, working together improves chances for success.

Asset Managers maintain directorships on portfolio company boards, leveraging governance rights to drive ESG improvements. The Asset Manager works closely with the portfolio company management team to understand key priorities, the rationale for poor ESG metrics (if applicable) and the resources available at the portfolio company. They then use this knowledge and their directorship on company boards to leverage governance rights and drive specific ESG initiatives.

Our stewardship focuses on maximising impact by collaborating with and empowering our portfolio companies. In 2022, InfraRed also launched its Portfolio Impact strategy, which has an objective of enhancing stewardship activities by responding to portfolio company feedback and championing initiatives that generate a positive social impact. As part of this, InfraRed issued a Client Insights Survey to individuals involved in the day-to-day management of educational and healthcare facilities. The objective was to gain insights on the foremost issues facing the facilities at that time, for InfraRed to tailor and support project specific initiatives. By collaborating with stakeholders closer to the daily operations of the asset has led to several successful outcomes – 1) We have greater assurance that we are addressing specific needs and are therefore maximising impact, 2) Relationships improved as stakeholders' responses were heard and acted upon.

A further example of collaborative stewardship is the biannual workshops hosted by our Asset Management and Sustainability Teams, facilitating the sharing of insights gained during the period prior. To ensure effective implementation of initiatives, InfraRed's asset management and sustainability teams develop instructional documents outlining exemplar practices; the 2022 ESG Best Practice Guidance Document, for instance, outlines core Environmental, Social and Governance focal points.

Acknowledging that the sustainability space is advancing rapidly, and without much practical guidance, we also informally engage and collaborate with industry peers in conversations around sustainability, compliance and net zero in practice. This reaffirms our commitment to demonstrate leadership and shape best practice within the sustainability landscape through a prioritisation of a wide range of stewardship activities exemplified above.

Data insights and sector knowledge / experience

Owing to transaction due diligence findings, sector knowledge and annual data capture InfraRed understands the material ESG factors that are pertinent to each investment. Material ESG factors are typically common within sectors and so from the outset of an investment, these are flagged to be focused on. For example, a key focus for fibre networks is cyber security. A focus on materiality ensures that our engagement intensity and stewardship are accurately aligned with the specific needs of each site or investment.

Stage and structure of company:

Additionally, the investment stage is pivotal in shaping our approach to stewardship. Particularly in the context of early-stage development investments, where InfraRed are proactive in ensuring that companies establish robust governance systems from the outset. In these situations, InfraRed would support in developing corporate policies, defining the ESG strategy and framing key priorities, etc. By equipping these teams with clear guidance, InfraRed help empower these portfolio companies to seamlessly incorporate ESG considerations into the core of their strategy as they mature. For more mature companies, InfraRed firstly undertakes through due diligence to assess whether strong ESG frameworks are already in place and identify whether and additional measures need to be implemented post-investment. Thus, we use stewardship more in the sense to maintain or improve these practices instead of formalising them de novo.

While we do not alter stewardship activities based on shareholding, the structure of the company underpins the levels and types of engagement required. For example, some companies do not have any direct staff which necessitate more hands-on forms of stewardship efforts. Similarly, some buildings of assets under management are occupied by third party clients such as the National Health Service (NHS) and Department of Education which warrant a greater focus on collaborative stewardship.

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

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

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

Select from the list:

- ☒ 1
- ☐ 4
- ☐ 5

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

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

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

Select from the list:

- ☒ 3
- ☐ 4
- ☐ 5

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

Select from the list:

- ☒ 2
- ☐ 4
- ☐ 5

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

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

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

InfraRed's stewardship activities and investment decision making are inherently linked, as investment decisions are fundamentally based on the sustainability characteristics of the investment which are ascertained through stewardship activities. For example, once an investment has passed negative screening, materiality analysis enables InfraRed's Origination & Execution Team to identify and evaluate material ESG considerations relevant to that sector. This process typically involves engaging with management teams of the portfolio company itself as well as other companies in the supply chain (for example, solar panel providers) to assess policies and processes in place. The findings from this assessment would then inform a sustainability action plan and stewardship activities to be implemented post-investment, which would be reviewed by the Fund Investment Committee as part of the investment approval decision. If the Investment Committee is not satisfied that ESG performance is satisfactory and cannot be improved through stewardship activities, then InfraRed would not proceed with the investment.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 28	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

If relevant, provide any further details on your organisation's overall stewardship strategy.

Please refer to earlier responses and InfraRed's 2023 Sustainability Report, Sustainability Policy and Stewardship Policy which is available on our website.

STEWARDSHIP: ENGAGEMENT WITH POLICY MAKERS

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

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

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

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

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

- ☐ (A) We participated in 'sign-on' letters
- ☒ (B) We responded to policy consultations
- ☒ (C) We provided technical input via government- or regulator-backed working groups

Describe:

InfraRed participated in a number of industry-wide collaborations to support the progression of net zero related initiatives within the industry. One of these included the Infrastructure and Projects Authority (IPA) Net Zero Working Group, a government-led initiative focused on public-private collaboration to create and share net zero solutions. InfraRed have been an active member of this group since March 2022, working to address the challenges associated with PFI/PPP projects in the UK. To date the group has made encouraging progress on a number of initiatives, including developing a streamlined GHG emission data collection process, sharing examples of effective GHG reduction initiatives and developing guidance for decarbonisation of operational PFI projects.

In addition, InfraRed is also a member of the initiative Climate international (iCI) and the Global Infrastructure Investor Association which leverage collaboration and engagement activities to facilitate progress on key industry and sustainability issues.

- ☒ (D) We engaged policy makers on our own initiative

Describe:

InfraRed regularly engages with MPs and other key stakeholders on aspects related to PFI projects, energy policy or financing models for infrastructure projects.

- ☐ (E) Other methods

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

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

- ☐ (A) We publicly disclosed all our policy positions
- ☒ (B) We publicly disclosed details of our engagements with policy makers

Add link(s):

<https://www.trig-ltd.com/wp-content/uploads/2023/05/TRIG-2023-Sustainability-Report.pdf>

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

STEWARDSHIP: EXAMPLES

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

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

(A) Example 1:

Title of stewardship activity:

Engagement with portfolio companies on GHG emissions inventory

(1) Led by

☒ (1) Internally led

○ (2) External service provider led

○ (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

☒ (1) Environmental factors

☐ (2) Social factors

☐ (3) Governance factors

(3) Asset class(es)

☐ (1) Listed equity

☐ (2) Fixed income

☐ (3) Private equity

☐ (4) Real estate

☒ (5) Infrastructure

☐ (6) Hedge funds

☐ (7) Forestry

☐ (8) Farmland

☐ (9) Other

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

Given that many of InfraRed's portfolio companies are commencing their net zero journeys, InfraRed elected to focus on engaging with the portfolio companies on improving the measurement of GHG emissions. As a result of these engagement activities, InfraRed saw the number of portfolio companies which responded to its 2022 GHG emissions questionnaire increased to 98%, which was a significant step up from a 75% response rate in the previous year. These efforts also led to improvements in data granularity, thanks to ongoing dialogue led by InfraRed's Asset Management team, as well as discussions held during InfraRed's bi-annual ESG summit with portfolio company management teams. As a result of this exercise, InfraRed has identified a number of useful findings that will frame its on-going engagement strategy to support the achievement of the net zero targets. For example, InfraRed found that a significant proportion of energy used is not sourced from renewable energy. As a result, InfraRed has set an objective to engage with more portfolio companies to utilise green energy contracts or on-site renewable generation.

(B) Example 2:
Title of stewardship activity:

IPA Net Zero Working Group

- (1) Led by
- ☒ (1) Internally led
 - ☐ (2) External service provider led
 - ☐ (3) Led by an external investment manager, real assets third-party operator and/or external property manager
- (2) Primary focus of stewardship activity
- ☒ (1) Environmental factors
 - ☐ (2) Social factors
 - ☐ (3) Governance factors
- (3) Asset class(es)
- ☐ (1) Listed equity
 - ☐ (2) Fixed income
 - ☐ (3) Private equity
 - ☐ (4) Real estate
 - ☒ (5) Infrastructure
 - ☐ (6) Hedge funds
 - ☐ (7) Forestry
 - ☐ (8) Farmland
 - ☐ (9) Other
- (4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

In addition to direct engagement with its portfolio companies, InfraRed also participated in a number of industry-wide collaborations to support the progression of net zero related initiatives within the industry. One of these included the Infrastructure and Projects Net Zero Working Group, a government-led initiative focused on public-private collaboration to create and share net zero solutions. InfraRed have been an active member of this group since March 2022, working to address the challenges associated with PFI/PPP projects in the UK. To date the group has made encouraging progress on a number of initiatives, including developing a streamlined GHG emission data collection process, sharing examples of effective GHG reduction initiatives and developing guidance for decarbonisation of operational PFI projects.

(C) Example 3:
Title of stewardship activity:

Client Insights Survey

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

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

The objective of InfraRed's portfolio impact strategy is to help to drive positive social outcomes and to improve the relationships between InfraRed and public and private sector clients. Through better understanding of the challenges communities face through feedback, InfraRed is able to refine its impact initiatives to address the needs of stakeholders either at a portfolio level or a project level. InfraRed assesses how it can respond to its clients and tailor initiatives based on various touchpoints on multiple levels, such as its Client Insight Survey.

