VANTAGE INFRASTRUCTURE

ESG AND SUSTAINABLE INVESTMENT POLICY

July 2024

Contents

1. INTRODUCTION

Vantage Infrastructure ("Vantage") is an independent specialist investment manager which provides private market investment opportunities within the infrastructure sector to address global clients' needs and create long term value.

Infrastructure assets are often characterised by their long-term nature, provision of essential services to society, relevance to local communities and relationships with a broad range of stakeholders.

Given these features, Vantage recognises that sustainability and ESG considerations are inextricably linked to the long-term performance, value and reputation of infrastructure investments. As a result, Vantage believes the integration of ESG considerations in the firm's investment, asset management and divestment decision-making, processes and practices to be of paramount importance to deliver outcomes in the best interest of investors and other stakeholders.

Vantage's ESG and sustainability strategy seeks to embed this integration via a common framework applied across its debt and equity businesses and at both manager and investee company levels.

2. PURPOSE AND SCOPE

The purpose of the Vantage ESG and Sustainable Investment Policy (the "Policy") is to set out the ESG philosophy, values and commitments of the Vantage group, that in turn inform Vantage's ESG framework and the firm's active ESG integration approach.

The Policy applies across the entire Vantage business, including all debt and equity products and investments.

The Policy is not intended to detail the Vantage ESG framework and approach, which are set out in separate documents. However, the Policy aims to inform investors, employees, and contractors of Vantage's ESG ethos and to foster a culture of sustainable investing.

3. ESG VALUES AND COMMITMENTS

Vantage's ESG framework and approach are informed by both the firm's internal ESG values and the external commitments it has made to support industry recognised principles.

In the performance of its investment management activities, Vantage has also regard to the ESG policies and principles adopted by its managed clients.

When requested by clients, Vantage can make formal commitments in investment management agreements, fund formation contracts or side letters relating to sustainable investment.

3.1 ESG Values

Vantage has identified and adopted a series of non-negotiable values that shall be applied in its investment and asset management processes and within its business:

- We will always act ethically and honestly, and with integrity, professionalism and transparency;
- We will comply with applicable laws, regulation and permits;
- We will not invest in businesses we consider unethical or socially or environmentally irresponsible;
- We will promote biodiversity preservation, resource efficiency and greenhouse gas emissions reduction;
- We will respect the best interests of local communities and stakeholders impacted by our investments;
- We will not tolerate discrimination and will promote diversity by race, gender, sexual orientation, religion or age; and

- We will not tolerate any form of modern slavery or human trafficking and we, along with our portfolio companies and investments, will treat workforces fairly and with respect, and will provide safe workplaces.

3.2 ESG Commitments

Vantage recognises the benefit of collaboration to both promote ESG interests and ensure that the firm's own approach to ESG remains current and in line with best practice.

Amongst other initiatives, Vantage is a signatory to the UN supported Principles for Responsible Investment ("PRI"), and is pleased to commit to PRI's six Principles for Responsible Investment (the "Principles"):

1. Incorporate ESG issues into investment analysis and decision-making processes;
2. Be active owners and incorporate ESG issues into ownership policies and practices;
3. Seek appropriate disclosure on ESG issues by the entities into which investments are made;
4. Promote acceptance and implementation of the Principles within the investment industry;
5. Work together to enhance effectiveness in implementing the Principles; and
6. Report on activities and progress towards implementing the Principles.

Vantage believes the implementation of these Principles will result in better outcomes for its clients and closer alignment between Vantage and its clients' investment objectives and broader societal objectives.

In addition to a formal commitment to the PRI Principles, Vantage's ESG and sustainable investment philosophy draws from a range of other principles, which inform the firm's broader ESG policy, framework and actions. Most notably, ESG considerations are inspired by:

- The UN Sustainable Development Goals ("SDGs");
- The Ten Principles of the UN Global Compact;
- The Net Zero Asset Managers initiative;
- The Equator Principles;
- The EU Taxonomy;
- The Global Investor Coalition on Climate Change;
- The Taskforce on Climate-Related Financial Disclosures ("TCFD");
- The Taskforce on Nature-Related Financial Disclosures ("TNFD");
- The UK's Good Practice Principles of Biodiversity Net Gain;
- The UK Stewardship Code; and
- International standards and principles on human rights (including the UK's Modern Slavery Act 2015, the UN's Guiding Principles on Business and Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the OECD guidelines on Multinational Enterprises).

