

# SUSTAINABLE INVESTMENT REPORT 2024

ARTICLE 29 OF THE  
FRENCH ENERGY-CLIMATE LAW & SFDR REPORT

The funds managed by RGREEN INVEST are reserved for investors professional and similar investors only. Investment in these funds entails significant risks of capital loss.

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# WARNING

**This annual report presents RGREEN INVEST's sustainability information for the year 2023, in accordance with Chapter V of Article D. 533-16-1 of the Monetary and Financial Code applicable to entities with more than €500 million in balance sheet total subject to both the provisions of Article 29 of the Energy and Climate Law and the provisions of Article 4 of Regulation (EU) 2019/2088 ("SFDR") of the European Parliament and of 27 November 2019.**

RGREEN INVEST is a portfolio management company, regulated in France by the Autorité des Marchés Financiers (AMF) under number GP-15000021. RGREEN INVEST is located at 47-51 rue de Chaillot, 75016 Paris, France. The website can be accessed at [rgreeninvest.com](http://rgreeninvest.com).

RGREEN INVEST has set up an ESG system briefly presented in this Report. The company uses several labels and certifications related to sustainable investing, which it implements for all or part of the funds it manages. This Report has been produced (1) with the objective of meeting the reporting requirements set by French law and regulations, (2) for the purpose of informing customers, (3) for the purpose of informing the public. This Report is not a marketing document, its objective is to present the work carried out by the management company as a company with a mission, as well as the prospects for the coming years.

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# INTRODUCTION

RGREEN INVEST is a French and independent management company, created in 2013 by Nicolas Rochon. A company with a mission since 2021, RGREEN INVEST has always been committed to the fight against climate change by driving a transformation of the traditional financial investment model.

Convinced of the need to align the interests of the financial sector with the challenges of the climate crisis, RGREEN INVEST has indeed paved the way for the deployment of renewable energy infrastructure at the international level by allowing institutional investors to direct their capital towards the financing of projects dedicated to accelerating the energy transition, mitigating and adapting to climate change.

Thanks to a team of 45 people with multidisciplinary skills, covering the finance, infrastructure and renewable energy sectors, RGREEN INVEST promotes the rise of key players in the energy transition sector in Europe and internationally by offering financing solutions adapted to each stage of project and business development.

RGREEN INVEST has numerous labels and commitments at its level or at the level of its managed funds; the company is a mission-driven company and is certified B Corp. The main funds are Greenfin-labeled and received a PRI score of 97/100 in the 2023 assessment. All funds managed by RGREEN INVEST to date are classified as Article 9 under the SFDR.

In May 2023, RGREEN INVEST welcomed a new minority shareholder, the Armen GP Stakes Fund I SLP, managed by the mission-driven management company Armen. Armen is committed to promoting the values defended by RGREEN INVEST and to encouraging its initiatives.

RGREEN INVEST is continuing its action in favour of the energy transition with an acceleration of its efforts to finance renewable energy, electric mobility and the decarbonisation of industry.



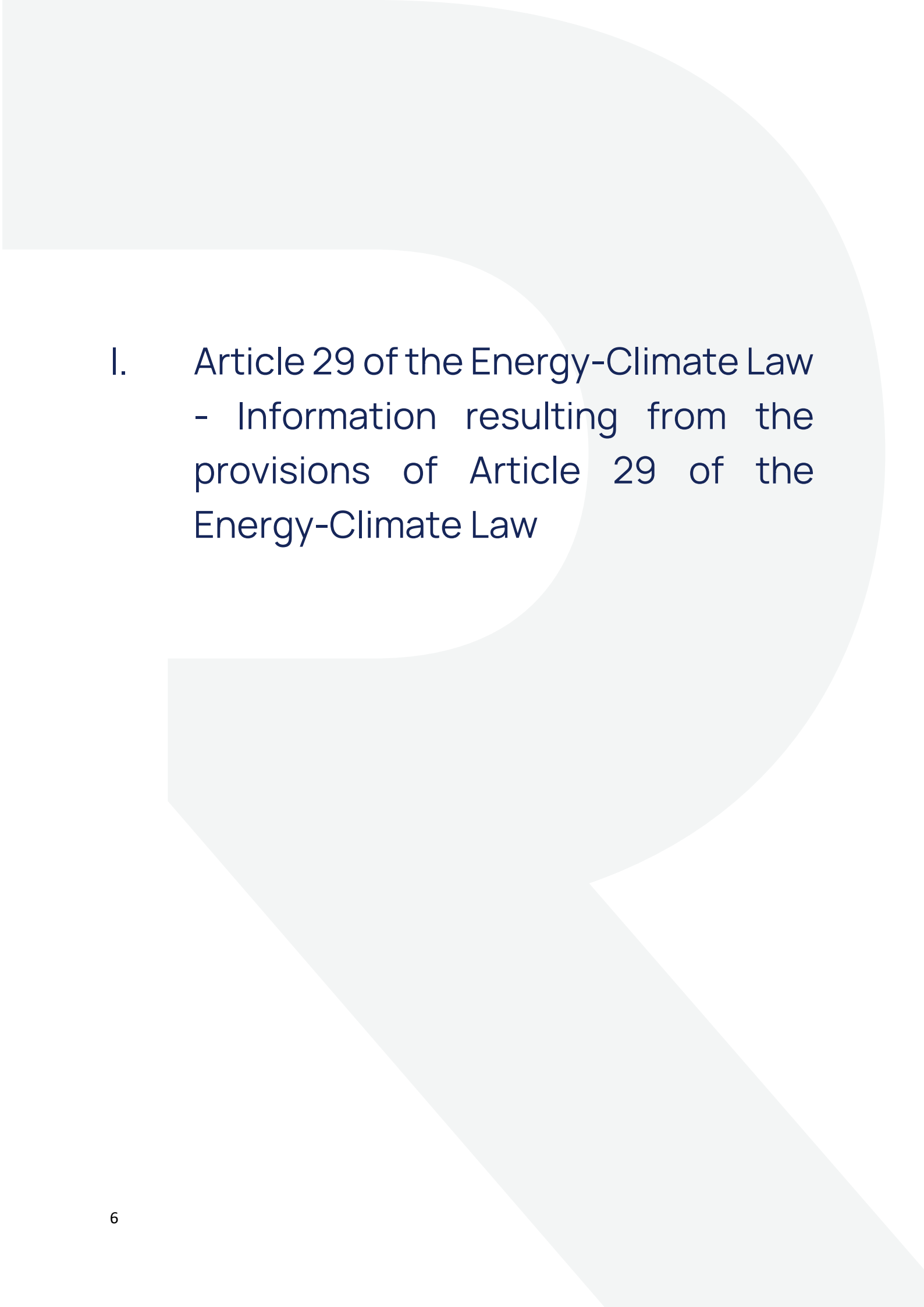
**Our key figures** - Figures as of 31/12/23

<b>RGREEN INVEST</b>	Company founded in 2013
	45 experienced professionals with diverse backgrounds, from the renewable energy, fund management or investment banking sectors
<b>FUNDS &amp; PARTICIPATIONS</b>	€2.2 billion in assets under management / fund commitment A total of 11 funds managed
	10 funds dedicated to infrastructure projects related to the energy transition and climate change adaptation 1 fund dedicated to investing in companies related to energy and climate transition
	+10 TECHNOLOGIES deployed: solar photovoltaic and concentrated solar photovoltaic, onshore / marine / floating wind turbines, biogas, hydroelectricity, electric mobility, biomass, geothermal energy, hydrogen, battery storage, industrial and commercial energy efficiency, etc.
	+50 developers / independent power producers / funded industrial companies
	+3,000 renewable ENERGY PROJECTS FUNDED Deployment of solar projects underway in Africa
<b>CLIMATE</b>	+5.2 GW OF GREEN PROJECTS FINANCED IN THE PORTFOLIO in operation, under construction or ready to build, jointly financed with other financing sources, banks or investors Including +1.3 GW according to the share financed by RGREEN INVEST
	+5.5 TWh OF RENEWABLE ELECTRICITY GENERATED IN 2023 by the projects financed in the portfolio, in operation Including + 1.1 TWh according to the share by RGREEN INVEST
	1.8 MtCO <sub>2</sub> e avoided in 2023 (vs. 1.7 tCO <sub>2</sub> e in 2022) by projects financed in the portfolio ("Scope 4"), of which 389 Kt CO <sub>2</sub> e avoided according to the share attributable to RGREEN INVEST.
	Compare this to the carbon footprint carried out by RGREEN INVEST for the year 2023, and counter-carried out by the company Carbometrix. Scope 1 = 27 tCO <sub>2</sub> e (vs 16 tCO <sub>2</sub> e in 2022) Scope 2 = 2 tCO <sub>2</sub> e (vs 2 tCO <sub>2</sub> e in 2022) Scope 3 (excl. 3.15) = 1,072 tCO <sub>2</sub> e (vs 614 tCO <sub>2</sub> e in 2022) Scope 3.15 = 252 KtCO <sub>2</sub> e (vs 242 KtCO <sub>2</sub> e in 2022) Ratio of avoided emissions (scope 4) / emissions generated (scope 1+2+3) over 2023 = x7
<b>ESG</b>	11 Article 9 SFDR funds (i.e. all funds managed by the company)
	1 impact fund (launched in February 2023)

**Note:**

(1) Although generating energy from renewable sources, so-called "green" infrastructures carry environmental and social risks. Emissions – although relatively minor – can be generated upstream and downstream in the value chain.

