



**PUBLIC TRANSPARENCY REPORT**

**2023**

**Dalmore Capital**

Generated 15-12-2023

# About this report

PRI reporting is the largest global reporting project on responsible investment. It was developed with investors, for investors.

PRI signatories are required to report publicly on their responsible investment activities each year. In turn, they receive a number of outputs, including a public and private Transparency Report.

The public Transparency Reports, which are produced using signatories' reported information, provide accountability and support signatories to have internal discussions about their practices and to discuss these with their clients, beneficiaries, and other stakeholders.

This public Transparency Report is an export of the signatory's responses to the PRI Reporting Framework during the 2023 reporting period. It includes the signatory's responses to core indicators, as well as responses to plus indicators that the signatory has agreed to make public.

In response to signatory feedback, the PRI has not summarised signatories' responses – the information in this document is presented exactly as it was reported.

For each of the indicators in this document, all options selected by the signatory are presented, including links and qualitative responses. In some indicators, all applicable options are included for additional context.

## Disclaimers

### Responsible investment definitions

Within the PRI Reporting Framework Glossary, we provide definitions for key terms to guide reporting on responsible investment practices in the Reporting Framework. These definitions may differ from those used or proposed by other authorities and regulatory bodies due to evolving industry perspectives and changing legislative landscapes. Users of this report should be aware of these variations, as they may impact interpretations of the information provided.

### Data accuracy

This document presents information reported directly by signatories in the 2023 reporting cycle. This information has not been audited by the PRI or any other party acting on its behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented.

The PRI has taken reasonable action to ensure that data submitted by signatories in the reporting tool is reflected in their official PRI reports accurately. However, it is possible that small data inaccuracies and/or gaps remain, and the PRI shall not be responsible or liable for such inaccuracies and gaps.

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# SENIOR LEADERSHIP STATEMENT (SLS)

## SENIOR LEADERSHIP STATEMENT

### SENIOR LEADERSHIP STATEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SLS 1	CORE	N/A	N/A	PUBLIC	Senior Leadership Statement	GENERAL

#### Section 1. Our commitment

- Why does your organisation engage in responsible investment?
- What is your organisation's overall approach to responsible investment, and what major responsible investment commitment(s) have you made?

We live in times of critical transformation. Over the next decade, political and business leaders globally are faced with the challenge of demonstrating significant progress in preserving the health of the planet and reversing global warming, while building resilience and sustaining economic growth and social cohesion. At Dalmore Capital, we strongly believe that the development and operation of resilient and sustainable infrastructure is vital for delivering this transformation. Given our focus and track record, we are well-placed to continue providing institutional investors with attractive investment opportunities in essential infrastructure that generate socioeconomic and environmental benefits and that help the transition to a net-zero emissions economy and deliver a number of the United Nations Sustainable Development Goals.

Intrinsic to that belief is our commitment to responsible investing and to the promotion of high standards of business ethics and integrity. Paying due consideration to environmental, social and governance factors throughout the investment cycle is a matter of strategic priority for Dalmore, as we recognise that such factors have, and will continue to have, a material impact on the long-term performance of infrastructure assets, and as such support the creation of long-term value for our investors and other stakeholders. Our approach to responsible investment is guided by our Responsible Investment Policy which is regularly reviewed by Dalmore' ESG Committee and approved by the Dalmore Board. At the heart of our approach is our ESG Framework that summarises the areas of focus for Dalmore - from screening, through due diligence, to active asset management.

Dalmore's investment due diligence process includes assessment of the ESG risks and opportunities inherent and unique to each potential deal we consider. We assess all new deals against our ESG Framework. The findings from the due diligence are summarised in Investment Committee papers and enable Dalmore to form a view as to whether to proceed with the investment, and if, so what will be required to improve and properly manage ESG-related risks.

Post-acquisition, Dalmore's focus on ESG matters is continued through the active ongoing management of assets.

Dalmore takes director positions on the board of our portfolio companies through which we seek to influence behaviour and decision-making, and to achieve outcomes at each portfolio company consistent with our Policy. In addition, Dalmore annually monitors practices and performance metrics related to our ESG Framework focus areas, across the entire portfolio of assets under management. As a result of these monitoring activities, we identify specific improvement initiatives and actions and discuss these with the boards of respective portfolio companies.

#### Section 2. Annual overview

- Discuss your organisation's progress during the reporting year on the responsible investment issue you consider most relevant or material to your organisation or its assets.
- Reflect on your performance with respect to your organisation's responsible investment objectives and targets during the reporting year. Details might include, for example, outlining your single most important achievement or describing your general progress on topics such as the following (where applicable):
  - refinement of ESG analysis and incorporation
  - stewardship activities with investees and/or with policymakers
  - collaborative engagements
  - attainment of responsible investment certifications and/or awards

At Dalmore we continue on our mission to focus on infrastructure projects that bring positive socioeconomic and environmental benefits and continuously look for ways to work with our portfolio companies to improve their services and engagement with stakeholders. Infrastructure will play a key role in delivering the UK Government's ambitions for a Green Industrial Revolution and Dalmore continues to seek opportunities for investment that supports this ambition. The overwhelming message from COP27 was that the world is not moving fast enough in its decarbonisation efforts. As a long term infrastructure investor, Dalmore can play an important role in supporting companies with clear decarbonisation transition plans and invest in new infrastructure needed to achieve Net Zero. Looking forward to the year ahead we have already identified our key priorities. We will report on climate related risks consistent with the recommendations of TCFD, working with our assets to understand climate related risks and support the identification of material impacts and relevant mitigation and adaptation measures.

Dalmore has engaged with the Infrastructure Projects Authority (IPA) as member of its Net Zero Working Group to establish common GHG metrics, establish baseline and identify mechanisms to support our public sector PFI projects in meeting public sector decarbonisation commitments.

Supporting our work in the development of a roadmap to net zero carbon emissions for Dalmore and the funds we manage in 2023. Dalmore Capital Fund 4 ("DCF 4") has been categorised as Article 8 under the EU's Sustainable Finance Disclosure Regulation ("SFDR"). At the end of 2022 we successfully completed the fund's second investment in the UK's second largest pure play Energy from Waste platform. Dalmore continues to recruit in targeted areas and as part of our commitment to responsible investment grown our senior team with the appointment of a dedicated ESG Director in May 2022. Our Corporate Social Responsibility ("CSR") strategy and the health and wellbeing of our employees have always been intertwined and we continued to progress with this in 2021/22. Employees have responded well to our hybrid working model and we look forward to continuing to support them in achieving a healthy work-life balance. We look forward to another successful year for the whole team, delivering on our ESG objectives, supporting our portfolio companies in transitioning to a low carbon economy and engaging with all our stakeholders to deliver benefits to the communities which we serve.

### Section 3. Next steps

- What specific steps has your organisation outlined to advance your commitment to responsible investment in the next two years?

Both the European Union and the UK Government have committed to redirect capital flows to sustainable investments and to bring about a common framework under which sustainable investments can be defined and compared. The EU green finance roadmap is defined under the EU Taxonomy and the Sustainable Financial Disclosure Regulations ("SFDR") which are supported by Regulated Technical Standards ("RTS") which set out specific categories of alignment known as Article 8 and Article 9 (light green and dark green characteristics). In parallel, the UK Government and Financial Conduct Authority ("FCA") have been developing its own Sustainable Disclosure Requirements ("SDR") and taxonomy. At the time of writing, the FCA had published its consultation paper with draft regulations which are planned to come into force in early 2023.

The Government has stated it will seek to link the requirements directly to the guidance of the TCFD, for which the UK is the first government to mandate compliance across the whole economy. It has also stated it will link requirements for climate action / mitigation to requirements to protect nature and biodiversity via a new standard under development called Taskforce on Nature Related Financial Disclosures (“TNFD”). It is expected that reporting requirements will be aligned to the newly established International Sustainability Standards Board (“ISSB”). Dalmore Capital Fund 4 and future funds will be required to implement either SFDR or SDR and we will continue to work on updating our internal processes to capture these requirements and the alignment of any new investments to the EU Taxonomy where relevant.