In relation to the SDGs, Vantage believes some goals have particular relevance for investments in the infrastructure sector. As a result, Vantage is committed to periodically map and report qualitative contributions of its debt and equity portfolio companies against SDGs.

In relation to climate change, Vantage has made a commitment to the Net Zero Asset Managers initiative to achieve net zero greenhouse gas emissions by 2050 or sooner. It is a TCFD supporter, an investor member of the Institutional Investors Group on Climate Change ("IIGCC") and a signatory of Initiative Climat International ("iCI"). As such, Vantage is committed to assessing and reporting on climate-related risks and opportunities, contributing to the objective of The Paris Agreement to limit global warming, measuring the carbon footprint of its investments and engaging with portfolio companies to reduce their greenhouse gas emissions. Vantage's commitment to combatting climate change as a strategy to underpin the long term financial and environmental performance of its investments is further detailed in its Climate Strategy.

In addition, the Vantage Equity team is committed to benchmarking the ESG credentials of its equity portfolio companies against their peers, and it uses the Global Real Estate Sustainability Benchmark (“GRESB”) at present.

3.3 Exclusions

Vantage's focus on the infrastructure sector naturally avoids many controversial sectors. Nevertheless, for clarity, these exclusions are detailed below, along with specific exclusions that have relevance to infrastructure.

Vantage excludes any investments in companies:

- Involved in the development, manufacture, use, stockpile or trade of any weapons, including, but not limited to, cluster munitions, landmines, chemical or biological weapons, and the military use of nuclear energy;
- Which generate 5% or more of their revenue from tobacco-related goods and services, alcohol, adult entertainment, pornography, gambling and recreational drugs;
- Involved in animal testing or genetically modified organisms (GMO);
- Located in countries or regions where sanctions apply or where there is weak governance or weak rule of law; and
- Identified as being severe violators of UN Global Compact norms.

In relation to the infrastructure sector, Vantage does not finance or invest into companies whose main business is likely to contribute significantly to climate change, such activities include those with revenues deriving:

- From coal or lignite exploration, mining, extraction, distribution or refining;
- From oil and gas exploration and production in Arctic regions, from bituminous sands or from deep sea drilling;
- More than 10% from power generation from coal.

However, Vantage recognises that the phase out of coal-fired energy generation is required to meet the Paris Agreement targets and that there are tangible sustainable benefits in facilitating that transition. Therefore, an exception to this policy may be permitted for companies generating more than 10% of revenues from coal-fired generation at the point of investment, provided that it can be shown the investment will directly accelerate the phase out of coal-fired generation using a quantified and documented pathway that is compliant with science-based targets to meet the goals of the Paris Agreement.

In addition to these exclusions, Vantage does not ordinarily invest in companies that it believes do not conform to the ESG Values and Commitments set out in sections 3.1 and 3.2. It also excludes companies that do not demonstrate the ability or willingness to manage ESG risks, unless Vantage believes it can drive improvement through active asset management.

Furthermore, in the context of “sustainable” products or investments (see section 4.3. for details), wider exclusions and requirements could be taken into account in addition to, or combined with, the aforementioned.

4. ESG INCORPORATION

Vantage seeks to systematically incorporate the above ESG Values and Commitments into its investment processes and within the running of its own business in the ways set out below.

4.1 ESG integration

Vantage has adopted an active ESG integration approach, which spans the entire lifecycle of its managed investments, from the initial evaluation of a transaction, through its onboarding and asset management and finally in any divestment considerations. Its stewardship approach to its assets under management seeks to be active, engaging, thorough, practical, tailored and consistently evolving and it is applied across the entire business. This ESG integration involves the consideration and management of the impact that ESG factors may have on the expected performance of an investment as well as on the wider users and stakeholders of that asset.