(2) It should be noted that RGREEN INVEST only invests in infrastructure projects using proven and validated technologies. The figures reveal the current level of investment by type of technology, all funds combined. A new private equity fund (non-infrastructure) was launched in the course of 2022, focusing on other technologies.

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- I. Article 29 of the Energy-Climate Law  
- Information resulting from the provisions of Article 29 of the Energy-Climate Law

## **A. The entity's general approach to the consideration of environmental, social and governance quality criteria**

RGREEN INVEST only invests in companies and projects that contribute to climate change mitigation and adaptation. These are mainly activities in the renewable energy sector and the energy transition.

The company actively integrates ESG topics throughout the investment process, from the sourcing and due diligence phase to the exit phase. An *Environmental and Social Management System* (ESMS) and an internal ESG scoring tool have been set up to monitor ESG performance throughout the life of each investment. The company is transparent and holds itself to the highest reporting standards. Every year, an "ESG & Impact" report is published. It presents the conclusions of the past financial year and the outlook for the current financial year with regard to the environmental and social issues associated with the company's direct and indirect activity. Also, on a quarterly and annual basis, precise reporting on the funds is carried out on the financial and ESG aspects for investors. This reporting complies with the SFDR Regulation (including the Principle Adverse Impacts) and presents certain indicators – in line with the "Article 9" classification. RGREEN INVEST has also adopted the Taxonomy Regulation, making it a major criterion for the selection and monitoring of investments, particularly in terms of ESG. All investments must at least comply with local environmental and social regulations within the European Union (EU) and the best international standards outside the EU.

RGREEN INVEST is committed to several initiatives: Mission-driven company (pursuing social and environmental objectives while generating economic benefits); signatory of the UN PRI (United Nations Principles for Responsible Investment) and rated 97% in 2023; "B Corp" (Certification for companies that meet high social and environmental standards); France Invest (to promote with conviction work to support unlisted companies and their central role in a living economy); ENERPLAN (a union representing the solar sector in France); The Institute of Sustainable Finance (which coordinates and brings together financial actors in Paris to promote an ecological and economic transition aligned with the Paris Agreement and the Sustainable Development Goals); the Syndicat des Energies Renouvelables (an organisation that promotes and defends the use of renewable energy sources in France). Finally, all "INFRAGREEN" funds are Greenfin certified (Label that distinguishes investment funds contributing to the ecological transition and the fight against climate change).

For more information, see Appendix E.<sup>1</sup>

## **B. Internal resources deployed by the entity**

RGREEN INVEST's ESG team has been further strengthened over the period 2023-2024 and is currently composed of 5 people for 4.5 Full-Time Equivalents (FTEs) - around 10% of the workforce at the end of 2023 compared to 2 FTEs at the end of 2022. This team includes an ESG director (15 years of experience), an ESG manager (6 years of experience) and two ESG analysts (1 to 3 years of experience) and a compliance and internal control team that is involved in the governance aspect. The total 2024 budget of the ESG Team has been estimated at approximately 5% of the company's total expenses in 2023.

A significant part of the role of the ESG Team is to put in place the procedures and tools to deploy the defined ESG strategy. The ESG team is occasionally supported by specialised service providers.

The team has developed a comprehensive training plan aimed at increasing the skills of all the management company's teams. Training courses led by specialized consultants on biodiversity and social risks in Africa are planned, as well as training in partnership with ABC Carbone and the AMF (Autorité des Marchés Financiers).

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<sup>1</sup> See Appendix E – Quantitative Indicators

Subject	Tools and processes put in place
<b>Procedures &amp; Corpus</b>	<ul style="list-style-type: none"> <li>• Environmental &amp; Social Management System (ESMS) set up to integrate ESG into the investment process, including due diligence, divestment and monitoring of portfolio companies.</li> <li>• Semi-annual ESG and CSR Committee.</li> <li>• Publication of an annual report on ESG and impact.</li> <li>• RGREEN INVEST requires the companies benefiting from its investments to comply with international conventions and standards, including: <ul style="list-style-type: none"> <li>○ The OECD Guidelines for Multinational Enterprises,</li> <li>○ The United Nations Guiding Principles on Business and Human Rights,</li> <li>○ The International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work,</li> <li>○ The eight fundamental ILO Conventions and the International Bill of Human Rights.</li> </ul> </li> <li>• Exclusion Policy</li> <li>• Shareholder engagement policy</li> <li>• Responsible purchasing policy</li> <li>• Travel Policy</li> <li>• Policy on Supply Chain Forced Labour Risks in the Photovoltaic Industry</li> <li>• ESG Charter</li> <li>• CSR Charter</li> <li>• Risk Management Policy</li> <li>• Shareholder engagement policy</li> </ul>
<b>Internal ESG Scoring Tool</b>	<ul style="list-style-type: none"> <li>• An ESG rating tool has been set up for each fund. The ESG Scoring Tool addresses key ESG risks and impacts and is designed to support the evaluation of an investment at every stage of the investment process.</li> </ul>
<b>External tools</b>	<ul style="list-style-type: none"> <li>• RGREEN INVEST uses a tool dedicated to the collection of ESG &amp; Impact data: Reporting 21 by Cority. This tool is used to collect information from portfolio companies on an annual basis. The information collected includes the SFDR's mandatory principal adverse sustainability impacts (PAIs) and information regarding the EU taxonomy.</li> <li>• RGREEN INVEST uses a tool dedicated to climate risk analysis: Altitude by AXA Climate.</li> </ul>
<b>Carbon footprint</b>	<ul style="list-style-type: none"> <li>• Carbon footprint assessment (scope 1-2-3) covering the direct and indirect emissions of the management company and its investments. The asset management company's carbon footprint (including investments) is calculated and reported annually. The carbon footprint at the level of each fund is calculated on a quarterly basis and calculated based on the portfolio's emissions over a rolling 12-month period.</li> <li>• In addition, the assessment of avoided emissions (scope 4), over a rolling 12 months, is carried out quarterly using an internal calculation.</li> <li>• RGREEN INVEST called on an external consulting firm, Carbometrix, to cross-check the internal calculation made.</li> </ul>
<b>Audit</b>	<ul style="list-style-type: none"> <li>• Every year, an external audit is carried out on the ESG &amp; CSR systems in order to issue a critical opinion on the CSR policy and the ESG mechanism at the level of the fund's management.</li> <li>• In 2021: External audit on compliance and regulatory requirements conducted by Duff &amp; Phelps.</li> <li>• In 2022: External audit of ESG and CSR mechanisms carried out by KPMG.</li> <li>• In 2023: Internal audit by Finegan on the ESG and CSR system.</li> </ul>



## **C. Approach to considering environmental, social and governance quality criteria at the level of the entity's governance**

RGREEN INVEST has a Management Committee that brings together all the directors of the different divisions on a monthly basis. The ESG, Compliance and Risk Director is a member. It facilitates the escalation of ESG issues and has a right of veto in the Investment Committee. An ESG & CSR Committee, composed of the ESG team and the management committee of RGREEN INVEST, has been in place for 5 years and meets every six months to validate the ESG action plan, the ESG-related budget, the ESG-specific training plan and the calendar for the year.

The company has a remuneration policy for its services that integrates ESG performance:

- For the INFRAGREEN V fund, 5% of the *Carried Interest payment* is subject to the achievement of an 80% level of alignment with Taxonomy at the level of the fund at its liquidation;
- For the INFRABRIDGE IV fund, 25% of the management company's performance fee is subject to the achievement of ESG performance indicators at the time of the fund's liquidation.

RGREEN INVEST has enshrined in its articles of association its commitment to taking account of environmental, social and governance issues by acquiring the status of Mission Company and adopting the following mission statement: *"To combat climate change by accelerating the energy transition and the adaptation of society through the financing of infrastructure with a positive and sustainable impact on the environment, local populations and territories"*.

## **D. Strategy for engagement with issuers or management companies and its implementation**

Since 2023, RGREEN INVEST has been working on updating its shareholder engagement policy to include additional requirements related to ESG issues and to better track its ESG-related votes. These elements will be available on the Company's website in the second half of 2024. The first strategies deployed by RGREEN INVEST were focused on debt funds. In recent years, the strategy of INFRAGREEN funds has evolved towards investments in equity/unlisted shares. The need (i) to organise and prepare the drafting of shareholders' agreements, and (ii) to deploy a shareholder strategy, has increased over time in view of this development.