In 2022, InfraRed developed its Client Insights Survey, originally introduced post-Covid to understand how best to support our stakeholders in those challenging times. The survey is designed to capture the social challenges and satisfaction of the client teams that lead our healthcare and education infrastructure projects. Insights collected enable InfraRed to develop more targeted and scalable impact initiatives that provide positive outcomes for its clients and the communities with access to the assets under management. The survey focuses on six key questions: three are in relation to capturing information on social challenges faced by the client and its end-users, whilst the other three relate to client satisfaction in relation to the portfolio company's performance. InfraRed incentivised its clients by offering a £500 donation to a charity of their choice on completion of the survey. As a result, InfraRed more than tripled the response rate from the 2021 Client Insights Survey and donated over £30,000 to causes nominated by its clients.

(D) Example 4:

Title of stewardship activity:

(1) Led by

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

(2) Primary focus of stewardship activity

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

(3) Asset class(es)

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

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

(E) Example 5:

Title of stewardship activity:

(1) Led by

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

(2) Primary focus of stewardship activity

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

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

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

CLIMATE CHANGE

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

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

☒ **(A) Yes, within our standard planning horizon**

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

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.

Transition risks and opportunities:

We recognise that policy changes, technological advances and market demands in relation to climate change is creating new dynamics that in turn create opportunities and risks for InfraRed. While InfraRed does not invest in high emitting sectors (e.g. coal, oil, shipping, etc.), it is well understood that a failure to decarbonise assets currently held under management in an orderly manner can ultimately translate into financial risk – whether this is exposure to carbon pricing, the opportunity cost of failing to adopt energy efficiency measures, or the exit value of an asset being sold to a long-term investor. InfraRed has therefore 1) updated its exclusion policy in 2021, precluding investments in companies that are incongruent now or in the medium term to a net zero future; and 2) InfraRed has committed to net zero and has set interim targets in line with the Net Zero Investment Framework for infrastructure. InfraRed also continues to monitor its existing portfolio for exposure to material transition risks which did not exist at the time of the original investment. In those instances, InfraRed would actively engage with the portfolio company to review risk mitigation measures in line with the company's current sustainability requirements and its financial responsibilities to its investors.

It is also worth noting that an accelerated transition to a low carbon economy may lead to cannibalisation of renewable energy prices that are not contracted. Such a dynamic is modelled and incorporated into sensitivity analysis which in turn forms part of risk management measures. The Renewable Infrastructure Group (TRIG), which InfraRed is the Investment Manager for, has disclosed this in its 2023 Sustainability Report on pages 38-39.

The transition is also creating new opportunities for infrastructure investors that InfraRed is increasingly capitalising on. For example, the energy transition is one of InfraRed's key investment themes having made a number of investments in renewable energy, distributed energy and energy solutions in 2022.

Physical risks and opportunities:

As an investor in long term and physical infrastructure, InfraRed carefully monitors and manages physical climate risk within its investment processes and risk management framework. Since 2021 it is a requirement that all new transactions complete a climate change risk assessment with a third-party consultant. Assessments can take different forms depending on the nature of the asset. For example, for a single physical structure such as a battery storage system, the site perimeter would be modelled and analysis provided on projected potential exposure expressed in both physical and financial terms. For example, a climate change risk assessment for a greenfield battery investment completed in 2022 identified minor flooding exposure, as a result the battery will be elevated to mitigate this risk.

However, for assets which sprawl over significant distances, approaches need to be tailored. For example, for a fibre transaction, InfraRed assessed whether chronic weather conditions in warming scenarios may cause migration in the communities served by the network. The results of this assessment were factored into the business plan.

InfraRed has also completed screening of physical risks for all assets held under management, the details of which are provided in PGS 44. 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. Risks considered included acute weather events such as river, coastal or flash flooding; hailstorms; wildfires; excess heat and wind, cyclones, tornados. Chronic risk analysis included increased temperatures such that the thermal capacity of equipment could be exceeded; changes to ground conditions from increased rain or drought conditions. InfraRed has shared the material findings with portfolio companies to in turn incorporate these into project level risk management systems and key initiatives.

Climate change is also creating new opportunities within the infrastructure industry to invest in adaptation infrastructure, and InfraRed will look to incorporate this emerging theme into investment strategies.

☒ **(B) Yes, beyond our standard planning horizon**

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

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.

InfraRed also has many funds under management, some of which have a 'buy and hold' investment strategy and others which have a 'capital gains' investment strategy. In respect to the capital gains funds, a climate change risk assessment was undertaken to consider 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. InfraRed decided to take this approach so that we could be aware of our climate related risks and opportunities before it disposed of the investment. By doing so, this enables InfraRed to take further action where appropriate and improve the value achieved for investors at divestment. In some circumstances, InfraRed assessed climate change risks for a longer period than was remaining under the asset concession period. Similarly, InfraRed 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.

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

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

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

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

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

Climate-related considerations are embedded in InfraRed's investment and management framework, and influence portfolio short-medium-and-long-term management decisions.

Investment strategy:

Climate change is a fundamental theme within fund investment strategies as well as the investment process itself. Firstly, the energy transition – brought about by the need to mitigate the worst effects of climate change and shift from fossil fuels is creating new and significant investment opportunities for infrastructure. For example, the hydrogen economy, biofuels, electric vehicle infrastructure and integrated low carbon domestic energy systems are some examples of sectors InfraRed's Origination and Execution team have been assessing and seeking to invest in in recent times. Energy transition is also one of the key investment themes pursued by InfraRed's funds under management – as demonstrated by InfraRed's climate solution target. InfraRed has committed to allocate 50% of its assets under management to climate solutions by 2025 (compared to a baseline of 45% as at 31 December 2022). This target factors in a material growth in AUM to 2025. Further details of InfraRed's climate solutions target can be found in its Net Zero Progress Report and Sustainability Report.

As mentioned in PGS 41, physical risks are modelled prior to investment as part of risk management as well as to inform design specifications and operational procedures where appropriate.

Financial planning:

For assets under management, the objective is to identify the potential risk exposure, quantify this in financial terms and put in place the adequate mitigation measures to protect the project where needed. To support investment companies in their journey towards climate change resilience, InfraRed commissions risk assessments using external specialist consultants to identify projects' physical and financial risk exposure to climate change. The results of this assessment were shared with the portfolio companies.

Climate change can also be leveraged to create value at a project level. For example, increased wind speeds may improve the output of a wind asset. Pursuing net zero can lead to material cost savings can assist with capital raising for funds.

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

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

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

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

- ☐ (O) Textile and leather
- ☐ (P) Water
- ☐ (Q) Other
- ☒ (R) We do not have a strategy addressing high-emitting sectors

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

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

- ☐ (A) Yes, using the Inevitable Policy Response Forecast Policy Scenario (FPS) or Required Policy Scenario (RPS)
- ☐ (B) Yes, using the One Earth Climate Model scenario
- ☐ (C) Yes, using the International Energy Agency (IEA) Net Zero scenario
- ☒ (D) Yes, using other scenarios

Specify:

SSP-8.5/RCP-8.5 ("Business as usual");
 SSP2-4.5/RCP-4.5 ("Emissions peak at 2040"); and
 SSP1-2.6/ RCP-2.6 ("Paris aligned").

- ☐ (E) No, we have not assessed the resilience of our investment strategy in different climate scenarios, including one that holds temperature rise to below 2 degrees

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

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

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

In 2020, InfraRed engaged a third party to complete a climate risk assessment for its assets. Chronic and acute risks were identified based on current climate conditions and future climate scenarios. 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 / Board (for listed funds). The assets were then ranked between 1 and 5 depending on their relative severity and frequency. Additional exposure rankings were also identified based on future climate scenarios, Business As Usual (4°C above pre-industrial levels) and a Low Carbon Case (less than 2°C above pre-industrial levels). Potential financial exposure from some weather events were then modelled with statistical stimulation undertaken 10,000 times for each asset to calculate the potential average annual loss (excluding mitigation and insurance) for each asset. The consultant produced a portfolio report for each fund as well as an individual asset report summarising the risks and opportunities identified for that asset.

InfraRed is currently assessing options for updating this assessment to take into consideration more up to date climate modelling. This is to improve both the understanding of climate risks, the management of such risks and will enhance how InfraRed report on these aspects under the TCFD framework.

In 2022, InfraRed completed climate risk assessment for its listed renewables fund, TRIG. Each asset was screened according to its specific location and key technology characteristics, with physical risks assessed using three different Intergovernmental Panel on Climate Change (IPCC) aligned emissions scenarios: Business as usual (SSP-8.5/RCP-8.5); Emissions peak in 2040 (SSP2-4.5/RCP-4.5); and Paris aligned (SSP1-2.6/RCP-2.6). These findings output for projected periods of extreme heat in a 100-year return period across the three aforementioned scenarios. Such as assessment has informed TRIG's EU Taxonomy alignment exercise and engagement activities in relation to climate risk.

Moreover, as of 2021, all new acquisitions must have a climate risk assessment pre-investment as part of due diligence. This feeds into financial valuation and design considerations where a material impact is identified.

