



JLEN

JLEN Environmental Assets Group Limited

Sustainability and ESG Report 2024

SUSTAINABILITY AND ESG

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ESG COMMITTEE CHAIR'S FOREWORD



In order to appropriately manage and communicate our approach to ESG and climate-related risks and opportunities, we continually seek to evolve and reflect changing best practice.

Jo Harrison
Chair, ESG Committee

In FY23/24, JLEN progressed four key ESG workstreams. The first was to set a target to be net zero by 2050, covering Scope 1, 2 and 3 emissions. This target is to be supported and informed by a Transition Plan, developed in line with the Transition Plan Taskforce Disclosure Framework, with associated interim targets currently under development. The Transition Plan is due for publication later in the year and will help to inform our sustainability-related disclosures in the future, for example disclosures against the Standards set by the International Sustainability Standards Board.

The second key workstream was a full review of our ESG KPIs. The review sought to identify those indicators against which we could set meaningful targets, as well as those indicators that were no longer as valuable in improving our understanding of our portfolio. The result is a streamlined set of ESG KPIs with targets set against some of the core indicators, against which we will be reporting going forwards.

The third workstream sought to progress biodiversity enhancement and understanding across JLEN's assets. This took the form of habitat enhancement at individual assets, as well as a pilot project to review nature-related risks using the Taskforce on Nature-related Financial Disclosures ("TNFD") methodology.

Finally, JLEN improved its cyber resilience in FY23/24, prioritising those assets that were shown to have vulnerabilities during the review undertaken in FY22/23. This work has been completed and has paved the way for further work to be undertaken to boost the cyber resilience of the entire JLEN portfolio.

In order to appropriately manage and communicate our approach to ESG and climate-related risks and opportunities, we continually seek to evolve and reflect changing best practice. Our Investment Manager maintains a proactive approach to emerging ESG regulations and standards. JLEN seeks to be an early adopter of these standards, often taking a voluntary approach to reporting and alignment, as with our Task Force on Climate-related Financial Disclosures ("TCFD") report. This year's focus has been on the UK Sustainability Disclosure Requirements and its implications across multiple teams and activities.

JLEN's ESG reporting naturally needs to evolve to reflect our ongoing development of processes. This year's report combines our TCFD and ESG disclosures into one document, allowing JLEN's reporting to be more closely integrated and to better respond to changing best practice and new regulations as they enter into force.

Our ESG reporting is a key part of our offering and JLEN is proud to have been named "Best Sustainable Alternative Asset Fund" in the 2023 Investment Week Sustainable Investment Awards.

Jo Harrison
Chair, ESG Committee
20 June 2024

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AT A GLANCE

Net zero by 2050

This year, JLEN's Board of Directors set a decarbonisation target. JLEN's objective is to achieve net zero greenhouse gas emissions across Scope 1, 2 and 3 by 2050. This target is being informed and progressed by the development of a Transition Plan, which is due for publication later in the year. Interim targets to support the net zero target are currently under development.

Focusing the KPIs

Following three years of data collection, JLEN and the Investment Manager have worked to focus its KPIs on those that it can set meaningful targets against. More information on the focused list of KPIs is set out on pages 26 to 28.

Awards

JLEN is proud to have been named "Best Sustainable Alternative Asset Fund" in the 2023 Investment Week Sustainable Investment Awards. The awards recognise fund providers, research and ratings teams, service providers and individuals who have a key part to play in the evolution of sustainable investing.

Developing a Transition Plan

In FY23/24, JLEN has been working with an external consultant to develop a Transition Plan for the Company, which aims to progress JLEN's net zero target. The plan is being developed in line with the recently finalised Transition Plan Taskforce Disclosure Framework. JLEN's first transition plan is due for publication towards the end of FY24/25.

Proactive approach to evolving regulations

The Investment Manager has developed a working group to track the implications of the Sustainability Disclosure Requirements ("SDR") across the whole of its activities. The working group's remit is to identify the teams that will be most impacted by SDR and ensure that the requirements are being integrated into the business's ways of working. JLEN's Board of Directors are working closely with the Investment Manager to voluntarily integrate SDR considerations into the Company's reporting.

Progress against planned initiatives

The following initiatives were identified in JLEN's 2023 TCFD report. Progress against each initiative during FY23/24 is set out below.

Planned initiative	Progress in FY23/24
Produce and roll out cyber security policy across the portfolio	Cyber resilience testing has been completed and improvements have been rolled out to all of JLEN's wind assets. A new cyber security policy is in development and is due for publication in 2025.
Roll out Ethixbase due diligence checks across the JLEN supply chain	The Investment Manager expanded the programme to undertake due diligence on new primary (tier 1) suppliers.
Review requirements for completion of a Transition Plan in line with the Transition Plan Taskforce Disclosure Framework	An external consultant has been commissioned to work with the Investment Manager to develop a Transition Plan that is aligned with the TPT Disclosure Framework.
Continue to refine and embed assessment of climate risks into the portfolio risk management framework	This action is being considered as part of the development of the Transition Plan.
Continue to work with the supply chain to calculate scope 3 emissions more accurately	The Investment Manager has reviewed this action and considers the use of PCAF ⁽¹⁾ emissions factors to be in line with good industry practice.
All assets to have a habitat management plan in place	69% of assets now have a habitat management plan in place. This is a significant increase from FY22/23 as the Investment Manager continued to roll out commissioned biodiversity baseline works.
Implement biodiversity enhancement at JLEN's anaerobic digestion sites	Habitat improvements were implemented at two of JLEN's nine AD sites. New habitats were planted, and shelters and nesting boxes provided for birds and hedgehogs. Habitat improvement works were also undertaken at one of JLEN's solar sites.

(1) Partnership for Carbon Accounting Financials: <https://carbonaccountingfinancials.com/about>.

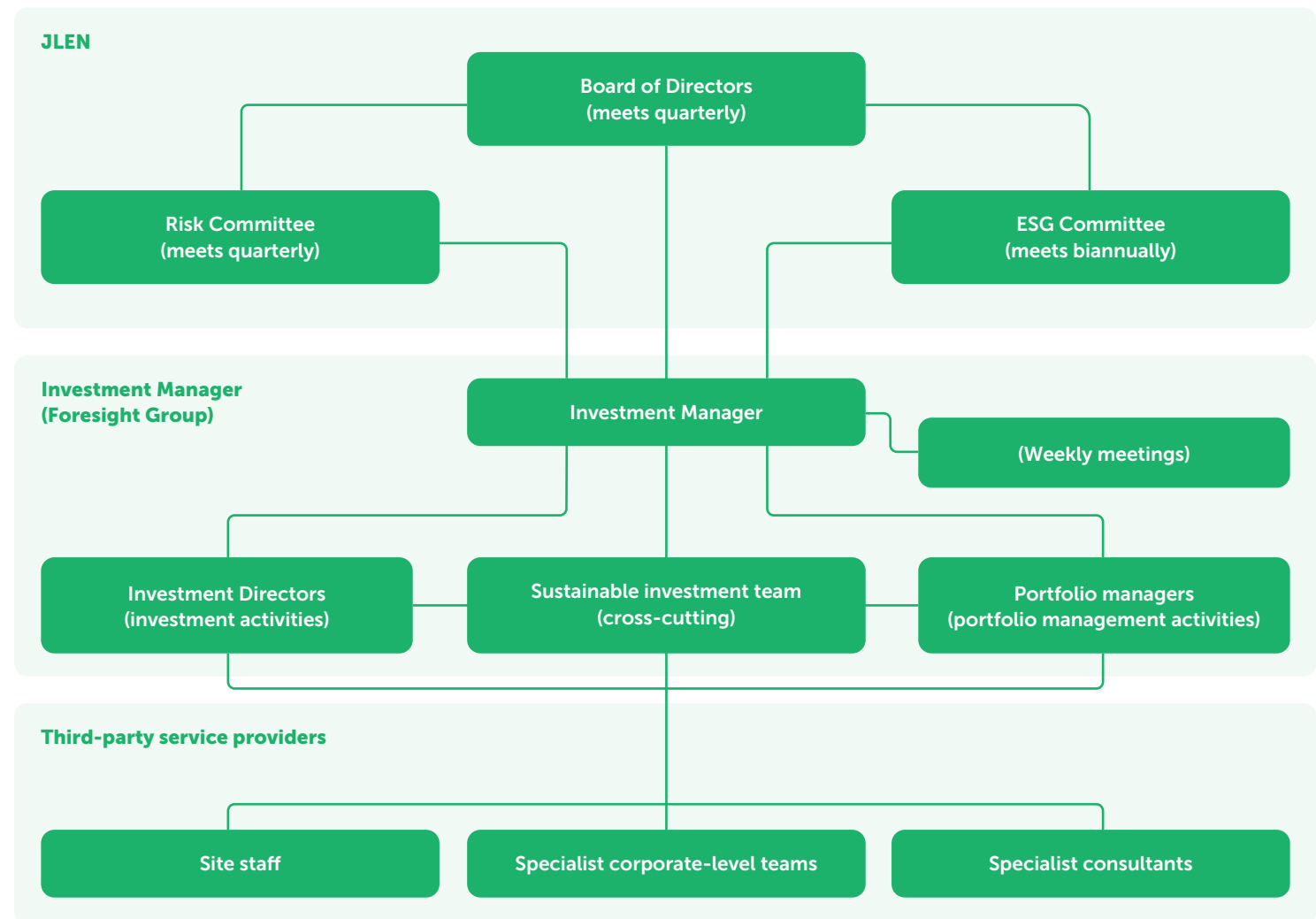
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GOVERNANCE

Overall responsibility for ESG resides with the Board of JLEN, with analysis and reporting against ESG criteria provided by JLEN's Investment Manager. JLEN's approach to ESG is based on three core principles: Assess, Monitor and Engage. Since the publication of the Company's first ESG report, JLEN has been focused on progressing each of these principles in order to maintain a robust ESG framework. Implementation of the core principles is underpinned by having the right people, policies and processes in place.

People

JLEN does not have any direct employees and, instead, actively engages with its Investment Manager, Foresight Group, to deliver on its ESG commitments. In order to achieve this, JLEN has a clear governance structure in place to ensure that management and monitoring of ESG and climate-related risks and opportunities are embedded into the decision-making processes of the Company, including its investment and portfolio management activities. The mechanisms by which ESG and climate-related risks and opportunities are managed helps to inform JLEN's strategy. Through this governance approach, JLEN's Board of Directors are supported and advised by a broad team of people with significant experience across the environmental infrastructure and wider sustainability landscape.

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GOVERNANCE continued

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JLEN's Board holds overall responsibility for decision making around ESG, including climate-related risks and opportunities. The Board of Directors has significant combined experience across the environmental infrastructure landscape, including risks and opportunities related to ESG and climate change. More information on the Directors can be found on pages 109 and 110 of the Annual Report and on JLEN's website⁽¹⁾. JLEN's Board of Directors meets quarterly and is advised by the Chairpersons of both the ESG Committee and Risk Committee at each meeting.

Among its other responsibilities, the Board conducts an annual review of the performance of the Company's Investment Manager, as well as other service providers and professional advisers.

Risk Committee

- Oversees JLEN's comprehensive risk management framework
- Comprises independent non-executive Directors
- Meets quarterly
- Responsible for identifying, measuring, managing and monitoring – appropriately and regularly – all risks relevant to the Company's investment strategy and to which the Company is, or may be, exposed. This covers ESG risk management, including climate-related risks.

