

Sustainability Policy

Last reviewed: December 2025

Effective from: January 2026



About InfraRed

InfraRed Capital Partners Limited (“InfraRed” or “we”) is an international infrastructure investment manager. We invest in essential infrastructure that is critical to the functioning of societies and economies - from digital, energy and social infrastructure to transport and utilities.

InfraRed manages US\$13bn¹ of equity capital for investors around the globe, in listed and private funds across both core and value-add strategies. As a firm we combine a global reach, operating worldwide from offices in London, New York, Madrid, Frankfurt, Sydney and Seoul, with deep sector expertise.

Purpose and scope of the Policy

This Sustainability Policy (“Policy”) outlines how InfraRed incorporates material sustainability considerations into our investment and ongoing management processes as well as in our own business operations.

This Policy applies across the investment lifecycle – from initial screening and the due diligence of an investment², through to the operations post-investment, and the exit, hand-back or decommissioning of an asset or a portfolio company.

The Policy applies to InfraRed and all its employees and is implemented to all investment portfolios managed by InfraRed. In certain situations, such as when holding a minority stake or where pre-existing contractual arrangements restrict changes, there may be constraints on InfraRed’s ability to influence sustainability considerations at portfolio company or asset level. Despite these limitations, InfraRed will follow this Policy, wherever feasible.

¹ Uses 5-year average FX as at 30th June 2025 at GBP/USD of 1.2851; EUR/USD 1.1071. EUM is USD 13.217m.

² For the purposes of this Policy, any reference to investments made or considered by InfraRed shall mean investments on behalf of mandates it manages.

Our core sustainability principles

InfraRed aims to achieve compelling investment returns³ from infrastructure that is critical to the functioning of societies and economies. We believe successful investment in infrastructure is more than the physical assets involved—it can achieve positive outcomes for investors where it enables economic growth, connects communities, and enhances quality of life in ways that are often intrinsic and enduring.

In support of that aim and in alignment with our fiduciary duty, we adopt a long-term investment mindset and take a holistic, integrated approach to sustainability, recognising that material sustainability factors can be both sources of value and risk. As part of this approach, we believe that applying a sustainability lens can primarily contribute to or enable four value drivers:

1. Seizing Opportunities	Selectively capitalising on investment opportunities underpinned by megatrends – including decarbonisation, energy security, digitalisation and connectivity, demographic shifts, and circular resource models – that are reshaping economic and social infrastructure today and for the future.
2. Operational Excellence	Delivering infrastructure assets in a smarter, safer, and more sustainable way to optimise performance, reliability, and efficiency throughout the investment lifecycle.
3. Stakeholder Confidence	Actively and responsibly managing the environmental and social aspects of infrastructure assets to reduce risks, amplify positive outcomes for investors and other stakeholders, and secure long-term social license to operate.
4. Long-term Resilience	Building capabilities to withstand, adapt to, and recover from, longer-term disruptions - such as those related to climate change, nature degradation, technological shifts, and evolving societal needs — while unlocking opportunities for innovation and sustainable growth.

Our commitments

Responsible Investment: InfraRed has been a signatory to the Principles of Responsible Investment (“PRI”)⁴ since 2011. As such we are committed to its six principles which we have incorporated in the development and implementation of our approach to sustainability and this Policy.

Paris-aligned Investing: InfraRed has committed to support the goals of the Paris Agreement to limit global warming to well below 2°C and pursue efforts to limit it to 1.5°C above pre-industrial levels, while enhancing climate resilience. This commitment builds on our long-standing capabilities of deploying capital in an expanding universe of attractive opportunities presented by the transition to a lower-carbon, energy-resilient economy. In this context and in line with the Net Zero Investment Framework⁵, InfraRed has set goals⁶ for certain⁷ investment portfolios, where InfraRed has determined to be consistent with their investment mandate, as follows:

- 50% of portfolio (by value) to be invested in climate solutions⁸ by 2025
- 70% of in-scope AUM to be aligning, aligned or net zero by 2030
- 90% of attributable emissions to be subject to engagement and stewardship action by 2030