Depending on the funds' commitments, the shareholders' agreements include specific obligations in terms of compliance with environmental, social and governance principles. The Shareholder Engagement Policy presents, for example, the following commitments:

- (i) Voting after case-by-case analysis, in favour of ESG and compliance topics. ESG themes: (1) climate change mitigation and adaptation (2) application of EU taxonomy alignment, (3) obligations under SFDR Article 9, (4) social best practices, including with regard to labour rights and indigenous peoples affected by infrastructure or funded activities, (5) exclusion criteria, (6) Greenfin label (if applicable), (7) ESG Governance and Compliance;
- (ii) Resolutions systematically voted:
  - a. Resolutions relating to executive compensation when this is not consistent with the company's long-term operating strategy and sustainability policy.
  - b. The company's long-term operational strategy and its policy on the Sustainable Development Goals.
  - c. Resolutions related to the SFDR, resolutions related to environmental issues, resolutions that do not comply with the exclusion list and the obligations of Article 9 on sustainable assets.
  - d. Resolution reinforcing the exclusion list and the obligations of Article 9 in relation to durable assets.

RGREEN INVEST has implemented a strategy to ensure that all of its funds are Article 9 compliant, and that some of these funds also benefit from the *Greenfin label*.

The discussions mainly focus on environmental issues and social aspects of companies (health and safety at work, impact of projects on local populations, etc.). Finally, particular importance is given to themes related to good governance practices, including respect for human rights and international labour law.

## **E. EU Taxonomy and fossil fuels**

RGREEN INVEST's internal policy prohibits the company from investing in activities related to extraction, distribution or any other activity directly related to the fossil fuel value chain. In addition, RGREEN INVEST cannot invest in a project that produces more than 250 gCO<sub>2</sub>e/kWh.

Regarding eligibility for the European Taxonomy, RGREEN INVEST has assessed that almost all of its assets in its portfolio (> 90%) are eligible. RGREEN INVEST declares alignment ratios to the Taxonomy of 0%. An in-depth analysis, based on a collection of specific documents and audit trails, is underway on the existing portfolio. In addition, RGREEN INVEST has integrated the objective of alignment with the Taxonomy on its new investments since 2023 and this is taken into account both in ESG Due Diligence and in the financial documentation as much as possible. The INFRAGREEN V fund, launched after the publication of the EU Taxonomy, provides for an investment limit of at least 80% of assets eligible for investment, with a *carried interest bonus* on the liquidation of the fund in the event of a minimum 80% alignment.

The INFRABRIDGE IV fund (senior debt) provides that 25% of the performance remuneration will be conditional on compliance with ESG criteria, including that of reaching, at the fund's liquidation, 80% of a substantial contribution to climate change mitigation and adaptation.

In addition, ESMA<sup>2</sup> recently published its guidelines on the use of certain ESG-related names by funds in April 2024. This document, which will come into force in the coming months, aims to regulate the use of certain designations and introduces requirements to be respected for the use by funds of the terms "sustainability", "impact", "environment", "transition", etc. These requirements include:

- (i) the achievement of a minimum threshold (%) of investments promoting environmental and social characteristics (Article 8) or sustainable investment objectives (Article 9) within the funds and;
- (ii) the exclusion of investments in controversial or fossil fuel-related activities as mentioned in the European regulation on benchmarks "Paris Agreement".<sup>3</sup>

RGREEN INVEST welcomes these guidelines which, in addition to increasing ESG transparency vis-à-vis the various stakeholders, will make it possible to highlight strategies oriented towards societal issues such as the energy transition. RGREEN INVEST will work on the application of these guidelines.

For more information on this section, see Appendix C.<sup>4</sup>

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<sup>2</sup> Final Report Guidelines on funds' names using ESG or sustainability-related terms :

[https://www.esma.europa.eu/sites/default/files/2024-05/ESMA34-472-440\\_Final\\_Report\\_Guidelines\\_on\\_funds\\_names.pdf](https://www.esma.europa.eu/sites/default/files/2024-05/ESMA34-472-440_Final_Report_Guidelines_on_funds_names.pdf)

<sup>3</sup> COMMISSION DELEGATED REGULATION (EU) 2020/1818 of 17 July 2020 supplementing Regulation (EU) 2016/1011 of the European Parliament and of the Council with regard to minimum standards for Union climate transition benchmarks and Union Paris Agreement benchmarks Article 12: <eur-lex.europa.eu/legal-content/FR/TXT/PDF/?uri=CELEX:32020R1818>

<sup>4</sup> See Appendix C – Asset Manager Taxonomy Alignment

## **F. Strategy for alignment with the international objectives of Articles 2 and 4 of the Paris Agreement relating to the mitigation of greenhouse gas emissions and, where applicable, for financial products whose underlying investments are entirely made on French territory, the national low-carbon strategy referred to in Article L. 222-1 B of the Environmental Code**

RGREEN INVEST has carried out its complete carbon assessment (scopes 1 – 2 – 3 and "scope 4" emissions avoided) in 2024, for the third consecutive year. This latest update is based on even more specific data and a refined methodology. Some technologies such as waste heat recovery processes were modelled for the first time in 2024.

In short, the strategy in terms of alignment with the Paris agreements is based on two dimensions:

- **The carbon footprint (the assessment):** The assessment includes all of the Corporation's direct and indirect emissions. It is based on the GHG *protocol* methodology and the Carbon Footprint methodology (specifically for the calculation of emissions related to offices, and IT equipment: Category 3.2). Investment-related emissions (Scope 3.15) were calculated using an online methodology: the GHG Protocol. The GHG emissions generated by the Company and its portfolios have been calculated using emission factors provided by ADEME and other reliable sources. Avoided emissions were calculated using the same emission factors and on the basis of reference scenarios corresponding to the situation prior to the implementation of the financed projects. To do this, certain assumptions have been made about the energy mix, lifespans and yields, always in accordance with the GHG Protocol and the recommendations of the ADEME. The issues were allocated to RGREEN INVEST by integrating its share in accordance with the PCAF methodology.  
RGREEN INVEST directly calculates the carbon footprint of companies in its portfolios based on information collected, few of which are subject to regulatory obligations in terms of GHG assessment and ESG reporting. The financial documentation includes the obligation to carry out a carbon assessment as much as possible. At this stage, RGREEN INVEST's estimates are counter-validated by a third party (Carbometrix).
- **The 2030 decarbonization trajectory (the action):** All of RGREEN INVEST's investments are dedicated to the energy transition and are in line with the Paris Agreement. Work is underway to formalise a 2030 target and will be made public in 2024. Regarding investments, this objective will be built through a relative reduction methodology based on carbon intensity.

Regarding reporting and monitoring, the company's carbon footprint will have to be renewed every year, during the first quarter.

**G. Strategy for alignment with long-term objectives related to biodiversity. The entity provides a strategy for alignment with the long-term objectives related to biodiversity, specifying the scope of the value chain chosen, which includes objectives set for 2030, and then every five years, on the following elements**

RGREEN INVEST is aware that its project development financing activity can have a negative impact on biodiversity. RGREEN INVEST complies with the Convention on Biological Diversity adopted on 5 June 1992 (in particular its three principles: conservation of biological diversity, sustainable use of biological diversity and fair and equitable sharing of benefits arising from the utilization of genetic resources). RGREEN INVEST is committed to identifying and monitoring biodiversity-related risks regarding its investments: in all situations where a major risk exists, an Environmental Impact Assessment (EIA) is required and is reviewed. Biodiversity risks are systematically assessed through the ESMS and the ESG scoring tool. This analysis is based on the environmental impact assessment of the projects, where applicable.

In 2022, RGREEN INVEST launched a project that aims to summarize all the risks to which its holdings are exposed and is based on analyses, internet due diligence and environmental impact studies. This work, materialized by a summary file, monitors indicators relating to biodiversity such as the number of hectares artificialized or the footprint of projects. RGREEN INVEST also relies on the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services. More specifically, a study is underway on the biodiversity footprint of portfolios and more specifically on the areas artificialized as a result of the technologies deployed. The initial findings of the study will be reported in the 2024 ESG & Impact Report.

**H. Approach to taking into account environmental, social and governance criteria in the management of risks, including physical, transition and liability risks related to climate change and biodiversity**

RGREEN INVEST is natively focused on the preservation of the environment and is aware of the risks associated with energy-related activities. The purpose of the company's investments, infrastructure, implies in principle an approach of anticipation and management of short, medium and long-term risks. Thus, traditional risk management systems such as financial, operational and infrastructure project risks were naturally deployed.

At the same time, RGREEN INVEST has quickly taken steps to anticipate and manage ESG risks, in particular the environmental risks inherent in investments in the renewable energy and so-called green technology sectors. Before the construction phase, the environmental and social impacts of future power plants are analysed and taken into account in the form of an Environmental and Social Action Plan (ESAP).