Improving our understanding and disclosure of climate risk and opportunities is a key step in helping us understand the risk to our portfolio and developing a net zero strategy. Over the next 12 months we will be undertaking physical and transition risk scenario analysis across our portfolio and engaging directly with our portfolio companies on the findings. We will be focusing our engagement at board level for those portfolio companies who have to date not provided their own TCFD disclosures. Working with our portfolio companies, we will be looking to define appropriate measures and targets to mitigate any risks identified.

Equally, we see this as a way of engaging with portfolio companies on potential opportunities that can be pursued in addressing climate change risks. We will be reporting on the results of our analysis as part of a standalone TCFD report in 2023. Although neither the EU SFDR nor the UK SDR mandate are achieving net zero at this time, we wish to align with the goals of the Paris Agreement to limit global heating to under 1.5°C, and generate sustainable returns for our investors. Exploration into how we can achieve this alignment is a key priority in 2022/23. We will be looking at how best to develop net zero targets across the many sectors we invest in.

While some of the sectors in which we invest have established transition pathways, many are still in the process of defining what a pathway may look like. Dalmore will continue to engage with its portfolio companies and key stakeholders in the development of its approach and in establishing a robust GHG baseline across its portfolio. Quality data coverage will be a key component for both defining existing performance, sign posting improvement areas, setting out pathways and reporting on progress. It is for this reason we have extended the scope of our ESG annual reporting and will increase our active involvement with the day-to-day operations of the portfolio companies we have invested in.

Achieving net zero and demonstrating that our portfolio companies meet wider sustainable investment goals can only be achieved through coordinated and collaborative working across the supply chain.

At COP26, the UK Government committed to the forthcoming Taskforce on Nature related Financial Disclosures (“TNFD”) which is to mirror the TCFD and become integral to the UK’s Sustainable Disclosure Regulations, stating that “there is no pathway to net zero without protecting and restoring nature, we are encouraging countries to include nature-based solutions in their climate plans.” Looking ahead to 2023, we will be following closely the development of TNFD and how to adopt the recommendations across our business. Going forward, we will continue to work with portfolio company management teams in managing the risks that climate change presents and we will also consider opportunities to support the transition to a low-carbon economy.

As a long-term investor in infrastructure, Dalmore recognises the important role we can play in decarbonisation plans to achieve Net Zero.

Stewardship and engagement has long been a key focus of Dalmore’s asset management approach. We work directly with our portfolio companies to further ESG priorities and in 2023 we will be formalising this approach by publishing our Stewardship and Engagement Policy.

#### **Section 4. Endorsement**

**'The Senior Leadership Statement has been prepared and/or reviewed by the undersigned and reflects our organisation-wide commitment and approach to responsible investment'.**

Name

Michael Ryan

Position

CEO

Organisation's Name

Dalmore Capital

A

'This endorsement applies only to the Senior Leadership Statement and should not be considered an endorsement of the information reported by the above-mentioned organisation in the various modules of the Reporting Framework. The Senior Leadership Statement serves as a general overview of the above-mentioned organisation's responsible investment approach. The Senior Leadership Statement does not constitute advice and should not be relied upon as such. Further, it is not a substitute for the skill, judgement and experience of any third parties, their management, employees, advisors and/or clients when making investment and other business decisions'.

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# ORGANISATIONAL OVERVIEW (OO)

## ORGANISATIONAL INFORMATION

### REPORTING YEAR

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 1	CORE	N/A	N/A	PUBLIC	Reporting year	GENERAL

What is the year-end date of the 12-month period you have chosen to report for PRI reporting purposes?

	Date	Month	Year
Year-end date of the 12-month period for PRI reporting purposes:	31	12	2022

## SUBSIDIARY INFORMATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 2	CORE	N/A	OO 2.1	PUBLIC	Subsidiary information	GENERAL

Does your organisation have subsidiaries?

(A) Yes

(B) No



## ASSETS UNDER MANAGEMENT

### ALL ASSET CLASSES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 4	CORE	OO 3	N/A	PUBLIC	All asset classes	GENERAL

What are your total assets under management (AUM) at the end of the reporting year, as indicated in [OO 1]?

USD

(A) AUM of your organisation, including subsidiaries, and excluding the AUM subject to execution, advisory, custody, or research advisory only

US\$ 6,934,000,000.00

(B) AUM of subsidiaries that are PRI signatories in their own right and excluded from this submission, as indicated in [OO 2.2]

US\$ 0.00

(C) AUM subject to execution, advisory, custody, or research advisory only

US\$ 0.00

### ASSET BREAKDOWN

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5	CORE	OO 3	Multiple indicators	PUBLIC	Asset breakdown	GENERAL

Provide a percentage breakdown of your total AUM at the end of the reporting year as indicated in [OO 1].



	(1) Percentage of Internally managed AUM	(2) Percentage of Externally managed AUM
(A) Listed equity	0%	0%
(B) Fixed income	0%	0%
(C) Private equity	0%	0%
(D) Real estate	0%	0%
(E) Infrastructure	>75%	0%
(F) Hedge funds	0%	0%
(G) Forestry	0%	0%
(H) Farmland	0%	0%
(I) Other	0%	0%
(J) Off-balance sheet	0%	0%

## ASSET BREAKDOWN: INTERNALLY MANAGED INFRASTRUCTURE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.3 INF	CORE	OO 5	N/A	PUBLIC	Asset breakdown: Internally managed infrastructure	GENERAL

**Provide a further breakdown of your internally managed infrastructure AUM.**

(A) Data infrastructure	0%
(B) Diversified	0%
(C) Energy and water resources	0%

(D) Environmental services	>0-10%
(E) Network utilities	>10-50%
(F) Power generation (excl. renewables)	>10-50%
(G) Renewable power	>0-10%
(H) Social infrastructure	>10-50%
(I) Transport	>10-50%
(J) Other	0%

## GEOGRAPHICAL BREAKDOWN

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 7	CORE	Multiple, see guidance	N/A	PUBLIC	Geographical breakdown	GENERAL

**How much of your AUM in each asset class is invested in emerging markets and developing economies?**

### AUM in Emerging Markets and Developing Economies

(H) Infrastructure	(1) 0%
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## STEWARDSHIP

### STEWARDSHIP

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 8	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Stewardship	GENERAL

Does your organisation conduct stewardship activities, excluding (proxy) voting, for any of your assets?

#### (7) Infrastructure

(A) Yes, through internal staff	<input checked="" type="checkbox"/>
(B) Yes, through service providers	<input type="checkbox"/>
(C) Yes, through external managers	<input type="checkbox"/>
(D) We do not conduct stewardship	<input type="radio"/>

## ESG INCORPORATION

### INTERNALLY MANAGED ASSETS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 11	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Internally managed assets	1

For each internally managed asset class, does your organisation incorporate ESG factors into your investment decisions?

(1) Yes, we incorporate ESG factors into our investment decisions

(2) No, we do not incorporate ESG factors into our investment decisions

(K) Infrastructure



## ESG/SUSTAINABILITY FUNDS AND PRODUCTS

### LABELLING AND MARKETING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18	CORE	OO 11–14	OO 18.1	PUBLIC	Labelling and marketing	1

Do you explicitly market any of your products and/or funds as ESG and/or sustainable?

(A) Yes, we market products and/or funds as ESG and/or sustainable

Provide the percentage of AUM that your ESG and/or sustainability-marketed products or funds represent:

>0-10%

- (B) No, we do not offer products or funds explicitly marketed as ESG and/or sustainable
- (C) Not applicable; we do not offer products or funds

**Additional information: (Voluntary)**

DCF4 is categorised as SFDR Article 8 Fund with Environmental and Social Objective and monitored against ESG Objectives set out in Dalmore Capitals ESG Framework.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18.1	CORE	OO 18	OO 18.2	PUBLIC	Labelling and marketing	1

Do any of your ESG and/or sustainability-marketed products and/or funds hold formal ESG and/or RI certification(s) or label(s) awarded by a third party?

- (A) Yes, our ESG and/or sustainability-marketed products and/or funds hold formal labels or certifications
- (B) No, our ESG and/or sustainability-marketed products and/or funds do not hold formal labels or certifications

## SUMMARY OF REPORTING REQUIREMENTS

### SUMMARY OF REPORTING REQUIREMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 21	CORE	Multiple indicators	Multiple indicators	PUBLIC	Summary of reporting requirements	GENERAL

The following table shows which modules are mandatory or voluntary to report on in the separate PRI asset class modules. Where a module is voluntary, indicate if you wish to report on it.