To support its ESG integration, Vantage has developed proprietary risk assessment frameworks to consistently identify, evaluate and manage risks and opportunities across the entire life cycle for both debt and equity investments. ESG factors are assessed from a materiality and risk to value perspective. The table below outlines a non-exhaustive list of ESG factors Vantage typically considers as part of its screening, due diligence and asset management activities:

ENVIRONMENTAL FACTORS	SOCIAL FACTORS	GOVERNANCE FACTORS
• Physical risks	• Health & safety and well being	• Ownership & control
• Energy transition	• Employment engagement & working conditions	• Board effectiveness
• Energy usage	• Diversity and inclusion	• Management performance
• Water usage	• Customer satisfaction	• Management alignment
• Waste generation	• Community engagement	• Transparency & disclosure quality
• Resource management	• Stakeholder engagement	• Cybersecurity & data protection
• Biodiversity & habitat protection		

The integration of climate-related factors, both physical risks and transition risks, is further detailed in Vantage's Climate Strategy as contained in its publicly available Sustainability Report.

4.1.1 Client engagement and alignment

Vantage engages with existing and future clients at the outset of its relationship with an investor, and on a regular basis thereafter, to understand their ESG approach and strategic ambitions. This allows Vantage to inform its processes and, for mandates, provide tailored solutions to align with clients' specific requirements.

4.1.2 ESG screening

Vantage's debt and equity teams systematically screen new investment opportunities against the exclusions, commitments and values set out in section 3 and in line with clients' sustainability objectives. For portfolios being managed in line with a net zero commitment, this may include a consideration of an asset's alignment with the portfolio's interim net zero targets. Similarly, for products or portfolios with sustainable investment objectives or environmental and social characteristics, consideration will be given to an asset's compatibility with these criteria.

For equity investments, Vantage typically targets companies with best-in-class ESG practices or with potential to improve ESG performance through its stewardship and active ownership approach. Debt investments will be declined if an asset does not meet the required ESG standards and if management teams are unwilling or unable to improve the asset's ESG profile within an acceptable timeframe.

Vantage completes an initial ESG assessment based on the information available at this early stage and identifies specific ESG due diligence items to prepare for the next phase. Where applicable, Vantage also starts engaging with external consultants and advisers based on any identified ESG scope.

4.1.3 Due diligence

During due diligence, Vantage Debt and Equity teams conduct a comprehensive assessment of the ESG risks and opportunities and their impact on value and pricing, with particular attention on climate change and carbon footprint, through TCFD-informed analysis. Vantage and its consultants review the vendor or issuer diligence materials, attend management presentations and site visits and request additional information on specific risk areas.

When possible, Vantage will attempt to quantify ESG risks by including the known ESG factors in cash flow forecasts or assessing potential valuation impacts through scenario analysis. On the equity side, and where possible, the team aims to assess the feasibility of an existing pathway to net zero or consider the impact of designing one, as part of the due diligence process.

The findings of this due diligence, including material ESG risks, are presented for approval to the respective Debt or Equity Investment Committees and, where applicable, Vantage's clients.

4.1.4 Execution and Onboarding

During the negotiation and execution phase, Vantage's debt team seeks to embed ESG reporting and disclosure covenants into financing documents. Where any ESG or transition risks have been identified which the borrower has committed to addressing, the team will seek appropriate covenants to document the required actions.

For sustainability-linked loans, or similar debt facilities for which ESG KPIs are required to be set, the debt team will work with the borrower and advisers to identify meaningful KPIs and targets, paying regard to the Sustainability Linked Loan Principles. These may be negotiated before or after financial close as appropriate.

Following transaction closing, Vantage's equity team establishes an ownership transition plan and engages with management to address the key actions identified during due diligence, including ESG, and to set strategic objectives. Vantage also ensures, where possible, that management is accountable for ESG and is aligned with those objectives.

4.1.5 Engagement and ongoing review

Vantage recognises the importance of engagement in promoting positive ESG outcomes and good corporate governance. It therefore seeks to build strong relationships with the companies it invests in, and their sponsors and key stakeholders, with a view to encouraging best practice in ESG transparency, sustainable development and social responsibility.

