EUROPEAN
COMMISSION

Brussels, 6.4.2022
C(2022) 1931 final

ANNEX 1

ANNEX

to the

Commission Delegated Regulation (EU) .../...

supplementing Regulation (EU) 2019/2088 of the European Parliament and of the Council with regard to regulatory technical standards specifying the details of the content and presentation of the information in relation to the principle of 'do no significant harm', specifying the content, methodologies and presentation of information in relation to sustainability indicators and adverse sustainability impacts, and the content and presentation of the information in relation to the promotion of environmental or social characteristics and sustainable investment objectives in pre-contractual documents, on websites and in periodic reports

ANNEX I

Template principal adverse sustainability impacts statement

For the purposes of this Annex, the following definitions shall apply:

(1) ‘scope 1, 2 and 3 GHG emissions’ means the scope of greenhouse gas emissions referred to in points (1)(e)(i) to (iii) of Annex III to Regulation (EU) 2016/1011 of the European Parliament and of the Council[1];

(2) ‘greenhouse gas (GHG) emissions’ means greenhouse gas emissions as defined in Article 3, point (1), of Regulation (EU) 2018/842 of the European Parliament and of the Council[2];

(3) ‘weighted average’ means a ratio of the weight of the investment by the financial market participant in an investee company in relation to the enterprise value of the investee company;

(4) ‘enterprise value’ means the sum, at fiscal year-end, of the market capitalisation of ordinary shares, the market capitalisation of preferred shares, and the book value of total debt and non-controlling interests, without the deduction of cash or cash equivalents;

(5) ‘companies active in the fossil fuel sector’ means companies that derive any revenues from exploration, mining, extraction, production, processing, storage, refining or distribution, including transportation, storage and trade, of fossil fuels as defined in Article 2, point (62), of Regulation (EU) 2018/1999 of the European Parliament and of the Council[3];

(6) ‘renewable energy sources’ means renewable non-fossil sources, namely wind, solar (solar thermal and solar photovoltaic) and geothermal energy, ambient energy, tide, wave and other ocean energy, hydropower, biomass, landfill gas, sewage treatment plant gas, and biogas;

(7) ‘non-renewable energy sources’ means energy sources other than those referred to in point (6);

(8) ‘energy consumption intensity’ means the ratio of energy consumption per unit of activity, output or any other metric of the investee company to the total energy consumption of that investee company;

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1 Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds and amending Directives 2008/48/EC and 2014/17/EU and Regulation (EU) No 596/2014 (OJ L 171, 29.6.2016, p. 1).

2 Regulation (EU) 2018/842 of the European Parliament and of the Council of 30 May 2018 on binding annual greenhouse gas emission reductions by Member States from 2021 to 2030 contributing to climate action to meet commitments under the Paris Agreement and amending Regulation (EU) No 525/2013 (OJ L 156, 19.6.2018, p. 26).

3 Regulation (EU) 2018/1999 of the European Parliament and of the Council of 11 December 2018 on the Governance of the Energy Union and Climate Action, amending Regulations (EC) No 663/2009 and (EC) No 715/2009 of the European Parliament and of the Council, Directives 94/22/EC, 98/70/EC, 2009/31/EC, 2009/73/EC, 2010/31/EU, 2012/27/EU and 2013/30/EU of the European Parliament and of the Council, Council Directives 2009/119/EC and (EU) 2015/652 and repealing Regulation (EU) No 525/2013 of the European Parliament and of the Council (OJ L 328, 21.12.2018, p. 1).

(9) ‘high impact climate sectors’ means the sectors listed in Sections A to H and Section L of Annex I to Regulation (EC) No 1893/2006 of the European Parliament and of the Council[4];

(10) ‘protected area’ means designated areas in the European Environment Agency’s Common Database on Designated Areas (CDDA);

(11) ‘area of high biodiversity value outside protected areas’ means land with high biodiversity value as referred to in Article 7b(3) of Directive 98/70/EC of the European Parliament and of the Council[5];

(12) ‘emissions to water’ means direct emissions of priority substances as defined in Article 2(30) of Directive 2000/60/EC of the European Parliament and of the Council[6] and direct emissions of nitrates, phosphates and pesticides ;

(13) ‘areas of high water stress’ means regions where the percentage of total water withdrawn is high (40-80%) or extremely high (greater than 80%) in the World Resources Institute’s (WRI) Water Risk Atlas tool “Aqueduct”;

(14) ‘hazardous waste and radioactive waste’ means hazardous waste and radioactive waste;

(15) ‘hazardous waste’ means hazardous waste as defined in Article 3(2) of Directive 2008/98/EC of the European Parliament and of the Council[7] ;

(16) ‘radioactive waste’ means radioactive waste as defined in Article 3(7) of Council Directive 2011/70/Euratom[8];

(17) ‘non-recycled waste’ means any waste not recycled within the meaning of ‘recycling’ in Article 3(17) of Directive 2008/98/EC;

(18) ‘activities negatively affecting biodiversity-sensitive areas’ means activities that are characterised by all of the following:

(a) those activities lead to the deterioration of natural habitats and the habitats of species and disturb the species for which a protected area has been designated;

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4 Regulation (EC) No 1893/2006 of the European Parliament and of the Council of 20 December 2006 establishing the statistical classification of economic activities NACE Revision 2 and amending Council Regulation (EEC) No 3037/90 as well as certain EC Regulations on specific statistical domains Text with EEA relevance (OJ L 393, 30.12.2006, p. 1–39).