- Advises the Board each quarter on the current and potential risk exposures of the portfolio, with particular focus on the Company's principal risks (those with the greatest potential to influence shareholders' economic decisions) and the controls in place to mitigate those risks
- Climate-related physical risk is a principal risk on the Group's risk register
- Other transition risks are specifically identified in the risk register, such as changing power prices and the extent of government support

ESG Committee

- Oversees ESG matters for JLEN
- All JLEN Directors also serve on the ESG Committee
- Meets biannually
- Responsible for JLEN's ESG strategy, ESG objectives and KPIs, and monitoring ESG progress
- Assesses and prioritises ESG risks and opportunities for the Company, including climate change risks under the TCFD framework and with relevant input from the Risk Committee
- Oversees the ESG and annual regulatory reporting
- Identifies relevant ESG training and opportunities
- Where risks are identified by the Committee, these will be referred to the Risk Committee for further consideration and inclusion in the risk register
- Receives a formal report from the Investment Manager biannually

Investment Manager

The investment management team is responsible for overall oversight of the JLEN portfolio and for ensuring that appropriate governance and policies are in place across the portfolio of assets.

In addition to discussing individual assets at the Investment Committee and other related meetings, the team holds responsibility for overseeing sustainability and ESG across JLEN's activities on behalf of the Board of Directors. Further information on the Investment Managers' skills and experience can be found on page 18 of the Annual Report.

The team works directly with, and is advised by, Foresight Group's sustainability team, which comprises sustainability professionals who hold responsibility for ESG and sustainability across Foresight Group. Further information on the sustainability team can be found on Foresight's website⁽²⁾.

Portfolio-level ESG and climate-related risks and opportunities are given a regular platform for discussion in weekly ESG and sustainability meetings, as well as further reporting and engagement with the JLEN Board and wider Foresight Group teams.

The team also works closely with the portfolio managers in order to understand and manage ESG and climate-related risks and opportunities and KPIs, as well as to progress the wider ESG objectives set by JLEN's Board.

Investment Manager PRI scores

Robust integration of ESG into the investment lifecycle: Foresight Group is a signatory to the Principles for Responsible Investment ("PRI"), a set of voluntary guidelines that help companies to address social, ethical, environmental and corporate governance issues as part of the investment process. The scorecard for Foresight Group's latest annual assessment is available via the PRI's assessment portal but, in summary, the Investment Manager achieved:

Category	Module score	Star score
Policy Governance and Strategy – Group	92	★★★★★
Direct – Infrastructure	96	★★★★★
Confidence Building Measures	100	★★★★★

The latest assessment transparency report is available on Foresight Group's website⁽³⁾ and on the UN PRI website⁽⁴⁾.



- (1) <https://jlen.com/about/board-of-directors/>.
 (2) <https://www.foresightgroup.eu/about-us/people>.
 (3) <https://media.umbraco.io/foresight/1xxlcbb5/private-full-transparency-report-foresight-group-holdings-ltd.pdf>.
 (4) <https://ctp.unpri.org/dataportalv2/transparency>.

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In order to ensure continuous improvement in JLEN's ESG and climate-related processes, training is provided on a range of relevant topics. In 2023/24, the JLEN Board was provided with a detailed update on the Transition Plan Taskforce Disclosure Framework. Board members were invited to engage with the ongoing development of JLEN's Transition Plan and feed into key commitments, helping to develop the Strategic Ambition for the plan.

Sustainability-linked objectives

Entity	Sustainability-linked objectives
JLEN Board of Directors	<p>JLEN's primary objective is to attain its goals by investing in a diversified portfolio of environmental infrastructure projects that support more environmentally friendly approaches to economic activity whilst generating a sustainable financial return.</p> <p>JLEN's Board of Directors is mandated to ensure that the Company achieves its primary objective. Directors receive a fixed fee per annum based on their role and responsibility within the Company and the time commitment required. It is not considered appropriate that Directors' remuneration should be performance related.</p>
Investment Manager	<p>Foresight is required by JLEN to help the Company achieve its primary objective.</p> <p>All Foresight employees are obliged to incorporate one or more sustainability-related objective(s) as part of their annual appraisal. Failure to achieve those objectives will result in an impact to the overall performance grade of the individual. This commitment by Foresight Group ensures that there is a mechanism in place for inclusion of specific climate-related performance targets in future.</p>

Policies

JLEN's investment policy is grounded in ESG principles, prioritising environmental, social and governance considerations. Its primary objective is to attain its goals by investing in a diversified portfolio of environmental infrastructure. Environmental infrastructure, as defined by JLEN, encompasses infrastructure assets, projects and asset-backed businesses that leverage natural or waste resources, promote environmentally friendly economic activities, facilitate the transition to a low-carbon economy or mitigate the impacts of climate change.

To support the investment policy, JLEN has established three ESG objectives:

Promote the efficient use of resources	Develop positive relationships with the communities in which JLEN operates	Ensure effective and ethical governance across the portfolio
<p>To invest in projects that manage the availability of natural resources, whether through utilisation of renewable resources, increasing resource or energy efficiency, or reusing or recovering waste.</p>	<p>To encourage positive relationship-building between portfolio assets and the communities in which they sit.</p>	<p>To manage portfolio assets in a way that promotes ethical, effective governance.</p>
<p>Example criteria:</p> <ul style="list-style-type: none"> resource management life on land/below water climate change and resilience 	<p>Example criteria:</p> <ul style="list-style-type: none"> health and wellbeing local economic impact – job creation local social impact community engagement and benefit 	<p>Example criteria:</p> <ul style="list-style-type: none"> anti-bribery and corruption modern slavery audit and tax practices environmental impact health and safety practices board composition

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JLEN does not provide goods or services in the normal course of business and has no customers, employees or turnover. As a result, JLEN does not fall within the scope of the UK Modern Slavery Act 2015 (the "Modern Slavery Act"). However, the Directors recognise the critical importance of preventing modern slavery and have chosen to develop a voluntary statement as part of the Company's ongoing commitment to high standards of business conduct and in recognition of the importance of the issues which the Modern Slavery Act seeks to address. This statement has been drafted and will be made available on the Company's website at the time of publication of this report.

The Board specifically notes the Investment Manager's Modern Slavery Act statement which sets out the Investment Manager's approach to matters such as services and supply chain due diligence and training of employees, recruitment and welfare. The Investment Manager's policy and practices in relation to modern slavery and human trafficking are included in the Foresight Group's Modern Slavery Act statement which is available at <https://www.foresightgroup.eu/modern-slavery-statement>.

Investment Manager policies

The Board acknowledges that, as non-executive Directors of an externally managed investment company, their influence is necessarily limited and will be significantly informed by the approach and policies of the Investment Manager. Foresight, as JLEN's Investment Manager, applies a series of policies in the management of the Company's assets. These policies include:

- Human Rights policy and approach;
- Sustainability and ESG policy;
- Modern Slavery policy;
- Approach to diversity, equity and inclusion;
- Anti-bribery and corruption policy;
- Anti-money laundering policy;
- Anti-tax evasion policy; and
- Whistleblowing policy.

Processes

ESG considerations, including analysis of climate-related risks and opportunities, are embedded throughout the Investment Manager's investment and asset management processes, from initial investment screening through due diligence and into ongoing monitoring and reporting.

JLEN approaches ESG via the following principles:

Assess

The Investment Manager undertakes due diligence on each of its asset acquisitions, including assessing a range of ESG criteria.

Each asset is evaluated in accordance with Foresight's Sustainability Evaluation Tool ("SET"). Further information on the SET and its underlying criteria is set out on page 22. The assets are scored against the criteria, providing an overall picture of ESG performance. Foresight has minimum thresholds for ESG performance, ensuring that, where necessary, post-investment improvement plans are implemented.

Monitor

Third-party service providers, sometimes with the assistance of technical advisers, monitor and manage the ongoing performance of each asset in the JLEN portfolio and report periodically to the Investment Manager. Site visits are undertaken by the Investment Manager to ensure that the asset's day-to-day running and ESG performance is as expected, and there are a range of audits undertaken by third parties to maintain visibility over ESG performance in the portfolio.

ESG updates are provided to the ESG Committee on a biannual basis, these updates help to inform JLEN's risk management process and the ongoing evolution of JLEN's strategy.

Engage

Stakeholder engagement is an important part of JLEN's approach. Engagement with stakeholders occurs through a combination of formal (e.g. contractual obligations or industry events) and informal channels (e.g. ongoing meetings and discussions). Further information on stakeholder engagement can be found on pages 60 to 64 of the Annual Report.

Reporting is an essential part of JLEN's stakeholder communication and the Investment Manager works to ensure its ESG reporting is continually improving and meeting the highest standards to support that.

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from page 26**ESG monitoring and engagement at asset level**

In order to ensure that ESG is being considered at all levels, in 2021/22 JLEN mandated that all board agendas for asset-level SPVs routinely include discussions around ESG matters. This formal mechanism is used to help roll out decisions made by the ESG Committee across all assets and to gather asset-specific ESG information. The mechanism provides consistency of approach and ESG engagement across JLEN's portfolio.

Processes for assessing and managing climate-related risks and opportunities**Climate-related risks**

The identification, assessment and management of risks are integral aspects of the Investment Manager's work in both managing the existing portfolio on a day-to-day basis and pursuing new investment opportunities (though the Board has ultimate responsibility for the risk management activities of the Group).

The Investment Manager has established internal controls to manage risks and the management team reviews and considers the Group's key risks, with the Risk Committee, on a quarterly basis. This includes consideration of climate-related risks and will cover new risks arising as well as changes in the likelihood or impact of any particular risk. Further information on the approach to managing climate-related risks can be seen on pages 21 to 23.

Climate-related opportunities

There are two key opportunities that the management team considers:

Sector opportunities –

the JLEN team frequently evaluates opportunities for infrastructure investments that generate lower GHG emissions than precursor infrastructure or that support the transition to a low-carbon economy. These opportunities are discussed with, and considered by, the JLEN Board.

Value-enhancing opportunities –

the Investment Manager assesses existing portfolio assets for opportunities to enhance climate-related performance and discusses assessment findings with the JLEN Board where appropriate, which holds responsibility for authorising significant proposed enhancements.

At an investment level, consideration of the sustainability credentials of environmental infrastructure and their resilience to climate-related physical risks is undertaken in accordance with a set of sector-specific assessment parameters underlying the five key areas of Foresight's proprietary Sustainability Evaluation Tool.

Emerging transition risks are considered by the Investment Manager's valuation team and these risks are then escalated to the Company's risk register and the Board, if appropriate. Further details of Foresight's approach to sustainability and how this is carried through practically to assessing climate-related risks and opportunities are set out in the risks and risk management section of this report on pages 21 to 23.



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Developing strategic approaches to biodiversity risk

Assessment and monitoring of biodiversity impacts is routinely undertaken at the asset level. Emerging frameworks, such as the Taskforce on Nature-related Financial Disclosures ("TNFD"), require portfolio-level monitoring of nature-related risks and opportunities. This requires consideration of available tools under development, which would not replace asset-level surveys and monitoring, but will provide portfolio-level overviews and tiered risk assessments. The approach is designed to feed directly into governance processes, as well as strategic decision making.

In FY23/24, Foresight Group partnered with Frontierra, an environmental geospatial consultancy specialising in the evaluation of nature-related risks, to undertake a TNFD pilot project.

