

# REPORTING ARTICLE 29 LOI ENERGIE CLIMAT

## GLOBAL ESG APPROACH

Sustainability is not an add on in the Manager's investment thesis, but a core aspect of it. InfraVia Capital Partners invests in infrastructure assets with a lifecycle spanning several decades, with the objective of delivering stable and long-term returns to investors. It also invests in, and accelerates high-growth companies supporting the digitalization of infrastructure and the economy. The in-house SDG-focused sustainability framework guides the Manager towards the development of more resilient assets with the view to optimize their performance. The Manager intends to go further in building custom tangible action plans, and in risk assessment by tackling a wider scope of exposure. The Manager aims also to identify long-term development opportunities which should contribute to the sustainability ambition. The Manager seeks to contribute to the creation of long-term profitability, durability and value for investors, public or private sector partners, entrepreneurs, and the communities involved in the projects.

For more information please refer to the Manager's Sustainability Charter, available on its website and currently revised (Q3 2022).

The Manager is committed to implementing its sustainability charter across the investment cycle, from investment selection to divestment. ESG-related considerations are systematically presented in the Investment Committee presentation. If an ESG negative matter is identified at time

of due diligence by the deal team, it does not necessarily mean that the Manager will not invest if it is believed that the matter can be remedied in an appropriate manner. If the Manager determines that this ESG negative matter will remain a critical one and that no proper remedy can be taken, then the Manager will refrain from investing.

The Manager considers, encourages, and promotes environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters ("Sustainability Factors") as part of its investment processes. Even though the Manager endeavors to deploy the ESG approach in a harmonized way across all funds and investments, the AIFs managed are or will be categorised following Sustainable Finance Disclosure Regulation ("SFDR") either:

(i) as meeting the provisions set out in Article 8 for products which promote environmental and social characteristics: two funds representing 4.134 Million EUR of AUM;

(ii) as falling within the scope of Article 6: ten funds representing 5,158 Million EUR of AUM.

The Manager is involved in diverse sustainability-related initiatives and groups:

- Member of the UNPRI since 2018, contributing to the annual rating measuring the implementation of responsible investment strategies. In the latest (2020) evaluation,

the Manager was rated A+ in the Infrastructure module and A in the Strategy & Governance module;

- Member of France Invest' ESG and Climate Change Commissions and working groups;
- Member of the Initiative Climate (iC) International, a global community of private investment firms who seek to better understand and manage the risks and opportunities associated with climate change;
- Member and current Chair of LTIIA (Long Term Infrastructure Investment Association), an organisation of asset owners, participation in issuing practical handbooks on ESG and climate change;
- Alliance Member of SASB (Sustainability Accounting standards Board), which mission is to help connect businesses and investors on the financial impacts of sustainability. Its tools help identify and manage key material topics across the investment cycle;
- Signatory of the Task Force on Climate-related Financial Disclosures (TCFD) Guidelines, on which the Manager bases its climate reporting and assessment.

## INTERNAL RESOURCES

Human: the importance of sustainability is embedded in the investment and entrepreneurship culture of the company and the Manager encourages the entire team to "own" the sustainable approach. The responsibility for overseeing and implementing ESG strategy and policy is under the umbrella and supervision of the CEO and COO. The ESG Manager is responsible for structuring the ESG

approach and building awareness across the team, the Investment team responsible for the pre-investment analyses, and the Asset Management team responsible for the monitoring and reporting during the holding period.

Financial: the ESG Manager annually validates a specific ESG budget with InfraVia Capital Partners' founders. The budget is shared between consulting and expert support on tasks such as ESG due diligences, regulatory watch, external data verification, carbon footprints, EBF assurance reports, etc.; administrative and communication work; annual fees for Memberships; and punctual internal or external events.

Technical: there is a mix of internal and external resources that can be used at different stages of investment. For example the internal ESG Toolbox is dedicated to investments teams to perform screening of ESG priorities and ESG risk mapping during pre-investment. During the holding phase, the Asset Manager & ESG Manager work directly with portfolio companies on their priorities and can, depending on the need, call on specific tools and/or expertise.