5 Directive 98/70/EC of the European Parliament and of the Council of 13 October 1998 relating to the quality of petrol and diesel fuels and amending Council Directive 93/12/EEC (OJ L 350, 28.12.1998, p. 58).

6 Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy (OJ L 327, 22.12.2000, p. 1).

7 Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives (OJ L 312, 22.11.2008, p. 3).

8 Council Directive 2011/70/Euratom of 19 July 2011 establishing a Community framework for the responsible and safe management of spent fuel and radioactive waste (OJ L 199, 2.8.2011, p. 48).

(b) for those activities, none of the conclusions, mitigation measures or impact assessments adopted pursuant to any of the following Directives or national provisions or international standards that are equivalent to those Directives have been implemented:

(i) Directive 2009/147/EC of the European Parliament and of the Council[9];

(ii) Council Directive 92/43/EEC[10];

(iii) an Environmental Impact Assessment (EIA) as defined in Article 1(2), point (g), of Directive 2011/92/EU of the European Parliament and of the Council[11];

(iv) for activities located in third countries, conclusions, mitigation measures or impact assessments adopted in accordance with national provisions or international standards that are equivalent to the Directives and impact assessments listed in points (i), (ii) and (iii);

(19) ‘biodiversity-sensitive areas’ means Natura 2000 network of protected areas, UNESCO World Heritage sites and Key Biodiversity Areas (‘KBAs’), as well as other protected areas, as referred to in Appendix D of Annex II to Commission Delegated Regulation (EU) 2021/2139[12];

(20) ‘threatened species’ means endangered species, including flora and fauna, listed in the European Red List or the IUCN Red List, as referred to in Section 7 of Annex II to Delegated Regulation (EU) 2021/2139;

(21) ‘deforestation’ means the temporary or permanent human-induced conversion of forested land to non-forested land;

(22) ‘UN Global Compact principles’ means the ten Principles of the United Nations Global Compact;

(23) ‘unadjusted gender pay gap’ means the difference between average gross hourly earnings of male paid employees and of female paid employees as a percentage of average gross hourly earnings of male paid employees;

(24) ‘board’ means the administrative, management or supervisory body of a company;

(25) ‘human rights policy’ means a policy commitment approved at board level on human rights that the economic activities of the investee company shall be in line with the UN Guiding Principles on Business and Human Rights;

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9 Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds (OJ L 20, 26.1.2010, p. 7).

10 Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (OJ L 206, 22.7.1992, p. 7).

11 Directive 2011/92/EU of the European Parliament and of the Council of 13 December 2011 on the assessment of the effects of certain public and private projects on the environment (OJ L 026, 28.1.2012, p. 1).

12 Commission Delegated Regulation (EU) 2021/2139 of 4 June 2021 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to climate change mitigation or climate change adaptation and for determining whether that economic activity causes no significant harm to any of the other environmental objectives (OJ L 442, 9.12.2021, p. 1).

(26) ‘whistleblower’ means ‘reporting person’ as defined in Article 5(7) of Directive (EU) 2019/1937 of the European Parliament and of the Council[13];

(27) ‘inorganic pollutants’ means emissions within or lower than the emission levels associated with the best available techniques (BAT-AEL) as defined in Article 3, point (13) of Directive 2010/75/EU of the European Parliament and of the Council[14], for the Large Volume Inorganic Chemicals- Solids and Others industry;

(28) ‘air pollutants’ means direct emissions of sulphur dioxides (SO_2), nitrogen oxides (NO_x), non-methane volatile organic compounds (NMVOC), and fine particulate matter ($PM_{2,5}$) as defined in Article 3, points (5) to (8), of Directive (EU) 2016/2284 of the European Parliament and of the Council[15], ammonia (NH_3) as referred to in that Directive and heavy metals (HM) as referred to in Annex I to that Directive;

(29) ‘ozone depletion substances’ mean substances listed in the Montreal Protocol on Substances that Deplete the Ozone Layer.

For the purposes of this Annex, the following formulas shall apply:

(1) ‘GHG emissions’ shall be calculated in accordance with the following formula:

$$\sum_{n}^{i}\left(\frac{current\ value\ of\ investment_i}{investee\ company's\ enterprise\ value_i} \times investee\ company's\ Scope(x)\ GHG\ emissions_i\right)$$

(2) ‘carbon footprint’ shall be calculated in accordance with the following formula:

$$\frac{\sum_{n}^{i}\left(\frac{current\ value\ of\ investment_i}{investee\ company's\ enterprise\ value_i} \times investee\ company's\ Scope\ 1, 2\ and\ 3\ GHG\ emissions_i\right)}{current\ value\ of\ all\ investments\ (€M)}$$

(3) ‘GHG intensity of investee companies’ shall be calculated in accordance with the following formula:

13 Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law (OJ L305, 26.11.2019, p. 17).

14 Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial emissions (integrated pollution prevention and control) (OJ L 334, 17.12.2010, p. 17).