The project assessed the associated nature-related impacts, dependencies, risks and opportunities of a number of assets across several funds, including 22 of JLEN's solar, onshore wind and energy-from-waste assets.

Funded by the UK Space Agency, the project evaluated each asset against the following key nature-related aspects:

Biomes	Biodiversity hotspots
Critical habitat	Protected areas
Indigenous areas	Deforestation
Ecosystem integrity	Water stress

The mapping exercise also considered material nature-related dependencies and impacts of each of the asset types.

Following the assessment, JLEN representatives attended an interactive workshop to discuss the findings and results of the assessment in order to determine and discuss the associated nature-related risks and opportunities at each asset. This involved detailed consideration of the processes and procedures already in place at each asset, and the identification of additional processes required to strengthen the governance and management of nature-related risks. Importantly, the workshop also identified methods to capitalise on nature-related opportunities.

The tool will assist in developing JLEN's disclosures against TNFD in the future. Additionally, the Investment Manager is identifying opportunities for using this tool across a wider selection of the portfolios that it manages and has partnered with Frontierra to apply for a further grant from the UK Space Agency in order to expand and customise the platform's capabilities. This expansion is expected to enhance decision-making opportunities through improved identification of nature-related risks and mitigants.



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By virtue of its investment policy, JLEN aims to make a significant contribution to reducing global GHG emissions and mitigating climate change. This goal is embedded into horizon-scanning activities that the Investment Manager undertakes on behalf of the JLEN Board of Directors – seeking to identify risks and opportunities for the portfolio.

In addition to horizon-scanning activities, the Investment Manager undertakes stakeholder engagement to understand stakeholder needs and the options for responding to those needs. The Investment Manager also maintains a watching brief on forthcoming disclosures frameworks and seeks to be an early adopter of core elements of those frameworks where possible.

Stakeholder engagement

JLEN's strategy is informed and driven by stakeholder engagement, aligning with JLEN's core principle: Engage. Information on different stakeholder types, how the Company has engaged and the key strategic decisions impacting the various stakeholder groups in the year, is set out on pages 60 to 64 of the Annual Report.

Materiality assessment

This year, Foresight Group undertook a double materiality assessment which is intended to inform the various activities that the Investment Manager undertakes.

The assessment examined both the impact of operations on the environment and society (impact materiality) and how environmental and social factors affect financial performance and reputation (financial materiality). The analysis was designed to align with the requirements of the European Sustainability Reporting Standards. The methodology involved mapping the value chain, engaging stakeholders, and assessing ESG impacts and financial implications.

The assessment identified key environmental impacts, such as the energy-intensive production of renewable technologies, and social concerns such as health and safety, gender inequality and human rights issues. Strong corporate governance was emphasised to mitigate risks such as corruption and unethical behaviour. It also highlighted financial risks and opportunities, such as the impact of volatile energy prices and the reliance on high climate-impact raw materials. Social risks, including human rights concerns in raw material sourcing and high employee turnover, were noted. Transparency in financial products and avoiding greenwashing were identified as crucial to maintaining investor trust.

Further analysis is ongoing, and the results of this assessment will help the Investment Manager to inform JLEN's strategy and its management of ESG and climate-related risks and opportunities going forward.

Monitoring future disclosures

The Investment Manager proactively monitors and engages on a series of evolving disclosures standards. JLEN seeks to be an early adopter of standards where possible, including voluntarily disclosing information such as through its voluntary TCFD reporting. This approach helps JLEN and its Investment Manager to develop its strategy in line with emerging regulations and standards, helping to reduce risks but also helping to identify opportunities for the Company to improve its stakeholder communication and approach to investment management.

The Taskforce on Nature-related Financial Disclosures ("TNFD")

The TNFD has developed a set of disclosure recommendations and guidance that encourage and enable business and finance to assess, report and act on their nature-related dependencies, impacts, risks and opportunities. The recommendations and guidance are designed to enable businesses and finance to integrate nature into decision making.

International Financial Reporting Standards Foundation's International Sustainability Standards Board ("ISSB")

In FY23/24 the International Sustainability Standards Board ("ISSB") issued its inaugural standards – IFRS S1 and IFRS S2 – with the aim of helping to improve trust and confidence in company disclosures about sustainability to inform investment decisions.

The Standards create a common language for disclosing the effect of climate-related risks and opportunities on a company's prospects. IFRS S1 provides a set of disclosure requirements designed to enable companies to communicate to investors about the sustainability-related risks and opportunities they face over the short, medium and long term. IFRS S2 sets out specific climate-related disclosures and is designed to be used with IFRS S1. Both fully incorporate the recommendations of the Task Force on Climate-related Financial Disclosures ("TCFD").

JLEN expects to adopt the ISSB reporting standards as and when the UK Sustainability Reporting Standards ("SRS") have been finalised and formally endorsed. Endorsement of the ISSB Standards is anticipated to take place in Q1 2025, with clarity over the expected timeline of adoption to be published thereafter. More information overleaf.

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The UK Government's framework to create a UK-based mechanism that endorses and governs the global corporate reporting baseline of IFRS Sustainability Disclosure Standards (IFRS S1 and S2). The government is anticipated to make the UK-endorsed ISSB standards available in Q1 2025.

UK Sustainability Disclosure Requirements ("SDR")

In November 2023, the FCA published the final rules on Sustainability Disclosure Requirements ("SDR") and investment labels, with the first requirement, the FCA's anti-greenwashing rule, taking effect from May 2024. The SDR enables in-scope UK-domiciled funds to apply the FCA's sustainability investment labels from 31 July 2024. At present, the SDR and investment labels will only apply to UK-domiciled funds; however, the UK Government has confirmed its intention to consult on how the regime can be extended to apply to overseas-domiciled funds in Q3 2024.

Although JLEN, as a Guernsey company, does not fall within the scope of the SDR and investment labels, the Board and the Investment Manager believe that the nature of JLEN's business and strategy is intrinsically aligned to the goal of a greener and less carbon-intensive future. JLEN is already positioned under Article 9 of the EU's SFDR, as a fund that has sustainable investment as an objective, and the Board and Investment Manager consider that the FCA's SDR is a key step to enable UK investors to have better confidence with respect to sustainable investment products. As a result, JLEN is voluntarily seeking to demonstrate alignment with the SDR's "Sustainability Focus" investment label as a matter of best practice, and will make available consumer-facing and pre-contractual disclosures later this year in accordance with the requirements and timeframes under the SDR.

The Investment Manager will continue to monitor the development and implementation of the SDR and investment labels, including the government's consultation on overseas funds later this year.

UK Green Taxonomy

In its 2023 Green Finance Strategy, the UK Government reiterated its commitment to developing a UK Green Taxonomy. As an Article 9 Fund under SFDR, the JLEN portfolio aligns with published sustainable investment criteria. A change to those criteria is identified as a climate-related risk on page 16. The Investment Manager continues to monitor progress in this area, and any implications it may have on the JLEN portfolio of assets.

Transition Plan Taskforce

In April 2022, the UK Government launched the Transition Plan Taskforce ("TPT") to develop a framework to help companies communicate their plan to achieve net zero to shareholders and other stakeholders.

The TPT's voluntary Disclosure Framework was published in October 2023 and has been designed to integrate with and build from the approach to transition plans found in both the UK regulations and FCA rules that implement the Task Force on Climate-related Financial Disclosures ("TCFD") recommendations, as well as the ISSB Standards and guidance from the Glasgow Financial Alliance for Net Zero ("GFANZ") on transition plans.

JLEN has commissioned the development of a Transition Plan in line with the TPT Disclosure Framework, the first iteration of which is due to be published by the end of FY24/25.

Developing European regulations

The Investment Manager monitors other recently implemented and developing ESG frameworks closely, such as the European Sustainability Reporting Standards ("ESRS") drafted by the European Financial Reporting Advisory Group ("EFRAG") as part of the Corporate Sustainability Reporting Directive ("CSRD").

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The tables on the following pages identify the top climate-related risks and opportunities and JLEN's response to them, demonstrating the impact that the risks and opportunities identified have on JLEN's business, strategy and financial planning. Each of these risks inform JLEN's principal risk register, and where direct linkages exist, those have been cross-referenced in this section. Further information on how the business responds to risk can be seen in the risks and risk management section of the Annual Report on pages 53 to 59.

This year, JLEN worked to further integrate climate-related risks with its overall risk management process overseen by the Risk Committee. This includes ensuring that climate-related risks are measured against the same impact and probability category definitions as the wider risk register, although the assessment is over a longer time period, as defined to the right of the page. Additionally, the Investment Manager is working to better integrate consideration of financial impacts into its climate-risk analysis.

The result is that climate-related risks are now integrated into JLEN's principal risk register, principal risks are set out on pages 55 to 59 of the Annual Report. The risks set out in this section are those underlying transition and physical risks that have helped to inform the principal risk register.

Climate-related risks and opportunities are assessed against the following timescales:

Timescale	Period	Justification
Short term	0-3 years	Aligns with the recommendations of the Transition Plan Taskforce Disclosure Framework
Medium term	4-15 years	This timescale encompasses 2030 to 2040, which is subject to significant levels of transition risk resulting from decarbonisation targets
Long term	16-30 years	Relates to the typical design life of environmental infrastructure assets and encompasses 2050, a key date for delivering net zero carbon emissions

JLEN's Investment Manager routinely analyses emerging environmental technologies and identifies whether they fit within JLEN's investment appetite, maintaining a watching brief on those technologies over time. More information on this can be found in the Investment Manager's report on pages 15 to 52 of the Annual Report.

Sector-level resilience

In order to further understand the top physical risks for each sector that JLEN invests in, the Investment Manager has worked to disaggregate the climanomics analysis further. Information on the top physical risks to each sector is set out in the table overleaf.








This work will be expanded on to understand the materiality associated with each of these risks, as well as associated timescales.