The new ESG Scoring tool includes all the ESG criteria monitored during the investments made. This tool, created in 2022, is operational on the AFRIGREEN, INFRAGREEN V, RSOLUTIONS, INFRABRIDGE III and INFRABRIDGE IV funds. This tool makes it possible to analyse RGREEN INVEST's compliance with its commitments on each transaction (exclusion, SFDR, Greenfin, PRI, etc.) and the application of international environmental and social standards. Finally, RGREEN INVEST is continuously working to ensure the social acceptability of the infrastructure financed.

Among the main risks identified are systematic risks related to climate and biodiversity that require specific long-term approaches.

**Physical climate risks:** With regard to physical climate risks, RGREEN INVEST has been systematically carrying out a risk assessment since the end of 2023. Using the "Altitude by AXA Climate" tool, we identify the main risks for each transaction and combine them with adaptation measures that we propose to our partners. This systematic

evaluation concerns our INFRAGREEN V and INFRABRIDGE IV funds. The analysis will gradually cover the entire portfolio.

Altitude calculates and assesses climate risks for three emission scenarios:

- SSP1-2.6 - Optimistic scenario: temperature increase stabilizes at around 1.8°C by the end of the century
- SSP2-4.5 - "Mid-road" scenario: This realistic scenario is expected to lead to a warming of about 2.7°C by the end of the century.
- SSP5-8.5 - High baseline scenario: This pessimistic scenario is expected to lead to warming of about 4.4°C by the end of the century.

Data on temperature, precipitation, humidity, solar radiation and winds are derived from Global Climate Models (GCMs). All funds will be progressively covered by this evaluation.

**Transition climate risks:** given the lack of exposure to fossil fuels and the low carbon intensity of the portfolios, RGREEN INVEST has a priori low exposure to transition risks. Nevertheless, the value chain of the projects and companies financed is not entirely carbon-free, which also exposes the portfolio to some extent to regulatory risks. RGREEN INVEST is working on the development of a tool for the systematic analysis and management of transition risks as part of its risk policy.

This work is carried out jointly by the Risk and ESG teams.

In the 2023 ESG & Impact Report published in autumn 2023, RGREEN INVEST presented the additional disclosures on climate-related risks, in line with the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD). We are continuing to analyse and present climate risks in the context of the 2024 financial year.

**Biodiversity risks:** RGREEN INVEST invests mainly in renewable energy technologies, we believe that our risk of dependence on biodiversity is low. However, we are aware that our projects may have a negative impact on local biodiversity, which could lead to legal or reputational risks for our projects. We assess biodiversity risks in our portfolio as part of our ongoing work to monitor the impact of our investments on biodiversity. The environmental footprint of our projects is the main impact indicator we use. In addition, we check whether our companies' assets are located in sensitive areas from a biodiversity perspective and whether appropriate impact assessments and potential mitigation mechanisms are in place to control and reduce the impact of projects on flora and fauna. We work in collaboration with our stakeholders to ensure that adequate impact assessments on flora and fauna are carried out, even when local legislation does not require them. RGREEN INVEST is working on the development of a biodiversity indicator and also plans to use external methodologies such as the Global Biodiversity Score. As indicated in **G**, a study is underway on the biodiversity footprint of portfolios and more specifically on the areas artificialized as a result of the technologies deployed.

**Other ESG Risks:** The ESG, Risk & Compliance team is responsible for the day-to-day analysis and assessment of ESG risks. ESG risks associated with specific assets are highlighted in our quarterly risk reports. ESG risks are discussed at both the ESG Committee and the Risk Committee, composed of selected employees, as well as at the level of the Management Committee of RGREEN INVEST. Systematic risks such as those related to climate and biodiversity are subject to specific policies and procedures. Other risks related to the nature of the projects and companies financed are analysed on a case-by-case basis with a strong contextual dimension depending on size, location, technology, etc.

The **main risks identified for the funded technologies** are summarized in the table below.

	Workers	Local communities	Fauna	Flora	Dismantling and recycling	Emission into the air	Climate	Other
MAIN POTENTIAL MACRO RISKS	<ul style="list-style-type: none"> <li>- On-site health and safety</li> <li>- Workers' rights</li> </ul>	<ul style="list-style-type: none"> <li>- Social acceptability and dialogue</li> <li>- Health and safety of local communities</li> <li>- Land acquisition</li> <li>- Displacement of Indigenous communities</li> <li>- Cultural heritage and visual impacts</li> </ul>	<ul style="list-style-type: none"> <li>- Habitat loss and destruction due to footprint</li> <li>- Danger to species due to operations</li> </ul>	<ul style="list-style-type: none"> <li>- Habitat loss and destruction</li> <li>-Deforestation</li> </ul>	<ul style="list-style-type: none"> <li>- Decommissioning /recycling planning and cost</li> </ul>	<ul style="list-style-type: none"> <li>- Material imports</li> <li>- High direct emissions for specific technologies</li> </ul>	<ul style="list-style-type: none"> <li>- Exposure to climate-related physical hazards</li> <li>- Low level of preparedness of some countries</li> </ul>	<ul style="list-style-type: none"> <li>- Impacts on the physical environment</li> <li>- Inefficient use of resources (land, water, etc.)</li> </ul>
Ground-mounted photovoltaics	<ul style="list-style-type: none"> <li>- Working in extreme heat</li> <li>- High risk of human rights violations in the value chain</li> <li>- Electrical hazard</li> </ul>	<ul style="list-style-type: none"> <li>- Risk of non-acceptance</li> <li>-Site reclamation</li> <li>-Fire</li> </ul>	<ul style="list-style-type: none"> <li>- Habitat loss</li> <li>- Birds and amphibians</li> </ul>	<ul style="list-style-type: none"> <li>- Deforestation / Competition with agriculture</li> </ul>	<ul style="list-style-type: none"> <li>- Partially functional recycling line</li> </ul>	<ul style="list-style-type: none"> <li>- Imported panels and primary materials (outside Europe)</li> </ul>	<ul style="list-style-type: none"> <li>- Depends on location</li> <li>- Highly vulnerable to flooding, hail, and high temperatures</li> </ul>	<ul style="list-style-type: none"> <li>- Use of metals</li> <li>- Use of large amounts of water for maintenance (risk in arid regions)</li> </ul>
Photovoltaics on roofs or shading structures	<ul style="list-style-type: none"> <li>- Working in extreme heat</li> <li>- High risk of human rights violations on the value chain</li> <li>- Electrical hazard</li> </ul>	<ul style="list-style-type: none"> <li>-Fire</li> <li>- Restoration of the roof</li> </ul>	<ul style="list-style-type: none"> <li>- Habitat loss due to the construction of new buildings to accommodate solar roofs</li> </ul>	<ul style="list-style-type: none"> <li>- Habitat loss due to the construction of new buildings to accommodate solar roofs</li> </ul>	<ul style="list-style-type: none"> <li>- Partially functional recycling line</li> </ul>	<ul style="list-style-type: none"> <li>- Imported panels and primary materials (outside Europe)</li> </ul>	<ul style="list-style-type: none"> <li>- Depends on location</li> <li>- Highly vulnerable to flooding, hail, and high temperatures</li> </ul>	<ul style="list-style-type: none"> <li>- Use of metals</li> <li>- Use of large amounts of water for maintenance (risk in arid regions)</li> </ul>
Onshore wind	<ul style="list-style-type: none"> <li>- Working at height</li> <li>- Electrical hazard</li> </ul>	<ul style="list-style-type: none"> <li>-Acceptance</li> <li>- Site reclamation</li> <li>- Wind turbine noise</li> <li>- Drop shadows</li> </ul>	<ul style="list-style-type: none"> <li>- Risk to birds and bats</li> </ul>	<ul style="list-style-type: none"> <li>- Habitat loss due to localized use of basement/concrete foundations</li> </ul>	<ul style="list-style-type: none"> <li>- High recycling cost: Boards that are difficult to recycle</li> </ul>	<ul style="list-style-type: none"> <li>- Imported parts (outside Europe)</li> </ul>	<ul style="list-style-type: none"> <li>- Depends on location</li> <li>- Highly vulnerable to flooding, hail, and high temperatures</li> </ul>	<ul style="list-style-type: none"> <li>- Use of metals and rare earth elements (Dysprosium/Neodymium)</li> </ul>
Offshore or floating wind	<ul style="list-style-type: none"> <li>- Working at height and above water</li> </ul>	<ul style="list-style-type: none"> <li>-Acceptance</li> <li>- Site remediation</li> <li>- Fishing areas</li> </ul>	<ul style="list-style-type: none"> <li>- Risk to birds and bats</li> <li>- Significant noise that may affect wildlife</li> </ul>	<ul style="list-style-type: none"> <li>- Habitat loss due to localized use of underground piles</li> </ul>	<ul style="list-style-type: none"> <li>- High recycling cost: Boards that are difficult to recycle, problem with marine foundations</li> </ul>	<ul style="list-style-type: none"> <li>- Imported parts (outside Europe)</li> </ul>	<ul style="list-style-type: none"> <li>- Depends on location</li> <li>- Highly vulnerable to flooding, hail, and high temperatures</li> </ul>	<ul style="list-style-type: none"> <li>- Use of metals and rare earths</li> </ul>
Small hydroelectric facilities	<ul style="list-style-type: none"> <li>- Working in hard-to-reach areas</li> </ul>	<ul style="list-style-type: none"> <li>- Dumping of areas used by local populations</li> </ul>	<ul style="list-style-type: none"> <li>- Impact on life in the water.</li> </ul>	<ul style="list-style-type: none"> <li>- Plant immersion</li> <li>- Disruption of ecological and sedimentary continuity</li> <li>- Increased water temperature</li> <li>- Modification of the hydrological regime</li> </ul>	<ul style="list-style-type: none"> <li>- High cost and blasting work</li> </ul>	<ul style="list-style-type: none"> <li>- Use of concrete</li> </ul>	<ul style="list-style-type: none"> <li>- Depends on location</li> <li>- Highly vulnerable to flooding, hail, and high temperatures</li> </ul>	
Geothermal energy		<ul style="list-style-type: none"> <li>- Groundwater pollution</li> <li>- Earthquakes</li> </ul>		<ul style="list-style-type: none"> <li>- Groundwater pollution</li> </ul>	<ul style="list-style-type: none"> <li>- Somewhat complex</li> </ul>	<ul style="list-style-type: none"> <li>- Possible emissions depending on the site</li> </ul>		<ul style="list-style-type: none"> <li>- Groundwater pollution</li> </ul>