15 Directive (EU) 2016/2284 of the European Parliament and of the Council of 14 December 2016 on the reduction of national emissions of certain atmospheric pollutants, amending Directive 2003/35/EC and repealing Directive 2001/81/EC (Text with EEA relevance), *OJ L 344, 17.12.2016, p. 1–31*

$$\sum_{n}^{i}\left(\frac{current\ value\ of\ investment_i}{current\ value\ of\ all\ investments\ (€M)} \times \frac{investee\ company's\ Scope\ 1,2\ and\ 3\ GHG\ emissions_i}{investee\ company's\ €M\ revenue_i}\right)$$

(4) ‘GHG intensity of sovereigns’ shall be calculated in accordance with the following formula:

$$\sum_{n}^{i}\left(\frac{current\ value\ of\ investment_i}{current\ value\ of\ all\ investments\ (€M)} \times \frac{The\ country's\ Scope\ 1,2\ and\ 3\ GHG\ emissions_i}{Gross\ Domestic\ Product_i(€M)}\right)$$

(5) ‘inefficient real estate assets’ shall be calculated in accordance with the following formula:

$$\frac{((Value\ of\ real\ estate\ assets\ built\ before\ 31/12/2020\ with\ EPC\ of\ C\ or\ below) + (Value\ of\ real\ estate\ assets\ built\ after\ 31/12/2020\ with\ PED\ below\ NZEB\ in\ Directive\ 2010/31/EU))}{Value\ of\ real\ estate\ assets\ required\ to\ abide\ by\ EPC\ and\ NZEB\ rules}$$

For the purposes of the formulas, the following definitions shall apply:

(1) ‘current value of investment’ means the value in EUR of the investment by the financial market participant in the investee company;

(2) ‘enterprise value’ means the sum, at fiscal year-end, of the market capitalisation of ordinary shares, the market capitalisation of preferred shares, and the book value of total debt and non-controlling interests, without the deduction of cash or cash equivalents;

(3) ‘current value of all investments’ means the value in EUR of all investments by the financial market participant;

(4) ‘nearly zero-energy building (NZEB)’, ‘primary energy demand (PED)’ and ‘energy performance certificate (EPC)’ shall have the meanings given to them in paragraphs 2, 5 and 12 of Article 2 of Directive 2010/31/EU of the European Parliament and of the Council[16].

16 Directive 2010/31/EU of the European Parliament and of the Council of 19 May 2010 on the energy performance of buildings (recast) (OJ L 153, 18.6.2010, p. 13)

Table 1

Statement on principal adverse impacts of investment decisions on sustainability factors

Financial market participant Bluefield Solar Income Fund Limited (the **Company),** 2138004ATNLYEQKY4B30 **Product Name:** Bluefield Solar Income Fund Limited **Legal Entity Identifier:** 2138004ATNLYEQKY4B30

Summary

Bluefield Solar Income Fund Limited (the "Company", LEI 2138004ATNLYEQKY4B30) considers principal adverse impacts (**PAIs**) of its investment decisions based on sustainability factors. The present statement is the consolidated statement of PAIs on sustainability factors of the Company, specifically relating to its portfolio of renewable energy infrastructure assets. The PAIs reflect operational assets as well as assets under construction.

This statement on PAIs on sustainability factors covers the reference period 1 January to 31 December 2023. The Company is an investment company focused on the development, acquisition, and ongoing operation of UK-based renewable energy infrastructure assets, including a large, diversified portfolio of operational solar energy assets, alongside a minority exposure to other renewable technologies, including wind and energy storage assets.

The Company is reporting against all mandatory indicators applicable to investments in investee companies. The indicators applicable to investments in sovereigns and supranationals, and the indicators applicable to investments in real estate assets, are not applicable to the Company given its investment universe. In addition, the Company is also reporting against an additional climate and other environmental-related indicator applicable to investment in investee companies (i.e. "Natural species and protected areas") and an additional indicator for social and employee, respect for human rights, anti-corruption and anti-bribery matters applicable to investments in investee companies (i.e. "Lack of a human rights policy"). These additional indicators were selected based on their materiality to the Company's operations.

During the reference period, the Company updated and enhanced the methodology used to assess greenhouse gas (GHG) emissions indicators by aligning it with the Partnership for Carbon Accounting Financials (**PCAF**). A PCAF aligned methodology enables the Company to achieve a more comprehensive assessment of the GHG emissions associated with its investments by allocating emissions across all finance providers throughout the portfolio structure. Furthermore, for the present statement, the Company has disclosed the sum of impacts during each quarter for all indicators, as

opposed to the average quarterly figure, which was provided previously. Such has contributed towards higher measured impacts than in 2022[17]. Due to the changes in methodology, undertaken to achieve better alignment with the requirements of the SFDR, a direct comparison with the previous year's PAI impacts is limited.

Two operational solar assets, acquired on the 23rd December 2022, were previously excluded from the Company's 2022 PAI statement, as these assets were held by the Company for an insignificant proportion of the previous reference period, and their inclusion at the time would not have provided a representative report of their adverse impacts. Both of these assets have since been onboarded onto the Company's PAI reporting regime and are included as part of the present statement.