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Sector-level risks

Sector	Share of portfolio value	Geographies	Top physical risks	Impact	Mitigation
	27%	UK	Temperature extremes	Increased technology and equipment degradation	Ongoing assessment of equipment degradation and technology-specific thresholds for safe operating temperatures Flexibility in fund mandate to invest in new technology types
	24%	Italy	Temperature extremes	Exceedance of threshold for safe operating conditions	Ongoing assessment of equipment degradation and technology-specific thresholds for safe operating temperatures
			Drought/water stress	Impact on performance due to lack of water to generate steam for the turbines	Assessment of ability to hold additional water reserves or ability for water recycling
		UK	Temperature extremes	Exceedance of threshold for safe operating conditions	Ongoing assessment of equipment degradation and technology-specific thresholds for safe operating temperatures
	14%	UK	Temperature extremes	Exceedance of threshold for safe operating conditions	Ongoing assessment of equipment degradation and technology-specific thresholds for safe operating temperatures Apply mitigation measures, e.g. retrofit cooling mechanisms
	18%	UK	Drought/water stress	Reduced performance due to localised water stress. This is mainly related to the impact of water stress and drought on crop growth	Analyse whether larger clamps are required in order to store more feedstock Flexibility in fund mandate to invest in new technology types
	9%	UK	Fluvial and pluvial flooding	Reduced performance due to water damage	Undertake a review of flood risk management plans
	7%	Norway	Temperature extremes	Increased technology and equipment degradation Exceedance of threshold for safe operating conditions	Ongoing assessment of equipment degradation and technology-specific thresholds for safe operating temperatures Apply mitigation measures, e.g. retrofit cooling mechanisms
	1%	UK	Inconsistent water availability (flooding and drought)	Volatile generation profile driven by excess rainfall and/or drought conditions	There is minimal mitigation available for this. The Investment Manager can consider climate risk in forecasting and annual budgets

SUSTAINABILITY AND ESG

STRATEGY continued

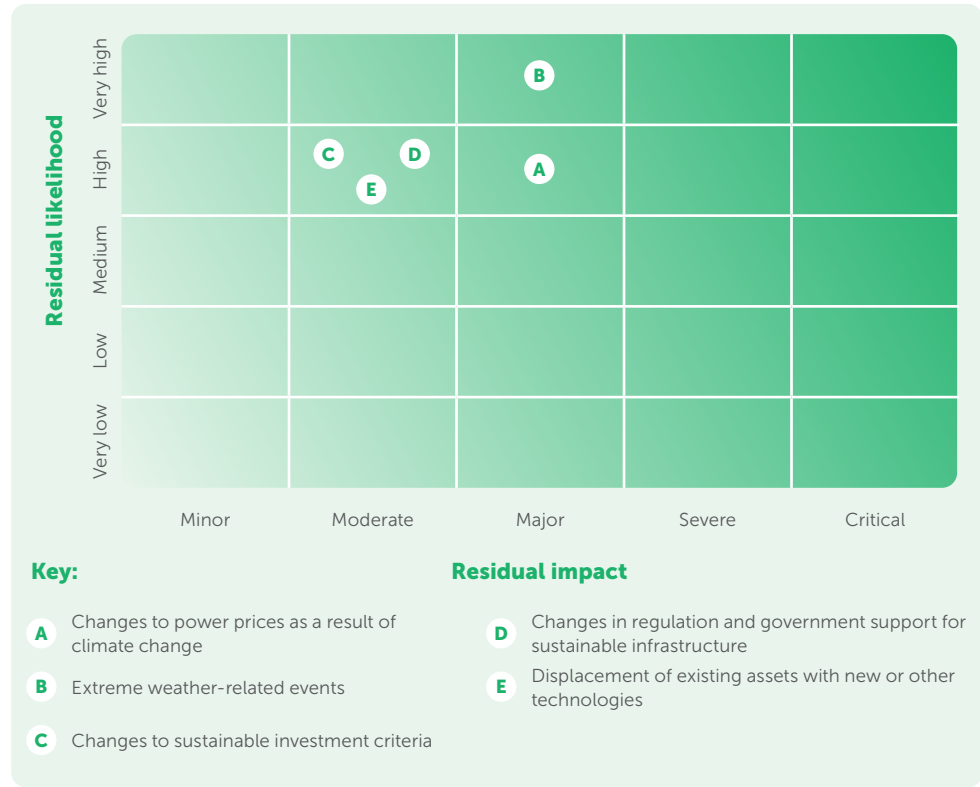
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Portfolio-level risks



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Risk type	Description	Time period	Financial impact	Investment Manager's response	Area of impact	Main risk register reference
A Changes to power prices						
Transition (market)	<ul style="list-style-type: none"> Lower than forecast power prices due to warmer winters or increased renewables deployment Increased power prices due to short-term shocks/decreased energy supplies from low wind resource or problems in the gas network could lead to governments turning to less sustainable ways of generating energy that are available in the shorter term – e.g. coal 	S, M, L	££	<ul style="list-style-type: none"> The majority of assets in the portfolio earn revenues that are not dependent on merchant power sales and various mechanisms are in place to help mitigate the risk of lower power prices (see principal risks on pages 55 to 59 of the Annual Report) Arguments for supporting less sustainable alternatives to manage short-term power price shocks are, on the whole, not supported by society, although, sometimes short-term pragmatism overrides this when combined with security of supply needs 	Strategy, Financial planning, Company's investments	5 6 7 9
B Extreme weather-related events						
Physical	Extreme weather-related events, either chronic (e.g. changing wind patterns, heat stress, rising sea levels) or acute (e.g. storms, heat wave, drought, floods), causing damage to Company assets or negatively impacting their production	M, L	££	<ul style="list-style-type: none"> Having conducted a review of the physical risks to the portfolio, the physical risks are largely localised and the impact of a single event or limited set of events is deemed to have a negligible impact to the overall portfolio; nevertheless, this is kept under close review by the Investment Manager 	Strategy, Financial planning, Company's investments	5 6 7

Timescales: S Short term (0-3 years) M Medium term (4-15 years) L Long term (16-30 years)

Financial impact: £ Moderate financial impact ££ Major financial impact £££ Severe financial impact

Risk register key: 3 Changes in regulation and government support 4 Reputational 5 Asset exposure to weather resource 6 Climate change – physical risk 7 Volume and cost of feedstock resource 9 Exposure to market power prices

SUSTAINABILITY AND ESG

STRATEGY continued



Risk type	Description	Time period	Financial impact	Investment Manager's response	Area of impact	Main risk register reference
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C Changes to sustainable investment criteria

Transition (regulation, market)	<ul style="list-style-type: none"> As the energy transition proceeds, and scientific knowledge regarding the consequences of particular courses of action increases, there is a risk that activities and assets that were once classified as "sustainable" become reclassified as "unsustainable" with consequences for JLEN's ownership of such assets Litigation risk if the EU and financial institutions continue to turn away from the energy-from-waste ("EfW") sector and policy developments penalise EfW assets. This could limit future deployment and impact lifecycle emissions for EfW assets in JLEN's portfolio 	S, M	£	<ul style="list-style-type: none"> JLEN invests in assets that contribute to the acceleration of the energy and sustainability transition and have strong transition characteristics. Third-party expert validation of the sustainability credentials of assets is sought where appropriate. Meanwhile, the Investment Manager assumes an active role in policy discussions and remains abreast of sustainable investment changes and reviews its strategy accordingly The diversified nature of JLEN's portfolio protects the Company against overexposure to any one sector. If deemed appropriate in the future, JLEN would review a phase out of EfW from the Company's investment strategy 	Strategy, Company's investments	3 4
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D Changes in regulation and government support for sustainable infrastructure

Timescales: S Short term (0-3 years) M Medium term (4-15 years) L Long term (16-30 years)

Financial impact: £ Moderate financial impact ££ Major financial impact £££ Severe financial impact

Risk register key: 3 Changes in regulation and government support 4 Reputational 5 Asset exposure to weather resource 6 Climate change – physical risk 7 Volume and cost of feedstock resource 9 Exposure to market power prices

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Risk type	Description	Time period	Financial impact	Investment Manager's response	Area of impact	Main risk register reference
Transition (market, regulation, reputation)	<ul style="list-style-type: none"> Changes in regulation to sectors in which JLEN is already invested, e.g. EfW not meeting criteria to be considered aligned to the EU Taxonomy Changes in farming regulation which impact the agri-AD portfolio Government support for short-term energy solutions that negatively impact the transition to a low-carbon future, e.g. support of coal 	S, M	£	<ul style="list-style-type: none"> Given the diversified nature of the assets, the impact is likely to be limited to a single asset or small part of the portfolio The risk over the long term is considered negligible as other avenues or solutions would be found for the asset or technology affected, such as selling an asset or finding alternative sources of feedstock 	Strategy, Financial planning	3 7
E Displacement of existing assets with new or other technologies						
Transition (technology)	<ul style="list-style-type: none"> As more resource and scientific-backed research is dedicated to achieving net zero goals, technologies could be developed that make current renewables or environmental infrastructure technologies obsolete. An example of this could be fusion power displacing all other forms of energy Other technologies such as nuclear or coal being prioritised in the short-to-medium term 	M, L	£	<ul style="list-style-type: none"> It is considered more likely that new technologies would be developed and JLEN is well positioned to invest in new energy solutions once they become proven at scale. It is unlikely that a single solution would be found for all the energy needs, but if it were, this would necessitate considerable buildout beyond the lifetime of JLEN's assets 	Strategy, Financial planning	n/a

Timescales: S Short term (0-3 years) M Medium term (4-15 years) L Long term (16-30 years)

Financial impact: £ Moderate financial impact ££ Major financial impact £££ Severe financial impact

Risk register key: 3 Changes in regulation and government support 4 Reputational 5 Asset exposure to weather resource 6 Climate change – physical risk 7 Volume and cost of feedstock resource 9 Exposure to market power prices

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Climate-related opportunities

Opportunity	Opportunity type	Description	Time period	Level of opportunity	Investment Manager's response	Area of impact
Increased demand for environmental infrastructure and businesses which support the transition to a low-carbon economy	Transition (market)	<ul style="list-style-type: none"> Increased demand for infrastructure which helps to balance the intermittent generation profile of renewables – e.g. battery storage Increased demand for shorter-term solutions to reach net zero by 2050, e.g. CNG refuelling stations and synthetic low-carbon fuels as a low-carbon transport option, while other solutions such as hydrogen power are further developed 	S, M, L	★★★	<ul style="list-style-type: none"> JLEN is already well positioned to invest in environmental infrastructure sectors that support the transition to a low-carbon economy, as can be demonstrated in the market and opportunities section of the Investment Manager's report on pages 20 to 24 of the Annual Report 	Strategy, Financial planning
Changes to energy pricing and market pricing of GHGs	Transition (regulation, market)	<ul style="list-style-type: none"> The market pricing of GHG emissions begins to increase which in turn drives the competitiveness of renewables Future changes to energy prices spurred by a clampdown on fossil fuels. Longer-term view on building out clean energy generation capacity when markets are supportive of renewables and prices are competitive 	S, M, L	★★★	<ul style="list-style-type: none"> JLEN is positioned to benefit from future increases in carbon pricing and cost competitiveness of renewables. JLEN is positioned to benefit from future increases in energy pricing and the increased buildout of renewables capacity 	Strategy, Financial planning

Timescales: S Short term (0-3 years) M Medium term (4-15 years) L Long term (16-30 years)

Level of opportunity: ★ Low opportunity ★★ Medium opportunity ★★★ High opportunity

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Opportunity	Opportunity type	Description	Time period	Level of opportunity	Investment Manager's response	Area of impact
Increased governmental support for environmental infrastructure projects	Transition (policy and legal)	<ul style="list-style-type: none"> Government policies aimed at facilitating the transition to a net zero carbon economy may subsidise certain technologies to increase their uptake or buildout, creating further opportunities for investment by JLEN Government policies aimed to help the transition to reduce the impact on natural resources, e.g. Norway's proposed resource rent tax rate in sea aquaculture 	S, M, L	★★	<ul style="list-style-type: none"> Government support of emerging sectors will change the risk profile and may open up areas that would otherwise be insufficiently attractive for JLEN investment 	Strategy, Financial planning
Technological developments and buildouts in environmental infrastructure	Transition (technology)	<ul style="list-style-type: none"> As new technologies become better developed, the Company is well positioned to invest in a diversified range of projects Examples of new technologies may include environmental or sustainable infrastructure related to fuels, food production or energy production 	S, M	★★	<ul style="list-style-type: none"> Attractiveness of investment opportunities will also depend on the business models as well as the proven nature of the technology 	Strategy, Financial planning
Changes in weather patterns leading to buildout of certain types of environmental infrastructure or business	Physical	<ul style="list-style-type: none"> Changes in weather patterns could lead to opportunities for new types of infrastructure or further investment into existing categories. An example of this could be flood defence infrastructure in response to increased rainfall or sea level rise or controlled environment agriculture facilities in response to higher temperatures 	M, L	★★★	<ul style="list-style-type: none"> The Investment Manager reviews over 900 deals a year in the environmental infrastructure space, which allows it to take advantage of these opportunities as they arise 	Strategy, Financial planning, Company's investments

Timescales: S Short term (0-3 years) M Medium term (4-15 years) L Long term (16-30 years)

Level of opportunity: ★ Low opportunity ★★ Medium opportunity ★★★ High opportunity

SUSTAINABILITY AND ESG

STRATEGY continued

Governance
from page 4Strategy
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from page 21Metrics and targets
from page 26**Strategic resilience**

JLEN's primary approach to resilience is focused on owning a portfolio of assets that is diversified by geography, technology, resource use and revenue make-up. The Investment Manager engages with a range of specialists across different areas of expertise and levels of the business to help drive and maintain a resilient portfolio. Risks and opportunities are also assessed within the framework discussed on pages 53 to 59 of the Annual Report and on an ad hoc, day-to-day basis.