Applicable modules	(1) Mandatory to report (pre-filled based on previous responses)	(2.1) Voluntary to report. Yes, I want to opt-in to reporting on the module	(2.2) Voluntary to report. No, I want to opt-out of reporting on the module
Policy, Governance and Strategy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Confidence Building Measures	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(K) Infrastructure	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

## OTHER ASSET BREAKDOWNS

### INFRASTRUCTURE: OWNERSHIP LEVEL

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 27	CORE	OO 21	N/A	PUBLIC	Infrastructure: Ownership level	GENERAL

What is the percentage breakdown of your organisation's infrastructure assets by the level of ownership?

- (A) A majority stake (more than 50%)
- Select from the list:
- (1) >0 to 10%
  - (2) >10 to 50%
  - (3) >50 to 75%
  - (4) >75%
- (B) A significant minority stake (between 10–50%)

Select from the list:

(1) >0 to 10%

(2) >10 to 50%

(C) A limited minority stake (less than 10%)

Select from the list:

(1) >0 to 10%

(2) >10 to 50%

## INFRASTRUCTURE: STRATEGY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 28	CORE	OO 21	N/A	PUBLIC	Infrastructure: Strategy	GENERAL

What is the investment strategy for your infrastructure assets?

(A) Core

(B) Value added

(C) Opportunistic

(D) Other

## INFRASTRUCTURE: TYPE OF ASSET

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 29	CORE	OO 21	INF 1	PUBLIC	Infrastructure: Type of asset	GENERAL

What is the asset type of your infrastructure?

(A) Greenfield

(B) Brownfield

## INFRASTRUCTURE: MANAGEMENT TYPE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 30	CORE	OO 21	Multiple, see guidance	PUBLIC	Infrastructure: Management type	GENERAL

### Who manages your infrastructure assets?

- (A) Direct management by our organisation
- (B) Third-party infrastructure operators that our organisation appoints
- (C) Other investors, infrastructure companies or their third-party operators
- (D) Public or government entities or their third-party operators

## SUBMISSION INFORMATION

### REPORT DISCLOSURE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 32	CORE	OO 3, OO 31	N/A	PUBLIC	Report disclosure	GENERAL

### How would you like to disclose the detailed percentage figures you reported throughout the Reporting Framework?

- (A) Publish as absolute numbers
- (B) Publish as ranges



# POLICY, GOVERNANCE AND STRATEGY (PGS)

## POLICY

### RESPONSIBLE INVESTMENT POLICY ELEMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 1	CORE	OO 8, OO 9	Multiple indicators	PUBLIC	Responsible investment policy elements	1, 2

Which elements are covered in your formal responsible investment policy(ies)?

- (A) Overall approach to responsible investment
- (B) Guidelines on environmental factors
- (C) Guidelines on social factors
- (D) Guidelines on governance factors
- (E) Guidelines on sustainability outcomes
- (F) Guidelines tailored to the specific asset class(es) we hold
- (G) Guidelines on exclusions
- (H) Guidelines on managing conflicts of interest related to responsible investment
- (I) Stewardship: Guidelines on engagement with investees
- (J) Stewardship: Guidelines on overall political engagement
- (K) Stewardship: Guidelines on engagement with other key stakeholders
- (M) Other responsible investment elements not listed here
- (N) Our organisation does not have a formal responsible investment policy and/or our policy(ies) do not cover any responsible investment elements

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 2	CORE	PGS 1	Multiple, see guidance	PUBLIC	Responsible investment policy elements	1

Does your formal responsible investment policy(ies) include specific guidelines on systematic sustainability issues?

- (A) Specific guidelines on climate change (may be part of guidelines on environmental factors)
- (B) Specific guidelines on human rights (may be part of guidelines on social factors)
- (C) Specific guidelines on other systematic sustainability issues
- (D) Our formal responsible investment policy(ies) does not include guidelines on systematic sustainability issues

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 3	CORE	PGS 1, PGS 2	N/A	PUBLIC	Responsible investment policy elements	6

**Which elements of your formal responsible investment policy(ies) are publicly available?**

**(A) Overall approach to responsible investment**

Add link:

<https://www.dalmorecapital.com/media/5hmjvjl/dalmore-capital-responsible-investment-policy-2022.pdf>

**(B) Guidelines on environmental factors**

Add link:

<https://www.dalmorecapital.com/media/5hmjvjl/dalmore-capital-responsible-investment-policy-2022.pdf>

**(C) Guidelines on social factors**

Add link:

<https://www.dalmorecapital.com/media/5hmjvjl/dalmore-capital-responsible-investment-policy-2022.pdf>

**(D) Guidelines on governance factors**

Add link:

<https://www.dalmorecapital.com/media/5hmjvjl/dalmore-capital-responsible-investment-policy-2022.pdf>

**(E) Guidelines on sustainability outcomes**

Add link:

<https://www.dalmorecapital.com/media/5hmjvjl/dalmore-capital-responsible-investment-policy-2022.pdf>

**(F) Specific guidelines on climate change (may be part of guidelines on environmental factors)**

Add link:

<https://www.dalmorecapital.com/media/5hmjvjl/dalmore-capital-responsible-investment-policy-2022.pdf>

**(G) Specific guidelines on human rights (may be part of guidelines on social factors)**

Add link:

<https://www.dalmorecapital.com/media/5hmjvjl/dalmore-capital-responsible-investment-policy-2022.pdf>

**(I) Guidelines tailored to the specific asset class(es) we hold**

Add link:

<https://www.dalmorecapital.com/media/5hmjvjl/dalmore-capital-responsible-investment-policy-2022.pdf>

**(J) Guidelines on exclusions**

Add link:

<https://www.dalmorecapital.com/media/5hmjvjl/dalmore-capital-responsible-investment-policy-2022.pdf>

**(L) Stewardship: Guidelines on engagement with investees**

Add link:

<https://www.dalmorecapital.com/media/5hmjvjl/dalmore-capital-responsible-investment-policy-2022.pdf>

**(Q) No elements of our formal responsible investment policy(ies) are publicly available**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 5	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy elements	2

Which elements are covered in your organisation’s policy(ies) or guidelines on stewardship?

- (A) Overall stewardship objectives
- (B) Prioritisation of specific ESG factors to be advanced via stewardship activities
- (C) Criteria used by our organisation to prioritise the investees, policy makers, key stakeholders, or other entities on which to focus our stewardship efforts
- (D) How different stewardship tools and activities are used across the organisation
- (E) Approach to escalation in stewardship
- (F) Approach to collaboration in stewardship
- (G) Conflicts of interest related to stewardship
- (H) How stewardship efforts and results are communicated across the organisation to feed into investment decision-making and vice versa
- (I) Other
- (J) None of the above elements is captured in our policy(ies) or guidelines on stewardship

## RESPONSIBLE INVESTMENT POLICY COVERAGE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 8	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy coverage	1

What percentage of your total AUM is covered by the below elements of your responsible investment policy(ies)?

### Combined AUM coverage of all policy elements

- (A) Overall approach to responsible investment
  - (B) Guidelines on environmental factors
  - (C) Guidelines on social factors
  - (D) Guidelines on governance factors
- (7) 100%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 9	CORE	PGS 2	N/A	PUBLIC	Responsible investment policy coverage	1

What proportion of your AUM is covered by your formal policies or guidelines on climate change, human rights, or other systematic sustainability issues?

**AUM coverage**

(A) Specific guidelines on climate change

(1) for all of our AUM

(B) Specific guidelines on human rights

(1) for all of our AUM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 10	CORE	OO 8, OO 9, PGS 1	N/A	PUBLIC	Responsible investment policy coverage	2

Per asset class, what percentage of your AUM is covered by your policy(ies) or guidelines on stewardship with investees?

**(E) Infrastructure**

(1) Percentage of AUM covered

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%
- (11) 100%**

# GOVERNANCE

## ROLES AND RESPONSIBILITIES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11	CORE	N/A	Multiple indicators	PUBLIC	Roles and responsibilities	1

Which senior level body(ies) or role(s) in your organisation have formal oversight over and accountability for responsible investment?