As of 31 December 2023, the Company had 93 MW of solar assets under construction. This included two solar plants, 49MW and 44MW in capacity, both of which are set to become energised during 2024. It should be noted that the GHG emissions related to assets under construction are significantly higher than for an operational asset, as the embodied carbon[18] is recognised in the year of construction. These emissions have been recognised within the Scope 3 category of the Company's GHG inventory, which have increased as a result. The Company is aware that the construction of new assets has the potential to create additional adverse impacts on sustainability factors compared to operational infrastructure. However, the Company is cognisant of the need to build out additional renewable capacity to support the UK's decarbonisation commitments, and ultimately supply additional renewable energy to the grid. The PAIs of both construction projects were monitored on a quarterly basis and are included within the following disclosure.

On the 22nd December 2023, the Company announced a long-term strategic partnership with GLIL Infrastructure, through which both parties committed to investing in a portfolio of 58 UK solar assets[19]. Given that this acquisition was completed on 25 January 2024[20], these assets have not been included within the current PAI statement. The Company acquired a 9% equity share in the portfolio, and has commenced preparations to report the PAIs of these investments within next year's PAI statement.

The Company's fiscal year runs from 1 July – 30 June. In order to analyse PAIs on sustainability factors during the reference period, the Company has used the valuations and debt of its investee companies at each quarter end during the 2023 calendar year, as well as the Company's equity in these investments, measured at the same intervals. This approach allows for the calculation of GHG emissions in line with PCAF standards, which more accurately recognises all finance providers in the fund structure. As an investment company, the Company has no employees, and management of the portfolio is outsourced to key business partners and service providers. The Company worked collaboratively with key service providers, responsible for both the asset management and operation and maintenance (O&M) of its portfolio of assets, and has established processes for the collection of PAI

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[17] Other contributions towards the Company's higher PAI impacts have been disclosed within Tables 1-3.

[18] Embodied carbon emissions are calculated using Environmentally Extended Input Output (EEIO) model emission factors. These factors are applied to economic flows between industries (in this case based on spend) and estimate the cradle-to-gate emissions. Further information can be found in the GHG Protocol Scope 3 Calculation Guidance.

[19] Strategic Partnership with GLIL Infrastructure – Company Announcement - FT.com

[20] https://www.londonstockexchange.com/news-article/BSIF/completion-of-phase-one-of-strategic-partnership/16303359

data. However, PAI reporting requires a breadth and depth of data that the industry is still adjusting to, and therefore data availability can prove challenging. The Company is committed to continue working with its key service providers to help improve the availability and quality of sustainability-related data over time. For the current disclosure, where data was unavailable, the Company has provided details of any estimates or assumptions applied, including a figure to demonstrate % estimated data.

As an investor in renewable energy infrastructure, the Company is aware of the role its assets play towards the energy transition and climate change mitigation. However, the Company acknowledges the potential adverse impacts of its investments, and is committed to producing a transparent account of these impacts within the following disclosure. Reporting of these impacts sits alongside the Company's wider ESG strategy, which is refreshed on an annual basis in line with its financial year, and includes a series of commitments and supporting KPIs to track ESG performance. Further details can be found within the Company's 2023 Annual Report, relating to the period ending 30 June 2023.

The PAIs are set out within Tables 1-3 below.

Description of the principal adverse impacts on sustainability factors[21]

Indicators applicable to investments in investee companies						
Adverse sustainability indicator		**Metric**	**Impact [2023]**	**Impact [2022]**	**Explanation**	**Actions taken, and actions planned and targets set for the next reference period**
CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS						
Greenhouse gas emissions	1. GHG emissions	Scope 1 GHG emissions	20.55 tCO2e	1.83 tCO_2e	Please note that due to the methodology changes, as described in the summary section, direct comparison	The use of non-renewable fuel sources will continue to be minimised

[21] Noting the Company reports under the SFDR as an overseas fund, it will refer to UK legislation and guidance when disclosing against the PAI indicators.

					with the previous year's PAI impacts is limited. The Company's scope 1 emissions relate to the ad hoc use of diesel generators. Generators are typically used during periods of equipment maintenance, repair or failure, or as part of construction (including repowering) activities. Diesel generator use increased during the reference period as a result of planned electricity network operator outages and maintenance and repair activities. In addition, during the latter half of the reference period, the Company commissioned several large-scale repowering projects across selected wind assets, to implement technological upgrades intended to achieve greater yields of renewable energy and improve the longevity of the assets. The repowering works required site-wide isolations whilst	where possible. The Company is continuing conversations with its service providers to assess the feasibility of using less emissions intensive forms of back-up power supply.

					construction works were completed (for reasons including H&S), which increased generator use.	
		Scope 2 GHG emissions	400.88 tCO2e (market based)	389.92 tCO_2e (market based)	Please note that due to the methodology changes, as described in the summary section, direct comparison with the previous year's PAI impacts is limited. Scope 2 emissions relate to the portfolio's consumption of electricity derived from the grid. This consumption is very small when compared with the amount of renewable energy that the portfolio generates (total consumption equated to <1% of total energy production during the reference period). Emissions have been calculated using the market based method[22], to reflect the impact of contractual instruments selected for the purchase	The Company will continue to transfer its assets onto renewable energy import tariffs as they come up for renewal.