As new investment opportunities such as emerging sectors evolve, JLEN will consider these as part of its investment strategy. Likewise, if new risks emerge for existing investment sectors, or if the impact of existing risks increases, JLEN will consider this at the Risk Committee, ESG Committee and Board level and identify opportunities for mitigation or, if necessary, disposal of assets.

Company-level resilience**Overview**

In FY22/23, the Investment Manager commissioned the S&P Global Climanomics platform to analyse the JLEN portfolio across four climate scenarios, integrating not only physical and transition risks, but also climate-related opportunities, to provide a single output that talks to the resilience of the portfolio under different climate futures. The results of this analysis were reported in the 2023 TCFD report.

This year, the Climanomics' analysis was updated to align with the scenarios published in the Intergovernmental Panel on Climate Change's ("IPCC") sixth Assessment Report. The revised methodology for the scenario analysis is set out below.

The basis for Climanomics' analysis is the Shared Socioeconomic Pathways ("SSPs") generated by the Intergovernmental Panel on Climate Change ("IPCC"). This is a change from the Representative Concentration Pathways ("RCPs") that were used to undertake scenario analysis last year. The change has been driven by the most recent IPCC Synthesis Report (AR6 2023).

The SSPs are an evolution of the earlier RCPs and represent a range of possible outcomes not only in future anthropogenic greenhouse gas emissions and their effects on atmospheric concentrations of CO₂, but also their potential societal, demographical and economical impacts.

The scenarios are best summarised as:

- **SSP 1/RCP 2.6** assumes aggressive mitigation and total GHG emissions reducing to net zero by 2050, resulting in a global average temperature increase of 1.3°C to 2.4°C by 2100;
- **SSP 2/RCP 4.5** implies aggressive mitigation with total GHG stabilising at current levels until 2050 and then declining to 2100. This results in a global average temperature increase of 2.1°C to 3.5°C by 2100;

- **SSP 3/RCP 7.0** estimates limited mitigation with total GHG emissions doubling by 2100 and global average temperatures increasing by 2.8°C to 4.6°C; and
- **SSP 5/RCP 8.5** assumes low mitigation, total GHG emissions tripling by 2075 and global average temperatures increasing by 3.3°C to 5.7°C.

Methodology

Climanomics integrates econometric assumptions driven by high resolution geographic, climate, socioeconomic, business and sector-specific data to the SSPs to quantify climate risk. The models assess both the risks and the opportunities associated with each scenario and generate outputs dependent on asset type. These results can then be applied to the Company's valuation model to estimate the potential financial impact.

In terms of categorisation of risks and opportunities, the Climanomics platform fully aligns with the TCFD framework by considering:

- 1. Physical risk** – Analysing atmospheric data related to acute and chronic climate hazards across temperature, precipitation, drought, wildfire, coastal flooding, tropical cyclones, water stress and fluvial-basin flooding to provide a rigorous estimate of risk under various conditions;
- 2. Transitional risk** – Incorporating modelling of hazards associated with a global transition to a low-carbon economy via litigation, reputational, technology and market; and

3. Opportunity modelling – Calculating opportunities derived from resource efficiencies, energy sourcing, changing markets and resilience.

Climanomics' methodology estimates direct financial impacts that the hazards are expected to incur on each asset type. Each technology's vulnerability is characterised by the specific ways in which it is likely to be impacted by a given climate-related variable. An asset type's overall "impact function" comprises these individual impact pathways. The platform has developed an extensive library of detailed impact functions for a wide variety of sectors, all of which are based on peer-reviewed and government-published research papers.

The science of scenario analysis is evolving quickly, and current assessments are made with the most credible existing frameworks and input data available. Given the nature of these estimates, limitations remain. However, the Company is committed to using best-in-class methodologies to accurately estimate its performance under different climate futures and will continue making the necessary adjustments as the methodologies progress.

Scenario analysis results

	NAV p/s	Difference (p)	% Difference
Base	113.6	0.0	0.0%
2.6	114.3	0.7	0.6%
7	113.1	-0.5	-0.4%
8.5	111.9	-1.7	-1.5%

SUSTAINABILITY AND ESG

RISK MANAGEMENT

Assessment of ESG and climate-related risks is incorporated into JLEN's comprehensive risk management framework and risk register, which assesses:

- a measure of the probability of each identified risk materialising; and
- the potential impact the risk event may have on the asset and, ultimately, its impact on the Company.

For each risk, mitigation actions are developed to reduce the likelihood of it occurring and to minimise the severity of its impact in the event that it does occur.

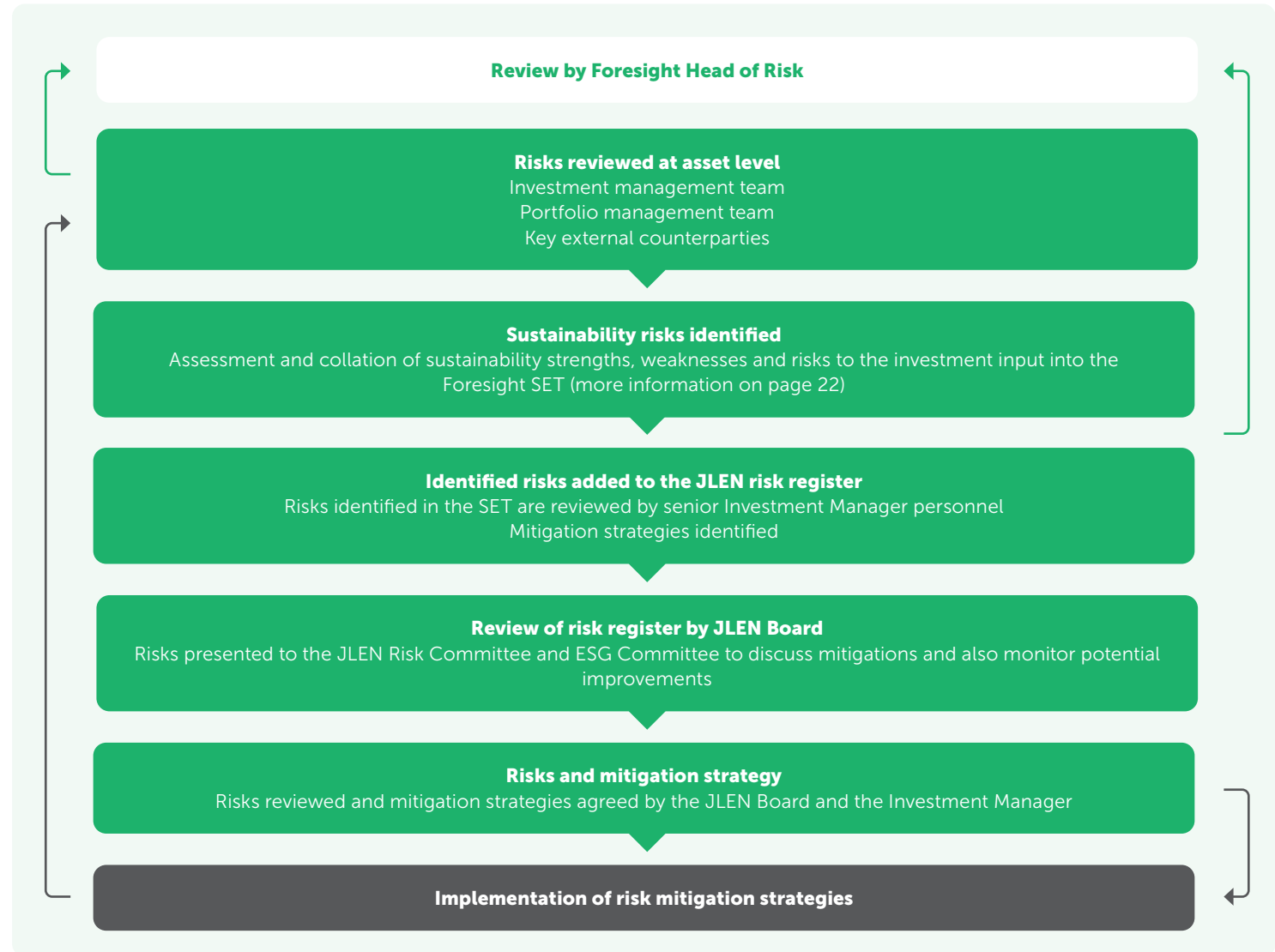
More information about the Risk Committee and process for managing the climate-related risks and opportunities can be found on page 8. The process itself is shown in the diagram opposite.

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Understanding of asset-level risks is driven in the first instance by pre-investment due diligence processes. This assessment is undertaken by the Investment Manager using their proprietary in-house tool, the Foresight Sustainability Evaluation Tool (“SET”).

The Foresight Sustainability Evaluation Tool (“SET”)

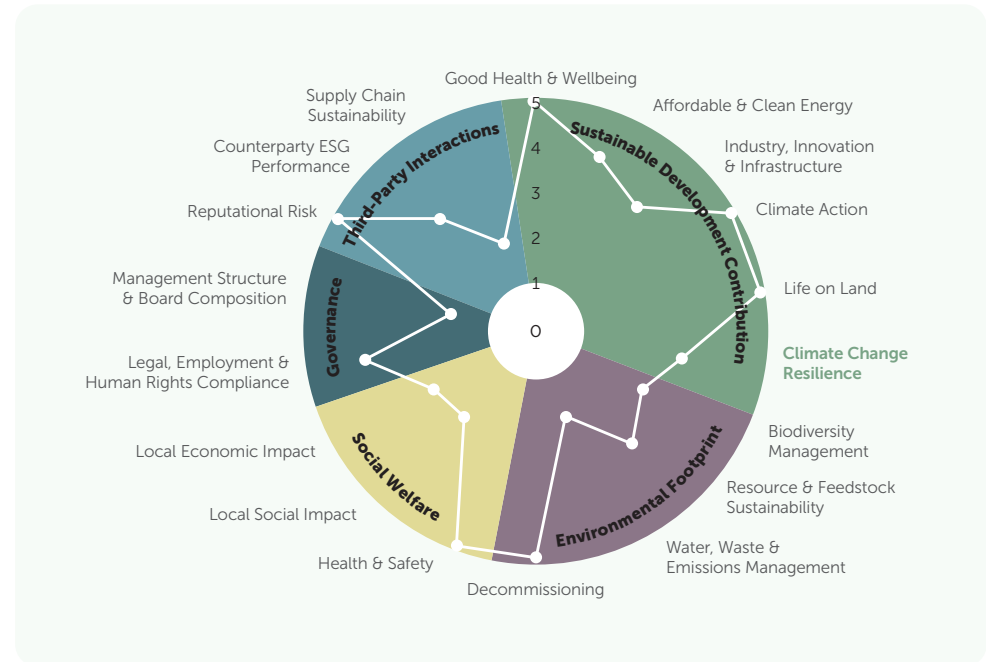
Driven by JLEN’s, and the Investment Manager’s, definition of sustainable infrastructure, the SET is applied during due diligence in order to assess whether a potential investment scores appropriately against a broad range of ESG considerations. The SET is made up of five criteria that cover the key areas of sustainability and ESG considerations to be assessed:

- **Sustainable Development Contribution:** The contribution made towards the global sustainability agenda, including an assessment of its resilience to climate change-related risk and opportunity;
- **Environmental Footprint:** The environmental impacts of an investment;
- **Social Welfare:** The interaction with local communities and the welfare of employees;
- **Governance:** The compliance with relevant laws and regulations; and
- **Third-Party Interactions:** The sustainability of key counterparties and the broader supply chain.

