

## Principal Adverse Impact Statement

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### 1. Summary (SFDR RTS L2, Art. 5)

The Sustainable Finance Disclosure Regulation ("SFDR" or "the Regulation") entered into force on 10 March 2021. The Regulation requires asset managers like Asper Investment Management ("Asper") to provide information to investors with regard to the integration of sustainability risks, the consideration of adverse sustainability impacts, the promotion of environmental or social characteristics, and sustainable investment into its investment decisions.

An adverse sustainability impact refers to the negative impact that an investment decision may have on the environment or society. This statement describes how Asper considers the principal adverse impact ("PAI") of Asper's investment decisions on sustainability factors in accordance with Article 4 of the Regulation. We intend to update this statement in accordance with the Regulation and the regulatory technical standards (the "RTS") relating to the Regulation. This statement applies as of 30 February 2021 and will be reviewed at least annually.

### 2. Description of the principal adverse sustainability impacts (SFDR RTS L2, Art. 6)

The RTS identifies a potential list of principal adverse impact indicators that financial market participants will need to report on annually. The tables in Appendix 1 reference the RTS and reflect the mandatory set of indicators we consider and the optional indicators we believe are most relevant to our investment decisions. Asper has taken the necessary steps to gather, monitor and measure the principal adverse impact indicators listed in Appendix 1.

Information on the mandatory and optional adverse impact indicators will be made available in the relevant periodic fund report. The publication of this statement on the principal adverse impact on sustainability factors coincides with the first reference period of 1 January 2022 to 31 December 2022. Reporting over that reference period on the indicators for adverse impact noted in Table 1, and any relevant indicators of Table 2 and 3 of Annex I of the RTS will take place in 2023, following the measurement of the first reference periods.

### 3. Description of policies to identify and prioritise principal adverse sustainability impacts (SFDR RTS L2, Art. 7)

Asper recognises the importance of transparency on sustainability-related disclosures, and we are committed to provide this level of transparency. Our [Responsible Investment Policy](#) addresses how Asper identifies, prioritises and mitigates principal adverse sustainability impacts and indicators, including through our engagement with portfolio companies. For each potential investment, relevant key ESG topics and principal adverse impacts are considered during our ESG due diligence and monitoring processes. Our [Sustainability and Integrated Reports](#) provide further detail and practical examples of our approach.

We believe that good ESG management is a core part of our investment skills, and accordingly, it is an integral part of the responsibilities of our investment team. ESG is integrated throughout Asper's investment research, diligence, decision making and ongoing management processes.

Specifically:

- Asper's Sustainability Committee is responsible for designing, implementing, and monitoring progress against Asper's Sustainability Framework, which reports to the Board on a quarterly basis. The Sustainability Committee meetings are attended by an independent expert on ESG and responsible investment.

- Asper's Platform Management Committee considers the ESG KPIs and activities of each platform on a quarterly basis.
- Asper's Investment Committee discusses and considers the findings of the ESG due diligence process and integrates ESG into decision making.

As part of our broader ESG data collection process, we collect and monitor the selected PAI indicators for all managed assets on a quarterly basis using an internally developed monitoring tool. We do not prioritise one principle adverse sustainable impact over another. In principle, we take the stand that all indicators are equally important.

#### 4. Actions taken or planned in relation to PAI (SFDR RTS L2, Art. 7)

Asper's funds typically invest in a project at planning and development stage, which means that construction, commissioning, and operation all take place under Asper's management. While doing so, Asper pursues each investment in accordance with the Responsible Investment Policy and Asper's Sustainability Framework. We are committed to promoting excellence on ESG topics throughout our funds, including through active engagement with our platforms and our suppliers. Relevant key ESG topics and principal adverse impact considerations are considered during our ESG due diligence and monitoring processes.

Asper has a long history of ESG integration, norms-based exclusions, and ESG-themed engagement. For further information, please refer to our [Responsible Investment Policy](#) and the latest Integrated Report on our website.

#### 5. Engagement policies (SFDR RTS L2, Art. 8)

Asper places a strong emphasis on the active management of its platforms. Transparency on ESG performance is typically achieved through board representation, senior management dialogue, and strong relationships and contractual arrangements with third-party operators. Accordingly, we have board representation on every platform investment to play a direct and active role in monitoring, assessing, and influencing the financial and ESG performance of our funds' investments, and to ensure strong governance.

