GCP INFRA

GCP INFRASTRUCTURE INVESTMENTS LIMITED
SUSTAINABILITY POLICY DOCUMENT

ADOPTED BY THE BOARD ON 22 AUGUST 2025

Gravis

Introduction

This document outlines the Sustainability policy adopted by GCP Infra, as the Company seeks to improve its focus and reporting on ESG matters.

Gravis Capital Management Limited is the Investment Adviser to GCP Infra and is committed to integrating consideration of sustainability risks and opportunities within its decision-making process, as it assesses new investments and monitors the existing portfolio on behalf of the Company.

By providing debt to finance a diverse portfolio of infrastructure projects in the UK, the Company has inherent environmental, social, and governance ("ESG") principles, demonstrated through the positive impact of its portfolio on society and on the energy transition. GCP Infra invests in assets that are integral to society, including those which contribute to a greener economy. Accordingly, the Company aligns with certain of the UN's Sustainable Development Goals ("SDGs"), which provide a framework for governments, businesses, and communities to work together for a sustainable future.

Since its IPO in 2010, the Company has delivered long-term, stable returns for investors through its diversified portfolio of long dated investments. The Company's portfolio includes renewable energy assets such as wind, solar, anaerobic digestion, biomass, geothermal and hydro-electric, demonstrating the environmental credentials of the Company. The Company also invests in PFI, including schools and hospitals, along with supported living, which provides accommodation for vulnerable adults. Investing in renewables, PFI and social housing projects indirectly creates job opportunities in supply chains which benefit local communities across the UK. The Company's approach, and the approach adopted by investee companies, to governance and to labour, health and safety has a positive impact on the employees, customers, suppliers, and local communities in which the assets operate.

The Company provides regular, sustained long-term dividend income to investors, whilst simultaneously providing positive environmental and social impacts through its investment portfolio.

Sustainability policy

The Company has implemented the following ESG procedures with its responsible investment practices aligned with the Investment Adviser's Responsible Investment policy.

Screening

<u>Positive screening</u>

Investment management processes positively screen for investments that promote sustainability, align with the Investment Adviser's values and benefit society, in areas such as climate change mitigation and adaptation, energy transition, critical infrastructure, decarbonising transportation, affordable living, social housing, education and healthcare. This screening process encourages the Company's investment in infrastructure that aligns with the UN SDGs and supports the Company's ESG principles.

UN SDGs the Company reported alignment at 30 September 2024

Negative screening

The Company excludes investments which focus on controversial weapons (anti-personnel mines, cluster munitions, chemical / biological weapons, nuclear weapons), alcohol production, gambling, pornography, allow non-medical animal testing, tobacco, coal production and power and nuclear fuel production.

Through its active due diligence and negative screening process, the Company excludes investments with the potential for negative social and environmental externalities in the future, as it focuses on investments that promote the long-term sustainable growth of society.

ESG due diligence

Prior to the approval of a new investment, the Investment Adviser's investment team assess how the investment fares against key relevant ESG criteria and includes an assessment of ESG characteristics in every investment proposal submitted to the Company's Investment Committee for approval. The assessment typically covers ESG-related risks and opportunities, and to the extent applicable, relevant policies and procedures, alignment with industry or investment-specific standards and ratings, and compliance with relevant ESG-related regulation and legislation. This includes an assessment of biodiversity, as well as diversity, equity and inclusion. A climate risk assessment is also conducted for all new investments.

The Investment Adviser has been a signatory to the Principles for Responsible Investment ("PRI") since 2019. The PRI, established in 2006, is a global collaborative network of investors working together to put the six principles of the PRI into practice. The Investment Adviser recognises that applying these principles better aligns investment activities with the broader interests of society and has committed to their adoption and implementation. Led by the Investment Adviser's investment team, the ESG profile is a significant consideration in the Company's investment decisions. The Investment Adviser has over a decade's worth of experience in infrastructure, real estate and real asset investments with core environmental and social benefits. The ESG investment process is overseen by the Investment Adviser's Responsible Investment committee.