The SET is an evolving tool and has been designed with flexibility in mind, making it adaptable to new sectors, industry frameworks and impact standards as the level of sophistication around climate-related risk grows. Moreover, the materiality of certain issues within each of these areas can be subject to frequent change, therefore a framework that can adapt easily to reflect these changes is important. The Investment Manager’s sustainability team carry out regular in-house consultation to decide on the individual “weighting” for each KPI within each Climate Change Resilience parameter. The weighting dictates the materiality of the KPI in the overall asset score, which can be easily updated and amended based on new information obtained.

The tool draws on IRIS+ indicators, which are an aggregation of a number of widely recognised sustainability and climate-related frameworks to measure, manage and optimise sustainability and climate-related performance. These frameworks include GRESB (previously Global Real Estate Benchmark), the Global Reporting Initiative (“GRI”), the Sustainability Accounting Standards Board (“SASB”), the UN Sustainable Development Goals (“UN SDGs”), the Global Impact Investing Network (“GIIN”) and Principles for Responsible Investment (“PRI”).

The final SET assessment, and the asset’s corresponding “Sustainability Web”, are produced as part of investment due diligence. An example of this web is shown below, with the “Climate Change Resilience” parameter being highlighted.



The output and identified action areas of each assessment parameter of the SET – including Climate Change Resilience – are provided to JLEN in order to inform investment decision making. The results also enable implementation of an asset-specific plan to manage any material risks as required. Further detail of the Climate Change Resilience analysis is set out on page 20.

Sector and portfolio-level risks are considered by the Investment Manager and mitigation options are discussed as part of JLEN’s comprehensive risk management framework. A detailed account of the material climate-related risks that have been identified, as well as their impacts and mitigation, can be found on pages 14 to 17.

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RISK MANAGEMENT continued

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from page 26**Climate-related risks and opportunities**

Broadly, climate-related risks and opportunities are split into two categories:

Transition	Physical
<p>These are risks related to the transition to a net zero or low-carbon future. These risks fall into four categories:</p> <ul style="list-style-type: none"> • policy and legal • technological • market; and • reputational 	<p>These are risks associated with physical impacts of weather and climate on asset operations and performance. These fall into two core categories:</p> <ul style="list-style-type: none"> • Acute: extreme weather events • Chronic: changes to climate patterns over time

Information on the material transition and physical risks identified by the Company are set out in the risk and risk management section on pages 14 to 17.

The Investment Manager considers those physical risks identified by the EU Taxonomy, and incorporates processes for identifying and assessing climate-related risk as part of its standard due diligence and portfolio management practices.

Climate-related risk assessment

Before any investment goes ahead, an assessment of both physical and transition climate-related risk is made in the Climate Change Resilience assessment parameter of the SET. This parameter is made up of multiple KPIs, each of which is weighted based on internal priority and materiality assessments and scored in line with response bands corresponding to the five-point scale below:

- 5 = High performance
- 4 = Above average
- 3 = Average performance
- 2 = Below average
- 1 = Low performance

The KPIs associated with the Climate Change Resilience assessment parameter include:

- EU Taxonomy alignment assessment (the Taxonomy itself includes a review of physical climate resilience);
- risk heatmap for a number of physical risks using Carbon Brief scenarios to inform future weather patterns;
- liability to pay carbon tax throughout asset life;
- whether a documented stranded asset risk assessment has been made; and
- consideration of climate-related market risks.

An average is then calculated to produce an overall score for the Climate Change Resilience assessment parameter, which is reviewed and updated annually by the Portfolio Management team. This quantitative KPI-based approach to assessing a project's exposure to climate risk helps to standardise the quality of climate-related assessment applied across the portfolio and also helps to guide and focus Investment and Portfolio Management team resource on the areas that require the most attention.

If the information required to complete the assessment is not readily available through project documentation, technical advisers may be tasked with conducting further investigation to address any sustainability or climate change-related specific queries. Examples may include an enhanced focus on flood risk under different climate scenarios, or the transitional risk presented by changing market dynamics.

The above-mentioned physical risks are assessed as part of the Climate Change Resilience assessment parameter. A Climate Risk Heatmap is then produced which is used to identify the most material physical risks an asset faces from climate-related extreme weather events, allowing for further investigation to be conducted or mitigation measures to be put in place.

Where material risks are identified, they are considered by the Risk Committee. Mitigation options are discussed and the Committee will determine whether the risk is acceptable under the JLEN risk management framework. The Risk Committee will advise the JLEN Board on the results of their findings. Further information on how this is managed can be found on page 53 of the Annual Report.

Other risk management processes**Management of environmental and health and safety risks and incidents**

JLEN takes its environmental and health and safety ("EHS") responsibilities very seriously, and seeks to ensure effective management of these issues in both its own operations and in its investment portfolio. JLEN aims to manage risks and incidents in a fair and transparent manner with appropriate action to reduce risk wherever possible.

Third-party asset managers are responsible for the day-to-day management of EHS issues and are required to report incidents to Foresight, which are recorded through their portfolio management software. Depending on the requirement, the software can deliver either a high degree of granularity on individual assets or an aggregated snapshot of the portfolio's performance as a whole. This allows the Investment Manager to monitor and report individual asset performance as well as sector and portfolio-level performance to a range of internal stakeholders.

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Foresight periodically contracts third parties to conduct comprehensive health and safety audits of each site. This serves both to encourage best possible working practices and acts as a means of highlighting areas for development. Foresight staff also perform spot auditing and reporting functions on selected assets on an ongoing basis. Any recommendations from the audits are allocated to the Investment Manager's asset management team, which then becomes responsible for ensuring the recommendations are actioned as necessary. These tasks are tracked through Foresight's portfolio management software and monitored to ensure they have been resolved in a timely manner. All audit results, shortfalls and recommendations are included on the agenda of the asset's board meetings.

Supplier Code of Conduct

In 2022/23 a Supplier Code of Conduct commenced implementation. Suppliers and potential suppliers received the Code of Conduct positively and it has opened up further avenues for engagement between JLEN and its suppliers. If a potential supplier identifies a requirement that they cannot comply with this is highlighted and discussed with the Investment Manager's sustainability team and any deviances, if deemed within acceptable risk tolerances, are highlighted in the supplier contract.

Human Rights processes

JLEN is aware that the renewable energy value chain carries the risk of significant impacts on human rights, as discussed in a recent report by the Business and Human Rights Resource Centre.

Following the OECD Guidelines for Multinational Enterprises, and with full consideration to the EU Taxonomy's Minimum Social Safeguards requirements, Foresight Group takes a multi-layered approach to mitigating supply chain risk as follows:

Internal activities:

- The Company specifically targets investment opportunities in European countries with strong regulatory frameworks around human rights and labour standards. This approach means that there are no investment activities in any countries named in the Conflict Affected and High-risk Areas list⁽¹⁾.
- Key counterparties' governance frameworks are assessed during due diligence as part of the Foresight Sustainability Evaluation Tool ("SET").
- Foresight Group has developed and issued a Supplier Code of Conduct which references the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises.
- Foresight Group also undertakes direct engagement with suppliers where there are specific areas of concern.

External activities:

- In 2022, Foresight Group engaged the Ethixbase platform to undertake a supply chain interrogation across regulatory and ESG risk criteria. This included an assessment of a supplier's capacity to scrutinise aspects such as Modern Slavery risk. Detail on this review was reported in the 2023 Annual Report.
- Enhanced due diligence, using specialist third parties, to conduct in-person audits of higher-risk counterparties and their facilities.
- Collaboration with industry partners (e.g. Solar Power Europe) and peers to deliver more effective engagement with key suppliers.

(1) Conflict affected and high-risk areas list - <https://www.cahaslist.net/>.

SUSTAINABILITY AND ESG

RISK MANAGEMENT continued

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Improving cyber resilience across the portfolio

The Board of Directors are highly aware of the risks posed by cyber attacks and have been working with the Investment Manager to develop and implement a cyber security strategy for the portfolio.

Cyber resilience assessment

In FY22/23, the Investment Manager engaged Kryptokloud to assess and rate the cyber resilience of each JLEN asset. The assessment was reported in the 2023 Annual Report. The results of the assessment identified that half of JLEN's assets demonstrated low resilience to cyber attacks. This led to a further phase of work to address these vulnerabilities.

Improving cyber resilience

As a result of this work, the Investment Manager commissioned a cyber security specialist with significant experience in the renewable energy sector to improve the cyber resilience of the JLEN portfolio. They undertook work to restructure assets' operational technology networks to ensure they are positioned behind a fourth generation firewall. This provides the following:

- robust security against cyber attacks;
- ensures a redundant 4G network connection in case of ADSL disconnection;
- accommodates secure connections for third parties; and
- eliminates the need for redundant network connections.

To date, the cyber security specialist has implemented its processes against JLEN's entire wind portfolio and are rolling out the next phases to the solar assets, with additional work being undertaken on waste and bioenergy assets as well. Further trials are planned for the AD, Glasshouse and BESS assets.

SPV cyber resilience**Driving consistency and monitoring**

Previously, cyber attacks were reported to the Investment Manager by the principal contractors. The cyber resilience work undertaken means that the Investment Manager, and JLEN, now have access to a dashboard with live updates.

A cyber security policy is due to be rolled out across the JLEN portfolio in FY25, which will drive greater consistency and resilience among the O&M and MSA contractors that operate JLEN's assets.

SUSTAINABILITY AND ESG

METRICS AND TARGETS

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In FY21/22, JLEN, in collaboration with Foresight, formalised its approach to ESG data collection, developing a set of baseline metrics against which targets have been developed.

JLEN's ESG and climate-related KPIs

In FY23/24, the Investment Manager undertook a full review of JLEN's ESG metrics (previously referred to as KPIs). The review sought to identify those metrics against which JLEN could set meaningful targets, as well as those metrics that were no longer as valuable in improving the Company's understanding of its portfolio.

The result is a streamlined set of ESG metrics. Targets have been set against some of the core indicators (the "KPIs"). JLEN will continue to report against the wider set of indicators, and further work to set targets against key indicators will be undertaken in FY24/25.

The key ESG targets currently applied to the portfolio are set out in the table opposite. Performance against all targets is reviewed at least annually by the ESG Committee and by the JLEN Board. The associated KPIs, as well as additional metrics collected in relation to the portfolio, are set out in the subsequent table on page 27. Key performance indicators are highlighted in bold text. The Investment Manager continues to consider additional targets across the ESG metrics.