#### 6. Reference to international standards (SFDR RTS L2, Art. 9)

We adhere to the responsible business conduct codes and international standards detailed on the sustainability page of our website. We ensure that the highest standards of business integrity and transparency are adhered to across the platforms, particularly across the permitting stage (e.g., achieving any permit, licence, or authorisation), through a robust business ethics policy, and by undertaking appropriate checks and transparent process around financial payments. We treat business partners fairly and uphold the highest ethical standards with third parties. Our application of PAI builds on the United Nations Sustainable Development Goals and relevant international conventions and norms, including, but not limited to:

- UN Global Compact
- United Nations Guiding Principles for Business and Human Rights
- International Labour Organization (ILO) Labour Standards

In addition, Asper is a signatory of the UN PRI (Principles for Responsible Investment), Institutional Investors Group on Climate Change (IIGCC) and Taskforce on Climate-Related Financial Disclosures (TCFD) and integrates their respective ESG and climate requirements into its investment strategy. Asper works in close cooperation with international reporting standards, benchmarks, and peers to channel ESG best practices.

#### 7. Historical comparison (SFDR RTS L2, Art. 10)

The earliest historical comparison will be provided in June 2024.

#### Additional information

More information on Asper's Responsible Investment Policy and sustainability framework can be found on <https://www.asper-im.com/>.

#### Change log of document

Date	Version number	Comments/changes
10 March 2021	1.0	Principal Adverse Impact Statement created
30 June 2022	2.0	Further nuanced descriptions on the identification of principal adverse impacts

## Appendix 1: Principal adverse impact indicators

### Climate and other environment related indicators

Adverse sustainability indicator	Metric	Table RTS	Measured
<b>Greenhouse Gas (GHG) emissions</b>	<ul style="list-style-type: none"> <li>Scope 1 GHG emissions</li> <li>Scope 2 GHG emissions</li> <li>Scope 3 GHG emissions (from 1 January 2023)</li> <li>Total GHG emissions</li> </ul>	1	Yes
<b>Carbon footprint</b>	Carbon footprint	1	Yes
<b>GHG intensity of investee companies</b>	GHG intensity of investee companies	1	Yes
<b>Emissions of inorganic pollutants</b>	Tonnes of inorganic pollutants equivalent per million EUR invested, expressed as a weighted average	2	Yes
<b>Emissions of air pollutants</b>	Tonnes of air pollutants equivalent per million EUR invested, expressed as a weighted average	2	Yes
<b>Exposure to companies active in the fossil fuel sector</b>	Share of investments in companies active in the fossil fuel sector	1	Yes
<b>Share of non-renewable energy consumption and production</b>	Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage	1	Yes
<b>Energy consumption intensity per high impact climate sector</b>	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector	1	Yes
<b>Activities negatively affecting biodiversity-sensitive areas</b>	Share of investments in investee companies with sites/ operations located in or near to biodiversity sensitive areas where activities of those investee companies negatively affect those areas	1	Yes
<b>Emissions to water</b>	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	1	Yes
<b>Hazardous waste ratio</b>	Tonnes of hazardous waste generated by investee companies per million EUR invested, expressed as a weighted average	1	Yes

### Social and Employee, Respect for Human Rights, Anti-Corruption and Anti-Bribery Matters

Adverse sustainability indicator	Metric	Table RTS	Measured
Violations of UNGC principles and OECD Guidelines for Multinational Enterprises	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	1	Yes
Lack of processes and compliance mechanisms to monitor compliance with UNGC principles or	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance	1	Yes

OECD Guidelines for Multinational Enterprises	/complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises		
Number of days lost to injuries, accidents, fatalities or illness	Number of workdays lost to injuries, accidents, fatalities or illness of investee companies expressed as a weighted average	3	Yes
Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	1	Yes
Board gender diversity	Average ratio of female to male board members in investee companies	1	Yes
Exposure to controversial weapons	Share of investments in investee companies involved in the manufacture or selling of controversial weapons	1	Yes
Lack of anti-corruption and anti-bribery policies	Share of investments in entities without policies on anti-corruption and antibribery consistent with the United Nations Convention against Corruption	3	Yes
Cases of insufficient action taken to address breaches of standards of anti-corruption and anti-bribery	Share of investments in investee companies with identified insufficiencies in actions taken to address breaches in procedures and standards of anticorruption and anti-bribery	3	Yes
Number of convictions and amount of fines for violation of anti-corruption and anti-bribery laws	Numbers of convictions and amount of fines for violations of anticorruption and anti-bribery laws by investee companies	3	Yes