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

Having commissioned the assessment for the portfolio in 2020, InfraRed distributed results of the assessments to the management teams of portfolio companies, alongside a "Climate change risk best practice guidance document". This was created to assist with the interpretation of these technical findings. The objective of this was to empower management teams to incorporate these findings into the risk register and to take action in response. Subsequently, InfraRed added new questions to its annual ESG survey to monitor the management of climate risks at the project level.

InfraRed monitors climate risk via its annual ESG survey, by asking questions on:

- Whether findings of the climate risk assessment has been incorporated into the company's risk register (90% of AUM have done so as at 2022)
- Whether climate related risks and opportunities were discussed at the board level (85% of AUM have done so as at 2022)
- Whether climate resilience initiatives are being implemented at the portfolio company (61% of AUM are doing so as at 2022)

Acknowledging that scientific understanding / data sets for climate risk has improved in recent times, InfraRed is currently looking to commission a more up-to-date assessments, which will improve risk management measures.

The commissioning of climate risk assessments prior to investment is also a form of risk management. For example, for one of our investment companies developing fibre networks in coastal areas in the US, the impacts of climate change were analysed. The assessment looked at not just the physical hazards in the location, but how this might affect the local population (in terms of migration) and consequently the demand for fibre in households. This is an example of how climate risk can influence revenue estimates, and underscores the importance of integrating findings into risk management practices.

In terms of the more recent climate risk assessment completed for TRIG's portfolio, the findings informed the DNSH test under the EU Taxonomy. Material exposures identified within the assessment were analysed in light of initiatives currently taking place at the project level, in order to ascertain whether they were/are proportionate to the risks identified. TRIG's Operations Manager has since begun conversations with portfolio companies that were found to be unaligned with the EU Taxonomy requirements, to identify solutions to better manage material climate risk and achieve alignment.

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

(1) Describe your process

As per the response provided to A).

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

As per the response provided to A).

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

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

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

☒ **(A) Exposure to physical risk**

(1) Indicate whether this metric or variable was used and disclosed, including the methodology

- ☐ (1) Metric or variable used
- ☐ (2) Metric or variable used and disclosed

☒ **(3) Metric or variable used and disclosed, including methodology**

(2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

<https://www.hicl.com/wp-content/uploads/2023/05/HICL-Annual-Report-2023.pdf>

☒ **(B) Exposure to transition risk**

(1) Indicate whether this metric or variable was used and disclosed, including the methodology

- ☐ (1) Metric or variable used
- ☐ (2) Metric or variable used and disclosed

☒ **(3) Metric or variable used and disclosed, including methodology**

(2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

<https://www.trig-ltd.com/wp-content/uploads/2023/05/TRIG-2023-Sustainability-Report.pdf>

☐ (C) Internal carbon price

☒ **(D) Total carbon emissions**

(1) Indicate whether this metric or variable was used and disclosed, including the methodology

- ☐ (1) Metric or variable used
- ☒ **(2) Metric or variable used and disclosed**
- ☐ (3) Metric or variable used and disclosed, including methodology

(2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

☒ **(E) Weighted average carbon intensity**

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

<https://www.hicl.com/wp-content/uploads/2023/05/HICL-Sustainability-Report-2023.pdf>

☒ **(F) Avoided emissions**

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

<https://www.trig-ltd.com/wp-content/uploads/2023/05/TRIG-2023-Sustainability-Report.pdf>

- ☐ (G) Implied Temperature Rise (ITR)
- ☐ (H) Non-ITR measure of portfolio alignment with UNFCCC Paris Agreement goals
- ☐ (I) Proportion of assets or other business activities aligned with climate-related opportunities
- ☐ (J) Other metrics or variables
 - (K) Our organisation did not use or disclose any climate risk metrics or variables affecting our investments during the reporting year

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

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

☒ **(A) Scope 1 emissions**

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

<https://www.hicl.com/wp-content/uploads/2023/05/HICL-Sustainability-Report-2023.pdf>
<https://www.trig-ltd.com/wp-content/uploads/2023/05/TRIG-2023-Sustainability-Report.pdf>
<https://www.ircp.com/wp-content/uploads/2023/06/InfraRed-Sustainability-Report-2023-3.pdf>

☒ **(B) Scope 2 emissions**

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

(2) Provide links to the disclosed metric and methodology, as applicable

<https://www.hicl.com/wp-content/uploads/2023/05/HICL-Sustainability-Report-2023.pdf>

<https://www.trig-ltd.com/wp-content/uploads/2023/05/TRIG-2023-Sustainability-Report.pdf>

<https://www.ircp.com/wp-content/uploads/2023/06/InfraRed-Sustainability-Report-2023-3.pdf>

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

(1) Indicate whether this metric was disclosed, including the methodology

☒ **(1) Metric disclosed**

☐ (2) Metric and methodology disclosed

(2) Provide links to the disclosed metric and methodology, as applicable

<https://www.hicl.com/wp-content/uploads/2023/05/HICL-Sustainability-Report-2023.pdf>

<https://www.trig-ltd.com/wp-content/uploads/2023/05/TRIG-2023-Sustainability-Report.pdf>

<https://www.ircp.com/wp-content/uploads/2023/06/InfraRed-Sustainability-Report-2023-3.pdf>

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

SUSTAINABILITY OUTCOMES

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

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

☒ **(A) Yes, we have identified one or more specific sustainability outcomes connected to our investment activities**

☐ (B) No, we have not yet identified the sustainability outcomes connected to any of our investment activities

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

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

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

☒ **(B) The UNFCCC Paris Agreement**

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

- ☐ (D) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
 - ☒ **(E) The EU Taxonomy**
 - ☐ (F) Other relevant taxonomies
 - ☐ (G) The International Bill of Human Rights
 - ☐ (H) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
 - ☐ (I) The Convention on Biological Diversity
 - ☐ (J) Other international framework(s)
 - ☐ (K) Other regional framework(s)
 - ☒ **(L) Other sectoral/issue-specific framework(s)**
- Specify:

PRI's Human Rights Risks a practical guide in due diligence

- (M) Our organisation did not use any widely recognised frameworks to identify the intended and unintended sustainability outcomes connected to its investment activities

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

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

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

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

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

- ☒ **(A) Yes, we have taken action on some of the specific sustainability outcomes connected to our investment activities**
- (B) No, we have not yet taken action on any specific sustainability outcomes connected to our investment activities

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

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

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

HUMAN RIGHTS

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

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

- ☒ (A) We assessed the human rights context of our potential and/or existing investments and projected how this could connect our organisation to negative human rights outcomes

Explain how these activities were conducted:

It is InfraRed's belief that decarbonisation should not come at the cost of fundamental human rights. As a result, InfraRed has worked to tighten its due diligence processes to reduce the risk that the company indirectly supports these practices. This includes scrutinising the relevant policies and management practices of suppliers to ensure they align with internationally recognised standards and best practices.

An example of how these investment processes are implemented in practices is TRIG, which InfraRed is Investment Manager to, acquisition of four development solar PV sites in Spain.

Given the concerns in the solar industry, InfraRed completed thorough due diligence on the key parties in the supply chain of the solar panels. This involves reviewing policies such as codes of conduct, engaging with procurement teams and specialist consultants. Where possible, InfraRed conducted on-site tracing of components to factories and locations used in the development of the panels. The supply chain was also monitored throughout the construction period.

- ☐ (B) We assessed whether individuals at risk or already affected might be at heightened risk of harm

☒ **(C) We consulted with individuals and groups who were at risk or already affected, their representatives and/or other relevant stakeholders such as human rights experts**

Explain how these activities were conducted:

To support its due diligence on the Project Cadiz transaction described in response to A), InfraRed engaged a specialist human rights adviser as well as engaging with relevant stakeholders in the solar industry as well as its business partners.

☐ (D) We took other steps to assess and manage the actual and potentially negative outcomes for people connected to our investment activities

○ (E) We did not identify and take action on the actual and potentially negative outcomes for people connected to any of our investment activities during the reporting year

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

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

☒ **(A) Workers**

Sector(s) for which each stakeholder group was included

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

☒ **(B) Communities**

Sector(s) for which each stakeholder group was included

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

☒ **(C) Customers and end-users**

Sector(s) for which each stakeholder group was included

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

- ☐ (11) Real estate
- ☐ (D) Other stakeholder groups

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

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

☒ **(A) Corporate disclosures**

Provide further detail on how your organisation used these information sources:

InfraRed undertakes counterparty and sustainability searches to inform its sustainability due diligence, particularly in relation to assessing human rights risks. This includes reviewing material that the counterparty releases directly on their website, as well as reviewing information, news items and reports available in the public domain. To assist this processes, InfraRed also uses various reference databases such as Refinitiv World-Check.

☒ **(B) Media reports**

Provide further detail on how your organisation used these information sources:

As per A).

☒ **(C) Reports and other information from NGOs and human rights institutions**

Provide further detail on how your organisation used these information sources:

As per A).

☐ (D) Country reports, for example, by multilateral institutions, e.g. OECD, World Bank

☒ **(E) Data provider scores or benchmarks**

Provide further detail on how your organisation used these information sources:

As per A).

☒ **(F) Human rights violation alerts**

Provide further detail on how your organisation used these information sources:

As per A).