Vantage's equity asset management team does not take a "broad brush" approach to ESG and sustainability management, but instead tailors ambitious ESG action plans by building ESG capacity within its portfolio companies, setting targets, leading initiatives and supporting management on key value drivers, and monitoring and reporting on their ESG performance. Vantage exercises governance rights to influence board and shareholder decision-making, and to achieve outcomes at each business, including ensuring that each company acts consistently with this Policy. The exercise of these governance rights is also governed by Vantage's Corporate Action Policy in line with its delegated powers.

The active ownership approach that Vantage implements encompasses engagement activities with its investee companies. Alignment with management teams on ESG topics constitutes the cornerstone of Vantage's stewardship, which is supported by wider collaboration with portfolio companies' staff and their stakeholders. At times, third-party advisers also support on the assessment and management of ESG risks or activities thus informing and strengthening Vantage's engagement.

A similar approach to stewardship is adopted by Vantage's debt business, which believes that it is possible to improve the ESG outcomes of debt investments both before and after financial close through active engagement with issuers and sponsors.

Vantage's debt team conducts regular engagement with all its portfolio issuers with a view to incrementally improving the availability and quality of ESG data disclosures and improved sustainable outcomes for the asset and its users. ESG disclosures are reviewed to identify topics for further engagement and priority is given to promoting decarbonisation and the setting of science-based net zero targets.

The debt team also actively exercises its rights and responsibilities on behalf of its investors, by ensuring that all requests and voting matters received from its borrowers are assessed and responded to in a timely manner, in line with its Issuer Requests Policy.

Where necessary, the debt team will consider escalation of its engagement priorities to sponsor level. It will also consider use of issuer request and voting processes to escalate its sustainable investment priorities, provided that the creditworthiness of an investment is maintained.

4.1.6 Collaboration

As highlighted in section 3.2, Vantage recognises the value that collective action can have in improving sustainable outcomes both at an individual asset level or at a broader industry level. It therefore prioritises collaborative stewardship efforts where appropriate to do so.
Most commonly, this means collaboration through industry memberships to discuss best practice processes to further sustainable investment topics, both at the manager level and through engagement with investee companies, and to agree standardised approaches to data collection and reporting.

Given the scale of the firm, Vantage does not ordinarily conduct political engagement but may do so where relevant to advance sustainable investment practices, provided that such engagement is conducted via industry collaboration.

4.1.7 Divestment

Vantage manages infrastructure equity investments applying a long-term value creation and resilience strategy. In the event of a divestment, Vantage is committed to report the portfolio company's ESG achievements and performance in the exit documents and, where relevant, consider carrying out ESG vendor due diligence.

4.2 Data sources

As set out in section 4.1.5, Vantage's engagement with its investee companies ensures that direct and continuous communication is in place, which allows its debt and equity teams to keep ESG data up-to-date, track companies' progress and take actions when necessary. ESG data collected may cover the topics listed in section 4.1. above, alongside data required under frameworks such as the TCFD and the EU's Sustainable Finance Disclosure Regulation ("SFDR").

Although Vantage mainly sources ESG data from its investee companies directly and/or through GRESB, further support could come from third-party service providers during the due diligence phase or during the asset management period.

4.3 Sustainable products

In the event Vantage categorises a product or investment as "sustainable", it will do so by referring to the relevant regulatory guidance, such as the framework provided for classifying sustainable investments and products under the SFDR.

4.4 Disclosure

Vantage believes in the discipline of transparency and disclosure and in encouraging investee companies to benchmark ESG performance and improve disclosure of material ESG issues and actions to stakeholders, including through GRESB.

Vantage also endeavours to continuously improve its own communication of ESG and sustainability matters to its clients. The business strives to deliver best-in-class reporting and to engage in regular communication on ESG activities with its clients. As part of its reporting, the debt and equity teams provide their investors with an analysis of ESG risks that apply to each investment.