- (A) Board members, trustees, or equivalent
- (B) Senior executive-level staff, or equivalent

Specify:

CEO

- (C) Investment committee, or equivalent

Specify:

ESG Committee

- (D) Head of department, or equivalent

Specify department:

ESG Director, Investor Relations, and Asset Management

- (E) None of the above bodies and roles have oversight over and accountability for responsible investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11.1	CORE	PGS 1, PGS 2, PGS 11	N/A	PUBLIC	Roles and responsibilities	1, 2

Does your organisation's senior level body(ies) or role(s) have formal oversight over and accountability for the elements covered in your responsible investment policy(ies)?

	(1) Board members, trustees, or equivalent	(2) Senior executive-level staff, investment committee, head of department, or equivalent
(A) Overall approach to responsible investment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Guidelines on environmental, social and/or governance factors	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(C) Guidelines on sustainability outcomes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(D) Specific guidelines on climate change (may be part of guidelines on environmental factors)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(E) Specific guidelines on human rights (may be part of guidelines on social factors)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(G) Guidelines tailored to the specific asset class(es) we hold	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(H) Guidelines on exclusions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(J) Stewardship: Guidelines on engagement with investees	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(N) This role has no formal oversight over and accountability for any of the above elements covered in our responsible investment policy(ies)	<input type="checkbox"/>	<input type="checkbox"/>

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11.2	CORE	N/A	N/A	PUBLIC	Roles and responsibilities	1 – 6

**Does your organisation have governance processes or structures to ensure that your overall political engagement is aligned with your commitment to the principles of PRI, including any political engagement conducted by third parties on your behalf?**

(A) Yes

Describe how you do this:

Dalmore's commitment to the 6 Principles of the PRI is explicitly mentioned within our Responsible Investment policy. All Dalmore employees are required to sign-off and confirm they have read and will adhere to the policy when participating in all activities. Dalmore's focus on ESG matters is continued through the active ongoing management of assets. Dalmore takes director positions on the board of its investee companies and uses those to exercise its governance rights to influence board behaviours and decision making, and to achieve outcomes at each business consistent with this Policy. Dalmore takes a tailored approach, and relevant ESG matters to each of the projects are monitored on a regular basis and reported to and discussed by the board of investee companies quarterly. As a result, and where practical, specific improvement initiatives and actions may be encouraged. Dalmore's PPP and non-PPP asset management teams meet on a bi-monthly basis to review portfolio companies, share best practices and escalate any significant issues, including ESG matters.

- (B) No
- (C) Not applicable, our organisation does not conduct any form of political engagement directly or through any third parties

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 12	CORE	N/A	N/A	PUBLIC	Roles and responsibilities	1

**In your organisation, which internal or external roles are responsible for implementing your approach to responsible investment?**

(A) Internal role(s)

Specify:

CEO, ESG Director, Portfolio Managers, Investor Relations, ESG Committee

- (B) External investment managers, service providers, or other external partners or suppliers
- (C) We do not have any internal or external roles with responsibility for implementing responsible investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 13	CORE	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

**Does your organisation use responsible investment KPIs to evaluate the performance of your board members, trustees, or equivalent?**

(A) Yes, we use responsible investment KPIs to evaluate the performance of our board members, trustees, or equivalent



Describe: (Voluntary)

It is of key importance to Dalmore that all employees are fully aligned with our Responsible Investment Policy and wider ESG Framework. Adherence to and implementation of these is considered during the annual performance review process. This performance review process is a significant factor in determining the remuneration of employees, as set out in Dalmore's Remuneration Policy. The first sub-section of the appraisal process requires the employee and their manager to confirm they have adhered to the Responsible Investment policy throughout the performance year. All employees are expected to develop and promote a greater understanding of Dalmore ESG focus areas.

The second part aims to understand each employee's application of ESG principles throughout the year in relation to their specific role and department. ESG Committee outlines specific targets for each department which are reviewed annually to incorporate priority ESG objectives relevant to the department and employees roles. Therefore, the focus of the review reflects this. For example, Acquisitions focus on how ESG has been factored into investment decision-making. Asset Management focuses on monitoring and implementing ESG at portfolio companies and KPIs for 2022 are linked to % GHG data collection across our assets as part of our annual ESG surveys and identification and support of carbon initiatives, and participation in internal training and workshops on climate risk and Climate change.

Where employees have been involved in a specific ESG initiative, this will also be considered as part of the appraisal process. Aggregation of firm-wide and department-specific appraisals allows for internal benchmarks to be used to compare and assess professionals' performance against set objectives.

- (B) No, we do not use responsible investment KPIs to evaluate the performance of our board members, trustees, or equivalent

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 14	CORE	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

**Does your organisation use responsible investment KPIs to evaluate the performance of your senior executive-level staff (or equivalent), and are these KPIs linked to compensation?**

- (A) Yes, we use responsible investment KPIs to evaluate the performance of our senior executive-level staff (or equivalent)

Indicate whether these responsible investment KPIs are linked to compensation

- (1) KPIs are linked to compensation

- (2) KPIs are not linked to compensation as these roles do not have variable compensation
- (3) KPIs are not linked to compensation even though these roles have variable compensation

Describe: (Voluntary)

- (B) No, we do not use responsible investment KPIs to evaluate the performance of our senior executive-level staff (or equivalent)

## EXTERNAL REPORTING AND DISCLOSURES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 16	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

What elements are included in your regular reporting to clients and/or beneficiaries for the majority of your AUM?

- (A) Any changes in policies related to responsible investment
- (B) Any changes in governance or oversight related to responsible investment
- (C) Stewardship-related commitments
- (D) Progress towards stewardship-related commitments
- (E) Climate-related commitments
- (F) Progress towards climate-related commitments
- (G) Human rights-related commitments
- (H) Progress towards human rights-related commitments
- (I) Commitments to other systematic sustainability issues
- (J) Progress towards commitments on other systematic sustainability issues
- (K) We do not include any of these elements in our regular reporting to clients and/or beneficiaries for the majority of our AUM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 17	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, did your organisation publicly disclose climate-related information in line with the Task Force on Climate-Related Financial Disclosures' (TCFD) recommendations?

- (A) Yes, including all governance-related recommended disclosures
- (B) Yes, including all strategy-related recommended disclosures
- (C) Yes, including all risk management-related recommended disclosures
- (D) Yes, including all applicable metrics and targets-related recommended disclosures
- (E) None of the above

Add link(s):

<https://www.dalmorecapital.com/media/gznzhykr/dalmore-capital-esg-highlights-report-2020-21.pdf>

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 19	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

**During the reporting year, did your organisation publicly disclose its membership in and support for trade associations, think tanks or similar bodies that conduct any form of political engagement?**

- (A) Yes, we publicly disclosed our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement
- (B) No, we did not publicly disclose our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement
- (C) **Not applicable, we were not members in or supporters of any trade associations, think tanks, or similar bodies that conduct any form of political engagement during the reporting year**

## STRATEGY

### CAPITAL ALLOCATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 20	CORE	N/A	N/A	PUBLIC	Capital allocation	1

**Which elements do your organisation-level exclusions cover?**

- (A) **Exclusions based on our organisation's values or beliefs regarding particular sectors, products or services**
- (B) Exclusions based on our organisation's values or beliefs regarding particular regions or countries
- (C) Exclusions based on minimum standards of business practice aligned with international norms such as the OECD Guidelines for Multinational Enterprises, the International Bill of Human Rights, UN Security Council sanctions or the UN Global Compact
- (D) Exclusions based on our organisation's climate change commitments
- (E) Other elements
- (F) Not applicable; our organisation does not have any organisation-level exclusions

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 21	CORE	N/A	N/A	PUBLIC	Capital allocation	1

**How does your responsible investment approach influence your strategic asset allocation process?**

- (A) **We incorporate ESG factors into our assessment of expected asset class risks and returns**  
 Select from dropdown list:
  - (1) **for all of our AUM subject to strategic asset allocation**
  - (2) for a majority of our AUM subject to strategic asset allocation
  - (3) for a minority of our AUM subject to strategic asset allocation

**(B) We incorporate climate change–related risks and opportunities into our assessment of expected asset class risks and returns**

Select from dropdown list:

- (1) for all of our AUM subject to strategic asset allocation**
- (2) for a majority of our AUM subject to strategic asset allocation
- (3) for a minority of our AUM subject to strategic asset allocation
- (C) We incorporate human rights–related risks and opportunities into our assessment of expected asset class risks and returns
- (D) We incorporate risks and opportunities related to other systematic sustainability issues into our assessment of expected asset class risks and returns
- (E) We do not incorporate ESG factors, climate change, human rights or other systematic sustainability issues into our assessment of expected asset class risks and returns
- (F) Not applicable; we do not have a strategic asset allocation process

## STEWARDSHIP: OVERALL STEWARDSHIP STRATEGY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 22	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

For the majority of AUM within each asset class, which of the following best describes your primary stewardship objective?