☐ (G) Sell-side research

☐ (H) Investor networks or other investors

☐ (I) Information provided directly by affected stakeholders or their representatives

☐ (J) Social media analysis

☐ (K) Other

INFRASTRUCTURE (INF)

POLICY

INVESTMENT GUIDELINES

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

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

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

FUNDRAISING

COMMITMENTS TO INVESTORS

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

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

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

PRE-INVESTMENT

MATERIALITY ANALYSIS

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

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

- ☒ (A) We assessed ESG materiality at the asset level, as each case is unique
 - Select from dropdown list
 - ☒ (1) for all of our potential infrastructure investments
 - ☐ (2) for a majority of our potential infrastructure investments
 - ☐ (3) for a minority of our potential infrastructure investments
 - ☐ (B) We performed a mix of industry-level and asset-level ESG materiality analyses
 - ☐ (C) We assessed ESG materiality at the industry level only
 - ☐ (D) We did not conduct ESG materiality analysis for our potential infrastructure investments

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

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

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

DUE DILIGENCE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 4	CORE	OO 21	N/A	PUBLIC	Due diligence	1

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

☒ **(A) Material ESG factors were used to identify risks**

Select from dropdown list

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

☒ **(B) Material ESG factors were discussed by the investment committee (or equivalent)**

Select from dropdown list

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

☒ **(C) Material ESG factors were used to identify remedial actions for our 100-day plans (or equivalent)**

Select from dropdown list

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

☒ **(D) Material ESG factors were used to identify opportunities for value creation**

Select from dropdown list

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

☒ **(E) Material ESG factors informed our decision to abandon potential investments in the due diligence phase in cases where ESG risks were considered too high to mitigate**

Select from dropdown list

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

☒ **(F) Material ESG factors impacted investments in terms of the price offered and/or paid**

Select from dropdown list

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

☐ **(G) Material ESG factors did not influence the selection of our infrastructure investments**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 5	CORE	OO 21	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 infrastructure investments?

☒ (A) We conduct a high-level or desktop review against an ESG checklist for initial red flags

Select from dropdown list

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

☒ (B) We send detailed ESG questionnaires to target assets

Select from dropdown list

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

☒ (C) We hire third-party consultants to do technical due diligence on specific material ESG factors

Select from dropdown list

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

☐ (D) We conduct site visits

☒ (E) We conduct in-depth interviews with management and/or personnel

Select from dropdown list

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

☐ (F) We conduct detailed external stakeholder analyses and/or engagement

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

Select from dropdown list

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

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

Select from dropdown list

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

☐ (I) Other

- ☐ (J) We do not conduct due diligence on material ESG factors for potential infrastructure investments

SELECTION, APPOINTMENT AND MONITORING OF THIRD-PARTY OPERATORS

SELECTION PROCESS OF THIRD-PARTY OPERATORS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 6	CORE	OO 21, OO 30	N/A	PUBLIC	Selection process of third-party operators	1, 4

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

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

APPOINTMENT PROCESS OF THIRD-PARTY OPERATORS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 7	CORE	OO 21, OO 30	N/A	PUBLIC	Appointment process of third-party operators	1, 4

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

- ☒ (A) We set clear and detailed expectations for incorporating material ESG factors into all relevant elements of infrastructure asset management
 - Select from dropdown list
 - ☒ (1) for all of our third-party operators
 - ☐ (2) for a majority of our third-party operators
 - ☐ (3) for a minority of our third-party operators
- ☒ (B) We set clear ESG reporting requirements
 - Select from dropdown list
 - ☒ (1) for all of our third-party operators
 - ☐ (2) for a majority of our third-party operators
 - ☐ (3) for a minority of our third-party operators
- ☒ (C) We set clear targets for material ESG factors
 - Select from dropdown list
 - ☒ (1) for all of our third-party operators
 - ☐ (2) for a majority of our third-party operators
 - ☐ (3) for a minority of our third-party operators
- ☐ (D) We set incentives related to targets on material ESG factors
- ☐ (E) Other
- ☐ (F) We did not include material ESG factors when appointing third-party operators

MONITORING PROCESS OF THIRD-PARTY OPERATORS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 8	CORE	OO 21, OO 30	N/A	PUBLIC	Monitoring process of third-party operators	1, 4

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

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

POST-INVESTMENT

MONITORING

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

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

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

Percentage of infrastructure assets this applies to:

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

☒ (5) >95%

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

Percentage of infrastructure assets this applies to:

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

☒ (5) >95%

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

Percentage of infrastructure assets this applies to:

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

☒ (5) >95%

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

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

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

(A) ESG KPI #1

GHG Emissions

(B) ESG KPI #2

Energy consumption

(C) ESG KPI #3

Water and waste reduction initiatives

(D) ESG KPI #4

Biodiversity impacts

(E) ESG KPI #5

Independent H&S inspections

(F) ESG KPI #6

Financial spend on ESG initiatives

(G) ESG KPI #7

Board gender diversity

(H) ESG KPI #8

Existence of key policies such as cyber security, business continuity, health & safety, modern slavery, conflicts of interest and diversity & inclusion

(I) ESG KPI #9

(J) ESG KPI #10

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

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

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

Select from dropdown list

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

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

Select from dropdown list

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

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

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

Select from dropdown list

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

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

Select from dropdown list

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

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

Select from dropdown list

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

☒ (G) We develop minimum health and safety standards

Select from dropdown list

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

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

Select from dropdown list

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

☐ (I) Other

- ☐ (J) We do not have processes in place to help meet our targets on material ESG factors for our infrastructure investments

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

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

(A) Process one

InfraRed set net zero targets in November 2022; which were developed in line with the Net Zero Investment Framework methodology and verified by Net Zero Asset Managers. InfraRed has since undertaken a number of measures to support the delivery of these targets. This includes:

1. GHG measurement

Given that many of InfraRed's portfolio companies are commencing their net zero journeys, InfraRed elected to focus on engaging with the portfolio companies on improving the measurement of GHG emissions. As a result of these engagement activities, InfraRed saw the number of portfolio companies which responded to its 2022 GHG emissions questionnaire increased to 98%, which was a significant step up from a 75% response rate in the previous year. These efforts also led to improvements in data granularity, thanks to ongoing dialogue led by InfraRed's Asset Management team, as well as discussions held during InfraRed's bi-annual ESG summit with portfolio company management teams. As a result of this exercise, InfraRed has identified a number of useful findings that will frame its on-going engagement strategy to support the achievement of the net zero targets. For example, InfraRed found that a significant proportion of energy used is not sourced from renewable energy. For that reason, InfraRed is putting in place processes to engage with more portfolio companies to utilise green energy contracts or on-site renewable generation.

2. IPA Net Zero Working Group

In addition to direct engagement with its portfolio companies, InfraRed also participated in a number of industry-wide collaborations to support the progression of net zero related initiatives within the industry. One of these included the Infrastructure and Projects Net Zero Working Group, a government-led initiative focused on public-private collaboration to create and share net zero solutions. InfraRed have been an active member of this group since March 2022, working to address the challenges associated with PFI/PPP projects in the UK. To date the group has made encouraging progress on a number of initiatives, including developing a streamlined GHG emission data collection process, sharing examples of effective GHG reduction initiatives and developing guidance for decarbonisation of operational PFI projects.

(B) Process two

Portfolio Impact

The objective of InfraRed's portfolio impact strategy is to help to drive positive social outcomes and to improve the relationships between InfraRed and public and private sector clients. Through better understanding of the challenges communities face through feedback, InfraRed is able to refine its impact initiatives to address the needs of stakeholders either at a portfolio level or a project level. InfraRed assesses how it can respond to its clients and tailor initiatives based on various touchpoints on multiple levels, such as its Client Insight Survey.

In 2022, InfraRed developed its Client Insights Survey, originally introduced post-Covid to understand how best to support our stakeholders in those challenging times. The survey is designed to capture the social challenges and satisfaction of the client teams that lead our healthcare and education infrastructure projects. Insights collected enable InfraRed to develop more targeted and scalable impact initiatives that provide positive outcomes for its clients and the communities with access to the assets under management. The survey focuses on six key questions: three are in relation to capturing information on social challenges faced by the client and its end-users, whilst the other three relate to client satisfaction in relation to the portfolio company's performance. InfraRed incentivised its clients by offering a £500 donation to a charity of their choice on completion of the survey. As a result, InfraRed more than tripled the response rate from the 2021 Client Insights Survey and donated over £30,000 to causes nominated by its clients.

InfraRed saw key themes emerge from the 66 responses received which has informed the company's thinking and subsequent creation of initiatives that it can scale across its portfolio. For example, a clear message from the Client Insights Survey was that the cost-of-living crisis has tightened budgets and aggravated staffing constraints. For example, a fifth of respondents explicitly mentioned 'costs' and 'funding' as a challenge to operations. As a result, InfraRed is designing solutions with its clients and partners that reduce budget pressures and improve operational efficiency. Further examples of this can be seen in InfraRed's 2023 Sustainability Report.

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

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

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

Select from dropdown list

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

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

Select from dropdown list

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

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

Select from dropdown list

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

☐ (D) Other

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

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 12	PLUS	OO 21	N/A	PUBLIC	Monitoring	1, 2

Describe how you ensure that material ESG risks are adequately addressed in the infrastructure investments where you hold a minority stake.