Ongoing monitoring and engagement

Following execution and investment, key relevant ESG indicators are monitored by the Investment Adviser's portfolio management team.

The Company seeks to engage with equity owners and/or operators of projects to understand the ESG factors relevant to those projects or properties, and, where possible, use influence as a lender of capital or investor to manage exposure to ESG risks.

The Investment Adviser carries out a climate risk assessment for each underlying asset on an annual basis. This includes transitional, technological and physical risks. The assessment considers the actual and potential impacts of climate-related risks and opportunities across the portfolio and considers both physical and transition risk opportunities for each asset.

Pre-investment

Deal screening

Investment management processes positively screen for investments that promote sustainability, conform with the Investment Adviser's values and benefit society, including, but not limited to, the areas of climate change mitigation and adaptation, energy transition, critical infrastructure, decarbonising transportation, affordable living, social housing, education and healthcare.

The screening excludes investments which focus on non-medical animal testing, armaments, alcohol production, pornography, tobacco, coal production and power, and nuclear fuel production. Investments with ongoing or persistent involvement in human rights abuses are also excluded.

ESG due diligence processes

Prior to a new investment being approved, the relevant investment team assess how the investment fares against key relevant ESG criteria and includes an assessment of ESG characteristics in every investment proposal submitted to the Company's Investment committee for approval.

The assessment typically covers ESG-related risks and opportunities, and, to the extent applicable, relevant policies and procedures, alignment with industry or investment-specific standards and ratings, and compliance with relevant ESG-related regulation and legislation.

This year, the Company added biodiversity to the ESG due diligence process, as well as DEI. A climate risk assessment was also added for all new investments.

Active ownership

Monitoring and engagement

Following execution and investment, key relevant ESG indicators are monitored by the Investment Adviser's portfolio management team. The Investment Adviser seeks to engage with equity owners and/or operators of projects to understand the ESG factors relevant to those projects or properties, and, where possible, use influence as a lender of capital or investor to manage exposure to ESG risks.

Reporting

The Investment Adviser reports on an annual basis, with its Responsible Investment report published each year. The Responsible Investment report sits alongside a PRI report, which summarises the Investment Adviser's responsible investment activities.

The Investment Adviser applies the recommendations of the TCFD in its own reporting and encourages the application of the TCFD framework in it's funds, in line with reporting requirements.

Governance and responsibilities

The Investment Adviser operates a Responsible Investment committee which comprises senior personnel from across the business, including two representatives from the team that provide investment advice to the Company. The committee is responsible for all aspects of the Investment Adviser's Responsible Investment policy, including oversight of ESG initiatives, reporting, regulatory compliance, staff training and making recommendations to the board of the Investment Adviser.

The Investment Adviser has a clearly defined governance structure with detailed processes that cover business operations, including investment management and portfolio monitoring and reporting.

In addition to its board, the Investment Adviser employs a team of professionals with in-depth experience in the investment industry and asset classes.

The Investment Adviser's approach to stewardship and engagement is based on the Principles of the UK Stewardship Code 2020 and is in line with its philosophy on responsible investing.

Corporate governance

Board oversight

The Board of GCP Infra retains ultimate responsibility for the formulation and implementation of this set of policies. The Investment Adviser is responsible for providing investment advice and to carry out portfolio management on the Company's behalf in line with these policies. Monitoring that each service provider is adhering to the principles outlined in this document is undertaken by the Board of GCP Infra at least annually on a formal basis and more regularly on an informal basis and when any changes trigger a review. The Sustainability Committee established by the Board of GCP Infra report to the main Board quarterly formally but much more regularly informally. As well as consideration at each quarterly Board Meeting one day a year is dedicated to consideration of ESG matters including training. ESG matters are also considered as part of the wider strategy.