### (5) Infrastructure

(A) Maximise our portfolio-level risk-adjusted returns. In doing so, we seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues.



(B) Maximise our individual investments' risk-adjusted returns. In doing so, we do not seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues.



## STEWARDSHIP: ENGAGEMENT WITH POLICY MAKERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39	CORE	OO 8, OO 9	PGS 39.1, PGS 39.2	PUBLIC	Stewardship: Engagement with policy makers	2

**Did your organisation, or the external investment managers or service providers acting on your behalf, engage with policy makers as part of your responsible investment approach during the reporting year?**

- (A) Yes, we engaged with policy makers directly
- (B) Yes, we engaged with policy makers through the leadership of or active participation in working groups or collaborative initiatives, including via the PRI
- (C) Yes, we were members of, supported, or were in another way affiliated with third party organisations, including trade associations and non-profit organisations, that engage with policy makers, excluding the PRI**
  - o (D) We did not engage with policy makers directly or indirectly during the reporting year beyond our membership in the PRI

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39.1	CORE	PGS 39	N/A	PUBLIC	Stewardship: Engagement with policy makers	2

**During the reporting year, what methods did you, or the external investment managers or service providers acting on your behalf, use to engage with policy makers as part of your responsible investment approach?**

- (A) We participated in 'sign-on' letters
- (B) We responded to policy consultations**
- (C) We provided technical input via government- or regulator-backed working groups**

Describe:

Dalmore is part the Infrastructure Public Authority Net Zero Working Group who's objective is to collaborate with investors in infrastructure PFI to develop specific approach to addressing decarbonisation in PFI projects.

- (D) We engaged policy makers on our own initiative

- (E) Other methods**

Describe:

Dalmore is a member of the GIIA and regularly provides asset data, technical analysis, and attends ESG sustainability working groups hosted by the GIIA the results of which feeds into industry response from GIIA to policy consultations. Dalmore attends Water Investors Meeting on a regular basis where participants exchange thoughts on the sector and discuss areas where we can collaborate to add value. Dalmore also engages policymakers indirectly through our portfolio companies. For example: Cadent is on the Hydrogen Taskforce, Through the Energy Networks Association (ENA) (for our energy assets) and Water UK (for our water assets), which directly promote issues including ESG

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39.2	CORE	PGS 39	N/A	PUBLIC	Stewardship: Engagement with policy makers	2

**During the reporting year, did your organisation publicly disclose details of your engagement with policy makers conducted as part of your responsible investment approach, including through external investment managers or service providers?**

- (A) We publicly disclosed all our policy positions
- (B) We publicly disclosed details of our engagements with policy makers
- (C) **No, we did not publicly disclose details of our engagement with policy makers conducted as part of our responsible investment approach during the reporting year**

Explain why:

Dalmore does not currently have a specific policy to disclose details of its policy engagement on consultations on its websites, however where relevant policy engagements are discussed in our annual ESG Highlights Report or shared via the consultation process by the regulator/policy makers.

## CLIMATE CHANGE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 41	CORE	N/A	PGS 41.1	PUBLIC	Climate change	General

**Has your organisation identified climate-related risks and opportunities affecting your investments?**

- (A) **Yes, within our standard planning horizon**

Specify the risks and opportunities identified and your relevant standard planning horizon:

Dalmore has identified climate related risks of our portfolio in line with the relevant fund life (2030-2040). As an investment manager of infrastructure assets, Dalmore recognises that climate change presents a range of physical and transition risks and opportunities that will materialise over different time horizons. We are aware that climate change and the transition towards a low carbon economy are relevant to both Dalmore's existing portfolio of infrastructure investments as well as future investment opportunities in the area of infrastructure. Given its significance, 'climate risk' has been specifically identified as a focus area within Dalmore's ESG Framework which is designed to guide the consideration of material ESG risks and opportunities when assessing potential new investments and during the ongoing active management of assets post investment.

Physical risks associated with extreme weather conditions and their impacts, such as flooding and severe wind, are relevant to long-term infrastructure investments which Dalmore focuses on. As such via our annual ESG survey, we monitor the exposure of Dalmore's existing portfolio to a range physical risks and the deployment of climate resilience and adaptation measures. Where necessary, further resilience measures are identified and implemented.

Transition risks and opportunities, such as those presented by climate-related policy changes and technological developments, are also relevant to Dalmore's portfolio and future investment pipeline.

Dalmore actively monitors such developments and their potential long-term implications on current holdings, particularly in the energy sector; and the range of future investment opportunities.

For new investment opportunities, each transaction is reviewed by the Investment Committee, which includes each board member, a minimum of three times during the investment process. ESG and climate-related risk and opportunities are a standard section of each paper that is presented to the committee. The ESG Committee and senior management of the Asset Management function formally report to the board and Executive Committee in regular frequency.

ESG and climate-related risk and opportunities are a standard agenda item, and all recent developments or proposed actions are discussed. As a result of careful deliberations with the Board on climate risks and opportunities, Dalmore formalised in 2020 the exclusion from its investment strategy of infrastructure assets whose primary activity is the extraction of or generation of electricity from fossil fuels. Climate risk is also one of the focus areas within Dalmore's ESG Framework.

- (B) Yes, beyond our standard planning horizon
- (C) No, we have not identified climate-related risks and/or opportunities affecting our investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 41.1	CORE	PGS 41	N/A	PUBLIC	Climate change	General

**Does your organisation integrate climate-related risks and opportunities affecting your investments in its overall investment strategy, financial planning and (if relevant) products?**

- (A) Yes, our overall investment strategy, financial planning and (if relevant) products integrate climate-related risks and opportunities
- (B) No, our organisation has not yet integrated climate-related risks and opportunities into its investment strategy, financial planning and (if relevant) products

Explain why:

Over the course of 2023 Dalmore has undertaken a portfolio wide physical and transition climate risk assessment using the following scenarios: IPCC SSP1-2.6 and SSP5-8.5 for physical risks, and NGFS Net Zero 2050 and NGFS Current Policies for transition risks. As part of our due diligence, physical climate risks assessment is undertaken for all assets and results considered as part of the investment decision making. Sector specific transition risks applicable to assets considered for investment also form part of our due diligence process to assess companies' ability to address those risks in the short, medium and long term. We have used the results to identify portfolio companies with whom we will undertake further quantitative assessments which will feed into the development of our overall investment strategy and financial planning over the course of 2023/24. As part of this work we are mapping our GHG emissions across our portfolio for 2030, 2040 and 2050 against various sector pathways to define a transition plan and interventions within our control to support Net Zero goals of our clients and portfolio companies.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 43	CORE	N/A	N/A	PUBLIC	Climate change	General

**Has your organisation assessed the resilience of its investment strategy in different climate scenarios, including one in which the average temperature rise is held to below 2 degrees Celsius (preferably to 1.5 degrees Celsius) above pre-industrial levels?**

- (A) Yes, using the Inevitable Policy Response Forecast Policy Scenario (FPS) or Required Policy Scenario (RPS)
- (B) Yes, using the One Earth Climate Model scenario
- (C) Yes, using the International Energy Agency (IEA) Net Zero scenario
- (D) Yes, using other scenarios



- (E) No, we have not assessed the resilience of our investment strategy in different climate scenarios, including one that holds temperature rise to below 2 degrees

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 44	CORE	N/A	N/A	PUBLIC	Climate change	General

**Does your organisation have a process to identify, assess, and manage the climate-related risks (potentially) affecting your investments?**

- (A) Yes, we have a process to identify and assess climate-related risks

(1) Describe your process

Dalmore monitor year on year performance related to climate policies and strategies, commitments to net zero and sector interim targets (e.g. science based targets), and monitor and quantify portfolio company CO2 emissions for Scope 1 and 2. In 2023 this will also include Scope 3 where available. In 2022 we collated data across our portfolio companies to establish baseline of portfolio companies assessment and exposure to climate physical hazards and transition risks, identification of material financial risks and tracking of investment in mitigation/adaptation measures, and engagement at board level on climate risks. The same metrics are considered as part of our due diligence process on new investments. The Investment Committee considers potential climate risks and their materiality taking into consideration the scope of potential mitigation measures available.