InfraRed is committed to adopting the same approach to sustainability for all its assets under management, including the management of ESG risks, irrespective of equity ownership. However, in the event that InfraRed holds a minority stake in a project, it would look to utilise the following mechanisms in order to fulfil its wider sustainability requirements:

- As part of its pre-investment processes, InfraRed shares its sustainability requirements with the target entity and its co-shareholders so that they are aware of InfraRed's expectations in relation to ESG. This includes defining the reporting framework with the target entity so that InfraRed can actively monitor its ESG performance. InfraRed also conducts due diligence on its co-shareholder to ensure their approach to sustainability aligns with that of InfraRed's.
- Ideally, InfraRed would look to secure a Board seat on the project so that it can leverage governance rights and engage directly with the management team and co-shareholders on sustainability issues.
- More broadly, InfraRed would proactively engage with its co-shareholders on a regular and ad-hoc basis so that all parties are aware of any material ESG risks and that the necessary steps are being put in place to manage these risks appropriately.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 13	PLUS	OO 21	N/A	PUBLIC	Monitoring	2

Describe how your ESG action plans are defined, implemented and monitored throughout the investment period.

InfraRed employs a comprehensive sustainability investment and management framework, based on a foundation of robust guiding principles, ensuring that sustainability is integrated into each stage of the investment process. The framework spans the pre-investment activities, through to the management of the portfolio and corresponding reporting activities undertaken until the end of the investment life. The key components of each stage are outlined in InfraRed's Sustainability Policy.

Pre-investment

When evaluating a new investment opportunity, InfraRed's Origination & Execution team are required to complete sustainability due diligence on the project with support from the Sustainability team. This due diligence considers the material sustainability risks and opportunities relevant to the sector in general, and also to the target entity more specifically. The teams assess the extent to which the project is already addressing the risks and opportunities. The due diligence also assesses the quality of the target's ESG policies and processes against InfraRed's sustainability requirements. Any gaps and/or areas of improvement are included in a sustainability action plan to be implemented post-investment which is documented in the Investment Paper approved by the Investment Committee. The sustainability action plan is then incorporated into a '100 day plan' which is handed over to the InfraRed Asset Manager. The Asset Manager then oversees and engages the portfolio company on the implementation of this plan.

Post-investment

Active Asset Management

Active management, stewardship and engagement initiatives are essential in fulfilling our duties as a responsible long-term asset manager. Post-investment, InfraRed ensures the delivery of ESG action plans through a number of channels.

InfraRed's Asset Managers sit on the boards of portfolio companies and regularly raise ESG issues at board meetings. ESG activities are also incorporated into regular Board reporting. This includes discussing current performance, sustainability objectives and targets, as well as sharing best practices and lessons learnt from InfraRed's wider portfolio. InfraRed's Asset Managers take an active approach to ensure that the InfraRed policy requirements, including policies governing sustainability, anti-bribery, cyber security, modern slavery, and health and safety are being met and implemented at all times. This is achieved by engaging with stakeholders through site visits, ad hoc and regular meetings, and bi-annual ESG summits.

InfraRed has an online platform through which all portfolio companies are required to complete an annual ESG survey. This portal enables the company's performance to be measured against a set of 75+ KPIs. The survey in essence is an annual review of sustainability performance, enabling InfraRed to create an action plan for areas to improve in the following year.

The ESG survey is updated annually to reflect best practice and regulatory requirements; for example the survey was updated to incorporate the Principal Adverse Impact Indicators ("PAII") mandated by the EU's Sustainable Finance Disclosure Regulation ("SFDR").

InfraRed also requires portfolio companies to submit a Greenhouse Gas ("GHG") Emissions Questionnaire to obtain the required data to estimate and monitor GHG impacts. Indicators tracked by the ESG survey and the GHG Emissions Questionnaire include but are not limited to:

- (i) energy consumption;
- (ii) the use of finite natural resources such as gas and water;
- (iii) the volume of hazardous and non-recyclable waste;
- (iv) management of resource use and reduction initiatives;
- (v) systemic climate risk;
- (vi) financial spend on ESG initiatives;
- (vii) key social initiatives implemented and planned;
- (viii) alignment of ESG initiatives with InfraRed's four strategic priorities;
- (ix) policies on cyber security, diversity & inclusion, anti-bribery and anti-corruption; and
- (x) implementation of and compliance with international frameworks.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 14	CORE	OO 21	INF 14.1	PUBLIC	Monitoring	1, 2

How do you ensure that adequate ESG-related competence exists at the asset level?

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

Select from dropdown list

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

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

Select from dropdown list

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

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

Select from dropdown list

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

☐ (D) We provide training on ESG aspects and management best practices relevant to the asset to employees (excl. C-suite executives)

☒ (E) We support the asset by finding external ESG expertise, e.g. consultants or auditors

Select from dropdown list

☐ (1) for all of our infrastructure investments

☒ (2) for a majority of our infrastructure investments

☐ (3) for a minority of our infrastructure investments

☒ (F) We share best practices across assets, e.g. educational sessions and the implementation of environmental and social management systems

Select from dropdown list

☒ (1) for all of our infrastructure investments

☐ (2) for a majority of our infrastructure investments

☐ (3) for a minority of our infrastructure investments

☒ (G) We apply penalties or incentives to improve ESG performance in management remuneration schemes

Select from dropdown list

☐ (1) for all of our infrastructure investments

☐ (2) for a majority of our infrastructure investments

☒ (3) for a minority of our infrastructure investments

☐ (H) Other

☐ (I) We do not ensure that adequate ESG-related competence exists at the asset level

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

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

(A) Initiative one

As highlighted above, InfraRed first commenced measuring the GHG emissions of its portfolio companies in 2021. Following this initiative, InfraRed has since been engaging with its portfolio companies to encourage them to measure their own GHG emissions directly. An example of this is InfraRed's investment in Deutsche GigaNetz (DGN), a German-based fibre network provider established in 2020. DGN has enhanced its focus on measuring its GHG impact and on identifying key levers through which it can reduce its emissions as it expands its fibre roll-out. The following provides insight into this initiative from DGN's perspective.

DGN's approach to GHG Emissions Inventory

DGN is aware that there is a growing desire from our investors such as InfraRed to reduce carbon footprint associated with the portfolio company's activities and the first step to doing so is understanding where the emissions come from. DGN began this process with a series of interviews with its staff to understand all activities undertaken in the company. As a result, DGN learnt that 99% of its emissions relate to Scope 3. This insight will frame its decarbonisation plan, focusing on engaging with current suppliers and being selective with new ones, based on sustainability credentials.

Another important learning from this exercise is that GHG reduction is a long process, and while data may not be complete now, DGN are taking measures to ensure that accuracy will improve going forward. For example, DGN have discussed formulating a supplier engagement strategy with the head of its Technical Department and have come up with a questionnaire for new suppliers, touching on, for example, whether they have sustainability goals concerning waste reduction. Ultimately, as DGN get more confident in its emissions data, with the support of InfraRed and other stakeholders, DGN hope to set science-based targets underpinned by a formal decarbonisation plan. This plan will take into consideration the company's objective of reducing emissions whilst also achieving our fast-growing business plan. As a first concrete step, DGN are planning a new generation of Point of Presence (PoP) connections and regional technical centres with all the necessary technical equipment to operate a fibre-to-the-home (FTTH) network. Smart meters within these will allow the accurate measurement of power consumption, making it possible to optimise air conditioning systems and reduce energy consumption.

(B) Initiative two

InfraRed has developed a series of ESG and climate change related guidance documents with input from the Sustainability, Asset Management and Origination and Execution teams, as well as external consultants where required. These documents are shared with portfolio companies with a view to empowering management teams to implement initiatives.

InfraRed also hosts ESG summits on a bi-annual basis for portfolio company management teams, covering key themes such as social impact, net zero and resource consumption. InfraRed also created a forum with key Management Service Providers ("MSPs") to share best practice in ESG initiatives and measurement. ESG case studies are also recognised and disseminated via these forums.

InfraRed also hosts the Creating Better Future Awards, an initiative set up to recognise portfolio companies that have implemented exemplary initiatives relating to ESG. The case studies submitted by portfolio companies are evaluated based on evidence that awareness has been created, that measurable results were achieved from an impact perspective, and the ability for the initiative to be replicated at scale. 36 initiatives were submitted for the 2022 calendar year and 13 received the Gold Standard. By recognising and celebrating excellence, we expect that the portfolio companies will be encouraged to launch a greater number of quality ESG projects.

STAKEHOLDER ENGAGEMENT

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

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

Pre-investment

As part of our pre-investment processes, InfraRed's Origination & Execution team are required to undertake due diligence on the project. This due diligence would identify the relevant stakeholders which need to be engaged prior to investment approval such as the portfolio company's management team, supply chain or co-shareholders. As a minimum, the Origination & Execution team engage with the target management team to understand their approach to sustainability as well as the key initiatives they are focussed on in the short and medium term. As part of this discussion, InfraRed would also communicate its sustainability requirements to the portfolio company management team and any co-shareholders. By doing so, InfraRed aims to align all parties' sustainability objectives in respect of the investment.

Some more specific stakeholder engagement conducted during due diligence of potential investments include:

- In 2022 InfraRed acquired the Vancouver Island Ferry Company which operate a newly established ferry service between downtown Vancouver and Nanaino, Canada. As part of this process, the Origination & Execution and Sustainability teams engaged with the portfolio company management team on key sustainability aspects including sustainable fuel sourcing, biodiversity impact management and partnership with Canada's First Nations in employment and contracting
- As part of InfraRed's due diligence of a newly constructed solar farm, the InfraRed Sustainability team engaged with the solar development and construction company to understand their supplier engagement and due diligence processes, with a particular focus on human rights issues.