Investment Adviser

Overview and structure

The Investment Adviser operates a Responsible Investment committee which is comprised of senior staff, including two representatives from the team that provide investment advice to the Company. The committee is responsible for all aspects of the Investment Adviser's Responsible Investment policy, including oversight of ESG initiatives, reporting, regulatory compliance, staff training and additional recommendations made to the board of the Investment Adviser. The Investment Adviser has a clearly defined governance structure with detailed processes that cover business operations, including investment management and portfolio monitoring and reporting. In addition to its board, the Investment Adviser employs a team of professionals with in-depth experience in the investment industry and asset classes.

Anti-bribery

With the enactment of the Bribery Act 2010, the Investment Adviser has developed appropriate anti-bribery policies and procedures. The Investment Adviser has a zero-tolerance policy towards bribery and is committed to carrying out its business fairly, honestly and openly.

Diversity and employee wellbeing

The Company and the Investment Adviser are committed to meeting all applicable labour laws and standards for all employees. The Investment Adviser is committed to ensuring its employees work in a respectful work culture and are treated fairly. Equality is defined as the fairness of access for all employee backgrounds regardless of nationality, race, colour, gender, age, sexual orientation or any other discriminatory factor. The Company acknowledges the importance of diversity and tracks this across its investments.

Furthermore, the Investment Adviser has a zero-tolerance approach to any form of discrimination. As such, it expects the following from all employees:

- Respect for everyone and appreciation for the different backgrounds of co-workers.
- Contributing to a respectful environment, which allows all employees to feel safe at work and reach their maximum potential.

Modern slavery

The Company's Modern Slavery statement is compliant with the Modern Slavery Act 2015. The statement outlines the Company's commitment to identifying and eliminating slavery and human trafficking in its business and supply chains and provides details of potential risk areas the Company is exposed to. It considers the sectors it operates in, such as the procurement of materials for electric vehicles, batteries and solar panels.

During the investment process, the Investment Adviser's investment team consider the potential risks relating to modern slavery and human rights. Prior to completing a transaction, a Responsible Investment checklist is completed by the Investment Adviser's investment team lead which includes provisions on modern slavery and human rights abuses. The Company has a regular programme of checking and monitoring investee companies and key suppliers using industry standard tools and through ongoing portfolio management activities. The Company's annual data collection exercise encompasses borrowers and investments with modern slavery statements and supplier codes of conduct.

Corporate ESG initiatives

Investment Adviser initiatives include policies which promote paid rather than unpaid internships, charitable donations, volunteering days and encourage low carbon office environments as well as business travel. The Investment Adviser participates in several internship schemes, offering paid internships to young people from underprivileged backgrounds. The Investment Adviser is committed to continuing to support similar schemes to promote diversity in the workplace and to encourage, mentor and sponsor the future workforce.

Governance

The Investment Adviser has a clearly defined governance structure with detailed processes that cover business operations, including investment management and portfolio monitoring and reporting.

The Investment Adviser obtains assurance of its controls processes annually through the completion of an ISAE 3402 audit by external auditor Deloitte LLP.

Furthermore, as a company that forms part of the ORIX group, who are Sarbanes Oxley (“SOX”) regulated, the Investment Adviser is subject to an internal SOX audit on an annual basis.

The Investment Adviser’s portfolio teams are responsible for assessing and monitoring investments from an ESG perspective.

The Investment Adviser also adopts the principles of The UK Stewardship Code 2020 and the PRI.

ESG frameworks

The Company aims to fully comply with the recommendation of the Task Force on Climate-Related Financial Disclosures (“TCFD”), which provides investors with information about how companies are mitigating the risk of climate change. The Company pledges to continue improving its disclosures on climate-associated risks in line with the TCFD. The TCFD report is contained within the Company’s Annual Report and Financial Statements which can be found on its website.

Strategy

In line with the Company’s positive and negative screening policy, the Company invests in assets that have a positive environmental and social impact. This includes both social infrastructure and renewable energy infrastructure.

