



EUROPEAN
COMMISSION

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ANNEXES 1 to 4

ANNEXES

to the

COMMISSION DELEGATED REGULATION (EU) .../...

amending and correcting the regulatory technical standards laid down in Delegated Regulation (EU) 2022/1288 as regards the content and presentation of information in relation to disclosures in precontractual documents and periodic reports for financial products investing in environmentally sustainable economic activities

ANNEX V

Template periodic disclosure for the financial products referred to in Article 9, paragraphs 1 to 4a, of Regulation (EU) 2019/2088 and Article 5, first paragraph, of Regulation (EU) 2020/852

Product name: Foresight Environmental Infrastructure Ltd

Legal entity identifier: GG00BJL5FH87

Sustainable investment objective

Did this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input checked="" type="radio"/> <input checked="" type="checkbox"/> Yes	<input type="radio"/> <input type="radio"/> <input type="checkbox"/> No
<input checked="" type="checkbox"/> It made sustainable investments¹ with an environmental objective: 100%	<input type="checkbox"/> It promoted Environmental/Social (E/S) characteristics and while it did not have as its objective a sustainable investment, it had a proportion of ___% of sustainable investments
<input checked="" type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy ²	<input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
<input checked="" type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	<input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
<input type="checkbox"/> It made sustainable investments with a social objective: ___%	<input type="checkbox"/> with a social objective
	<input type="checkbox"/> It promoted E/S characteristics, but did not make any sustainable investments



To what extent was the sustainable investment objective of this financial product met?

FGEN Environmental Infrastructure Limited (the "Company" or "FGEN") aims to invest in a diversified portfolio of environmental infrastructure projects that support more environmentally friendly approaches to economic activity whilst generating a sustainable financial return.

FGEN has a climate change mitigation objective and supports the transition to a low carbon economy by virtue of investing in a diversified portfolio of environmental infrastructure.

¹ Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

² The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852 establishing a list of environmentally sustainable economic activities. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

FGEN defines environmental infrastructure as assets, projects and asset-backed businesses that utilise natural or waste resources or support more environmentally friendly approaches to economic activity, support the transition to a low carbon economy or which mitigate climate change.

During the reference period of 1 April 2024 – 31 March 2025, the fund continued to meet its objective, wherein all deployments of capital or investments made by the fund during the reference period can be classed as contributing materially to the sustainable investment objective of the fund.

The investments into operational assets and the investments at development and construction phases make substantial contributions to the following environmental objectives set out in (EU) 2020/852:

Climate change mitigation

Generating, transmitting, storing, distributing or using renewable energy in line with Directive (EU) 2018/2001, including through using innovative technology with a potential for significant future savings or through necessary reinforcement or extension of the grid;

Establishing energy infrastructure required for enabling the decarbonisation of energy systems;

Producing clean and efficient fuels from renewable or carbon-neutral sources.

Sustainable use and protection of water and marine resources

Protecting the environment from the adverse effects of urban and industrial wastewater discharges, including from contaminants of emerging concern such as pharmaceuticals and microplastics, for example by ensuring the adequate collection, treatment and discharge of urban and industrial waste waters;

Ensuring the sustainable use of marine ecosystem services or contributing to the good environmental status of marine waters, including by protecting, preserving or restoring the marine environment and by preventing or reducing inputs in the marine environment.

Transition to a circular economy

Minimising the incineration of waste and avoiding the disposal of waste, including landfilling, in accordance with the principles of the waste hierarchy.

Protection and Restoration of Biodiversity and Ecosystems




Sustainable agricultural practices, including those that contribute to enhancing biodiversity or to halting or preventing the degradation of soils and other ecosystems.

As per the asset allocation planned for the fund, a maximum of 5% of investments will be categorised as "Not sustainable". This allocation relates to the Fund's cash reserves. As at 31 Mar 2025, 1.62% of fund's current assets were categorised as cash and cash equivalent. As detailed below, cash reserves held by the fund are for portfolio management purposes, which help to deliver the fund's sustainable investment objective.

How did the sustainability indicators³ perform?

FGEN has mapped its portfolio's sustainable impact performance against the UN Sustainable Development Goals ("SDGs") and their underlying targets. The below represents FGEN's contribution to the SDGs for the stipulated reference period:

³ Sustainability indicators measure how the sustainable objectives of this financial product are attained.