³ Past performance is not a reliable indicator of future results

⁴ The Principles for Responsible Investment provide a framework for incorporating sustainability issues into investment practice. More information is available on the PRI website: <https://www.unpri.org/?lwr.cachebust=1764173257921>

⁵ Developed by the Paris Aligned Investing Initiative, and its investor networks, with support from other industry stakeholders and recommended for use by both asset owners and asset managers

⁶ In 2025, InfraRed changed its terminology to refer to “goals” instead of “targets”

⁷ In scope AUM includes all funds managed by InfraRed, except for two Value Add funds that are currently being divested. 90% of portfolio by value, as at 31 December 2024, is considered in scope. Note this percentage may fluctuate year-on-year.

⁸ Climate solutions are defined as renewable energy generation, battery storage and other supporting infrastructure for the energy transition, as well as activities aligned with the EU Taxonomy, with substantial contribution to Climate Mitigation.

Thematic lenses and focus on materiality

Our sustainability approach is grounded in the principle of materiality: we prioritise the topics that are most likely to influence long-term value, risk, and resilience.

We generally consider three thematic lenses — **Climate & Nature; Wellbeing, Livelihoods & Inclusion; and Stewardship & Integrity** - that capture the breadth of sectors, geographies and operational models considered by our investment mandates and represented in our existing portfolios. For each thematic lens we have defined a set of guiding aspirations, which are pursued to the extent relevant to each mandate and underlying investments as well as our own business operations.

Climate & Nature

- Capitalising on attractive investment opportunities related to the transition to a lower-carbon, energy-resilient and resource-efficient economy.
- Driving operational performance through decarbonisation, efficient resource use and responsible environmental management.
- Building long-term resilience to climate and nature-related risks to protect asset value.

Wellbeing, Livelihoods & Inclusion

- Delivering safe and reliable infrastructure that supports access to essential services and positive socio-economic outcomes.
- Supporting initiatives that address local stakeholder/community needs.
- Nurturing fair and inclusive employment to drive innovation, productivity and talent retention.

Stewardship & Integrity

- Maintaining high standards of corporate governance and responsible business conduct.
- Upholding ethical practices and integrity in decision-making, including responsible use of emerging technologies, such as Artificial Intelligence ('AI').
- Aligning sustainability priorities with value chain partners to develop resilience and deliver lasting infrastructure outcomes.

Determining materiality

Central to applying this approach as part of our investment and ongoing management processes, is the identification and management of the most pertinent sustainability topics for each investment – i.e. the ones that are most likely to present material risks and / or opportunities. This ensures that our assessments and actions are targeted and aligned with our overarching goal of delivering lasting value to investors and society.

To support this, InfraRed utilizes a proprietary materiality mapping, which was updated at the end of 2025 to draw on the latest industry best practice and standards, and considers, among other things, the sector and operating model characteristics (i.e. workforce, geography, project stages) of specific investments. The mapping is organized in 14 distinct topics (as outlined in the table below) that we have identified as relevant to the breadth of the investment mandates we manage and the existing portfolios' composition. Among these, we consider five topics, indicated with (*), of importance for all infrastructure investments and incorporate them as standard in our pre-investment assessment and ongoing management.

Table 1: Sustainability-related topics considered in determining materiality

Climate & Nature	Wellbeing, Livelihoods & Inclusion	Stewardship & Integrity
Climate change adaptation and ecosystem resilience	Health & safety*	Responsible business conduct and transparency*
Decarbonisation and energy efficiency*	Community wellbeing and development	Corporate governance and risk management*
Circularity and waste management	Customer engagement and welfare	Digital trust and security
Sustainable water management	Talent management & inclusion	Responsible supply chains*
Pollution prevention and control		
Conservation of natural habitats and biodiversity		

The materiality map is supplemented by internal Sustainability Management Guidelines, which support relevant InfraRed teams in assessing the maturity and efficacy of the approach adopted by each investee to managing their material sustainability topics - at the time of initial investment (as part of diligence), during the holding period (monitoring), or, if necessary, in preparation for exit, with a view to demonstrating the advancement during our holding period.