[22] The market based method is derived from GHG Protocol Scope 2 Guidance.

					of energy to power the assets i.e., whether a renewable energy tariff has been opted for. During the reference period, the Company successfully transferred a number of its assets onto renewable tariffs. In absolute terms[23], this resulted in an approximate 58% decrease in Scope 2 emissions (please note this is not reflected in the PAI metrics due to methodology changes described above).	
		Scope 3 GHG emissions	27,090.53 tCO2e	2,899.59 tCO_2e	Please note that due to the methodology changes, as described in the summary section, direct comparison with the previous year's PAI impacts is limited. Scope 3 emissions represented approximately 98% of the total GHG emissions from the Company's portfolio	The Company has continued to apply a spend-based methodology, using the UK EEIO[24] factors published by DEFRA, to account for the emissions associated with the goods and services it procures. However, it recognises the limitations of these

[23] "Absolute emissions" refers to total portfolio emissions, without adjusting for the Company's equity share.
[24] Environmentally Extended Input-Output (EEIO)

					during the reference period. Scope 3 emissions substantially increased during the reference period as a result of the Company’s construction activities, which increased emissions associated with Scope 3 category 1: ‘Purchased Goods & Services’ (which represents 97% of the Company’s total Scope 3 emissions). Whilst the Company acknowledges that construction activities will have a short-term impact on its GHG inventory, this is unavoidable if it is to construct new renewable infrastructure, and ultimately supply an increased amount of renewable energy to the grid. In relation to other Scope 3 categories, ‘Fuel-and-Energy-Related’ emissions (<1% gap filled), and emissions associated with ‘Waste Generation’ (86%	factors, given their reliance upon broad industry averages. Following the increase in emissions associated with construction expenditure, the Company will explore the use of alternative carbon accounting methodologies to improve the accuracy of Scope 3 data, allowing for more granular insight into these emissions. Please refer to the Company’s annual ESG report for information on its supplier engagement activities.

					estimated), represented approximately 1% of total GHG emissions, collectively. The high proportion of estimated waste data was largely due to O&Ms centralising waste collection across multiple sites, making asset-specific calculations of waste challenging.	
		Total GHG emissions	27,511.96 tCO2e (market based)	3,291.34 tCO_2e (market based)	Please note that due to the methodology changes, as described in the summary section, direct comparison with the previous year's PAI impacts is limited. For the reasons described above, total portfolio emissions increased during the reference period. Such is to be expected as the Company builds out its development pipeline. Despite this, market-based Scope 2 emissions decreased during the period as a result of the Company's commitment to transfer its operational	In addition to the actions referenced above, in its 2023 Annual Report, the Company outlined its commitment to developing a net zero pathway. An update on this, and the Company's wider ESG activities, will be provided in the Company's 2024 Annual Report.

					assets onto renewable tariffs.	
	2. Carbon footprint	Carbon footprint	22.54 tCO2e/€M (market based)	2.28 tCO2e (market based)	Please note that due to the methodology changes, as described in the summary section, direct comparison with the previous year's PAI impacts is limited. The reasons for the increased calculated carbon footprint of the Company derive from the explanations given above under PAI 1 "GHG emissions".	As above.
	3. GHG intensity of investee companies	GHG intensity of investee companies	128.22 tCO2e/€M (market based)	100.90 tCO2e/ €M (market based)	Please note that due to the methodology changes, as described in the summary section, direct comparison with the previous year's PAI impacts is limited.	As above.
	4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	0%	0%	In line with the Company's Investment Policy, investment can only be made into renewable energy infrastructure assets and supporting technologies.	Not applicable.
	5. Share of non-renewable energy	Share of non-renewable energy	0.12%	82.61% non-renewable	Please note that due to the methodology changes, as	During the reference period, the Company

	consumption and production	consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage of total energy sources		energy consumption 0% non-renewable energy production (100% renewable energy production)	described in the summary section, direct comparison with the previous year's PAI impacts is limited. The approach to calculating this metric has been amended to present the gross combined figures (as opposed to the previous approach of stating consumption of non-renewable vs renewable energy sources). As a result, there is limited comparability between 2022 and 2023 figures. The metric shows the combined impact of non-renewable energy in the portfolio is negligible.	achieved an approximate 58% reduction in absolute Scope 2 emissions by transferring several assets onto renewable energy import tariffs. The Company will continue to transfer its assets onto renewable energy import tariffs as they come up for renewal. The use of non-renewable fuel sources will continue to be minimised where possible.
	6. Energy consumption intensity per high impact climate sector	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector	0.0184 GWh/€M	0.04 GWh/€M	Please note that due to the methodology change, as described in the summary section, direct comparison with the previous year's PAI impacts is limited. The Company falls into the high impact climate sector of "Electricity, Gas, Steam, and Air Conditioning Supply" as defined within D 35.11 of	The Company will continue to contribute to climate change mitigation and the UK energy transition through the generation and provision of renewable energy to the UK grid.

					the NACE Code (Regulation (EC) No 1893/2006), which includes the operation of generation facilities that produce electric energy. The energy consumption intensity of the Company has remained low, reflecting the minimal quantity of energy consumed by the Company's assets.	
Biodiversity	7. Activities negatively affecting biodiversity-sensitive areas	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	0%	0%	The Company has implemented data collection processes through its service providers, who undertake activities to build and maintain its solar and wind assets, to identify any adverse impacts to biodiversity-sensitive areas across the portfolio. During the reference period, there were no reported material pollution or environmental incidents.	The Company has mapped its operational portfolio in relation to biodiversity sensitive areas[25]. It has also integrated this mapping exercise into the due diligence process for new acquisitions, alongside other questions to understand whether a target's activities have had any known

[25] As defined within this regulation and referred to in the technical screening criteria regulation (2021/2139).