SDG	Target	FGEN's performance 2023/24	FGEN's performance 2024/25
3. Good Health and Well-being 	3.9 Substantially reduce the number of deaths and illnesses from hazardous chemicals and air, water and soil pollution and contamination	Avoidance of: 733 tonnes NOx (Nitrous Oxide) 537 tonnes SOx (Sulphur Dioxide) 13 tonnes PM10 (µm10 Particulate Matter) 6 tonnes PM2.5 (µm2.5 Particulate Matter)	Avoidance of: 687 tonnes NOx (Nitrous Oxide) 504 tonnes SOx (Sulphur Dioxide) 12 tonnes PM10 (µm10 Particulate Matter) 5 tonnes PM2.5 (µm2.5 Particulate Matter)
6. Clean water and sanitation 	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.	>40.2 billion litres of wastewater treated	>34.7 billion litres of wastewater treated
7. Affordable and clean energy 	7.2 Increase substantially the share of renewable energy in the global energy mix.	1,358 GWh renewable energy produced	1,272 GWh renewable energy produced
8. Decent work and economic growth 	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. 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.	FGEN's portfolio is optimised to make the most of naturally available resources such as wind power. By maximising the power produced by each turbine, FGEN ensures that its assets are operating as efficiently as they can. 467 FTE jobs supported by FGEN's portfolio.	FGEN's portfolio is optimised to make the most of naturally available resources such as wind power. By maximising the power produced by each turbine, FGEN ensures that its assets are operating as efficiently as they can. 426 FTE jobs supported by FGEN's portfolio.
9. Industry, innovation and infrastructure 	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.	422.4 MW renewable generation capacity added to the electricity grid.	409 MW renewable generation capacity added to the electricity grid.
12. Responsible Consumption 	12.5 By 2030, substantially reduce waste generation through prevention, reduction, recycling and reuse.	680,825 tonnes waste diverted from landfill	703,470 tonnes waste diverted from landfill

13. Climate Action



13.3 Improve education, awareness-raising and human and institutional capacity on climate change mitigation, adaptation, impact reduction and early warning.

Emissions avoidance of 212,917 tCO₂e

Emissions avoidance of 193,663 tCO₂e

15. Life on land



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.

Saving an annual oil equivalent of 116,771 TOE (Tonnes Oil Equivalent), contributing to the avoidance of fossil fuel use.

Saving an annual oil equivalent of 109,376 TOE (Tonnes Oil Equivalent), contributing to the avoidance of fossil fuel use.

69% of FGEN's portfolio have active biodiversity management plans in place.

84%⁴ of FGEN's portfolio have active biodiversity management plans in place.

● ...and compared to previous periods?

Please see the above table for the 2023/2024 sustainability indicator comparators.

● How did the sustainable investments not cause significant harm to any sustainable investment objective?

FGEN both monitors the attainment of its climate change mitigation objective and compliance with the "do no significant harm" test under the Sustainable Finance Disclosure Regulation. The Fund achieves this through the use of its Portfolio Sustainability Metrics, which are used to assess the sustainability performance of assets throughout their operational life. These metrics are collected on a monthly basis at an asset level covering a range of sustainability and ESG topics enabling reporting against the mandatory principal adverse impact indicators.

Pre-investment Due Diligence, and ongoing requirements for monitoring of sustainability and ESG factors have been structured around both regulatory requirements and three key frameworks. An example of these frameworks include the EU Taxonomy- interrogating the investments against the Taxonomy's screening criteria to highlight an investment's substantial contribution to Climate Change Mitigation (or other environmental objective as appropriate) and driving focus on the minimising of adverse impacts. Aspects of the DNSH criteria outlined in the Delegated Act are assessed during the acquisition process and reviewed periodically.

● How were the indicators for adverse impacts⁵ on sustainability factors taken into account?

For the stipulated reference period, the Fund's PAI update is shown below:

Table of fund Principle Adverse Impacts

				23/24 Impact	24/25 Impact	Unit
GHGs	1	GHG Emissions	Scope 1 GHG Emissions	77,017.2	80,651.3	tCO ₂ e
			Scope 2 GHG Emissions	2,620.3	4103.6	tCO ₂ e
			Scope 3 GHG Emissions (from Jan 23)	63,100.01	81,993	tCO ₂ e
			TOTAL GHG Emissions	142,737.5	166,747.9	tCO ₂ e

⁴ 10. This figure includes only fully owned operational sites within the UK.