The InfraRed Sustainability Team is responsible for undertaking periodic reviews of these and other internal tools and resources, with input from relevant internal and external stakeholders, to ensure they remain fit for purposes and current.

Sustainability Investment and Management Framework

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 monitoring activities undertaken until the end of the investment life. The key components of each stage are outlined on the following pages.



⁹ This may include, as applicable, the EU Sustainable Finance Disclosure Regulation (SFDR) and the UK Sustainable Disclosure Regulation (SDR), among others

Pre-investment

Screening

At the outset of considering a new investment opportunity, InfraRed conducts screening against its [Exclusion Policy](#). The Exclusion Policy outlines the activities and conduct that InfraRed shall not support or facilitate, with a materiality threshold or altogether, depending on the nature of each investment opportunity. The purpose of such exclusions is to orientate investment activity towards investment themes with *inter alia* lower operational, stranded asset and reputational risks as society's attitudes towards infrastructure evolve.

Due Diligence (DD)

Following negative screening, the Investments Team is expected to complete a more detailed assessment with public searches and counterparty due diligence. This is to confirm there are no sustainability or conduct-related red flags related to the transaction being considered. Where feasible, and relevant, we may also instruct external DD advisors to complete searches with specific focus on the principles outlined in the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, and the IFC Performance Standards on Environmental and Social Sustainability.

As a core step of the due diligence process, the Investments Team, supported by the Sustainability Team, assesses each investment opportunity against a set of material sustainability factors (refer to [Determining materiality](#) above) with a view to identifying pertinent risks and opportunities that should be addressed prior to the Investment Committee making an investment decision or as part of the post-investment action plan. We also endeavour to use quantitative data to assess performance against the identified material sustainability factors, where possible, drawing from a subset of the key metrics that we monitor post investment (refer to [Monitoring](#) section below), such as the Principal Adverse Impact indicators defined within SFDR.

We endeavour to complete a climate-related risk assessment for all new investments, as standard – recognizing the growing impacts of climate-related risks for infrastructure.

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.

Investment Approval and Closing

The due diligence findings and any actions to be implemented post-investment are summarised in the investment paper and submitted to the Investment Committee for consideration and approval. As part of this approval process, the Head of Sustainability also reviews the investment paper and provides sign-off on the sustainability elements of each transaction.

Whilst InfraRed's preference is to proactively engage with the relevant parties to identify solutions to address sustainability-related risks or concerns, we will not proceed with a transaction if we do not believe that there is a satisfactory solution that will bring about mitigation, improvement or resolution to such risks or concerns.

Where appropriate, we may consider the need for securing specific governance or information rights related to sustainability matters and/or sustainability risks being appropriately managed during our investment's life by third party service providers.

Post-investment

Management

Active management, stewardship and engagement initiatives are essential in fulfilling our fiduciary duties. There are a number of ways by which InfraRed seeks to protect and enhance value through sustainability, including:

Active Asset Management and Engagement

Members of InfraRed Asset Management and Investments teams typically sit on the boards of portfolio companies and in discharging their duties as board directors we expect them to seek to ensure that material sustainability risks and opportunities are monitored and appropriately addressed. To that end, they may:

- raise sustainability matters at board meetings at least annually, including the discussion of current performance, sustainability priorities, and sharing best practices, InfraRed conducted analysis and recommendations, as well as lessons learnt from our wider portfolio;
- Recommend that there is senior-level responsibility assigned for sustainability matters within portfolio companies;
- Seek arrangements to ensure that sustainability-risks are documented into portfolio company or asset level risks registers, and that InfraRed standard policies, including policies governing sustainability, anti-bribery, cyber security, and health and safety, are appropriately implemented and adhered to by the management teams running the day-to-day operations of the investment; and
- Recommend the implementation of specific sustainability actions that support the overall business plan. These may include developing robust decarbonization plans, active management of finite and scarce resources, community initiatives and integration of sustainability considerations into procurement decisions.