	Workers	Local communities	Fauna	Flora	Dismantling and recycling	Emission into the air	Climate	Other
Methanisation	- Explosion	- Unacceptability - Smell of gasoline	- Destruction of habitat on the power plant site/right-of-way	- Groundwater and river pollution - Destruction of habitat on site / Coverage of the plant	- Relatively complicated recycling and dismantling	- Risk of CH4 and H2S emissions - Imported supplies (long distance) - Raw materials related to unsustainable agriculture and not compliant with EU regulations		
Biomass	-Fires	- Unacceptability - Smell of gasoline - Local pollution: Carbon monoxide and fine particles	- Destruction of habitat on the power plant site/right-of-way	- Forest destruction	- Relatively complicated recycling and dismantling	- Carbon release and local pollution - Imported supplies (long distance) - Gas leaks	- Depends on location - Highly vulnerable to high temperatures, cold snaps, droughts and floods	- Discharge of fine particles - Local pollution: carbon monoxide
Hydrogen	- Fires and explosions	- High energy use to the detriment of local communities	- Destruction of habitat on the power plant site/right-of-way	- Destruction of habitat on the power plant site/right-of-way	- Relatively complicated recycling and dismantling	- The cost of CO2 varies depending on the technology used (green, blue or grey hydrogen) - Indirect greenhouse gases due to leaks - High energy consumption leading to high emissions if based on fossil sources - Gas leaks		- Purification of the required water by electrolysis
Electric charging stations and electricity storage	- Electrical hazards -Fires		- Destruction of habitat on the power plant site/right-of-way	- Destruction of habitat on the power plant site/right-of-way	- Relatively complicated recycling and dismantling	- The cost of CO2 varies depending on the technology used and the place of manufacture.	- Depends on location - Highly vulnerable to temperature changes	- Use of metals and rare earths

**Table: Key sustainability risks identified by technology**

## A. List of financial products mentioned under Articles 8 and 9 of the Disclosure Regulation (SFDR)

	Investment sectors	Instruments	Localiza- tion	Impact Fund	Certif- icatio- ns	SFDR	Minimum level of sustainable investment*	Minimum level of alignment with EU taxonomy**	Compensation -related ESG	Share of assets under management taking ESG criteria into account
<b>INFRABRIDGE II</b> (formerly NEW ENERGIES II)	Renewable energy infrastructure and adaptation to climate change	Senior short- term debt (Bridge financing)	Europe			Article 9 (Launched before the SFDR)	100%	70%	Yes	100%
<b>INFRABRIDGE III</b>	Renewable energy infrastructure and adaptation to climate change	Senior short- term debt (Bridge financing)	Europe			Article 9	90%	70%	Yes	100%
<b>INFRAMEZZ</b>	Renewable energy infrastructure and adaptation to climate change	Called junior (mezzanine)	France, German y			Article 9 (Launched before the SFDR)	100%	70%	Yes	100%
<b>INFRAGREEN II</b> 2015	Renewable energy infrastructure and adaptation to climate change	This junior	Europe		Green fin	Article 9 (Launched before the SFDR)	100%	80%	Yes	100%
<b>INFRAGREEN II</b> 2016	Renewable energy infrastructure and adaptation to climate change	This junior	Europe			Article 9 (Launched before the SFDR)	100%	80%	Yes	100%
<b>INFRAGREEN III</b>	Renewable energy infrastructure and adaptation to climate change	Equity and junior debt	Europe		Green fin	Article 9	100%	80%	Yes	100%
<b>INFRAGREEN IV</b>	Renewable energy infrastructure and adaptation to climate change	Equity and junior debt	Europe		Green fin	Article 9	100%	80%	Yes	100%
<b>INFRAGREEN V</b>	Renewable energy infrastructure and adaptation to climate change	Equity	Europe and internat- ional		Green fin	Article 9	100%	80%	Yes	100%
<b>AFRIGREEN</b>	Photovoltaic and energy storage projects for commercial and industrial customers	Senior debt and direct financing	Africa	Yes		Article 9	100%	50%	Yes	100%
<b>R SOLUTIONS</b>	Innovative projects and companies	Equity	Europe			Article 9	90%	0%	Yes	100%

## II. SFDR reporting - Information resulting from the provisions of Article 4 of Regulation (EU) 2019/2088 of the European

## Summary of the main adverse impacts on sustainability factors

### Summary of the main adverse impacts on sustainability factors

For more information on this section, see Appendix G.<sup>5</sup>

### Description of the main adverse impacts on sustainability factors and historical comparison

For more information on this section, see Appendix G.<sup>6</sup>

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

For more information on this section, see Appendix G.

## I. Engagement Policy

### Analysis and thresholds

RGREEN INVEST has set thresholds for certain PAIs:

- 0% exposure to the fossil fuel sector (PAI 4)
- 0% exposure to non-renewable energy production (PAI 5)
- 0% exposure to violations of UN rules and OECD MNEs (PAI 10)
- 0% exposure to controversial weapons (PAI 14)

RGREEN INVEST is considering setting other thresholds for PAIs such as emissions to water (IAP 8), hazardous waste and radioactive waste (IAP 9). For the other PAIs, the level will be analysed and evaluated for each investment. It is also necessary to assess the probability of occurrence and the severity of the adverse impact, as well as the potentially irremediable nature of these impacts.

In fact, RGREEN INVEST makes a positive contribution to climate and energy issues. RGREEN INVEST nevertheless commits its partners to calculate their carbon footprint, work on the decarbonization of their supply chains and formalize their alignment with the Paris agreements. RGREEN INVEST's strategy is also to push portfolio companies to develop in regions with a high-carbon energy mix and high consumption of fossil fuels, which leads to a greater positive impact.

With regard to negative impacts related to social and societal issues, RGREEN INVEST works with funded companies to implement objectives, policies and procedures to support diversity and minimize other potential negative social impacts.

RGREEN INVEST monitors the level of negative impacts through the processes described in the previous section. During the holding period, RGREEN INVEST monitors the implementation of the ESG action plan through regular meetings and an annual data collection cycle.

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<sup>5</sup> See Appendix G – Adverse Impact Indicators

<sup>6</sup> See Appendix G – Adverse Impact Indicators

## **J. References to international standards**

RGREEN INVEST's ESG commitments are based on the following international standards:

- The United Nations Sustainable Development Goals (SDGs)
- The Principles for Responsible Investment (PRI)
- Task Force on Climate-related Financial Disclosures (TCFD)
- CDP's Climate Change Questionnaire
- L'initiative "Science Based Targets" (SBTi)
- United Nations and OECD Guidelines on Responsible Business Conduct
- *IFC Performance Standards*
- The *Environmental and Social Standards* of the EIB (European Investment Bank) depending on the project

**RGREEN INVEST's carbon footprint** includes all of the company's direct and indirect emissions. It is based on the GHG *protocol* methodology and the Carbon Footprint methodology (specifically for the calculation of emissions related to offices, and IT equipment: Category 3.2). Investment-related emissions (Scope 3.15) were calculated in line with the GHG Protocol (PCAF) methodology. The issues were allocated to RGREEN INVEST by integrating its share in accordance with the PCAF methodology.

At this stage, RGREEN INVEST's estimates are counter-validated by a third party (Carbometrix).

In addition, all of RGREEN INVEST's investments are dedicated to the energy transition and are in line with the Paris Agreement. Work is underway to formalise a 2030 target and will be made public in 2024. Regarding investments, this objective will be built using a relative reduction methodology based on carbon intensity, in particular via the Science Based Target initiative (SBTi) approach.