Post-investment

InfraRed seeks to actively engage with its clients, service provider's and other key stakeholders to coordinate approaches and align views to maximise the performance of its assets under management. InfraRed has implemented several internal and external tools to enhance the quality and efficiency of engagement activities. An example of this is the stakeholder mapping tool developed by the Asset Management Team to promote strategic engagement at the asset level. This tool identifies key project stakeholders, their relevant level of authority and interest and the strength of relationships between the various stakeholders. The results are then used to establish communication channels which can be used to resolve project-related issues prior to enforcing contractual measures. This tool ensures a systematic approach to stakeholder engagement is implemented across all our assets. The tool is used both internally, and externally by InfraRed's management service providers.

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

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

☒ (A) Our firm's high-level commitment to responsible investment, e.g. that we are a PRI signatory

Select from dropdown list

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

☒ (B) A description of what industry and asset class standards our firm aligns with, e.g. TCFD or GRESB

Select from dropdown list

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

☒ (C) Our firm's responsible investment policy (at minimum, a summary of key aspects and firm-specific approach)

Select from dropdown list

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

☐ (D) Our firm's ESG risk assessment methodology (topics covered in-house and/or with external support)

☐ (E) The outcome of our latest ESG risk assessment on the asset or portfolio company

☒ (F) Key ESG performance data on the asset or portfolio company being sold

Select from dropdown list

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

☐ (G) Other

☐ (H) No responsible investment information was shared with potential buyers of infrastructure investments during the reporting year

☐ (I) Not applicable; we had no sales process (or control over the sales process) during the reporting year

DISCLOSURE OF ESG PORTFOLIO INFORMATION

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

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

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

SUSTAINABILITY OUTCOMES (SO)

SETTING TARGETS AND TRACKING PROGRESS

SETTING TARGETS ON SUSTAINABILITY OUTCOMES

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

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

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

(2) Classification of sustainability outcome

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

(3) Sustainability outcome name

InfraRed is the Investment Manager of TRIG, which has assessed its EU Taxonomy alignment.

(4) Number of targets set for this outcome

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

☒ (B) Sustainability outcome #2

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

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

(2) Classification of sustainability outcome

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

(3) Sustainability outcome name

NZAM AUM Commitment

(4) Number of targets set for this outcome

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

☒ (C) Sustainability outcome #3

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

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

(2) Classification of sustainability outcome

☒ (1) Environmental

☐ (2) Social

☐ (3) Governance-related

☐ (4) Other

(3) Sustainability outcome name

NZAM Climate Solutions

(4) Number of targets set for this outcome

☐ (1) No target

☒ (2) One target

☐ (3) Two or more targets

☒ (D) Sustainability outcome #4

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

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

☒ (2) The UNFCCC Paris Agreement

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

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

☐ (5) The EU Taxonomy

☐ (6) Other relevant taxonomies

☐ (7) The International Bill of Human Rights

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

☐ (9) The Convention on Biological Diversity

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

(2) Classification of sustainability outcome

☒ (1) Environmental

☐ (2) Social

☐ (3) Governance-related

☐ (4) Other

(3) Sustainability outcome name

NZAM Climate Engagement

(4) Number of targets set for this outcome

☐ (1) No target

☒ (2) One target

☐ (3) Two or more targets

☐ (E) Sustainability outcome #5

☐ (F) Sustainability outcome #6

☐ (G) Sustainability outcome #7

☐ (H) Sustainability outcome #8

☐ (I) Sustainability outcome #9

☐ (J) Sustainability outcome #10

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

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

(B1) Sustainability Outcome #2: Target details

(B1) Sustainability Outcome #2:	NZAM AUM Commitment
(1) Target name	NZAM AUM commitment
(2) Baseline year	2021
(3) Target to be met by	2030
(4) Methodology	InfraRed's chosen methodology is the Paris-aligned Investment Initiative's (PAII) Net Zero Investment Framework (NZIF) for Infrastructure. A portfolio coverage target, defined by the NZIF for Infrastructure, is the percentage of assets under management that will be net zero, aligned or aligning by a given year. To be considered aligning, an asset must have short and medium term targets that are underpinned by science based pathways for its sector; it must disclose all material scope emissions (including scope 3) and evidence the governance of net zero plans. The requirements of aligned have a greater focus on implementation. The asset must have forecast emissions performance against targets set as well as have a decarbonisation strategy to support the reduction projection. To be considered net zero, actual emissions must match or outperform the science-based decarbonisation pathway.
(5) Metric used (if relevant)	% of AUM managed in line with net zero
(6) Absolute or intensity-based (if relevant)	
(7) Baseline level or amount (if relevant):	8% of AUM as at 31/12/2021
(8) Target level or amount (if relevant)	70% of AUM to be net zero, aligned, or aligning by 2030

(9) Percentage of total AUM covered in your baseline year for target setting 83%

(10) Do you also have a longer-term target for this? (1) Yes

(C1) Sustainability Outcome #3: Target details

(C1) Sustainability Outcome #3: NZAM Climate Solutions

(1) Target name NZAM Climate Solutions

(2) Baseline year 2021

(3) Target to be met by 2025

(4) Methodology

InfraRed's chosen methodology is the Paris-aligned Investment Initiative's (PAII) Net Zero Investment Framework (NZIF) for Infrastructure.

InfraRed define investments in climate solutions as renewable energy, battery storage and other supporting infrastructure for the energy transition. Climate solutions classifications are informed by the EU Taxonomy. We note the following:

- evolvments in the Taxonomy or other industry guidance on the definition of climate solutions, such as the work being completed by IIGCC, may lead to certain projects being reclassified, and our baseline may need to be revised to reflect such changes;
- this target is also dependent on fundraising activities which is dependent on market conditions and attractiveness of the asset class

(5) Metric used (if relevant) % of AUM in climate solutions

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

(7) Baseline level or amount (if relevant): 45%

(8) Target level or amount (if relevant) 50%

(9) Percentage of total AUM covered in your baseline year for target setting 83%

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

(2) No

(D1) Sustainability Outcome #4: Target details

(D1) Sustainability Outcome #4: NZAM Climate Engagement

(1) Target name NZAM Climate Engagement

(2) Baseline year 2021

(3) Target to be met by 2030

(4) Methodology InfraRed's chosen methodology is the Paris-aligned Investment Initiative's (PAII) Net Zero Investment Framework (NZIF) for Infrastructure. Whilst InfraRed can evidence the number of channels through which the company currently engages with its portfolio companies and clients on a regular and ad-hoc basis, we have not formally tracked engagement as a metric to date, hence, InfraRed have set its baseline as 0%.

(5) Metric used (if relevant) % of financed emissions in material sectors are subject to direct or collective engagement and stewardship actions

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

(7) Baseline level or amount (if relevant): 0%

(8) Target level or amount (if relevant) 90%

(9) Percentage of total AUM covered in your baseline year for target setting 83%

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

(2) No

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

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

	(1) Target name	(2) Long-term target to be met by	(3) Long-term target level or amount (if relevant)
(B1) Sustainability Outcome #2: NZAM AUM Commitment	NZAM AUM commitment	2050	The expectation is that the proportion of assets under management covered by the target will grow over time until all assets are included, ultimately reaching 100% aligned or net zero by 2040.

FOCUS: SETTING NET-ZERO TARGETS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 3	PLUS	SO 1	Multiple, see guidance	PUBLIC	Focus: Setting net-zero targets	General

If relevant to your organisation, you can opt-in to provide further details on your net-zero targets.

- ☐ (A) Yes, we would like to provide further details on our organisation's asset class-specific net-zero targets
- ☐ (B) Yes, we would like to provide further details on our organisation's net-zero targets for high-emitting sectors
- ☐ (C) Yes, we would like to provide further details on our organisation's mandate or fund-specific net-zero targets
- ☒ (D) No, we would not like to provide further details on our organisation's asset class, high-emitting sectors or mandate or fund-specific net-zero targets
 - ☐ (E) No, our organisation does not have any asset class, high-emitting sectors or mandate or fund-specific net-zero targets

TRACKING PROGRESS AGAINST TARGETS

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

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

(B1) Sustainability outcome #2:

(B1) Sustainability outcome #2: NZAM AUM Commitment

Target name: NZAM AUM commitment

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

(C1) Sustainability outcome #3:

(C1) Sustainability outcome #3: NZAM Climate Solutions

Target name: NZAM Climate Solutions

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

(D1) Sustainability outcome #4:

(D1) Sustainability outcome #4: NZAM Climate Engagement

Target name: NZAM Climate Engagement

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

(1) Yes

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

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

(B1) Sustainability Outcome #2: Target details

(B1) Sustainability Outcome #2:	NZAM AUM Commitment
(1) Target name	NZAM AUM commitment
(2) Target to be met by	2030
(3) Metric used (if relevant)	% of AUM managed in line with net zero
(4) Current level or amount (if relevant)	As InfraRed's net zero targets were set in November 2022, InfraRed will report its progress against this target for the period ending 31 December 2023. This will be incorporated in InfraRed's annual sustainability report which will be published in May 2024. For further information please see attached InfraRed's Net Zero Progress Report and its latest Sustainability Report available on the website.
(5) Other qualitative or quantitative progress	<p>InfraRed has begun incorporating the operational asset requirements into pre-investment assessment to understand where a portfolio company is on its journey prior to acquisition. InfraRed also use its ESG survey to understand the progress of its existing assets. The pre-investment assessment and survey results are then used inform the key actions to be implemented for each portfolio company, such as the requirement to complete a decarbonisation plan.</p> <p>For example, InfraRed's most recent found that over two-thirds of portfolio companies by valuation have implemented a decarbonisation initiative and discussed net zero with its subcontractors, however less than half of the management teams have considered a net zero strategy.</p>

Hence, InfraRed is working on a number of initiatives that will help support portfolio companies to progress on their net zero journeys. These include:

- supporting portfolio companies to measure GHG emissions for 2022 CY and assess their performance against sector pathways
- providing guidance to all portfolio companies on key steps to take to develop and implement decarbonisation plans
- identifying key portfolio companies (based on valuation and quantum of emissions) to engage with directly to implement decarbonisation plans
- updating guidance for new investments to require GHG emissions and decarbonisation plans to be completed within appropriate timeframes post-investment.