(2) Describe how this process is integrated into your overall risk management

The Risk Management Committee, reporting to the Board, provides oversight and challenge to ensure inherent risks (including climate) have been identified, assessed and appropriately managed. Climate Change presents a recognised and significant risk in its own right which is why all UK-based enterprises are now mandated to report on climate risk under TCFD by 2025. Our established ESG Framework ensures that climate risks are considered throughout the investment cycle. Where possible, Dalmore takes a board position and as a shareholder influences behaviour and management decision-making to identify and consider climate related risks. Our Performance Review Committees report quarterly on a company's performance including management's activities on climate risk mitigation.

- (B) Yes, we have a process to manage climate-related risks

(1) Describe your process

Through our annual ESG survey and engagement with portfolio companies Dalmore has begun to establish key performance indicators around climate risk which are tracked annually and used to inform improvement actions and support in developing both qualitative and quantitative evaluation of climate risks at the portfolio company level. Over the course of 2022 this information was used to understand knowledge and information gaps, and identification of material risks where relevant. We work closely with our portfolio companies to understand how we can support and influence the mitigation of those risks and/or provide support in identifying the resources/tools to address gaps and enable portfolio companies to understand their climate – related risks. As Infrastructure investor we have made commitment to exclude any future investments in fossil fuel sector.

(2) Describe how this process is integrated into your overall risk management

Our ESG committee annually review outcomes of ESG KPIs which feed into identification of our priorities for stewardship and engagement. Where possible we request Portfolio Companies to review annually their climate risks and incorporate this into their overall risk register.

- (C) No, we do not have any processes to identify, assess, or manage the climate-related risks affecting our investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 45	CORE	N/A	N/A	PUBLIC	Climate change	General

During the reporting year, which of the following climate risk metrics or variables affecting your investments did your organisation use and disclose?

(A) Exposure to physical risk

(1) Indicate whether this metric or variable was used and disclosed, including the methodology

(1) Metric or variable used

- (2) Metric or variable used and disclosed
- (3) Metric or variable used and disclosed, including methodology

(B) Exposure to transition risk

(1) Indicate whether this metric or variable was used and disclosed, including the methodology

(1) Metric or variable used

- (2) Metric or variable used and disclosed
- (3) Metric or variable used and disclosed, including methodology

(C) Internal carbon price

(D) Total carbon emissions

(1) Indicate whether this metric or variable was used and disclosed, including the methodology

- (1) Metric or variable used
- (2) Metric or variable used and disclosed
- (3) Metric or variable used and disclosed, including methodology

(2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

<https://www.dalmorecapital.com/media/gnznhykr/dalmore-capital-esg-highlights-report-2020-21.pdf>

(E) Weighted average carbon intensity

(F) Avoided emissions

(G) Implied Temperature Rise (ITR)

(H) Non-ITR measure of portfolio alignment with UNFCCC Paris Agreement goals

(I) Proportion of assets or other business activities aligned with climate-related opportunities

(J) Other metrics or variables

(K) Our organisation did not use or disclose any climate risk metrics or variables affecting our investments during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 46	CORE	N/A	N/A	PUBLIC	Climate change	General

During the reporting year, did your organisation disclose its Scope 1, Scope 2, and/or Scope 3 greenhouse gas emissions?

(A) Scope 1 emissions

(1) Indicate whether this metric was disclosed, including the methodology

- (1) Metric disclosed
- (2) Metric and methodology disclosed

(2) Provide links to the disclosed metric and methodology, as applicable

<https://www.dalmorecapital.com/media/gnznhykr/dalmore-capital-esg-highlights-report-2020-21.pdf>

**(B) Scope 2 emissions**

- (1) Indicate whether this metric was disclosed, including the methodology
  - (1) Metric disclosed
  - (2) Metric and methodology disclosed**
- (2) Provide links to the disclosed metric and methodology, as applicable

<https://www.dalmorecapital.com/media/gnznhykr/dalmore-capital-esg-highlights-report-2020-21.pdf>

**(C) Scope 3 emissions (including financed emissions)**

- (1) Indicate whether this metric was disclosed, including the methodology
  - (1) Metric disclosed
  - (2) Metric and methodology disclosed**
- (2) Provide links to the disclosed metric and methodology, as applicable

<https://www.dalmorecapital.com/media/gnznhykr/dalmore-capital-esg-highlights-report-2020-21.pdf>

- (D) Our organisation did not disclose its Scope 1, Scope 2, or Scope 3 greenhouse gas emissions during the reporting year

## SUSTAINABILITY OUTCOMES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47	CORE	N/A	Multiple indicators	PUBLIC	Sustainability outcomes	1, 2

**Has your organisation identified the intended and unintended sustainability outcomes connected to its investment activities?**

- (A) Yes, we have identified one or more specific sustainability outcomes connected to our investment activities**
- (B) No, we have not yet identified the sustainability outcomes connected to any of our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47.1	CORE	PGS 47	N/A	PUBLIC	Sustainability outcomes	1, 2

**Which widely recognised frameworks has your organisation used to identify the intended and unintended sustainability outcomes connected to its investment activities?**

- (A) The UN Sustainable Development Goals (SDGs) and targets**
- (B) The UNFCCC Paris Agreement
- (C) The UN Guiding Principles on Business and Human Rights (UNGPs)

- (D) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- (E) The EU Taxonomy**
- (F) Other relevant taxonomies
- (G) The International Bill of Human Rights
- (H) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- (I) The Convention on Biological Diversity
- (J) Other international framework(s)
- (K) Other regional framework(s)
- (L) Other sectoral/issue-specific framework(s)
- (M) Our organisation did not use any widely recognised frameworks to identify the intended and unintended sustainability outcomes connected to its investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47.2	CORE	PGS 47	PGS 48	PUBLIC	Sustainability outcomes	1, 2

**What are the primary methods that your organisation has used to determine the most important intended and unintended sustainability outcomes connected to its investment activities?**

- (A) Identify sustainability outcomes that are closely linked to our core investment activities**
- (B) Consult with key clients and/or beneficiaries to align with their priorities
- (C) Assess which actual or potential negative outcomes for people are most severe based on their scale, scope, and irremediable character
- (D) Identify sustainability outcomes that are closely linked to systematic sustainability issues**
- (E) Analyse the input from different stakeholders (e.g. affected communities, civil society, trade unions or similar)
- (F) Understand the geographical relevance of specific sustainability outcome objectives**
- (G) Other method
- (H) We have not yet determined the most important sustainability outcomes connected to our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 48	CORE	PGS 47.2	PGS 48.1, SO 1	PUBLIC	Sustainability outcomes	1, 2

**Has your organisation taken action on any specific sustainability outcomes connected to its investment activities, including to prevent and mitigate actual and potential negative outcomes?**

- (A) Yes, we have taken action on some of the specific sustainability outcomes connected to our investment activities
- (B) No, we have not yet taken action on any specific sustainability outcomes connected to our investment activities**  
Explain why not:

Dalmore believes that essential infrastructure, energy transition and sustainable energy generation have a significant and positive role to play in supporting economic growth, decarbonisation of the economy, and delivering greater social cohesion through improved access to, and provision of, social services (such as health care, education, and public services). Intrinsic to that belief is our commitment to responsible investing and to the promotion of high standards of business ethics and integrity, and the recognition that ESG factors have, and will continue to have, a material impact on the long-term performance of infrastructure assets and support long-term value to our investors. As such we see a good alignment between our investment strategy and the UN Sustainable Development Goals (UN SDGs). Dalmore has recently mapped its investment activities against the UN SDGs and over the last two years has been gathering data from its investee companies to establish a baseline against the material SDGs most closely linked to our investments. Our 2021-2022 ESG Highlights Report identified relevant SDGs and identified how our activities have the potential to contribute both positively and negatively to our material SDGs. We have identified climate action and supporting net zero as key sustainability outcome and focus of stewardship activities in 2023.