In determining the approach for each investment, InfraRed initially prioritises the sustainability action plan developed during the [Due Diligence](#) phase, with a view to, over time, develop programmes that ensure an integrated approach to protecting assets, people, and ecosystems while ensuring operational continuity and long-term resilience. In each case, actions are tailored to the specific circumstances of each investment and in support of protecting and enhancing investment returns.

Knowledge Sharing

InfraRed seeks to develop and share relevant guidance documents which can assist portfolio companies in advancing their approaches to managing material sustainability risks and capitalizing on opportunities. We also host sustainability summits for portfolio company management teams, covering key themes such as social impact, decarbonisation and resource consumption. InfraRed also utilises its regular engagement with Management Service Providers (“MSPs”) to share and discuss best practice and implementation of initiatives at scale. Case studies from portfolio companies are often recognised and disseminated via these forums.

Recognising Excellence

InfraRed believes in the importance of recognising portfolio companies that are implementing impactful sustainability initiatives to ensure positive outcomes can be amplified and replicated where relevant by other portfolio companies. We seek to do this in a variety of ways, for example through our annual Creating Better Futures Awards¹⁰ or the publication of dedicated case studies on our website or in our sustainability disclosures.

¹⁰ Further information about the Awards is available at: <https://www.ircp.com/sustainability/creating-better-futures-award/>

Business Continuity and Escalation

InfraRed requires its portfolio companies to have a business continuity plan in place which clearly documents the processes and communication protocol to be enacted in the event of a severe incident. This is monitored annually. Business continuity plans vary depending on the nature of the company and the key stakeholders involved but, in all cases, the general manager or CEO is alerted as soon as practically possible. The general manager or CEO then informs the portfolio company's board of directors which includes InfraRed representative.

The issue is subsequently escalated with the respective Fund Manager and the Investment Committee. Where necessary, the InfraRed Senior Management Team and Sustainability Team are also involved and a rectification plan is developed and implemented. When there is a material adverse event, in line with InfraRed's usual policy, this is communicated to investors as soon as possible following the event.

Monitoring

InfraRed monitors the sustainability performance and management of risks and opportunities across the portfolios it manages via several approaches:

- InfraRed representatives on portfolio company boards regularly review sustainability performance, risk management and compliance with applicable laws, regulations and portfolio company policies and procedures;
- Substantive sustainability-related risk, incidents or developments are typically presented to respective Investment Committees as part of the quarterly portfolio reviews; and
- All portfolio companies that are in construction stage or beyond, where InfraRed is a shareholder on behalf of the mandates it manages, are expected to complete our annual sustainability surveys (see more details below).

InfraRed uses an online platform through which portfolio companies are requested to report data across a set of 100+ quantitative and qualitative metrics, including the primary data necessary for the calculation of greenhouse gas ("GHG") emissions, and regulatory requirements such as the Principal Adverse Impact indicators ("PAII") prescribed under SFDR. This data collection serves as an annual review of sustainability performance, enabling Asset Management and Investments teams to identify and implement initiatives to improve sustainability performance, track progress and monitor any issues going forward with a view to protect and enhance value, including the setting of company-specific KPIs. It also provides broader oversight of the sustainability profile of a portfolio company over and above the regular board reports from the management team. The data collection approach is reviewed annually to reflect emerging investor needs, industry best practice and evolving regulatory requirements.

End of Investment Life

In the event that InfraRed makes a divestment, the Investments Team seeks to be transparent with potential acquirers about the sustainability profile and performance of the business or asset. In addition, the Investments Team completes counterparty searches on potential acquirers to assess their commitment to manage the investment responsibly.

We also endeavour to ensure that sustainability is considered when a project approaches the end of its investment life through hand back arrangements or decommissioning. For example, we seek to effectively manage the expiry of PFI contracts and transition process, ensuring public services continue to be resilient and fit for purpose after it is handed back to public service clients. In respect of decommissioning a project at the end of its useful life, it is important that we also consider the feasibility of applying principles of the circular economy by recycling parts and diverting these from landfill.