Since 2014, InfraRed have captured ESG metrics via our annual ESG survey. Released to all portfolio companies directly managed by InfraRed, the survey is updated annually to enhance the monitoring and reporting of each portfolio company's sustainability performance. This year, questions were updated to reflect the requirements of the NZIF framework, for example did the portfolio company have net zero targets in place or a decarbonisation plan, and if not, were they intending to do so in the next 12 months. InfraRed have used the survey output to understand net zero progress and to identify where additional support may be needed.

(6) Methodology for tracking progress

(C1) Sustainability Outcome #3: Target details

(C1) Sustainability Outcome #3: NZAM Climate Solutions

(1) Target name NZAM Climate Solutions

(2) Target to be met by 2025

(3) Metric used (if relevant) % of AUM in climate solutions

(4) Current level or amount (if relevant) As InfraRed's net zero targets were set in November 2022, InfraRed will report its progress against this target for the period ending 31 December 2023. This will be incorporated in InfraRed's annual sustainability report which will be published in May 2024. For further information please see attached InfraRed's Net Zero Progress Report and its latest Sustainability Report available on the website.

(5) Other qualitative or quantitative progress	<p>As investors in long-term, high quality infrastructure that serves essential community needs, sustainability has always been part of InfraRed's DNA. In today's world, long-term sustainability trends are increasingly informing future infrastructure needs, and we are evolving our strategy to respond to this shift. Three key themes we are increasingly focusing on are: energy transition, connecting communities and circular economy.</p> <p>InfraRed has been looking to deliver on this target by continuing to invest in the energy transition and exploring opportunities in circular waste management, district heating networks, sustainable biogas, and green hydrogen. In 2022, InfraRed committed a further US\$1.7 billion in energy transition assets. A more recent example of this is InfraRed's latest investment is in electric vehicle infrastructure in Germany, where in May 2023 it committed financing to roll out thousands of chargers across Europe.</p>
(6) Methodology for tracking progress	<p>InfraRed undertakes an assessment to determine which assets in its portfolio can be classified as climate solutions as described above. InfraRed continues to monitor developments in terms of standardising an industry definition of climate solutions.</p>
(D1) Sustainability Outcome #4: Target details	
(D1) Sustainability Outcome #4:	NZAM Climate Engagement
(1) Target name	NZAM Climate Engagement
(2) Target to be met by	2030
(3) Metric used (if relevant)	% of financed emissions in material sectors are subject to direct or collective engagement and stewardship actions
(4) Current level or amount (if relevant)	<p>As InfraRed's net zero targets were set in November 2022, InfraRed will report its progress against this target for the period ending 31 December 2023. This will be incorporated in InfraRed's annual sustainability report which will be published in May 2024. For further information please see attached InfraRed's Net Zero Progress Report and its latest Sustainability Report available on the website.</p>
(5) Other qualitative or quantitative progress	<p>At the heart of InfraRed's strategy to reach net zero lies engagement with our public sector clients, management teams and other key stakeholders. Active engagement helps InfraRed to more effectively address a broad range of climate change-related matters, such as impact measurement, initiatives to reduce GHG emissions and measures to improve climate resilience.</p>

A major focus of InfraRed's engagement strategy over the last year was to:

- ▲ Proactively engage with portfolio companies to expand GHG emissions data collection and strengthen disclosure, particularly on scope 3 emissions
- ▲ Adapt engagement approach based on the materiality of emissions and levels of operational control
- ▲ Develop a structured process to track and report on engagement levels, and periodically report on this progress

As highlighted in earlier responses, InfraRed has progressed well in collecting GHG emissions data from its portfolio companies, having placed this exercise at the core of our engagement activity over the past year. InfraRed are proud to report that 98% of our portfolio companies responded to our GHG emissions questionnaire this year, a significant step up from a 75% response rate in 2021. These efforts have also led to improvements in data granularity, thanks to ongoing dialogue led by InfraRed Asset Management team, as well as discussions held during InfraRed's bi-annual ESG summit with portfolio company management teams. As a result of this GHG estimation exercise, there are several findings that have, and will continue to, framed our engagement strategy. For example

InfraRed found that a sizeable proportion of energy used is not sourced directly from renewable energy. InfraRed's objective therefore will be to engage more portfolio companies to utilise green energy contracts or on-site renewable generation.

(6) Methodology for tracking progress

As noted above, InfraRed's ESG survey is a central way by which we track progress. This year, questions were updated to reflect the requirements of the NZIF framework and allow us to understand the level of engagement led by project company management teams with their stakeholders – for example, public sector clients, facilities management providers and the supply chain.

With specific reference to GHG emissions monitoring, collecting business activity data annually (via GHG questionnaire), alongside key intensity metrics such as energy output or sqm of building, allows InfraRed to track emissions performance on a year-by-year basis. We also rank the emissions intensities across the portfolio in a given year on a sectoral basis to gain better insight on the better / worst performers.

INDIVIDUAL AND COLLABORATIVE INVESTOR ACTION ON OUTCOMES

LEVERS USED TO TAKE ACTION ON SUSTAINABILITY OUTCOMES

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

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

- ☒ (A) Stewardship with investees, including engagement, (proxy) voting, and direct influence with privately held assets
 Select from drop down list:
☒ (1) Individually
☒ (2) With other investors or stakeholders
☐ (B) Stewardship: engagement with external investment managers
☐ (C) Stewardship: engagement with policy makers
☐ (D) Stewardship: engagement with other key stakeholders
☒ (E) Capital allocation
☐ (F) Our organisation did not use any of the above levers to take action on sustainability outcomes during the reporting year

CAPITAL ALLOCATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 6	PLUS	SO 5	N/A	PUBLIC	Capital allocation	1

During the reporting year, how did your organisation use capital allocation to take action on sustainability outcomes, including to prevent and mitigate actual and potential negative outcomes?

(A) Across all sustainability outcomes

(1) Capital allocation activities used	(2) Sector allocation
(2) Explain through an example	<p data-bbox="558 331 1468 506">Infrastructure investments have the power to drive systemic change, leading to long-term reductions in emissions by transforming the way we produce and consume energy, transport people and goods, and use natural resources. For example, investing in sustainable biogas can displace fossil fuels in hard-to-abate sectors, while electric vehicle charging points or electrified rail help reduce emissions from transportation, a significant source of emissions globally.</p> <p data-bbox="558 541 1446 653">InfraRed's Origination and Execution team has been looking to deliver on InfraRed's NZAM Climate Solutions target by continuing to invest in the energy transition and exploring opportunities in circular waste management, district heating networks, sustainable biogas, and green hydrogen.</p> <p data-bbox="558 688 1471 768">Investing in climate solutions, particularly greenfield projects, can have a greater impact than decarbonising InfraRed's portfolio because it fundamentally addresses the root causes of greenhouse gas emissions.</p> <p data-bbox="558 804 1414 856">An example of a recent investment with strong sustainability outcomes is outlined below.</p> <p data-bbox="558 921 678 949">Jolt Energy</p> <p data-bbox="558 953 1463 1157">For several years, InfraRed has been assessing opportunities to invest in companies which are supporting the decarbonisation of the transport sector through installing additional electric vehicle (EV) charging points. With the recent EU mandate stating that from 2035, all cars must be zero emissions, InfraRed has made a timely investment in Jolt Energy, a company specialising in ultra-fast chargers for EVs in urban areas in Germany. InfraRed's commitment will allow Jolt to expand its business and deploy thousands of chargers.</p> <p data-bbox="558 1192 1438 1272">Jolt's advanced technology, which is up to 15 times faster than current charging stations, is bridging the gap between the era of internal combustion engines and an electrified future.</p>

(B) Sustainability Outcome #1:

(B) Sustainability Outcome #1:	InfraRed is the Investment Manager of TRIG, which has assessed its EU Taxonomy alignment.
(1) Capital allocation activities used	

(2) Explain through an example

(C) Sustainability Outcome #2:

(C) Sustainability Outcome #2: NZAM AUM Commitment

(1) Capital allocation activities
used

(2) Explain through an example

(D) Sustainability Outcome #3:

(D) Sustainability Outcome #3: NZAM Climate Solutions

(1) Capital allocation activities
used

(2) Explain through an example

(E) Sustainability Outcome #4:

(E) Sustainability Outcome #4: NZAM Climate Engagement

(1) Capital allocation activities
used

(2) Explain through an example

STEWARDSHIP WITH INVESTEEES

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

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

(A) Across all sustainability outcomes

(1) Describe your approach	<p>InfraRed is actively engaged on a wide range of climate change aspects, such as data collection, GHG reduction initiatives and climate resilience measures. InfraRed does this:</p> <ul style="list-style-type: none"> ▲ Directly, when the InfraRed Asset Manager attends Board meetings and 1-1 meetings with clients, in which they engage on net zero initiatives and decarbonisation feasibility/strategy studies, social impact initiatives, diversity and inclusion etc. ▲ Indirectly, through industry working groups, workshops, and presentations with our portfolio company management teams. InfraRed also issue guidance documents on, for example, interpreting climate risk assessments and sourcing data for emissions calculations. <p>Wherever possible, InfraRed looks to engage and align with its co-shareholders to help support a consistent approach to sustainability for the portfolio company and all its shareholders.</p>
(2) Stewardship tools or activities used	<p>(1) Engagement</p> <p>(5) Leveraging roles on the board or board committees (e.g. nomination committees)</p> <p>(6) Taking roles on investee boards</p> <p>(7) Working directly with portfolio companies and/or real asset management teams</p> <p>(9) Other</p>
(3) Example	<p>InfraRed first commenced measuring the GHG emissions of its portfolio companies in 2021. Following this initiative, InfraRed has since been engaging with its portfolio companies to encourage them to measure their own GHG emissions directly. An example of this is InfraRed's investment in Deutsche GigaNetz (DGN), a German-based fibre network provider established in 2020. DGN has enhanced its focus on measuring its GHG impact and on identifying key levers through which it can reduce its emissions as it expands its fibre roll-out. The following provides insight into this initiative from DGN's perspective.</p>

DGN's approach to GHG Emissions Inventory

DGN is aware that there is a growing desire from our investors such as InfraRed to reduce carbon footprint associated with the portfolio company's activities and the first step to doing so is understanding where the emissions come from. DGN began this process with a series of interviews with its staff to understand all activities undertaken in the company. As a result, DGN learnt that 99% of its emissions relate to Scope 3. This insight will frame its decarbonisation plan, focusing on engaging with current suppliers and being selective with new ones, based on sustainability credentials. Another important learning from this exercise is that GHG reduction is a long process, and while data may not be complete now, DGN are taking measures to ensure that accuracy will improve going forward. For example, DGN have discussed formulating a supplier engagement strategy with the head of its Technical Department and have come up with a questionnaire for new suppliers, touching on, for example, whether they have sustainability goals concerning waste reduction. Ultimately, as DGN gets more confident in its emissions data, with the support of InfraRed and other stakeholders, DGN hopes to set science-based targets underpinned by a formal decarbonisation plan. This plan will take into consideration the company's objective of reducing emissions whilst also achieving our fast-growing business plan. As a first concrete step, DGN are planning a new generation of Point of Presence (PoP) connections and regional technical centres with all the necessary technical equipment to operate a fibre-to-the-home (FTTH) network. Smart meters within these will allow the accurate measurement of power consumption, making it possible to optimise air conditioning systems and reduce energy consumption.

(B) Sustainability Outcome #1:

(B) Sustainability Outcome #1:

InfraRed is the Investment Manager of TRIG, which has assessed its EU Taxonomy alignment.

(1) Describe your approach

(2) Stewardship tools or activities used

(3) Example

(C) Sustainability Outcome #2:

(C) Sustainability Outcome #2:

NZAM AUM Commitment

(1) Describe your approach

(2) Stewardship tools or activities used

(3) Example

(D) Sustainability Outcome #3:

(D) Sustainability Outcome #3: NZAM Climate Solutions

(1) Describe your approach

(2) Stewardship tools or activities used

(3) Example

(E) Sustainability Outcome #4:

(E) Sustainability Outcome #4: NZAM Climate Engagement

(1) Describe your approach

(2) Stewardship tools or activities used

(3) Example

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

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

- ☒ **(A) We prioritise the most strategically important companies in our portfolio.**
Describe how you do this:

Whilst InfraRed prioritises the material emitters in its portfolio as highlighted in the response to B) below, InfraRed does also take into consideration factors such as equity ownership and operational control when developing its net zero engagement strategy. For example, when selecting portfolio companies to prioritise for decarbonisation strategies, InfraRed prioritised investments where we had a 100% equity ownership.

More importantly, InfraRed's engagement strategy also takes into consideration its level of operational control. Many of InfraRed's portfolio companies are in Public Finance Initiative (PFI) / Public Private Partnership (PPP) projects. InfraRed, via its portfolio companies, is responsible for developing and maintaining the infrastructure asset, for example, a hospital or school, so that our client can provide the essential services within it, e.g., treating patients and teaching students.

Rather than the operation, the portfolio company is typically responsible for the maintenance and lifecycle services of equipment providing heating, cooling and lighting. The provision of these services must be performed in accordance with rigid terms and fixed-price legal contracts, many of which were executed over 20 years ago. This makes it difficult to overcome the complexities of net zero.

Contract structures lead to a lack of operational control irrespective of the equity ownership which is why client engagement forms a vital component of our approach to net zero. In addition, InfraRed is actively engaging with public authorities, such as the Infrastructure and Projects Authority (IPA) net zero working group which is facilitating public and private collaboration to address the net zero challenges for PFI/PPP projects in the UK.

Select from the list:

- ☒ 2
- ☐ 4

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

Describe how you do this:

As highlighted above, InfraRed has recently completed the GHG emissions inventory for 2022. This inventory helps to identify the material emitters within InfraRed's portfolio which will be prioritised in terms of InfraRed's net zero engagement activities. For example, the emissions inventory informed the key portfolio companies InfraRed was going to engage with directly and develop and implement decarbonisation plans.

Select from the list:

- ☒ 1
- ☐ 4

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

Describe how you do this:

As highlighted above, InfraRed's is actively leveraging the mechanisms highlighted in A) and B) to inform its net zero strategy. However, InfraRed is mindful of its overall net zero commitments which relate to most of its portfolio. Hence, InfraRed continues to engage with portfolio companies via board meetings as well as implementing portfolio-wide net zero initiatives such as webinars, guidance materials to support management teams to progress on their net zero journeys.

Select from the list:

- ☒ 3
- ☐ 4

☐ (D) Other

STEWARDSHIP: COLLABORATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 13	PLUS	SO 5	N/A	PUBLIC	Stewardship: Collaboration	2

During the reporting year, to which collaborative initiatives did your organisation contribute to take action on sustainability outcomes, including preventing and mitigating actual and potential negative outcomes?

(A) Initiative #1

(1) Name of the initiative	IPA Net Zero Working Group
(2) Indicate how your organisation contributed to this collaborative initiative	<p>(B) We acted as a collaborating investor in one or more focus entities (e.g. investee companies)</p> <p>(C) We publicly endorsed the initiative</p> <p>(E) We supported the coordination of the initiative (e.g. facilitating group meetings) or provided other administrative support</p> <p>(G) We were part of an advisory committee or similar</p> <p>(H) We contributed to the development of the initiative's materials and/or resources (e.g. co-authored a report)</p>
(3) Provide further detail on your participation in this collaborative initiative	<p>In addition to direct engagement with its portfolio companies, InfraRed also participated in a number of industry-wide collaborations to support the progression of net zero related initiatives within the industry. One of these included the Infrastructure and Projects Net Zero Working Group, a government-led initiative focused on public-private collaboration to create and share net zero solutions. InfraRed have been an active member of this group since March 2022, working to address the challenges associated with PFI/PPP projects in the UK. To date the group has made encouraging progress on a number of initiatives, including developing a streamlined GHG emission data collection process, sharing examples of effective GHG reduction initiatives and developing guidance for decarbonisation of operational PFI projects.</p>

(B) Initiative #2

(1) Name of the initiative

(2) Indicate how your organisation contributed to this collaborative initiative

(3) Provide further detail on your participation in this collaborative initiative

(C) Initiative #3

(1) Name of the initiative

(2) Indicate how your organisation contributed to this collaborative initiative

(3) Provide further detail on your participation in this collaborative initiative

(D) Initiative #4

(1) Name of the initiative

(2) Indicate how your organisation contributed to this collaborative initiative

(3) Provide further detail on your participation in this collaborative initiative

CONFIDENCE-BUILDING MEASURES (CBM)

CONFIDENCE-BUILDING MEASURES

APPROACH TO CONFIDENCE-BUILDING MEASURES

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

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

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

INTERNAL REVIEW

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

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

- ☒ (A) Board, trustees, or equivalent
 - Sections of PRI report reviewed
 - ☒ (1) the entire report
 - ☐ (2) selected sections of the report
- ☒ (B) Senior executive-level staff, investment committee, head of department, or equivalent
 - Sections of PRI report reviewed
 - ☒ (1) the entire report
 - ☐ (2) selected sections of the report

- (C) None of the above internal roles reviewed selected sections or the entirety of the responses submitted in our PRI report this year