# INFRASTRUCTURE (INF)

## POLICY

### INVESTMENT GUIDELINES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 1	CORE	OO 21, OO 29, OO 30	N/A	PUBLIC	Investment guidelines	1 to 6

**What infrastructure-specific ESG guidelines are currently covered in your organisation's responsible investment policy(ies)?**

- (A) Guidelines on our ESG approach tailored to each infrastructure sector and geography where we invest
- (B) Guidelines on our ESG approach to greenfield investments
- (C) Guidelines on our ESG approach to brownfield investments
- (D) Guidelines on pre-investment screening
- (E) Guidelines on our approach to ESG integration into short-term or 100-day plans (or equivalent)
- (F) Guidelines on our approach to ESG integration into long-term value-creation efforts
- (H) Guidelines on our engagement approach related to the workforce
- (I) Guidelines on our engagement approach related to third-party operators
- (J) Guidelines on our engagement approach related to contractors
- (K) Guidelines on our engagement approach related to other external stakeholders, e.g. governments, local communities, and end-users
- (L) Our responsible investment policy(ies) does not cover infrastructure-specific ESG guidelines

## FUNDRAISING

### COMMITMENTS TO INVESTORS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 2	CORE	OO 21	N/A	PUBLIC	Commitments to investors	1, 4

**For all of the funds that you closed during the reporting year, what type of formal responsible investment commitments did you make in Limited Partnership Agreements (LPAs), side letters, or other constitutive fund documents?**

- (A) We incorporated responsible investment commitments in LPAs (or equivalent) as a standard default procedure
- (B) We added responsible investment commitments in LPAs (or equivalent) upon a client's request
- (C) We added responsible investment commitments in side letters upon a client's request
- (D) We did not make any formal responsible investment commitments for the relevant reporting year
- (E) Not applicable; we have not raised funds in the last five years

## PRE-INVESTMENT

### MATERIALITY ANALYSIS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 3	CORE	OO 21	INF 3.1	PUBLIC	Materiality analysis	1

**During the reporting year, how did you conduct ESG materiality analysis for your potential infrastructure investments?**

- (A) We assessed ESG materiality at the asset level, as each case is unique
  - Select from dropdown list
    - (1) for all of our potential infrastructure investments
    - (2) for a majority of our potential infrastructure investments
    - (3) for a minority of our potential infrastructure investments
- (B) We performed a mix of industry-level and asset-level ESG materiality analyses
- (C) We assessed ESG materiality at the industry level only
- (D) We did not conduct ESG materiality analysis for our potential infrastructure investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 3.1	CORE	INF 3	N/A	PUBLIC	Materiality analysis	1

**During the reporting year, what tools, standards and data did you use in your ESG materiality analysis of potential infrastructure investments?**

- (A) We used GRI standards to inform our infrastructure ESG materiality analysis
- (B) We used SASB standards to inform our infrastructure ESG materiality analysis
- (C) We used the UN Sustainable Development Goals (SDGs) to inform our infrastructure ESG materiality analysis**
- (D) We used the GRESB Materiality Assessment (RC7) or similar to inform our infrastructure ESG materiality analysis
- (E) We used the environmental and social factors detailed in the IFC Performance Standards (or similar standards used by development finance institutions) in our infrastructure ESG materiality analysis
- (F) We used climate disclosures, such as the TCFD recommendations or other climate risk and/or exposure analysis tools, to inform our infrastructure ESG materiality analysis**
- (G) We used the UN Guiding Principles on Business and Human Rights (UNGPs) to inform our infrastructure ESG materiality analysis
- (H) We used geopolitical and macro-economic considerations in our infrastructure ESG materiality analysis**
- (I) We engaged with existing owners and/or managers (or developers for new infrastructure assets) to inform our infrastructure ESG materiality analysis
- (J) Other

## DUE DILIGENCE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 4	CORE	OO 21	N/A	PUBLIC	Due diligence	1

**During the reporting year, how did material ESG factors influence the selection of your infrastructure investments?**

- (A) Material ESG factors were used to identify risks**  
Select from dropdown list
  - (1) for all of our potential infrastructure investments**
  - (2) for a majority of our potential infrastructure investments
  - (3) for a minority of our potential infrastructure investments
- (B) Material ESG factors were discussed by the investment committee (or equivalent)**  
Select from dropdown list
  - (1) for all of our potential infrastructure investments**
  - (2) for a majority of our potential infrastructure investments
  - (3) for a minority of our potential infrastructure investments
- (C) Material ESG factors were used to identify remedial actions for our 100-day plans (or equivalent)
- (D) Material ESG factors were used to identify opportunities for value creation
- (E) Material ESG factors informed our decision to abandon potential investments in the due diligence phase in cases where ESG risks were considered too high to mitigate**  
Select from dropdown list
  - (1) for all of our potential infrastructure investments
  - (2) for a majority of our potential infrastructure investments
  - (3) for a minority of our potential infrastructure investments**
- (F) Material ESG factors impacted investments in terms of the price offered and/or paid
- (G) Material ESG factors did not influence the selection of our infrastructure investments



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 5	CORE	OO 21	N/A	PUBLIC	Due diligence	1

**Once material ESG factors have been identified, what processes do you use to conduct due diligence on these factors for potential infrastructure investments?**

- (A) We conduct a high-level or desktop review against an ESG checklist for initial red flags**  
 Select from dropdown list
  - (1) for all of our potential infrastructure investments**
  - (2) for a majority of our potential infrastructure investments
  - (3) for a minority of our potential infrastructure investments
- (B) We send detailed ESG questionnaires to target assets**  
 Select from dropdown list
  - (1) for all of our potential infrastructure investments**
  - (2) for a majority of our potential infrastructure investments
  - (3) for a minority of our potential infrastructure investments
- (C) We hire third-party consultants to do technical due diligence on specific material ESG factors**  
 Select from dropdown list
  - (1) for all of our potential infrastructure investments
  - (2) for a majority of our potential infrastructure investments
  - (3) for a minority of our potential infrastructure investments**
- (D) We conduct site visits**  
 Select from dropdown list
  - (1) for all of our potential infrastructure investments**
  - (2) for a majority of our potential infrastructure investments
  - (3) for a minority of our potential infrastructure investments
- (E) We conduct in-depth interviews with management and/or personnel
- (F) We conduct detailed external stakeholder analyses and/or engagement
- (G) We incorporate ESG due diligence findings in all of our relevant investment process documentation in the same manner as other key due diligence, e.g. commercial, accounting and legal**  
 Select from dropdown list
  - (1) for all of our potential infrastructure investments**
  - (2) for a majority of our potential infrastructure investments
  - (3) for a minority of our potential infrastructure investments
- (H) Our investment committee (or an equivalent decision-making body) is ultimately responsible for ensuring all ESG due diligence is completed in the same manner as for other key due diligence, e.g. commercial, accounting and legal**  
 Select from dropdown list
  - (1) for all of our potential infrastructure investments**
  - (2) for a majority of our potential infrastructure investments
  - (3) for a minority of our potential infrastructure investments
- (I) Other
- (J) We do not conduct due diligence on material ESG factors for potential infrastructure investments

# POST-INVESTMENT

## MONITORING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 9	CORE	OO 21	INF 9.1	PUBLIC	Monitoring	1

During the reporting year, did you track one or more KPIs on material ESG factors across your infrastructure investments?

(A) Yes, we tracked KPIs on environmental factors

Percentage of infrastructure assets this applies to:

- (1) >0 to 10%
- (2) >10 to 50%
- (3) >50 to 75%
- (4) >75 to 95%
- (5) >95%

(B) Yes, we tracked KPIs on social factors

Percentage of infrastructure assets this applies to:

- (1) >0 to 10%
- (2) >10 to 50%
- (3) >50 to 75%
- (4) >75 to 95%
- (5) >95%

(C) Yes, we tracked KPIs on governance factors

Percentage of infrastructure assets this applies to:

- (1) >0 to 10%
- (2) >10 to 50%
- (3) >50 to 75%
- (4) >75 to 95%
- (5) >95%

- (D) We did not track KPIs on material ESG factors across our infrastructure investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 10	CORE	OO 21, OO 30	INF 10.1	PUBLIC	Monitoring	1, 2

What processes do you have in place to support meeting your targets on material ESG factors for your infrastructure investments?