# Appendices



## Annex C - Share of assets under management for activities eligible for the technical criteria of Regulation (EU) 2020/852 "Taxonomy"

(1) In line with the explanations provided by the European Commission in its October 2022 Communication on the interpretation of certain legal provisions with regard to the reporting of eligible economic activities and assets (question 20 of this Communication), financial institutions use the most recent information published by their counterparties to determine the level of eligibility of their assets under management on the EU Sustainable Activities Taxonomy

Table 3 - Information to be submitted by entities subject to the provisions of Article 29 of the Energy and Climate Law but not subject to Article 8 of Regulation (EU)

Share of the asset manager's investments that are intended to finance or associated with taxonomy-aligned activities in relation to its total investments		Percentage					
Weighted average value of all investments that are intended to finance or are associated with Taxonomy-aligned economic activities, <b>relative to the total value of assets covered by the PCI</b> , with the following weights for investments in companies	Based on turnover	0%					
	Based on capital expenditure	0%					
<b>Additional information on exclusions in the numerator and denominator</b>							
Share of <b>exposures to financial and non-financial undertakings not subject to Articles 19a and 29a of Directive 2013/34/EU</b> , in relation to total assets covered by the KPI		100,0%					
Share of <b>exposures to central governments, central banks or supranational issuers</b> , in relation to total assets covered by the KPI		0,0%					

Share of <b>derivatives</b> in total assets covered by the KPI		0,0%					
<b>Breakdown of KPI by environmental objective</b>							
Share of the asset manager's investments that are allocated to activities that contribute significantly to the achievement of climate objectives		<b>(1) Climate Change Mitigation</b>	<b>(2) Adaptation to climate change</b>	<b>(3) Sustainable use and protection of aquatic and marine resources</b>	<b>(4) Transition to a circular economy</b>	<b>(5) Pollution prevention and reduction</b>	<b>(6) Protection and restoration of biodiversity and ecosystems</b>
Weighted average value of all investments that are intended to finance or are associated with economic activities that contribute significantly to the achievement of the environmental objective in relation to the total value of assets covered by the KPI	Based on turnover	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
	Based on capital expenditure	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%

**Table 4 - Voluntary alignment ratio incorporating an estimate of counterparty matching**

This optional ratio cannot replace the key performance indicator defined by Annex IX of European Delegated Regulation 2021/2178, which must be entered in tables 2 or 3 depending on whether or not the body is subject to European Regulation 2020/852.

Share of the asset manager's investments that are intended to finance or associated with Taxonomy-aligned activities in relation to its total investments		Percentage
Weighted average value of all investments that are intended to finance or are associated with taxonomy-aligned economic activities, relative to the total value of assets covered by the KPI (Key Performance Indicator or Taxonomy Alignment KPI), with the following weightings for investments in companies	Based on turnover	0,0%
	Based on capital expenditure	0,0%
Percentage of assets covered by the KPI (Key Performance Indicator or Taxonomy Alignment KPI) in relation to the total investments of the asset manager/investment firm/credit institution (total assets under management). Excluding investments in sovereign entities	Based on turnover	0,0%
	Based on capital expenditure	0,0%
Comments or explanations about the estimation methodology used and its limitations ( <b>optional section</b> )	<p>The eligibility of RGREEN INVEST's investments to the Taxonomy has been assessed against the 6 environmental objectives: (i) climate change mitigation, (ii) climate change adaptation, (iii) sustainable use and protection of aquatic and marine resources, (iv) transition to a circular economy, (v) pollution prevention and control, and (vi) protection and restoration of biodiversity and ecosystems.</p> <p>In 2023, the level of alignment of the portfolio with the EU taxonomy is assessed against the objectives of (i) climate change mitigation and (ii) climate change adaptation only.</p> <p>As of today, all investments in the fund should be 100% taxonomy eligible. The majority of investment activities fall into the following categories: 4.1. Electricity generation from photovoltaic solar energy; 4.3. Electricity production from wind energy; 4.10. Electricity storage; 6.15. Enabling infrastructure for low-carbon road transport and public transport.</p>	

<p>As in 2023, it was decided, as a precaution and transparency, to publish a 0% alignment ratio, pending the completion of the rigorous analysis of the technical evaluation criteria and the collection of all documentation.</p> <p>For example, RGREEN INVEST strengthens the collection of recyclability and value chain procedures and ensures that financed projects are subject to an assessment of their vulnerability to climate risk and a corresponding adaptation plan. This will allow for a relevant assessment of DNSH and Minimum Safeguards.</p> <p>As the production of these documents is logically part of the normal implementation schedule of the projects themselves, the publication of auditable Taxonomy ratios of RGREEN INVEST is planned from 2025 for the 2024 fiscal year.</p> <p>As a reminder, since 2022, RGREEN INVEST has been systematically analysing the eligibility and alignment of its new investments with the Taxonomy.</p> <p>Regarding its latest fund INFRAGREEN V, in the shareholder agreements of the investments made, it is stipulated that the beneficiary companies must be 100% aligned with the taxonomy (substantial criteria, DNSH and minimum social guarantees) before the liquidation of the fund.</p>
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Entities subject to 29LEC reporting shall provide information on their alignment with the taxonomy in Tables 2 or 3 of Annex C [annexes that will be available in next year's ROSA 29LEC questionnaire] depending on whether or not they are subject to the provisions of Article 8 of Regulation (EU) 2020/852.

They may also publish on a voluntary basis additional ratios reflecting estimates of this level of alignment with the taxonomy, which can be provided in Table 4 of Annex C.

In accordance with Article 7.7 of Delegated Regulation (EU) 2021/2178, financial undertakings may, inter alia, use estimates to assess the Taxonomy-alignment of their exposures to corporates not subject to the disclosure requirements of Articles 19a and 29a of EU Directive 2013/34/EU, if they are able to demonstrate compliance with all the criteria set out in Article 3 of Taxonomy Regulation (EU) 2020/852, with the exception of the criterion set out in Article 3(b) of that Regulation.

This method of estimating the Taxonomy alignment of issuers (specified in the aforementioned Article 7.7) is not identical to the one authorised in European Delegated Regulation 2022/1288 for the calculation of the Taxonomy alignment of financial products. Indeed, Regulation 2022/1288 allows the use of "equivalent information" when issuers' Taxonomy alignment data is not directly available, the notion of "equivalent information" still needs to be defined.

**Appendix D - Quantitative indicators from D. 533-16-1**

ATTENTION: The sections below appear in line with the answers you will have provided in Appendix D (only when the section of Decree 29LEC is indicated as present in the entity's 29LEC report)

As a reminder: decimals must be delimited using periods "." and not commas ","

Indicator category	Indicator/paragraph detail and number	Metric	Format	Numerical indicator
1. Information relating to the entity's general approach	1.c. Overall percentage share of assets under management that take into account environmental, social and governance criteria in the total amount of assets under management managed by the entity	As a % of assets under management	%	100%
2. Information relating to the internal resources deployed by the entity  <i>This data must be that of the entity subject to 29LEC reporting and not the consolidated data at group level As a reminder, these</i>	2.a. Description of the financial, human and technical resources dedicated to taking into account environmental, social and governance criteria in the investment strategy by relating them to the total assets under management or held by the entity. The description includes some or all of the following indicators: percentage share of the corresponding full-time equivalents; Percentage share and euro amount of budgets for environmental, social and governance data. amount of investment in research; Use of external service providers and data providers	% share of FTEs concerned in total FTEs	%	10%
		% share of dedicated budgets in the financial institution's total budget	%	3%
		€ amounts of dedicated budgets	Monetary amount (€)	463 000.00
		Amount of investment in research [2]	Monetary amount (€)	-

<p><i>indicators are required by Decree 29LEC, the information provided must include the information you have published in your 29LEC entity report</i></p>		<p>Number of external service providers and data providers used (<i>this is all of your service providers or suppliers whose data is used to take ESG criteria into account in your investment strategy</i>)</p>	<p>Number</p>	<p>9</p>
<p>4. Information on the strategy for engagement with issuers or management companies and its implementation</p>	<p>4.c. Assessment of the engagement strategy implemented, which may include the share of companies with which the entity has initiated a dialogue, the themes covered and the follow-up actions of this strategy</p> <p><b>ATTENTION</b> : for actors who only manage real estate or infrastructure funds, these are the engagement actions carried out with service providers, tenants, property managers, etc. (so it's not necessarily shareholder engagement)</p>	<p>% share of companies involved in a dialogue on all companies concerned by the theme covered</p>	<p>%</p>	<p>100%</p>
		<p>Specify the denominator of the above indicator</p>	<p>Text</p>	<p>60 companies in portfolio</p>
	<p>4.d. Assessment of the voting policy, in particular relating to the tabling and voting at general meetings of resolutions on environmental, social and governance quality issues</p> <p><i>(Examples of resolutions E, S or G: dealing with the trajectory for reducing GHG emissions, gender equality, well-being at work or the training of board members on</i></p>	<p><b>The indicators below are optional. Actors obviously have the possibility of publishing others in their 29LEC reports</b></p>		
	<p>Total number of ESG filings</p>	<p>Number</p>	<p>See above</p>	