Vantage is committed to increasing the disclosure of climate-related risks in accordance with the framework devised by the TCFD, while complying with its commitment to NZAM or under the SFDR, where applicable.

In line with the EU SFDR requirements, Vantage uses best efforts to collect data on the principal adverse sustainability impacts of its investment decisions and to make the necessary reporting disclosures in line with the provisions of section 7 of this Policy.

Vantage will publish this Policy and an annual sustainability report on its website.

4.5 Contractors at investee level

Vantage is committed to playing an active role in promoting ESG within its equity portfolio companies, which can in turn further support ESG practices as part of their daily operations.

For Special Purpose Vehicle (SPV) type investments or projects, which do not have or have limited direct employees and rely on outsourcing of a range of functions to contractors, the Vantage equity team will aim to support the selection and management of contractors to ensure alignment with the firm's ESG standards. For all other types of equity investments, the Vantage equity team seeks to promote common ESG standards for contractors and the supply chain.

5. ESG GOVERNANCE

5.1 Accountability

Vantage believes in promoting leadership and accountability to make the implementation of its Policy effective across its own business. Vantage supports the inclusion of ESG and sustainability actions, targets and KPIs both across its business and within portfolio companies.

The Board of Vantage is responsible for setting and overseeing Vantage's ESG strategy and connecting sustainability with its corporate purpose. The Board approves the Policy and monitors its implementation.

The Managing Director, Infrastructure Debt champions ESG and the firm's sustainable investment philosophy, policies and practices. A Senior Partner and Board member of Vantage has formal oversight and accountability for ESG.

In addition, an ESG working group is responsible for the continued development of Vantage's ESG policy, framework, approach and toolkits, all of which are designed to ensure broader ESG accountability, consistent implementation and continuous improvement of processes across the business and at the investee company level.

Vantage debt and equity teams are responsible for identifying and managing ESG risks and opportunities for new and existing investments and reporting them to the relevant investment committee in accordance with the terms of each charter.

Through each of these levels, accountability for ESG is integrated throughout the entire Vantage business and its investment portfolios, with all employees aware of their ESG-related responsibilities.

5.2 Continuous ESG Training and Dialogue

Training is an important part of ensuring that Vantage's employees understand this Policy. Accordingly, Vantage shall conduct ESG training, develop an internal ESG and sustainability culture, and foster an 'ESG dialogue' externally with investee companies, clients, consultants and other stakeholders.

5.3 Managing conflicts of interest

As a specialist provider of infrastructure debt and equity investments to multiple clients, Vantage may find itself in a position where conflicts of interests arise. In order to protect the interests of Vantage's clients and ensure they are treated equitably, Vantage maintains and operates organisational and administrative arrangements such that it can identify, prevent, manage (including disclosure where necessary) and monitor conflicts of interest. These are documented in its Conflict Management Policy.

The Conflict Management Policy ensures that Vantage must take all appropriate steps to prevent or manage conflicts of interest between Vantage and its clients, the debt and equity teams and between individual clients. In particular, Vantage will only invest clients' funds in one part of the capital structure (senior or junior debt or equity but never a combination) of a business, Debt and Equity teams maintain appropriate ethical walls and the two teams will not support different bids or consortia at the same time for the same asset.

6. REVIEW AND COMPLIANCE WITH THIS POLICY

6.1 Policy Review

The Policy is subject to the approval of the Vantage Board and the review and endorsement of the Debt and Equity Investment Committees.

The Policy is subject to review on a biennial basis or as required to ensure that it remains relevant and current.

6.2 Policy Compliance

The Debt and Equity Investment Committees, as appropriate, are responsible for ensuring this Policy is considered by each committee to the extent relevant in all proposed investment decisions.

7. VANTAGE SFDR DISCLOSURES

The EU's Sustainable Finance Disclosure Regulation ("SFDR") came into force in December 2019, with key disclosure requirements applicable from 10 March 2021. The SFDR is a key initiative under the EU's Action Plan for promoting ESG finance that was launched in 2018 and aims to provide investors with the information needed to make informed investment choices based on ESG factors.