Risk management

The Investment Adviser has a comprehensive risk framework and compliance process to ensure that all risks, including ESG risks, are monitored and managed with due care and diligence and that the Company is fully compliant with applicable environmental legislation. These risk management systems allow the Investment Adviser to identify, measure, manage and monitor all risks that are relevant to the Company.

The Investment Adviser has a dedicated Risk Officer who reports directly to the Board in accordance with functional and hierarchical separation of risk management and portfolio management.

The Company continues to incorporate this risk management framework, to monitor ESG risks in the portfolio to ensure it continues to have positive impacts on the environment and society.

Credit risk management

The Investment Adviser identifies relevant ESG risks which could materially impact the credit quality of our borrowers. The relevance and materiality of those ESG risks are identified, recorded and assessed. The Investment Adviser assigns an ESG risk (low, medium high) to each loan to reflect ESG risks potentially impacting the ability and willingness of the borrower to meet its financial obligations on a timely basis. The risk of an asset becoming stranded because of energy transition or physical climate risk (such as flooding or drought) or bad governance without necessary mitigants in place would be categorised as loans with a high ESG risk.

Metrics and targets

The Investment Adviser continues to collect ESG data from the Company's portfolio to quantify, develop and report on material ESG metrics and targets. External expertise is accessed to independently assess the methodology, progress and reporting rigour. The process involves the Investment Adviser's portfolio management team liaising with each asset operator to obtain relevant ESG data on the underlying portfolio assets, allowing the Investment Adviser to identify and set baseline metrics for future ESG reporting.

The Company will continue to undertake an annual climate risk assessment and endeavour to continually improve the quality and quantity of disclosures made. This will include material metrics and targets with relevant merit.

Dawn Crichard
Chairperson of the Sustainability Committee, GCP Infrastructure Investments Limited.
Date: 22 August 2025

Appendix 1

PRI - Principles for Responsible Investment

1. We will incorporate ESG issues into investment analysis and decision-making processes.
2. We will be active owners and incorporate ESG issues into our ownership policies and practices.
3. We will seek appropriate disclosure on ESG issues by the entities in which we invest.
4. We will promote acceptance and implementation of the Principles within the investment industry.
5. We will work together to enhance our effectiveness in implementing the Principles.
6. We will each report on our activities and progress towards implementing the Principles.

UN Global Compact principles

1. Businesses should support and respect the protection of internationally proclaimed human rights; and
2. Make sure that they are not complicit in human rights abuses.
3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
4. The elimination of all forms of forced and compulsory labour;
5. The effective abolition of child labour; and
6. The elimination of discrimination in respect of employment and occupation.
7. Businesses should support a precautionary approach to environmental challenges;
8. Undertake initiatives to promote greater environmental responsibility; and
9. Encourage the development and diffusion of environmentally friendly technologies.
10. Businesses should work against corruption in all its forms, including extortion and bribery.

UK Stewardship Code principles

1. Signatories' purpose, investment beliefs, strategy, and culture enable stewardship that creates long-term value for clients and beneficiaries leading to sustainable benefits for the economy, the environment and society.
2. Signatories' governance, resources and incentives support stewardship.
3. Signatories manage conflicts of interest to put the best interests of clients and beneficiaries first.
4. Signatories identify and respond to market-wide and systemic risks to promote a well-functioning financial system.
5. Signatories review their policies, assure their processes and assess the effectiveness of their activities.
6. Signatories take account of client and beneficiary needs and communicate the activities and outcomes of their stewardship and investment to them.
7. Signatories systematically integrate stewardship and investment, including material environmental, social and governance issues, and climate change, to fulfil their responsibilities.
8. Signatories monitor and hold to account managers and/or service providers.
9. Signatories engage with issuers to maintain or enhance the value of assets.
10. Signatories, where necessary, participate in collaborative engagement to influence issuers.
11. Signatories, where necessary, escalate stewardship activities to influence issuers.
12. Signatories actively exercise their rights and responsibilities