Oversight and Governance

InfraRed is committed to high standards of corporate governance, including matters related to sustainability. We maintain a comprehensive set of policies and tailor our decision-making processes to the nature and scale of our business and investments.

Roles and Responsibilities

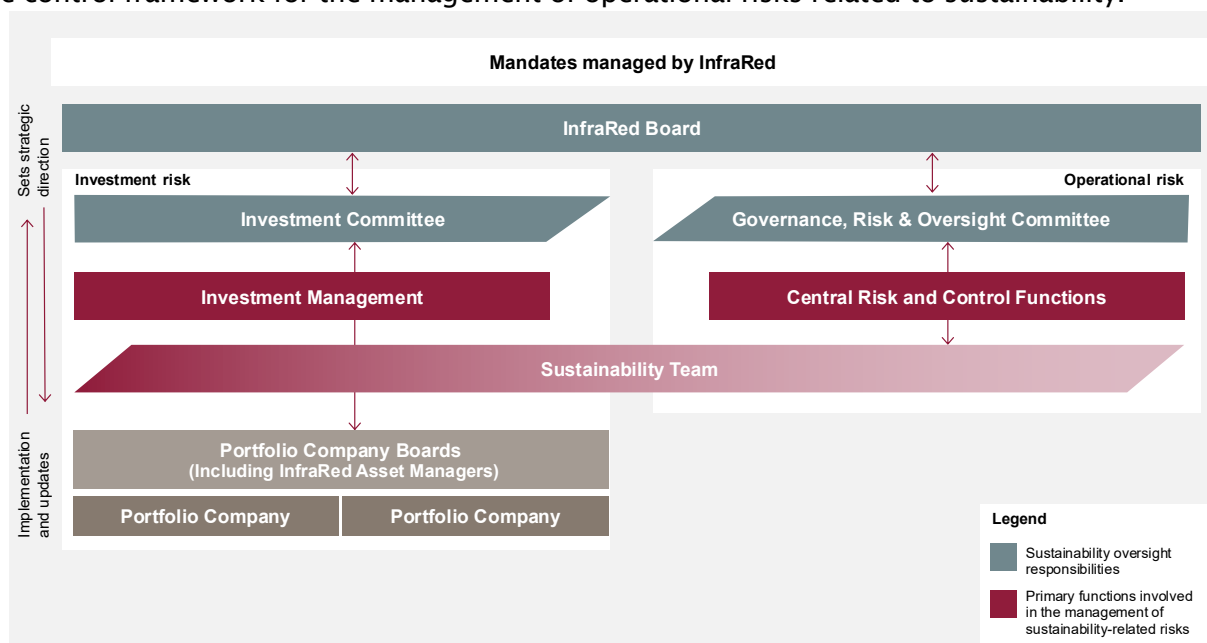
InfraRed's Board sets the strategic direction and considers all material factors, including those relating to sustainability. The Board reviews and approves InfraRed's Sustainability Policy and receives quarterly updates on sustainability matters from the InfraRed's Sustainability Team.

Each mandate's **Investment Committee (IC)** considers sustainability-related risks and opportunities, ensuring that applicable requirements have been followed, such as examining due diligence findings, considering how sustainability factors may affect investment returns and conducting quarterly portfolio reviews.

InfraRed's **Investment Management teams** (Fund Managers and Investments and Asset Management teams) oversee the management of sustainability risks and opportunities from screening through investment approval to ongoing asset management and eventual disposal/decommissioning, with support and guidance from the Sustainability Team. Investment-specific risks and opportunities are timely reported to each mandate's Investment Committee with appropriate mitigation approaches.

The dedicated **Sustainability Team** provides subject matter expertise, sets goals, and implements programmes, working closely with the wider business to integrate sustainability considerations.