In FY23/24, JLEN set two new targets. The first was a target to achieve net zero GHG emissions across Scope 1, 2 and 3 by 2050. The second was a target to develop and roll out a cyber security policy across the portfolio.

Aspect	KPI	Target
Environmental	*New* Total emissions (tCO ₂ e)	Net zero Scope 1, 2 and 3 emissions by 2050
	Purchased energy originating from renewable sources	95% of assets to purchase energy from renewable tariffs
	Management of biodiversity	100% of fully owned, UK-based, operating assets to have biodiversity management plans in place ⁽¹⁾
Governance	*New* Cyber security	Produce and roll out cyber security policy in FY24/25

- (1) The scope of the biodiversity surveys undertaken is intended to be in addition to standard planning and pre-construction surveys. As such, it is not suited to pre-operational sites. Additionally, the survey methodology is specific to UK sites, in that it applies the DEFRA biodiversity metric, therefore it is not appropriate for use on non-UK sites at present.

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METRICS AND TARGETS continued

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Aspect	Metric	Measurement	2023/24	2022/23	2021/22 (Baseline)
Environmental	Scope 1 emissions ⁽¹⁾	Tonnes carbon dioxide equivalent (tCO ₂ e)	77,017 ⁽²⁾	82,314	68,368
	Scope 2 emissions	Tonnes carbon dioxide equivalent (tCO ₂ e)	2,620	9,338	6,798
	Scope 3 emissions	Tonnes carbon dioxide equivalent (tCO ₂ e)	63,100	117,843	not reported
	Total emissions⁽³⁾	Tonnes carbon dioxide equivalent (tCO₂e)	142,738	209,495	75,166
	Renewable energy generated	MWh renewable electricity ⁽⁴⁾	810,123	730,871	742,331
		MWh renewable heat ⁽⁴⁾	547,682	594,261	571,461
	GHG emissions avoided	tCO ₂ e avoided – new methodology ⁽⁵⁾	212,917	212,263	not reported
	Waste treatment	(t) waste recycled	133,718	129,114	135,203
		(t) waste diverted from landfill	680,825	684,181	695,498
	Water treatment	(l) wastewater treated	40,213,501,000 ⁽⁶⁾	35,586,057,000	35,620,619,000
	Environmental incidents	Reportable environmental incidents	2 ⁽⁷⁾	3	5
	Purchased energy originating from renewable sources	% of total purchased energy ⁽⁸⁾ in the portfolio originating from renewable sources	39	21	47
		% of assets sourcing purchased energy from renewable energy tariffs	77	45	not reported
	Management of biodiversity	% of assets with biodiversity plans	69	42	30

(1) GHG emissions have been calculated in line with the GHG Protocol.

(2) Biomass Waste Emission Factors has changed from 588 to 1,093 kgCO₂e/tonne. The emissions factor has been updated to align with The Institute for Environmental Protection and Research ("ISPRA") factors.

(3) Ownership has now been incorporated into the emissions calculations.

(4) For assets which have a dual generation profile of both electricity and heat, energy is converted and measured in the energy profile that is predominant.

(5) The "new methodology" uses country-specific grid emissions factors for the geography in which the asset is based. It follows the International Financial Institutions ("IFI") Approach to GHG Accounting for Renewable Energy Projects and uses the Harmonised IFI Default Grid Factors for calculation. The "old methodology" used coal as the sole comparator and was used until FY21/22. These figures are no longer reported. Performance data calculated using the old methodology can be found in the 2023 Annual Report.

(6) The increased water treated in FY23/24 was due to significantly increased rainfall in that year compared with the two previous years.

(7) More information on environmental incidents is set out on page 29.

(8) Purchased energy refers to the fact that all assets have their own energy requirements and where these requirements are not met in full by an asset's own generation, energy is purchased from energy suppliers for delivery via the grid.

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Aspect	Metric	Measurement	2023/24	2022/23	2021/22 (Baseline)
Social	Community funding	£ provided to community projects	655,076	432,756	418,000
	Health and safety incidents	RIDDOR reportable accidents	4 ⁽⁹⁾	3	3
		Other material accidents	0	1	0
	Community engagement procedures	% of assets with formal stakeholder/community engagement policies and processes	64 ⁽¹⁰⁾	80	14
		% of assets with a clear, easily accessible complaints handling mechanism in place	76 ⁽¹¹⁾	81	49
	Jobs supported	number of "full-time equivalent" ("FTE") jobs supported ⁽¹²⁾	467	347	376 ⁽¹³⁾
	Accessibility of community fund documents	% of community funds that are easily accessible and signposted for local communities	84	83	83
Governance	Portfolio audits of health and safety practices	% of assets audited	89	84	81
	Portfolio audits of tax and financial practices	% of assets audited	87 ⁽¹⁴⁾	89	98
	Governance oversight	% of assets which comply with a governance policy and associated documents, that are reviewed on a periodic basis	80	73 ⁽¹⁵⁾	81
	Cyber security	% of assets with cyber security policy in place	n/a – new KPI	n/a – new KPI	n/a – new KPI

(9) More information on health and safety incidents is set out on page 29.

(10) Decrease in performance is attributed to some assets requiring formal review of policies, new ownership in other assets resulting in template policies no longer in use, and new construction-phase assets in the portfolio that do not have policies in place yet.

(11) Decrease in performance is attributed to new construction assets in the portfolio.

(12) FTE jobs are calculated using total hours worked over the course of the year.

(13) In some instances in 2021/22, 12 months of data was not available and in that case, an average number of hours worked was calculated from the data available.

(14) Number decreased as four of the audits fell into the first week of April.

(15) This figure reduced in 2022/23 as JLEN altered the way it measures this KPI following the introduction and roll out of a new suite of policies.

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- Where it has not been possible to collect specific data, assumptions have been made using appropriate proxy technologies, sites and time periods.
- Scope 1 emissions do not yet include fugitive emissions from AD sites (i.e. leaks, flaring, venting). The emissions have begun to be calculated and work is in progress to integrate the results into the full GHG calculations database going forward.
- PCAF emission factors have been used to calculate Scope 3 emissions. This is calculated from asset revenue data.

Reportable environmental and health and safety incidents

The number of reportable environmental and health and safety incidents recorded for the JLEN portfolio in FY23/24 is set out in the table on the previous page.

The following RIDDOR reportable incidents were recorded for JLEN's portfolio during FY23/24:

- Three incidents at a waste treatment plant
 - One operative suffered broken bones as a result of being struck in the face by material being ejected from a compactor. The incident occurred because standard procedures had not been followed. The operator continues to investigate the incident and will identify opportunities to improve processes.
 - An existing back injury was exacerbated when an operative manually lifted materials rather than using the lifting devices available.
 - An operative dislocated their knee while clearing a faulty piece of equipment.
- At another site in the waste and bioenergy portfolio, an engineer trapped their finger between a load and a trolley, resulting in the loss of the very tip of their finger.

In each case, a root cause analysis was undertaken and procedures reiterated to staff where needed. The Investment Manager also worked with operators to ensure that reporting of RIDDOR incidents happens in a timely manner, rather than during routine reporting.

The following reportable environmental incidents were recorded for JLEN's portfolio during FY23/24:

- A section of wastewater pipeline was lost at a site on the east coast of Scotland following severe storms. Wastewater flows were restricted to minimise outflows of wastewater to the sea and emergency repairs were scheduled. The Scottish Environmental Protection Agency ("SEPA") were informed of the incident.
- At JLEN's Italian EfW site, a half-hourly limit for Nitrous Oxides (NOx) emissions was breached. While the daily limit was not breached, a half-hourly breach is reportable to the Italian Environment Authority.

Internal controls and collection and verification of data

The following steps have been taken to validate the data presented in this Sustainability and ESG report, which is accurate to the best of the Investment Manager's knowledge.

In order to generate the KPI's reported here, the Investment Manager receives data from two primary sources:

- front-line site managers and asset operators; and
- independent sustainability advisers (principally for climate-related disclosures).

Whilst some reliance is placed on externally generated data, the Investment Manager performs the following steps to assess its validity:

- following submission, data is reviewed for completeness by the Foresight portfolio management team prior to upload onto the Investment Manager's custom-built data management platform, Sennen;
- the data is then processed and analysed by the Foresight sustainability team; including assessment of anomalies and outliers; and
- material KPIs, such as those associated with JLEN's sustainability-linked loan facility, are further subject to third-party assurance.

KPI performance is also presented and discussed with the JLEN ESG Committee on a bi-annual basis.

Despite best intentions to design a robust internal control framework, there remains scope for error in collation of underlying data and therefore the Investment Manager is committed to enhancing validation processes in the coming years, including assessment of external validation providers. It is also possible that methodologies for collecting or considering data develops and therefore data will not always be comparable year-on-year.

Task Force on Climate-related Financial Disclosures

Although JLEN, as an investment company, is not required to include a full TCFD disclosure under the Listing Rules of the FCA, the Board and the Investment Manager believe that the nature of JLEN's business and strategy is intrinsically aligned to the goal of a greener and less carbon-intensive future and consider TCFD to be a positive step in driving that direction. As a result, JLEN has again voluntarily included climate-related financial disclosures in these financial statements. This year's report is more closely integrated with the wider ESG report as JLEN and its Investment Manager work to align with forthcoming reporting requirements.

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Both the Investment Manager and the Board of JLEN are fully supportive of the TCFD's goals in bringing climate change considerations into mainstream reporting. However, analytical frameworks for evaluating the complex impacts that climate change will have on the markets in which JLEN operates are still in their infancy. As a result, there is currently no standardised way of assessing climate change risks and opportunities and how these are managed by the Company.

The disclosures in this report comply with the TCFD recommendations. Further information on where each disclosure can be located is set out in the table below. JLEN continues to work on developing its approach to climate-related issues and this will be reflected in future disclosures.

TCFD disclosures table

The table below sets out the TCFD recommendations, a summary of activities in FY23/24 and a reference to where the information can be found in this report.