Vantage complies with the SFDR because one or more of the following may apply:

- Vantage sees the SFDR as a gold standard for ESG disclosure requirements and therefore has decided to adopt it on a voluntary basis, recognising the importance of promoting positive ESG and sustainability practices;
- Vantage is a UK and US-based fund manager who may market funds into the EU under national private placement regimes ("NPPR"s) and is therefore subject to the SFDR in relation to those funds;
- Vantage is a UK and US-based fund manager that acts as the delegated investment manager to an EU firm which is subject to the SFDR; and
- Vantage is a UK and US-based firm operating funds with an EU structure and is responsible for compliance with the SFDR.

The SFDR applies to *financial market participants*, which include:

- Markets in Financial Instruments Directive ("MiFID") investment firms providing portfolio management services;
- Alternative investment fund managers (AIFMs);

and *financial* advisers, which include:

- An investment firm which provides advice;
- An AIFM which provides investment advice.

The SFDR sets out requirements in relation to the financial products offered by *financial market participants*, which include (not exhaustively):

- Portfolios managed by MiFID managers; and
- AIFs managed by AIFMs.

Vantage, as a MiFID manager providing portfolio management services to segregated accounts and as an AIFM, is subject to disclosure requirements under the SFDR, which are set out below.

As a MiFID firm providing standalone investment advice, Vantage is subject to a more limited set of disclosure requirements under the SFDR, which are set out below.

The SFDR sets out disclosure obligations that apply at both product and entity level (e.g. at both AIF and AIFM level as well as MiFID manager and portfolio service level). Product level disclosures include disclosures that are made to investors, whilst those made at entity level include public disclosures made on the entity's website. The types of disclosures that are required can be broken down into the disclosure of prescribed information:

- On an entity's website;
- In the pre-contractual information for a financial product; and,
- Periodic information provided to investors.

In practice, a pre-contractual disclosure would be included in:

- The AIFMD article 23 or FUND 3.2.2R disclosure or
- The information required to be provided to clients under MiFID Article 24(4), or FCA Rule COBS 2.2A.2R.

The pre-contractual disclosures relevant for Vantage as a MiFID manager and AIFM include the FUND 3.2.2R disclosure in the prospectus or an AIF and regulatory disclosures required under COBS 2.2A.2R made available to managed account and fund clients.

Should Vantage ever be in a position where it delegates elements of portfolio management to another non-EU manager, Vantage would obtain a contractual undertaking from such delegates to provide the firm with all relevant information required to meet its disclosure obligations under SDFR.

7.1 SFDR defined terms

The following defined terms are relevant when considering Vantage's disclosure obligations. These are defined under the SFDR and are summarised below:

- **Sustainable investment** – an investment in an economic activity which:
    - Contributes to an environmental objective or a social objective
    - Does not significantly harm any environmental or social objectives and
    - The investee company follows good governance practices
- **Sustainability risk** – an environmental, social or governance event or condition which, if it occurs, could cause a material negative impact on the value of an investment.
- **Sustainability factors** – environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

7.2 Entity level disclosures under SFDR

At the entity level, *financial market participant* must disclose prescribed information on their websites which include:

Article 3

- Policies on the integration of sustainability risks in the investment decision-making process

Articles 4(1)(a), 4(2), 4(5)(a)

- How principal adverse impacts of investment decisions on sustainability factors are considered

Article 5(1)

- How its remuneration policies are consistent with the integration of sustainability risks (this information must also be provided within firms' remuneration policies)

The entity level requirements apply to the firm at the level of Vantage UK but this Policy along with SFDR requirements are applied across the Vantage group entities wherever possible and appropriate.

7.3 Product level disclosures

At the product level, *financial market participants* are required to disclose:

Article 6(1)(b) and 6(2)(b)

- Information in the pre-contractual disclosures provided to investors, and in periodic reports, about how sustainability risks are integrated into the financial market participant's investment decisions as well as the likely impact of these risks on the returns of the financial product

Article 7(1)(a) and Article 7(1)(b)

- Information in the pre-contractual disclosures provided to investors, and in periodic reports, on whether the financial product considers adverse impacts on sustainability factors, and if so how it does this.