					UK local planning authorities stipulate the environmental assessments and resulting mitigation measures to be undertaken as part of the development process of new assets. Once operational, the Company's service providers, including O&M providers, are responsible for ensuring each asset remains compliant with its Landscape and Ecological Management Plan (LEMP). The LEMP may specify enhancement measures which support (and potentially increase) the biodiversity present across the site, for example wildflower seeding or bat and bird box installation.	negative impacts on biodiversity. In addition, the Company is focusing on the opportunities for biodiversity enhancement across its portfolio, and has committed to developing a nature strategy. The strategy will be informed by the TNFD[26] framework, to help ensure it follows a standardised approach for identifying and managing nature-related risk, opportunities, impacts and dependencies. The Company has also made several other nature-related commitments as part of its ESG strategy, including to undertake further ecological assessments, details of which can be found

[26] Taskforce for Nature-Related Financial Disclosures (TNFD)

						in its 2023 Annual Report.
Water	8. Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	0 tonnes/€M	0 tonnes/€M	A small quantity of water (usually mains or deionised water) is brought to site for PV washdown purposes by contractors. During the reference period, no pollution incidents were reported and the Company's service providers advised that only mains or deionised water was used for PV washdown.	The Company will continue to use a small quantity of water for panel washdown purposes.
Waste	9. Hazardous waste and radioactive waste ratio	Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average	Hazardous waste: 0.0016 tonnes/€M Radioactive waste: 0 tonnes/€M	Hazardous waste: 0.01 tonnes/€M Radioactive waste: 0 tonnes/ €M	Please note that due to the methodology changes, as described in the summary section, direct comparison with the previous year's PAI impacts is limited. The Company's activities are not associated with radioactive substances and no radioactive waste was produced during the reference period. The minimal amount of hazardous waste produced during the reference period relates largely to oil, which	The Company continues to work with third-party service providers to improve data quality (noting that hazardous substances are used in small quantities across the portfolio, which are difficult to measure in absolute terms).

					was used to undertake solar transformer and wind turbine maintenance activities. Data availability relating to hazardous waste has improved since the last period, however, approximately 21% of data was still estimated.	
INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS						
Social and employee matters	10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (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	0%	0%	During the reference period there were no reported violations of the UNGC or OECD guidelines in relation to the Company's portfolio of assets. The Company itself has no employees. However, through its Supplier Code of Conduct and other policies, the Company communicates its expectations to suppliers[27] regarding responsible business principles, including in relation to human and social rights.	In May 2023 the Company adopted a Whistleblowing Policy, available on the Company's website, which may be used by contractors, suppliers and other business partners to report grievances or violations, including in relation to social and employee matters. The Company has also adopted a Human Rights Policy and a

[27] Policies are rolled out to a subset of suppliers, following a spend-based approach.

						Supplier Code of Conduct, aligned with international human rights frameworks. Policy adherence is being integrated into new key service provider contracts, including EPC, O&M and asset management arrangements.
	11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance /complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	0%	100%	The Company adopted a Human Rights Policy on 29 June 2023. The policy is guided by international best practice frameworks for human rights, including the UNGC principles and OECD Guidelines for Multinational Enterprises. In May 2023, the Board adopted a Whistleblowing Policy, as described above.	Human and labour rights remain a key area of focus for the Company. Please refer to the Company's ESG commitments within its 2023 Annual Report for further details on actions planned for the current financial year.

	12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	-	-	The Company does not have any employees.	Not applicable.
	13. Board gender diversity	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members	40% - in relation to the Company Board 0% - in relation to the Board of investee companies (SPVs)	38.33% - in relation to the Company Board	The Company Board had 40% female representation as at 31 December 2023; this PAI has been updated from the quarterly average that was provided previously. The female representation of the board of the investee companies (SPVs) has also been disclosed.	Not applicable.
	14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investments in investee companies involved in the manufacture or selling of controversial weapons	0%	0%	The Company does not invest in controversial weapons. As per its Investment Policy, the Company can only invest in renewable energy infrastructure assets and supporting technologies.	Not applicable.