	<i>climate issues or the indexation of the remuneration of board members). executive teams to achieve ESG goals)</i>	Number of environmental issues filings	Number	See above
		Number of votes on environmental issues	Number	See above
		Number of Social Issues Filings	Number	See above
		Number of votes on social issues	Number	See above
		Number of filings on governance quality issues	Number	See above
		Number of votes on governance quality issues	Number	See above
		% of total ESG deposits out of total deposits made	%	See above
		% of total votes (yes/no) on ESG issues out of total votes cast	%	See above
		% of environmental issues filings out of total filings completed	%	See above
		% of votes on environmental issues out of total votes cast	%	See above
		% of deposits on social issues out of total deposits made	%	See above
		% of votes on social issues out of total votes cast	%	See above
		% of filings on governance quality issues out of total filings made	%	See above
		% of votes on governance quality issues out of total votes cast	%	See above
5. Information on the EU Taxonomy and Fossil Fuels	5.b. Share of assets under management in companies active in the fossil fuel sector, as defined in the delegated act pursuant to Article 4 of that Regulation. [1]	Share of assets under management in %	%	0%. RGREEN INVEST is not committed to the production processes and life cycle of fossil fuels.

	<p>Share of assets under management in companies active in the <b>coal</b> sector (sub-part of indicator 5b above)</p> <p><i>This indicator was added at the request of the Directorate-General of the Treasury and is not required in Decree 29LEC itself. It is therefore optional, but we thank you for completing it as far as possible</i></p>	Share of assets under management in %	%	0
	<p>Share of assets under management in companies active in the <b>conventional oil and gas</b> sector (sub-part of indicator 5b above)</p> <p><i>This indicator was added at the request of the Directorate-General of the Treasury and is not required in Decree 29LEC itself</i></p>	Share of assets under management in %	%	0
	<p>Share of assets under management in companies active in the <b>unconventional oil and gas</b> sector (sub-part of indicator 5b above)</p> <p><i>This indicator was added at the request of the Directorate General of the Treasury and is not required in Decree 29LEC itself</i></p>	Share of assets under management in %	%	0
	<p>5.b. For <b>asset management companies that manage real estate funds</b> (predominantly real estate asset management companies are required to complete this indicator, the rest of the asset management companies can complete it on an optional basis):</p> <p><b>Exposure to fossil fuels via real estate assets calculated as the share of investments in real estate assets used for the extraction, storage, transport or production of fossil fuels.</b></p> <p>This is indicator n°17 of Table 1 of Annex 1 of the RTS SFDR (Delegated Regulation (EU) 2022/1288)</p>	Share of investments in %	%	0%. RGREEN INVEST is not committed to the production processes and life cycle of fossil fuels.

	Share of investments in real estate assets used for coal extraction, storage, transport or production (sub-part of indicator 5b above) <i>This indicator was added at the request of the Directorate-General of the Treasury and is not required in Decree 29LEC itself. It is therefore optional, but we thank you for completing it as far as possible</i>	Share of investments in %	%	0%. RGREEN INVEST is not committed to the production processes and life cycle of fossil fuels.
	Share of investments in real estate assets used for the extraction, storage, transport or production of <b>conventional oil and gas</b> (sub-part of indicator 5b above) <i>This indicator was added at the request of the Directorate-General of the Treasury and is not required in Decree 29LEC itself. It is therefore optional, but we thank you for completing it as far as possible</i>	Share of investments in %	%	0%. RGREEN INVEST is not committed to the production processes and life cycle of fossil fuels.
	Share of investments in real estate assets used for the extraction, storage, transport or production of <b>unconventional oil and gas</b> (sub-part of indicator 5b above) <i>This indicator was added at the request of the Directorate General of the Treasury and is not required in Decree 29LEC itself. It is therefore optional, but we thank you for completing it as far as possible</i>	Share of investments in %	%	0%. RGREEN INVEST is not committed to the production processes and life cycle of fossil fuels.
6. Information on the alignment strategy with the international goals to limit global warming under the Paris Agreement	6.a. A quantitative objective for 2030, reviewed every five years until 2050. The revision of this objective must be carried out no later than five years before its expiry. The target includes direct and indirect greenhouse gas emissions in absolute value or intensity value relative to a baseline scenario and a base year. It can be expressed as the measure of implied temperature increase or as the volume of greenhouse gas emissions;	<b>One of the two aspects (t°C or GHG emissions) must be reported in the 29LEC reports of the actors, as required by the decree. Actors obviously have the possibility of publishing others in their 29LEC reports</b>		
		Quantitative target for 2030 expressed in the volume of GHG emissions (if applicable)	Numerical value	Given their nature (exclusively renewable energy and green technologies), RGREEN INVEST's investments are de facto aligned with the Paris Agreement. RGREEN INVEST is committed to setting a science-based target covering our GHG emissions from our investments. RGREEN INVEST is committed to carrying out this approach in accordance with the Science Based Targets Initiative (or an equivalent initiative) during the year 2024.
		Unit of measurement for the 2030 quantitative target	Text	Given their nature (exclusively renewable energy and green technologies), RGREEN INVEST's investments are de facto aligned with the Paris Agreement. RGREEN INVEST is committed to setting a science-based target covering our GHG emissions from our investments. RGREEN INVEST is committed to carrying out this approach in

				accordance with the Science Based Targets Initiative (or an equivalent initiative) during the year 2024.
		Amount of assets covered by the quantitative alignment target expressed in the volume of GHG emissions	Monetary amount (€)	2 200 000 000
		Share of assets covered by the quantitative alignment target expressed in volume of GHG emissions on total assets	%	100
		Quantitative target for 2030 expressed in terms of implied temperature increase (if applicable)	Numerical value	Currently being defined
		Amount of assets covered by the quantitative alignment target expressed in terms of implied temperature rise	Monetary amount (€)	2 200 000 000
		Share of assets covered by the quantitative alignment target expressed in terms of implied temperature rise on total assets	%	100
		Type of asset covered by this objective	Text	All the assets of RGREEN INVEST
	6.b Where the entity uses an internal methodology, elements on it to assess the alignment of the investment strategy with the Paris Agreement or the national low-carbon strategy:	Use of an internal methodology?	Yes/No	No
	6. B. II. the level of coverage at the portfolio level ;(the level of coverage between asset classes is to be specified in the report)	Portfolio-level coverage level in %	%	100
	6. B. III. the time horizon chosen for the evaluation;	Evaluation time horizon	Date	RGREEN INVEST will set a medium-term target for 2030 and a long-term target for 2040.
	6. c. Quantification of results using at least one indicator	Free metric (consistent with the objective mentioned in 6.a., if applicable)	Numerical value	Currently being defined

	(if several indicators used, add as many columns as indicators used)	Free metric description	Text	Currently being defined
		Free metric unit of measurement	Text	Currently being defined
	6.f. The changes made within the investment strategy in line with the strategy of alignment with the Paris Agreement, and in particular the policies put in place with a view to a gradual exit from coal and unconventional hydrocarbons, specifying the phase-out timetable and the share of total assets under management or held by the entity covered by these policies	Coal: % of total assets under management or held by the entity	%	0%
		Have you set up a timetable for phasing out coal?	Yes/No	No RGREEN INVEST does not finance coal-related projects.
		Indicate the final coal phase-out date for OECD countries in your policy	Date	RGREEN INVEST is not committed to the production processes and life cycle of fossil fuels.
		Indicate the date of the final phase-out of coal used by your policy for non-OECD countries	Date	RGREEN INVEST is not committed to the production processes and life cycle of fossil fuels.
		Unconventional hydrocarbons: % of total assets under management or held by the entity	%	0%
		Have you set up a timetable for the gradual phase-out of unconventional hydrocarbons?	Yes/No	No

		Indicate the date of the final phase-out of unconventional hydrocarbons set by your policy for OECD countries	Date	RGREEN INVEST is not committed to the production processes and life cycle of fossil fuels.
		Indicate the date of the final phase-out of unconventional hydrocarbons set by your policy for non-OECD	Date	RGREEN INVEST is not committed to the production processes and life cycle of fossil fuels.
7. Information on the strategy for alignment with long-term biodiversity-related objectives	7. c. Mention of the reliance on a biodiversity footprint indicator, and, if applicable, how this indicator measures compliance with international biodiversity-related targets.	Free metric	Numerical value	<p>Currently, RGREEN INVEST monitors the impact of its investments on biodiversity in an essentially qualitative way. We check whether our companies' assets are located in sensitive areas from a biodiversity perspective and whether appropriate impact assessments and potential mitigation mechanisms are in place to control and minimise the impact of projects on flora and fauna. We work with our stakeholders to ensure that biodiversity studies are carried out when required by local legislation.</p> <p>Finally, RGREEN INVEST is working on the development of a biodiversity indicator and also plans to use external methodologies such as the Global Biodiversity Score. We plan to detail and explain this indicator during 2024.</p>
		Brief description of the metric	Text	The methodology to be used is currently being developed.
		Free metric unit of measurement	Text	The methodology to be used is currently being developed.
		Amount of assets covered by the biodiversity footprint indicator	Monetary amount (€)	RGREEN INVEST aims for the indicator to cover all outstanding amounts.
		Share of assets under management covered by the biodiversity footprint indicator in total assets under management	%	RGREEN INVEST aims for the indicator to cover 100% of the assets under management.