Central Risk and Control functions (Legal, Compliance, Operational Risk and Governance) provide the control framework for the management of operational risks related to sustainability.



Sustainability-linked objectives

Sustainability forms part of InfraRed's annual business objective-setting process and as such is integrated into the business. As a result, members of InfraRed's senior leadership may set sustainability-related objectives specific to their responsibilities.

Sustainability Capacity Building

We recognise that the impact of sustainability factors on the economy and our investments is rapidly evolving and that it is important for staff to maintain an appropriate level of awareness and understanding of these factors. As such, we are committed to a culture of ongoing learning and improvement through regular internal training and knowledge sharing in line with our sustainability priorities and emerging developments, such as regulatory changes.

- **On-the job:** On an ongoing basis, the Sustainability Team and the Investments and Asset Management teams work together and exchange views on matters pertinent to specific transactions or projects.
- **Internal training:** InfraRed's Sustainability Team provides training, as needed, to relevant teams within the business. For example, the Sustainability Team hosts an induction for all new joiners, which reinforces, from the very outset, the relevance of sustainability to InfraRed and its activities.
- **Manuals / guidance documents:** The Sustainability Team has developed several internal manuals and guidance documents aimed at ensuring that appropriate standards are systematically upheld into various workstreams.
- **Briefing and updates:** briefs and updates to staff, e.g. via 'lunch and learn' or 'town hall' sessions, are provided periodically to ensure continued sustainability awareness throughout the organisation.
- **External resources:** to the extent relevant and appropriate, InfraRed makes available external resources, such as guidelines, research articles or other materials to staff.

Where relevant and appropriate, InfraRed seeks to utilize technology, such as digital tools and solutions, with a view to enhancing the efficiency of our processes and the quality and robustness of our analysis and deliverables.

Industry collaboration

InfraRed's involvement in the development of international standards, industry guidelines, reporting frameworks, or collaborative initiatives is focused on topics that align with and help advance its sustainability priorities, and the investment objectives of respective mandates managed by InfraRed. With this in mind, InfraRed maintains memberships and engages with a variety of international and regional organisations, including the Principles for Responsible Investment (PRI), the Global Infrastructure Investment Association (GIIA) and Association of Investment Companies (AIC).

Transparency

Reporting

In addition to meeting our regulatory obligations, we believe that transparency around our performance and management of material sustainability-related risks and opportunities is important and supports our investors' needs. We provide our investors and other key stakeholders with an annual update on progress against our sustainability priorities through InfraRed's sustainability report, fund-specific reporting and regulatory disclosures, policies, regulatory statements, and other ad hoc communications.

Key Policies and Publications available on our website include:

- ▲ Anti-Modern Slavery and Human Trafficking Statement
- ▲ InfraRed Sustainability Report, including TCFD
- ▲ PRI Transparency Report
- ▲ PRI Assessment Report

Anti-greenwashing

Further to the introduction of the UK Financial Conduct Authority's ("FCA's") Sustainability Disclosure Requirements and the Anti-greenwashing Rule (ESG 4.3.1 of the FCA Handbook), and in light of similar requirements in other jurisdictions, such as the EU, InfraRed continues to ensure that all its communications are fair, clear and not misleading, and that they are consistent with the sustainability-related characteristics of each of the mandates we manage.

InfraRed will only publish information regarding investments' sustainability-related performance where we have reviewed the relevant evidence available (including when provided as part of the sustainability survey) and satisfied ourselves that this information is clear, proportionate and accurate. Similarly, we will endeavour not to omit or hide relevant information regarding the sustainability performance of our investments. As set out in the [Reporting](#) section, we provide our investors and other key stakeholders with details about progress against our sustainability priorities through InfraRed's annual sustainability reports, fund reporting, policies and other ad hoc communications. Further information, including relevant product level sustainability-related disclosures, is available upon request or in the case of listed funds managed by InfraRed, on their dedicated webpages.

Policy Review

The InfraRed Board is responsible for arranging periodic reviews of this Sustainability Policy to ensure it remains current and fit for purpose.