Other indicators for principal adverse impacts on sustainability factors

Table 2

Additional climate and other environment-related indicators

CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS						
Adverse sustainability impact	**Adverse impact on sustainability factors (qualitative or quantitative)**	**Metric**	**Impact [2023]**	**Impact [2022]**	**Explanation**	**Actions taken, and actions planned and targets set for the next reference period**
Indicators applicable to investments in investee companies						
Water, waste and material emissions	1. Natural species and protected areas	1.Share of investments in investee companies whose operations affect threatened species 2.Share of investments in investee companies without a biodiversity protection policy covering operational sites owned, leased, managed in, or adjacent to, a protected area or an area of high biodiversity value outside protected areas	1. 0% 2. 0%	1. 0% 2. 25% AUM covered by biodiversity policy during period.	The Company has a Biodiversity Policy, published on the Company's website. The Company has established reporting mechanisms which enables its key service providers to report sustainability information, including any known impacts to threatened species. During the reference period, there were no reported instances of significant	The Company has committed to developing a nature strategy informed by the TNFD. Please refer to the Company's 2023 Annual Report for further information.

					adverse impacts to threatened species.	

Table 3

Additional indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters

INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS						
Adverse sustainability impact	**Adverse impact on sustainability factors (qualitative or quantitative)**	**Metric**	**Impact [2023]**	**Impact [2022]**	**Explanation**	**Actions taken, and actions planned and targets set for the next reference period**
Indicators applicable to investments in investee companies						
Human Rights	1. Lack of a human rights policy	Share of investments in entities without a human rights policy	0%	100%	The Company adopted a Human Rights Policy on 29 June 2023. This policy is applicable to all asset-holding investee companies.	Please refer to the Company's 2023 Annual Report for further details on actions planned for the current financial year.

Description of policies to identify and prioritise principal adverse impacts on sustainability factors

Description of policies

The Company has adopted ESG policies which support the integration and consideration of sustainability factors across the investment lifecycle[28]. The Company aims to deliver the commitments within these policies by encouraging their enactment through the service providers who are involved

[28] The investment lifecycle refers to the holding period of the investment; it does not include the manufacturing or end-of-life processing of materials.

in the development, construction, and operation of its assets. Policy adherence is stipulated within new agreements with key third party contractors, namely O&M, asset management and EPC companies.

The Company's Sustainable Investment Policy was formally adopted by the Company Board on 29 June 2023. The policy outlines how sustainability factors are considered and integrated within the investment process and as part of operational activities. It sets out the Company's ESG framework, including the three key pillars of its ESG strategy, and details how ESG considerations are integrated through a combination of negative screening, investment screening, due diligence, investment approval, management, and reporting. Pre-acquisition, an ESG questionnaire is used to help identify material ESG risks and opportunities, which have been identified in line with Sustainability Accounting Standards Board (**SASB**) standards and regulatory frameworks, such as the SFDR. The PAIs are explicitly referenced within this. Once acquired, ESG factors (including opportunities to create positive value[29]) are managed through the Company's ESG strategy (as documented within the Company's Sustainable Investment Policy), which is implemented via the Company's key service providers, including the Bluefield development, investment, asset management and O&M teams. A set of commitments and KPIs have been developed to enable the Company to monitor and evidence its ESG performance over time; these can be found on pages 40-42 of the Company's Annual Report 2023.

The Company's ESG Policy, adopted by the Board in June 2022, speaks more broadly to the Company's sustainability context and its role in delivering renewable energy as part of climate change mitigation. Through this policy, the Company acknowledges that delivering renewable energy has wider ESG challenges that must be managed, and that it also presents broader opportunities and benefits that can be maximised. The Company published its Biodiversity Policy in September 2022, reflecting its ambition to deliver positive ecological gain across its portfolio as an additional way to help mitigate the impacts of climate change. The Company has also adopted a Waste Management Policy, Sustainable Procurement Policy, Human rights Policy and Supplier Code of Conduct.

The Board of the Company has ultimate responsibility for and oversight of ESG matters; please refer to page 32 of the Company's Annual Report 2023 for a summary of the Company's ESG governance structure, which demonstrates how responsibilities are delegated by the Board across the Company's key service providers.

Methodologies – how were the PAIs identified and assessed?

The Company's ESG strategy was developed with reference to the SASB standards, industry expertise and consultation with internal and external stakeholders to identify the ESG risks and opportunities most relevant to the Company and its operations. The strategy comprises a series of publicly available commitments and supporting KPIs, which were developed with reference to the requirements of the SFDR. Progress is reported annually, in line with the Company's financial year. In relation to PAI reporting, the Company selected additional indicators by cross-referencing priority ESG

[29] Examples of positive value include social value through community benefit fund payments, or environmental value through nature initiatives on site.

topics, identified via its materiality assessment, against the PAIs of the SFDR, so that the most relevant indicators were selected. Given the Company's focus on biodiversity, the PAI of "natural species and protected areas" was selected. Human and labour rights are also a key consideration for the Company, particularly in relation to materials sourcing and supply chain management, therefore the PAI indicator of "lack of a human rights policy" was chosen. Relevant PAIs have been integrated into the Company's investment due diligence process and as described, considered within the Company's overarching ESG strategy.

The Company has worked to strengthen the collaborative relationships that it has with its key service providers, to help improve the availability and quality of sustainability data. The Company's asset management partner issues a quarterly data request to O&M providers to collect asset-level data, such as waste generation, biodiversity impacts, environmental incidents etc. Quarterly data is also collected from EPC partners, to track the PAIs of construction activities. Data is collated from a wide range of sources, including contractor service and repair reports, invoices, and other forms of internal records. Relationships between the Bluefield service provider companies supports efficient data collection for a large portion of the Company's portfolio. However, data collection from external third parties remains a challenge, particularly as many providers across the industry are still developing data collection processes. As a result, in some instances, estimated data was accepted. The Company has disclosed the % of any estimated data in *Table 1*.