Recommended disclosure	Page reference	Activities in FY23/24
Governance		
a. Describe the Board's oversight of climate-related risks and opportunities	5-6, 8	The JLEN Board worked to more closely integrate management of climate-related risks and opportunities into its governance processes, including commissioning the development of a Transition Plan. A workshop was held with Directors to inform them of the structure and objectives of a Transition Plan, and directors helped to shape the key commitments within the document, including the Strategic Ambition.
b. Describe management's role in assessing and managing climate-related risks and opportunities	5-6, 8	
Strategy		
a. Describe the climate-related risks and opportunities the organisation has identified over the short, medium and long term	12-19	During the year the Investment Manager identified the level of financial impact that each climate-related risk might have on the portfolio. Work was undertaken by the Investment Manager to disaggregate the climate-scenario analysis to develop an understanding of the risks at sector level. The JLEN Board commissioned the development of a Transition Plan in line with the Transition Plan Taskforce Disclosures Framework. JLEN's first Transition Plan is due to be published at the end of FY24/25.
b. Describe the impact of climate-related risks and opportunities on the organisation's businesses, strategy and financial planning	12-19	
c. Describe the resilience of the organisation's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario	20	
Risk management		
a. Describe the organisation's processes for identifying and assessing climate-related risks	22-23	Climate risk is embedded in JLEN's risk management framework and climate-risk analysis is included within due diligence processes as part of Foresight's Sustainability Evaluation Tool ("SET").
b. Describe the organisation's processes for managing climate-related risks	23	
c. Describe how processes for identifying, assessing and managing climate-related risks are integrated into the organisation's overall risk management	12, 22-23	

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Recommended disclosure	Page reference	Activities in FY23/24
Metrics and targets a. Disclose the metrics used by the organisation to assess climate-related risk and opportunities in line with its strategy and risk management process	23, 27	This year, JLEN set a target to achieve net zero emissions by 2050. This target is informing, and being informed by, the Transition Plan that is currently under development.
b. Disclose Scope 1, Scope 2 and, if appropriate, Scope 3 greenhouse gas ("GHG") emissions and the related risks	27	
c. Describe the targets used by the organisation to manage climate-related risks and opportunities and performance against targets	26	

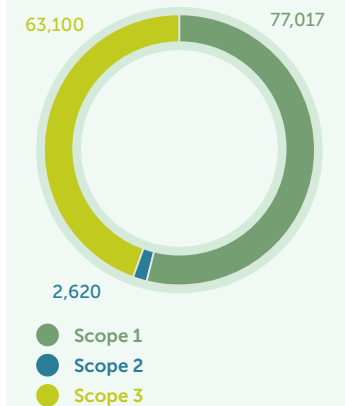
TCFD Core Metrics

Metric	Description	Expressed as	2023/24	2022/23	2021/22 (baseline)
Weighted average carbon intensity ⁽¹⁾	Portfolio's exposure to carbon-intensive assets	tCO ₂ e/£m revenue	231.6	339.9	Not calculated ⁽³⁾
Total carbon emissions ⁽²⁾	The absolute greenhouse gas emissions associated with the portfolio	tCO ₂ e	79,637	91,653	75,166
Carbon footprint	Total carbon emissions for a portfolio normalised by the market value of the portfolio	tCO ₂ e/£m invested	106.0	112.5	99
Carbon intensity ⁽¹⁾	Volume of carbon emissions per million pounds of revenue	tCO ₂ e/£m revenue	280.7	349.9	Not calculated ⁽³⁾
Exposure to carbon-related assets	The amount or percentage of carbon-related assets in the portfolio	%	14.6%	17%	16%

(1) The Investment Manager is committed to working with third-party MSA providers to continually improve data quality.

(2) In accordance with TCFD methodology, these calculations are undertaken using scope 1 and scope 2 emissions only.

(3) The baseline for these metrics is 2022/23.

Carbon emissions tCO₂e
(FY23/24)

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Portfolio electricity and carbon avoidance

A summary of the greenhouse gas benefits delivered by the portfolio is provided in the table below. As JLEN invests into broader environmental infrastructure technologies, the Company anticipates that the GHG emissions avoided will reduce as some assets will be net emitters.

Asset portfolio by sector	2023/24 GHG emissions avoided (tCO ₂ e)	2022/23 GHG emissions avoided (tCO ₂ e)	2021/22 GHG emissions avoided (tCO ₂ e)
Wind	120,321	118,385	Calculation methodology superseded. Data not comparable.
Solar (including rooftop)	19,983	20,725	
AD	74,481	74,918	
Hydro	987	752	
Biomass	-2,167	-1,859	
Energy-from-waste	-688	-659	
Total	212,917	212,263	

The calculation methodology follows the International Financial Institutions ("IFI") Approach to GHG Accounting for Renewable Energy Projects and uses the Harmonised IFI Default Grid Factors for calculation.

Sustainable Finance Disclosure Regulation

The Sustainable Finance Disclosure Regulation ("SFDR") is a European regulation introduced to improve transparency in the market for sustainable investment products, to prevent greenwashing and to increase transparency around sustainability claims made by financial market participants.

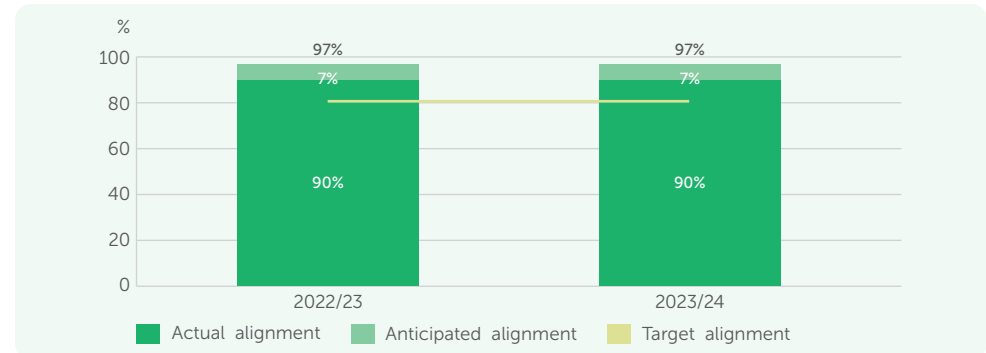
JLEN discloses under Article 9 of the SFDR, defined as "a fund that has sustainable investment as its objective". Pursuant to Article 11 of the SFDR, certain disclosures relating to the overall sustainability-related impact of the Company are set out in the disclosures linked below, and summarised here:

Sustainable investment objective of the Company

The Company's objective contributes to the climate change mitigation objective and supports the transition to a low-carbon economy by investing in a diversified portfolio of environmental infrastructure, including infrastructure assets, projects and asset-backed businesses that utilise natural or waste resources or support more environmentally friendly approaches to economic activity whilst generating a sustainable financial return.

The Company's activities will contribute materially towards the emissions reduction objectives set out under the Paris Climate Agreement. By way of example, JLEN has invested into a portfolio of diversified renewable energy assets, clean fuel distribution assets and other assets that contribute to decarbonising both the national energy mix and other emissions-intensive activities.

Alignment with EU Taxonomy (internal assessment)



- JLEN commitment: minimum proportion of 80% of investments aligned with EU Taxonomy by value
- Current alignment: 97%.
- Greenhouses and other indoor food production systems, inclusive of aquaculture, have not yet had Technical Screening Criteria (TSC) developed. However, the proposed text for the remaining four Environmental Objectives of the EU Taxonomy clearly stipulate that both greenhouses and other indoor food production systems are to be prioritised for development in the next iteration. Based off the TSC for other food production systems, JLEN is confident that its assets in these sectors will satisfy the stipulated criteria as and when they are developed. As such, within this disclosure the Company has chosen to account for these assets as being Taxonomy aligned.

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Performance of sustainability indicators

JLEN discloses under Article 9 of the SFDR. The impact element of JLEN's SFDR reporting aligns against the UN Sustainable Development Goals ("UN SDGs").

The SDGs are a set of 17 goals for sustainable development. To be achieved by 2030, they recognise that ending poverty must go hand-in-hand with strategies that build economic growth and address a range of social needs including education, health, social protection and job opportunities, while tackling climate change and environmental protection. The Investment Manager has mapped JLEN's portfolio against the SDGs and the table below records performance against the selected SDGs over the past three years.





Contribution to the Sustainable Development Goals

SDG	Target	Metric	2023/24	2022/23	2021/22
	3.9 Substantially reduce the number of deaths and illnesses from hazardous chemicals and air, water and soil pollution and contamination.	tNO _x avoided (Nitrous Oxide)	733	932	Not reported
		tSO _x avoided (Sulphur Dioxide)	537	684	
		tPM ₁₀ avoided (µm10 Particulate Matter)	13	16	
		tPM _{2.5} avoided (µm2.5 Particulate Matter)	6	7	
	6.3 Improve water quality by reducing pollution, eliminating dumping and minimising release of hazardous chemicals and materials, halving the proportion of untreated wastewater and substantially increasing recycling and safe reuse globally.	Billion litres of wastewater treated	40.2	35.6	35.6
	7.2 Increase substantially the share of renewable energy in the global energy mix.	GWh renewable electricity produced	767	731	742
		GWh renewable heat produced	591	594	571
		Number of homes powered by renewable energy per year (excludes AD portfolio)	284,167	252,025	255,000
	8.4 Improve progressively global resource efficiency in consumption and production and endeavour to decouple economic growth from environmental degradation, in accordance with the 10-year framework of programmes on sustainable consumption and production, with developed countries taking the lead.	JLEN's portfolio is optimised to make the most of naturally available resources such as wind power. By maximising the power produced by each turbine, JLEN ensures that its assets are operating as efficiently as they can			
	8.5 Achieve full and productive employment and decent work for all women and men, including for young people and persons with disabilities, and equal pay for work of equal value.	FTE jobs supported by JLEN's portfolio	467	347	376

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SDG	Target	Metric	2023/24	2022/23	2021/22
	9.1 Develop quality, reliable, sustainable and resilient infrastructure, including regional and transborder infrastructure, to support economic development and human wellbeing, with a focus on affordable and equitable access for all.	Total MW generation capacity	422.4	359.5	359.5
	12.5 By 2030, substantially reduce waste generation through prevention, reduction, recycling and reuse.	Tonnes waste diverted from landfill	680,825	684,181	695,498
		Tonnes waste recycled	133,718	129,114	135,203
	13.3 Improve education, awareness-raising and human and institutional capacity on climate change mitigation, adaptation, impact reduction and early warning.	Greenhouse gas emissions avoided (tCO ₂ e)	212,917	212,263	Methodology superseded
	15.5 Take urgent and significant action to reduce the degradation of natural habitats, halt the loss of biodiversity and, by 2020, protect and prevent the extinction of threatened species.	Annual avoidance of fossil fuels (tonnes oil equivalent, TOE)	116,771	113,941	Not reported
		Active biodiversity management plans in place (%)	69	42	30

Principle Adverse Impact reporting

JLEN's Principle Adverse Impact reporting for SFDR is set out in the Annex V disclosure document which is available on the Company's website⁽¹⁾.

SFDR RTS Website Disclosure, Annex III and Annex V

JLEN's Annex III Pre-Contractual Disclosure is available on the Company website⁽¹⁾, as is the RTS Website Disclosure⁽¹⁾.

JLEN's Article V Periodic Disclosure is available on the Company's website⁽¹⁾.

(1) <https://jlen.com/sustainability/publications/>

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Supporting data-driven projects

Addressing agricultural pollution in the River Wylde catchment

This year, JLEN's Community Fund contributed £7,000 to a grassroots project aimed at tackling pollution in the River Wylde Catchment. A group of 31 farmers from the Wylde Valley in Wiltshire has established a laboratory inside a stable to tackle pollution in the River Wylde, which is a Site of Special Scientific Interest. The Wylde Valley Farmers raised a total of £18,000 to purchase a photometer to test for phosphates and nitrates, which will help them take regular water samples with the aim of identifying significant sources of pollution in the River Wylde.

Farmers are under increasing pressure to reduce sources of pollution to waterways but evidence of exactly where the pollution originates from is rarely available. Trained by the Game and Wildlife Conservation Trust in how to use the equipment, the farmers are aiming to identify sources of pollution, even if it implicates a fellow farmer. The group is promoting collaboration over prosecution and hopes to provide high-quality field data to the Environment Agency to use as an evidence base. The initiative involves weekly water sampling at 17 sites along the river, upstream and downstream of Wessex Water storm overflows, villages with private septic tanks and riverside livestock and arable farms.

The goal is to use the data to tackle pollution sources and improve water quality and ecological health in the River Wylde.

Inspired by similar work undertaken in Norfolk, this initiative could provide a further template for other farming clusters to implement their own water testing programmes, contributing vital data on pollution sources and helping to improve water quality and ecological health in river catchments across the country.



10 year
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