⁵ Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

	2	Carbon Footprint	Carbon Footprint	106.0	124.88	tCO2e/€m invested
	3	GHG intensity of Investee Companies	GHG intensity of Investee Companies	280.7	216.92	tCO2e/€m revenue
	4	Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	0	0	%
	5	Share of non-renewable energy consumption and production	Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage	77	75	% of operational assets have renewable tariffs
				39	39	% of total consumption is renewable
				100	100	% of total production is renewable
	6	Energy consumption intensity per high impact climate sector	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector	4.37	0.17	GWh / €m revenue
Biodiversity	7	Activities negatively affecting biodiversity-sensitive areas	Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas	0	0	%
Water	8	Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	0	0	tonnes of emissions to water
Waste	9	Hazardous Waste Ratio	Tonnes of hazardous waste generated by investee companies per million EUR invested, expressed as a weighted average	32.15	38.93	tonnes hazardous waste
Social and Employee Matters	10	Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	0	0	known incidents
	11	Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance /complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprise	0	0	known investee companies
	12	Unadjusted Gender Pay Gap	Average unadjusted gender pay gap of investee companies	N/A	N/A	%
	13	Board Gender Diversity	Average ratio of female to male board members	50 50	60 40	% female % male
	14	Exposure to controversial weapons (antipersonnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investments in investee companies involved in the manufacture or selling of controversial weapons	0	0	%

Additional Voluntary PAIs	15	Investments in companies producing chemicals	Share of investments in investee companies the activities of which fall under Division 20.2 of Annex I to Regulation (EC) No 1893/2006	N/A	0%	%
	16	Number of convictions and amount of fines for violation of anti-corruption and anti-bribery laws	Numbers of convictions and amount of fines for violations of anti corruption and anti-bribery laws by investee companies	N/A	0	Known convictions

As noted above, the Investment Manager's ongoing portfolio monitoring requires monthly data to be collected and reported on a quarterly basis. This enables robust reporting against the Principal Adverse Impact indicators on a regular basis. Performance against these indicators over time is monitored with a view to consistent improvement. Focused areas for improvement at present are:

- Reduction in overall Carbon Footprint of the Fund (PAI 2);
- Reduction in GHG intensity of Investee Companies (PAI 3); and
- Share of non-renewable energy consumption and production (PAI 5).

Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:

FGEN's investment process ensures that the projects have in place policies that cover topics such as Sustainability and ESG, Modern Slavery, Inclusion and Diversity, Anti-Bribery and Corruption, Health and Safety, Stakeholder Engagement, Whistleblowing, Cyber Security. The contents of these policies have been informed by the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

Furthermore, on engaging counterparties, they are requested to agree to the Investment Manager's Supplier Code of Conduct, which specifically references adherence to the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, thus providing greater assurance of compliance across both FGEN's SPVs and its supplier base.

As such, the investments made by the fund during the reference period are focused on alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.



How did this financial product consider principal adverse impacts on sustainability factors?

As noted above, the Investment Manager collects monthly, asset level sustainability and ESG data enabling reporting against the mandatory principal adverse impact indicators in Table 1 Annex 1 of the RTS. The PAI update for the stipulated reference period is provided in the table above.



What were the top investments of this financial product?

Largest investments	Sector	% Assets	Country
Rjukan	Fishing - Aquaculture ⁶ (TBC)	46.3%	Norway
FEIP	Energy Transition - fund investment	14.5%	Luxembourg
Cramlington	Electricity generation from bioenergy	9.5%	UK
CNG	Transmission and distribution networks for renewable gases	7.9%	UK
Sandridge	Storage of electricity	7.3%	UK

The above table provides details on the largest capital deployments or investments made by the fund as a proportion of total Capex deployed during the reference period, alongside the economic activity classification under the EU Taxonomy.