## GOVERNANCE

ESG elements are overseen on a regular basis at multiple levels as follows:

- Senior Management and the ESG Manager are in charge of defining ESG strategy & approach;
- The ESG Manager is in charge of leading and coordinating the ESG process across the firm;

- The Investment team, with support from the ESG Manager, is responsible for the pre-investment ESG analysis which is presented at the Investment Committee;
- The Asset Management team, including the ESG Manager, is responsible for ESG post-investment analysis and monitoring;
- Appointed board members (Partner, Investment Director, Asset Manager Director) are responsible for implementing and monitoring ESG matters at the portfolio companies' board level;
- On a case-by-case basis, specific external advisers may also be appointed to assist on specific subjects.

In line with its ambition to promote sustainability factors the Manager has undertaken to take ESG criteria into consideration when assessing the employee's performance. In that respect, qualitative criteria are, depending on the role and function of the employee, determined to assess the employee's performance. These criteria may refer to the quality of ESG analysis, the involvement in the development and monitoring of the ESG action plan, the adherence to the company's sustainability charter.

## ENGAGEMENT STRATEGY

In its current funds, the Manager committed to exclude investing in companies whose principal purpose is to produce/distribute armaments, alcohol, tabaco, gambling, gaming, pornography. Some of the Manager's funds exclude investing in companies that generate more than 20% of their revenues from coal-based activities, including, but not limited to, coal extraction and/or coal power generation and/or electricity via a coal powered plant and/or coal mining activities unless the objective of

the investment is to transition the relevant assets into alternative to coal powered plants.

Throughout the investment cycle the Manager aims to maintain interactions with the management teams of the portfolio companies to follow and promote ESG practices. The Manager intends to share its convictions in the portfolio companies' Supervisory Board and when appropriate disseminate best practices. In addition initiative has been taken for infrastructure companies to annually address ESG during a board aiming to consider extra-financial matters and discuss ESG practices, roadmaps, and performance.

## TAXONOMY MENTION

Please note that the regulatory demands with regards to the European Green Taxonomy have been pushed to 2023. To date, InfraVia Capital Partners worked on calculating its portfolio's eligibility with this Taxonomy, with regards to asset revenues, capex & opex. This analysis covers both Infrastructure and Growth funds. The Manager is also working on calculating its asset alignment after consolidating the 2021 ESG questionnaire data, which included asset-specific questions incorporated this year that were considered necessary to be able to do the calculation. These numbers will be assessed in Q3 by an independent third party to provide critical review & improvements on the tested approach.

## PARIS AGREEMENT ALIGNMENT

The Manager performs an annual carbon footprint for all assets owned by the funds it manages. These are not certified but performed on a high-level basis, with non-audited opera-

tional reported KPIs. In Q3 2022, the Manager intends to have the carbon-related indicators provided by the portfolio companies moderately verified (sample) with an independent third party. This should help improve data reliability and progress on the calculation methodology.

With regards to net zero, before setting a trajectory, the Manager aims to better understand how to integrate the ever-evolving scope of its funds and investments. The Manager has started testing the Science-Based Target (SBT) approach by working to build a trajectory for a targeted sample of its assets. This should help better understand the scope and extensiveness of the exercise.

## BIODIVERSITY ALIGNMENT

For some assets the Manager already identified potential externalities, such as leaks from storage or degradation for green field renewable projects, and has taken steps to assess, monitor, prevent and/or remediate (as the case may be) impacts on surrounding biodiversity. The Manager has opened the discussion with the portfolio companies in 2022 by including SDG target 15.5 relative to habitat degradation, biodiversity and species loss, in the annual ESG questionnaire. This should allow to better understand materiality for assets and their maturity on biodiversity-related matters.

## RISK MANAGEMENT

The Manager recognizes climate change as a transversal material factor for the portfolio companies and its strategy focuses on assessing climate-related risks to improve long-term viability of the investments; and recognizing potential environmental

impacts of assets and deploying, where possible, mitigation. Pre-investment, the Manager internally performs a high-level climate-related risks and opportunities analysis based on the following:

- Direct and indirect physical R&O associated with severe climate events that could damage the infrastructure or specific events such as epidemics or heat waves;
- Regulation R&O that can emerge with new national or European policies designed to support the transition to a lower-carbon economy, more stringent emissions reductions requirements, etc.;
- Technology R&O that entail breakthroughs in innovation with regards to renewables, storage or carbon capture technologies, leading to reduced costs;
- Market R&O associated with changing customers preference, growing trends for less carbon-intensive technologies, value chain localization and monitoring, changes in capacity markets;

Reputational R&O linked to increased expectation on restrictions, high public pressure and scrutiny, and rising expectation from all stakeholders.