Asset-level data was aggregated at the level of each asset-holding entity (**SPV**) and then again at portfolio-level, combined with data relating to non-asset-holding entities (holding companies), to reflect the PAIs of the Company's investments in their entirety. Some PAI metrics relate specifically to SPV and holding company level, as they capture business activities that are not undertaken at the asset level. For instance, external suppliers transact with these entities, with the spend data then used to calculate emissions pertaining to Scope 3 category 1: purchased goods & services. Similarly, policies are adopted at the level of the SPVs, being the entity with which contracts are drawn with third-party service providers.

An external sustainability consultant was engaged to calculate the Company's GHG emissions for the reference period, using the GHG protocol. Where any data gaps existed, the consultants used their expertise to make reasonable assumptions and estimates. Estimates and gap filling techniques were used where required, though it is important to note that this represented a very small proportion of the Company's total GHG emissions (<1%). The proportion of estimated and extrapolated data (if used) relating to each PAI has been disclosed within Table 1. A small margin of error is expected with the use of estimates and proxies, and the Company is committed to improving the accuracy of its PAI disclosures over time, as data collection processes and calculation methodologies mature.

For the present statement, the Company updated its methodology for the GHG PAI indicators to align with the PCAF standards, enabling recognition of all finance providers in the structure. This enhanced methodology provides a more accurate representation of the Company's share of GHG emissions. Furthermore, for the present statement, the Company has disclosed the sum of impacts during each quarter for all indicators, as opposed to the average quarterly figure, which was provided previously. Such has contributed towards higher measured impacts than in 2022. Due to the changes in methodology described, undertaken to achieve better alignment with the requirements of the SFDR, a direct comparison with the previous year's PAI impacts is limited.

Margin of error with our methodologies

The methodology to identify PAI’s is always subject to data availability and quality. The Company is reliant on the quality of data received from investee companies and third-party service providers. PAI reporting requires a breadth and depth of data that the industry is still adjusting to, and therefore data availability can prove challenging. The Company is committed to continue working with its key service providers to help improve the availability and quality of sustainability-related data over time. However, a degree of error is anticipated whilst data collection processes mature.

Engagement policies

The Company invests in infrastructure assets, held within SPVs which have no employees. The Company’s Investment Adviser monitors the ESG performance of its investments through the collection and analysis of asset and portfolio-level data, as previously described.

The Company acknowledges the influence that it has to help drive ESG practices across its key service providers. To communicate its ESG expectations, the Company has adopted a suite of policies, including: a Sustainable Procurement Policy; Human Rights Policy; Waste Management Policy and Supplier Code of Conduct. The Company has been integrating policy adherence into new contracts with third-party O&Ms, asset managers and EPCs, given their role in servicing the Company’s portfolio.

References to international standards

The Company utilises an ESG due diligence questionnaire to assess sustainability-related aspects of its prospective investments. The tool was developed in line with SASB Standards and encompasses requirements of the EU Taxonomy’s “Do No Significant Harm” (DNSH) screening criteria, SFDR PAI indicators, and considerations derived from the recommendations of the Taskforce for Climate-Related Financial Disclosures (TCFD). ESG due diligence of prospective investments (including any associated O&M parties) is undertaken alongside traditional legal and technical due diligence, to inform investment decision-making in alignment with ESG regulatory frameworks and the Company’s responsible investment approach. For more information about how sustainability considerations are integrated into the investment process, please refer to the Company’s Sustainable Investment Policy. The Company’s Investment Adviser, who implements this process and policy, has remained a signatory to the Principles for Responsible Investment (PRI) since 2019.

As referenced, the Company’s Human Rights Policy and Supplier Code of Conduct were informed by international frameworks for human rights, including the UNGC principles and OECD Guidelines for Multinational Enterprises. The PAI indicators related to social and employee matters, in particular ‘a lack of processes and compliance mechanisms to monitor compliance with and violations of the UNGC and OECD Guidelines’, complements the Company’s alignment with these frameworks.

The Company has developed its own set of ESG KPIs to monitor the activities it undertakes to address its material ESG risks and opportunities. Progress is reported each financial year within the Company’s annual report; please refer to the 2023 Annual Report for the latest set of results.

During the reference period, the Company made its second voluntary disclosure in line with the TCFD. Progress in relation to the identification and management of material climate-related risks and opportunities is disclosed using metrics outlined within the Company’s TCFD and ESG disclosures, both of which are reported in line with its financial year. Please refer to the Company’s 2023 Annual Report for further information. The Company also updated and enhanced the methodology used to assess GHG emissions indicators by aligning it with the Partnership for Carbon Accounting Financials (**PCAF**). PCAF is a global initiative to address emissions specifically related to financial activities, enabling financial institutions to more accurately measure and disclose the emissions associated with financial portfolios and investments.

Historical comparison

A historical comparison has been provided in the tables of this disclosure template. As described, due to methodological enhancements, there is limited comparability between the 2022 and 2023 PAI impacts.