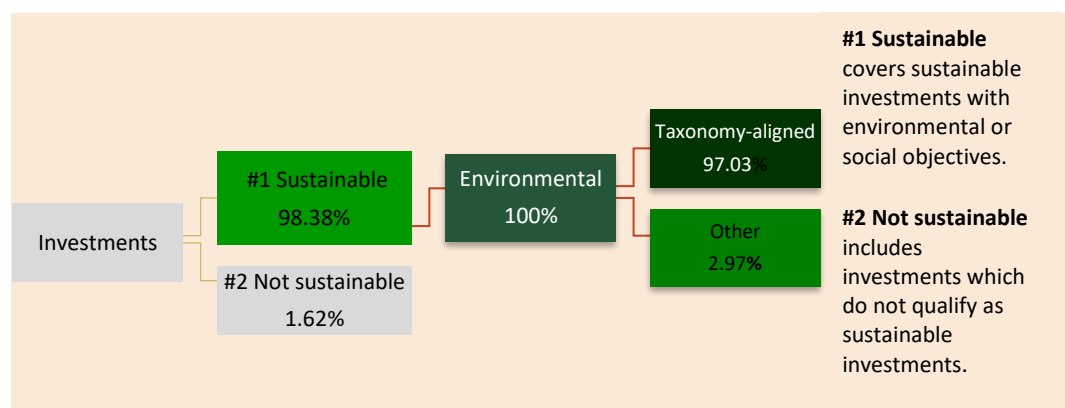
What was the proportion of sustainability-related investments?

What was the asset allocation⁷?

FGEN intends that all of the fund's assets will be used for the purpose of attaining the fund's sustainable investment objective. Notwithstanding, FGEN may hold a cash reserve.

Therefore, for the purpose of disclosing in line with the expectations of Commission Delegated Regulation (EU) 2022/1288, FGEN confirms that as at 31 Mar 2025 a proportion of 98.38% of the fund's total assets were invested in alignment with the fund's sustainable investment objective. 1.62% of the fund's assets can be categorised as "#2 Not sustainable"; this allocation relates to the cash and cash equivalents of the fund.

In which economic sectors were the investments made?



⁶ Greenhouses and other indoor food production systems, inclusive of aquaculture, have not yet had Technical Screening Criteria (TSC) developed. However, the [Platform on Sustainable Finance Technical Working Group's Full List of Technical Screening Criteria](#), recommends that aquaculture and greenhouses be "prioritised in the next round [of development]." Based off the TSC for other food production systems, FGEN 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.

⁷ Asset allocation describes the share of investments in specific assets.

The 2.97% classified as 'Other' relates to FGEN's investment into ETA Manfredonia, an Energy from Waste (EfW) facility in Italy.⁸

Meanwhile, the above table of top investments details the classifications of the economic sectors for the investments and capital deployments that were made during this reference period.

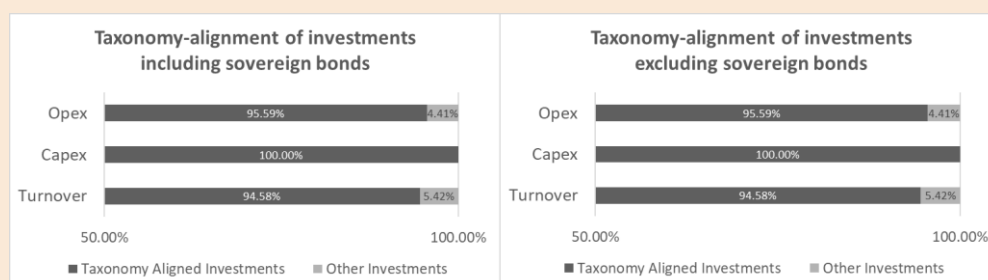


To what extent were sustainable investments with an environmental objective aligned with the EU Taxonomy?⁹

During the reference period 100% of the Fund's new investments and capital deployments both fulfilled the sustainable investment objective and were aligned with the EU Taxonomy.

As of 31 March 2025, the FGEN portfolio was 97.03% aligned with the EU Taxonomy. It's important to note that the fund's EfW investment is not taxonomy aligned.

The graphs below show the percentage of investments¹⁰ that were aligned with the EU Taxonomy. As there is no appropriate methodology to determine the taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



***For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures**

Did the financial product invest in fossil gas and/or nuclear energy related activities complying with the EU Taxonomy¹¹?

☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

⁸ As a result of the changing nature of the Taxonomy EfW assets are no longer included. FGEN invested into ETA Manfredonia, a 16.8MW operational EfW plant in Italy, in May 2021. It is an operational asset within the portfolio and contributes to the sustainable investment objective of the fund by reducing the national grid infrastructure's reliance on fossil fuels for baseload generation, while simultaneously dealing with a waste stream that would otherwise go to landfill.

⁹ Taxonomy-aligned activities are expressed as a share of:

- turnover reflecting the share of revenue from green activities of investee companies
- capital expenditure (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- operational expenditure (OpEx) reflecting green operational activities of investee companies.

¹¹ Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do no significant harm to any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

● **What was the share of investments made in transitional¹² and enabling¹³ activities?**

All investments made during the reference period are deemed to make a significant contribution to one of the environmental objectives of (EU) 2020/852 as set out on pg. 2 of this document.

As at 31 March 2025, 7.94% of the Fund's investments or capital deployed during the reference period were into enabling activities, with no investments in transitional activities.

The below table represents the proportion of CapEx that was deployed into enabling activities during the reference period:

Largest investments in enabling activities	Sector	CapEx	Country
Sandridge	Storage of electricity	7.3%	UK
Clayfords	Storage of electricity	0.3%	UK
Lunanhead	Storage of electricity	0.3%	UK

● **How did the percentage of investments aligned with the EU Taxonomy compare with previous reference periods?**

Previous communications surrounding SFDR-related disclosures are available on the Company's website.



What was the share of sustainable investments with an environmental objective that were not aligned with the EU Taxonomy?

As at 31 March 2025, the FGEN portfolio was 97.03% EU Taxonomy aligned. The other 2.97% is allocated to the fund's EfW investment.



What was the share of socially sustainable investments?

N/A.



What investments were included under "not sustainable", what was their purpose and were there any minimum environmental or social safeguards?

As mentioned, the fund may hold a cash reserve for the purposes of ongoing portfolio management to enable the continued attainment of the Company's sustainable investment objective. Given the purpose of these investments, there are no minimum environmental and social safeguards applied to such assets. At any point, this cash reserve will account for no more than 5% of the Company's assets.

Therefore, for the purpose of disclosing in line with the expectations of Commission Delegated Regulation (EU) 2022/1288, FGEN confirms that as at 31 March 2025 a proportion of 98.38% of the fund's assets were invested in alignment with the fund's sustainable investment objective. 1.62% of the fund's assets can be categorised as "#2 Not sustainable"; this allocation relates to the cash and cash equivalents of the fund.

¹² Transitional activities are economic activities for which low-carbon alternatives are not yet available and that have greenhouse gas emission levels corresponding to the best performance.

¹³ Enabling activities directly enable other activities to make a substantial contribution to an environmental objective



What actions have been taken to attain the sustainable investment objective during the reference period?

As mentioned, FGEN has continued to invest in line with its sustainable investment objective: To invest in a diversified portfolio of environmental infrastructure projects that support more environmentally friendly approaches to economic activity whilst generating a sustainable financial return.

FGEN has a climate change mitigation objective and supports the transition to a low carbon economy by virtue of investing in a diversified portfolio of environmental infrastructure.

FGEN defines environmental infrastructure as assets, projects and asset-backed businesses that utilise natural or waste resources or support more environmentally friendly approaches to economic activity, support the transition to a low carbon economy or which mitigate climate change.

This document has detailed the economic activities the fund has invested into and their level of alignment with the EU Taxonomy.

The fund has continued to quantify and disclose the positive sustainable impact its operational portfolio has achieved and will continue to do so as more and more of its investments become operational.

Finally, through robust quarterly reporting across the operational portfolio, it has continued to track the principle adverse impacts of its investment activity. These have also been disclosed in this periodic disclosure.



How did this financial product perform compared to the reference sustainable benchmark?

A specific index has not been designated as a reference benchmark for the Fund.

● How did the reference benchmark¹⁴ differ from a broad market index?

N/A.

● How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the sustainable investment objective?

N/A.

● How did this financial product perform compared with the reference benchmark?

N/A.

● How did this financial product perform compared with the broad market index?

N/A.

¹⁴ Reference benchmarks are indexes to measure whether the financial product attains the sustainable objective.