7.4 Comply or explain

Financial market participants may decide not to consider principal adverse impacts on sustainability factors in their SFDR disclosures (both entity and product level disclosures), provided they meet certain prescribed criteria (for example, if they had less than an average of 500 employees during the financial year as at their balance sheet date under Article 4(3) of the SFDR). They may also determine that sustainability risks are not relevant to a particular financial product. However, clear reasons must be provided on a *comply* or *explain* basis.

As a firm, Vantage is committed to considering adverse impacts on sustainability factors in both its entity and product level disclosures and has determined that sustainability risks are relevant to its financial products. As such, Vantage has published on its website initial SFDR disclosures highlighting how principal adverse impacts are captured and integrated into the firm's activities. In addition, the Vantage teams are making progress on voluntary entity-level reporting of principal adverse impacts, which will be made available in due course. Notwithstanding, Vantage will meet any mandatory disclosure requirements under SFDR for specific financial products.

7.5 Sustainable investment product disclosures

For *financial market participants* promoting sustainable investment products, the disclosure requirements differentiate between those products that promote environmental or social characteristics and those products which have an objective to have a positive impact on the environment and society.

Financial products that promote environmental or social characteristics (Article 8 of SFDR)
For financial products that *promote* environmental or social characteristics, where the investee companies follow good governance policies, the disclosure must include information on:

- How those characteristics are met; and
- How any designated index is consistent with those characteristics.

Where applicable Vantage would therefore assess the financial products and funds that are managed to determine whether those are in or out of scope of Article 8 of the SFDR. Financial products can be considered as “promoting environmental or social characteristics” if information provided to clients, marketing communications, or disclosures for investors refer to sustainability factors that are considered before investment by the financial product or fund.

The characteristics of the investee companies that the financial product and/or fund(s) are invested in are reviewed and monitored to ensure that they continue to have good environmental and social credentials, as well as good governance practices. This is integrated into the firm’s business processes, as described elsewhere in this Policy.

Financial products which have sustainable investment as an objective (Article 9 of SFDR)
For financial products that have sustainable investment as an objective and where an index has been designated as a reference benchmark, the disclosure must include:

- Information on how the index is aligned with the objective; and
- An explanation as to why the designated index differs from a broad market index.

For financial products which have sustainable investment as an objective but no index has been designated as a reference benchmark, the disclosure must include an explanation as to how the objective will be met.

Financial products with reductions in carbon emissions as the objective (Article 9(3) of SFDR)
Where a financial product has a reduction in carbon emissions as its objective, the disclosure shall include the objective of low carbon emission exposure with reference to achievement of the long-term global warming objectives of the Paris Agreement.
In addition to the above, under Article 10 of the SFDR financial market participants must also publish on their website, information on:

- A description of the environmental or social characteristics or the sustainable investment objective;
- Methodologies used to assess, measure and monitor the environmental or social characteristics or the impact of the sustainable investments selected for the financial product, including the data sources used;
- Screening criteria for the underlying assets i.e. investee companies and other asset types (i.e. projects or SPVs); and,
- Relevant sustainability indicators for measurement of the environmental or social characteristic or the overall sustainable impact of the financial product.

Wherever applicable Vantage would therefore assess the financial products and funds that are managed to determine whether those are in or out of scope of Article 9 of the SFDR.

Vantage will also publish on its website periodic disclosures for financial products which have sustainable investments or reduction of carbon emissions as its objective, pursuant to Article 11 of the SFDR.

7.6 Review of disclosures

Vantage ensures that any disclosures made, or information published in relation to this Policy are kept up to date. The disclosures are reviewed by the Senior Manager with responsibility for ESG in conjunction with the Compliance Officer for the Vantage group entities.

7.7 Marketing

Article 13 of the SFDR requires Vantage to conduct a general review of its marketing documentation to ensure that they do not contradict the mandatory disclosure requirements under the SFDR. Vantage achieves this by ensuring that all relevant documentation is reviewed as part of its financial promotions approval process, which includes checking to ensure that content does not contradict the firm's SFDR disclosures.