(A) We use operational-level benchmarks to assess and analyse the performance of assets against sector performance

Select from dropdown list

- (1) for all of our infrastructure investments
- (2) for a majority of our infrastructure investments
- (3) for a minority of our infrastructure investments

- (B) We implement international best practice standards such as the IFC Performance Standards to guide ongoing assessments and analyses
- (C) We implement certified environmental and social management systems across our portfolio
- (D) We make sufficient budget available to ensure that the systems and procedures needed are established**  
Select from dropdown list
  - (1) for all of our infrastructure investments**
    - (2) for a majority of our infrastructure investments
    - (3) for a minority of our infrastructure investments
- (E) We hire external verification services to audit performance, systems, and procedures
- (G) We develop minimum health and safety standards**  
Select from dropdown list
  - (1) for all of our infrastructure investments**
    - (2) for a majority of our infrastructure investments
    - (3) for a minority of our infrastructure investments
- (H) We conduct ongoing engagement with all key stakeholders, e.g. local communities, NGOs, governments, and end-users
- (I) Other**  
Specify:
 

We conduct an internally managed ESG survey across the portfolio. Results and progression is easily tracked, and comparable across and within sub-sectors.

Select from dropdown list

  - (1) for all of our infrastructure investments**
    - (2) for a majority of our infrastructure investments
    - (3) for a minority of our infrastructure investments
  - (J) We do not have processes in place to help meet our targets on material ESG factors for our infrastructure investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 11	CORE	OO 21	N/A	PUBLIC	Monitoring	1, 2

**Post-investment, how do you manage material ESG risks and ESG opportunities to create value during the holding period of your investments?**

- (A) We develop asset-specific ESG action plans based on pre-investment research, due diligence and materiality findings**  
Select from dropdown list
  - (1) for all of our infrastructure investments
  - (2) for a majority of our infrastructure investments**
  - (3) for a minority of our infrastructure investments
- (B) We adjust our ESG action plans based on performance monitoring findings at least yearly**  
Select from dropdown list
  - (1) for all of our infrastructure investments
  - (2) for a majority of our infrastructure investments**
  - (3) for a minority of our infrastructure investments
- (C) We, or the external advisors that we hire, support our infrastructure investments with specific ESG value-creation opportunities**

Select from dropdown list

- (1) for all of our infrastructure investments
- (2) for a majority of our infrastructure investments
- (3) for a minority of our infrastructure investments

(D) Other

Specify:

We maintain dialog with all stakeholders, including local and central government, to deepen understanding of ESG needs and collaborate on ESG projects.

Select from dropdown list

- (1) for all of our infrastructure investments
- (2) for a majority of our infrastructure investments
- (3) for a minority of our infrastructure investments
- (E) We do not manage material ESG risks and opportunities post-investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 14	CORE	OO 21	INF 14.1	PUBLIC	Monitoring	1, 2

**How do you ensure that adequate ESG-related competence exists at the asset level?**

(A) We assign our board responsibility for ESG matters

Select from dropdown list

- (1) for all of our infrastructure investments
- (2) for a majority of our infrastructure investments
- (3) for a minority of our infrastructure investments

(B) We ensure that material ESG matters are discussed by our board at least yearly

Select from dropdown list

- (1) for all of our infrastructure investments
- (2) for a majority of our infrastructure investments
- (3) for a minority of our infrastructure investments

(C) We provide training on ESG aspects and management best practices relevant to the asset to C-suite executives only

(D) We provide training on ESG aspects and management best practices relevant to the asset to employees (excl. C-suite executives)

Select from dropdown list

- (1) for all of our infrastructure investments
- (2) for a majority of our infrastructure investments
- (3) for a minority of our infrastructure investments

(E) We support the asset by finding external ESG expertise, e.g. consultants or auditors

Select from dropdown list

- (1) for all of our infrastructure investments
- (2) for a majority of our infrastructure investments
- (3) for a minority of our infrastructure investments

(F) We share best practices across assets, e.g. educational sessions and the implementation of environmental and social management systems

Select from dropdown list

- (1) for all of our infrastructure investments
- (2) for a majority of our infrastructure investments
- (3) for a minority of our infrastructure investments

(G) We apply penalties or incentives to improve ESG performance in management remuneration schemes

(H) Other

(I) We do not ensure that adequate ESG-related competence exists at the asset level

## EXIT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 16	CORE	OO 21	N/A	PUBLIC	Exit	4, 6

**During the reporting year, what responsible investment information was shared with potential buyers of infrastructure investments?**

- (A) Our firm's high-level commitment to responsible investment, e.g. that we are a PRI signatory**
  - Select from dropdown list
    - (1) for all of our infrastructure investments**
    - (2) for a majority of our infrastructure investments
    - (3) for a minority of our infrastructure investments
- (B) A description of what industry and asset class standards our firm aligns with, e.g. TCFD or GRESB
- (C) Our firm's responsible investment policy (at minimum, a summary of key aspects and firm-specific approach)**
  - Select from dropdown list
    - (1) for all of our infrastructure investments**
    - (2) for a majority of our infrastructure investments
    - (3) for a minority of our infrastructure investments
- (D) Our firm's ESG risk assessment methodology (topics covered in-house and/or with external support)**
  - Select from dropdown list
    - (1) for all of our infrastructure investments**
    - (2) for a majority of our infrastructure investments
    - (3) for a minority of our infrastructure investments
- (E) The outcome of our latest ESG risk assessment on the asset or portfolio company**
  - Select from dropdown list
    - (1) for all of our infrastructure investments**
    - (2) for a majority of our infrastructure investments
    - (3) for a minority of our infrastructure investments
- (F) Key ESG performance data on the asset or portfolio company being sold
- (G) Other
  - (H) No responsible investment information was shared with potential buyers of infrastructure investments during the reporting year
  - (I) Not applicable; we had no sales process (or control over the sales process) during the reporting year

## DISCLOSURE OF ESG PORTFOLIO INFORMATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
INF 17	CORE	OO 21	N/A	PUBLIC	Disclosure of ESG portfolio information	6

During the reporting year, how did you report your targets on material ESG factors and related data to your investors?

- (A) We reported through a publicly-disclosed sustainability report
- (B) We reported in aggregate through formal reporting to investors
- (C) We reported at the asset level through formal reporting to investors
- (D) We reported through a limited partners advisory committee (or equivalent)
- (E) We reported at digital or physical events or meetings with investors
- (F) We had a process in place to ensure that reporting on serious ESG incidents occurred
- (G) Other
- (H) We did not report our targets on material ESG factors and related data to our investors during the reporting year

## CONFIDENCE-BUILDING MEASURES (CBM)

### CONFIDENCE-BUILDING MEASURES

#### APPROACH TO CONFIDENCE-BUILDING MEASURES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 1	CORE	N/A	Multiple indicators	PUBLIC	Approach to confidence-building measures	6

How did your organisation verify the information submitted in your PRI report this reporting year?

- (A) We conducted independent third-party assurance of selected processes and/or data related to the responsible investment processes reported in our PRI report, which resulted in a formal assurance conclusion
- (B) We conducted a third-party readiness review and are making changes to our internal controls or governance processes to be able to conduct independent third-party assurance next year
- (C) We conducted an internal audit of selected processes and/or data related to the responsible investment processes reported in our PRI report
- (D) Our board, trustees (or equivalent), senior executive-level staff (or equivalent), and/or investment committee (or equivalent) signed off on our PRI report
- (E) We conducted an external ESG audit of our holdings to verify that our funds comply with our responsible investment policy
- (F) We conducted an external ESG audit of our holdings as part of risk management, engagement identification or investment decision-making

(G) Our responses in selected sections and/or the entirety of our PRI report were internally reviewed before submission to the PRI

(H) We did not verify the information submitted in our PRI report this reporting year

## INTERNAL REVIEW

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 6	CORE	CBM 1	N/A	PUBLIC	Internal review	6

### Who in your organisation reviewed the responses submitted in your PRI report this year?

(A) Board, trustees, or equivalent

(B) Senior executive-level staff, investment committee, head of department, or equivalent

Sections of PRI report reviewed

(1) the entire report

(2) selected sections of the report

(C) None of the above internal roles reviewed selected sections or the entirety of the responses submitted in our PRI report this year