[1] 'companies active in the fossil fuel sector' means companies that derive income from the exploration, mining, extraction, production, processing, storage, refining or distribution, including transport, storage and trade, of fossil fuels as defined in Article 2(62) of Regulation (EU) 2018/1999 of the European Parliament and of the Council

[2] Any investment in research to combat the risk of climate change.

**Appendix E - Table of correspondence with the provisions of Article D. 533-16-1 of the Monetary and Financial Code, including any improvement plans referred to in 9° of III of Article D. 533-16-1 of the CMF**

"- When the information provided for in Decree 29LEC is not present in the report, the section explaining the reasons for omission and presentation of the improvement plan is required in the following two cases: ""Presence of explanation(s) on the absence of information"" and ""Information absent without explanation""

- The year entered in the last column ""Year planned to present the missing information"" must be greater than or equal to 2023"

<b>URL link to access the report:</b>	<a href="https://www.rgreeninvest.com/esg-impact/">https://www.rgreeninvest.com/esg-impact/</a>
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Reference in Article D. 533-16-1 of the Monetary and Financial Code	Information provided for by Order in Council 2021-663	Information in the report?	Parts and pages of the report dealing with the subject	If information is not presented: narrative explanation of the reasons for the omission with presentation of the improvement plan			
				Reason for omission (as described in the report)	Narrative explanation of the reason for the omission	Improvement Plan	Planned year to report
<b>1°: General approach of the entity</b>	Summary presentation of the entity's general approach to the consideration of environmental, social and governance quality criteria, and in particular in the investment policy and strategy	Information presented	Part 1				
	Content, frequency and means used to inform subscribers, affiliates, contributors, beneficiaries or clients about the criteria relating to the ESG objectives taken into account	Information presented	Part 1				
	List of financial products mentioned under Article 8 and 9 of the Disclosure Regulation (SFDR) (respectively, products that promote environmental and/or social characteristics and products that have sustainable investment as their objective)	Information presented	Part 1				
	Adherence of the entity, or of certain financial products, to a charter, code, initiative or obtaining a label on the consideration of ESG criteria as well as a summary description thereof, in line with d) of Article 4 of the Disclosure Regulation (SFDR)	Information presented	Part 1				

<b>2°: Internal resources deployed by the entity</b>	Description of the financial, human and technical resources dedicated to the integration of ESG criteria into the investment strategy by relating them to the total assets under management or held by the entity. The description includes some or all of the indicators: percentage share of the corresponding full-time equivalents; Percentage share and amount in euro of ESG data budgets; amount of investment in research; Use of external service providers and data providers	Information presented	Part 2				
	Actions taken to strengthen the internal capacity of the entity. The description includes all or part of the information relating to training, communication strategy, development of financial products and services associated with these actions	Information presented	Part 2				
<b>3°: Approach to taking into account environmental, social and governance quality criteria at the level of the entity's governance</b>	Knowledge, skills and experience of governance bodies, including administrative, supervisory and management bodies, in decision-making related to the integration of ESG criteria into the investment policy and strategy of the entity and the entities controlled by the entity, if any. Information may include the level of supervision and the associated process, the reporting of results, and competencies	Information presented	Part 1				
	Inclusion, in accordance with Article 5 of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019, in remuneration policies of information on how those policies are appropriate for the integration of sustainability risks, including details on the criteria for linking the remuneration policy to performance indicators	Information presented	Part 1				
	Integration of ESG criteria into the internal rules of the entity's board of directors or supervisory board	Information presented	Part 1				
<b>4°: Strategy for engagement with issuers or management companies as well as its implementation</b> <b>ATTENTION: Some</b>	Scope of companies concerned by the engagement strategy	Information presented	Part 1				
	Presentation of the voting policy and balance sheet	Information presented	Part 1				
	Assessment of the engagement strategy implemented, which may include the share of companies with which the entity has initiated a dialogue, the themes covered and the actions taken to monitor this strategy	Information not presented	N/A	In progress	The processes for monitoring the engagement strategy have been put in place and the assessment is		2025

requirements of this section 4° do not apply to all activities (e.g. absence of a voting policy for real estate fund asset management companies), for these requirements we thank you for: 1- Select the answer "Irrelevant information" in the column "Information present in the report?" 2- And justify this irrelevance in the "Narrative explanation" column					being drawn up		
	Review of the voting policy, in particular relating to the tabling and voting at general meetings of resolutions on environmental, social and governance issues	Information not presented	N/A	In progress	The processes for monitoring the engagement strategy have been put in place and the assessment is being drawn up		2025
	Investment strategy decisions, including sector divestment	Information presented	Part 1				
	Note: In the event that the entity publishes a specific report relating to its shareholder engagement policy, this information may be incorporated by reference to this article						
<b>5°: European taxonomy and fossil fuels</b>	Share of assets under management for activities in accordance with the technical screening criteria set out in the delegated acts relating to Articles 10 to 15 of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on establishing a framework to facilitate sustainable investment and amending Regulation (EU) 2019/2088, in accordance with the delegated act adopted pursuant to Article 8 of that Regulation	Information presented	Part 1				
	Share of exposures under management in the fossil fuel sector, within the meaning of the delegated act pursuant to Article 4 of the Disclosure Regulation (SFDR)  <b>ATTENTION</b> : for real estate asset management companies, this is the publication of the indicator "Exposure to fossil fuels via real estate assets" of Annex 1 of the SFDR RTS, which consists of the "Share of	Information presented	Part 2				

	investment in real estate assets used for extraction, storage, transport or production of fossil fuels"						
<b>6°: Publication of the actor's alignment strategy with the objectives of Articles 2 and 4 of the Paris Agreement relating to the mitigation of greenhouse gas emissions and, where applicable, for financial products whose underlying investments are entirely made on French territory, its national low-carbon strategy mentioned in Article L. 222-1 B of the Environmental</b>	<p>A quantitative objective for 2030, reviewed every five years until 2050. The revision of this objective must be carried out no later than five years before its expiry. The target includes direct and indirect greenhouse gas emissions in absolute value or intensity value relative to a baseline scenario and a base year. It can be expressed as the measure of implied temperature increase or as the volume of greenhouse gas emissions</p>	Information presented	Part 1				
	<p>Where the entity uses an internal methodology, elements shall be presented on it to assess the alignment of the investment strategy with the Paris Agreement or the national low-carbon strategy. The expected elements concern at least all the requirements listed in III.6° b) i) to III.6° b) x) of Decree 29LEC.</p>	Information presented	Part 1				
	Quantification of results using at least one indicator	Information not presented	N/A	Work in progress	<p>RGREEN INVEST is natively aligned with the Paris Agreement. Work is underway to formalize this within the framework of a recognized methodology.</p>		2025

<p><b>Code. This strategy must contain the following elements:</b></p> <p><b>ATTENTION: This section is mandatory, the choice lies in the selection of the indicator associated with the alignment objective with the Paris Agreement or the national low-carbon strategy (implied temperature or volume of greenhouse gas emissions)</b></p>	<p>For entities managing index funds, information on the use of the Union's "climate transition" and "Paris Agreement" benchmarks defined by Regulation (EU) 2019/2089 of the European Parliament and of the Council of 27 November 2019</p> <p><b>ATTENTION :</b> for asset management companies not managing any index funds, please read: 1- Select the answer "Irrelevant information" in the column "Information present in the report?" 2- And justify this irrelevance in the "Narrative explanation" column</p>	Not Relevant Information	N/A	Information not relevant to the entity concerned.	N/A	N/A
	<p>The role and use of valuation in the investment strategy, and in particular the complementarity between the assessment methodology used and the other indicators on environmental, social and governance criteria used more broadly in the investment strategy</p>	Information not presented	N/A	Work in progress	<p>RGREEN INVEST is natively aligned with the Paris Agreement. Work is underway to formalize this within the framework of a recognized methodology.</p>	2025
	<p>The changes made to the investment strategy in line with the strategy of alignment with the Paris Agreement, and the policy put in place for a gradual phase-out of coal and unconventional hydrocarbons, specifying the phase-out timetable and the share of total assets managed or held by the entity covered by these policies</p>	Information not presented	N/A	Work in progress	<p>RGREEN INVEST is natively aligned with the Paris Agreement. Work is underway to formalize this within the framework of a recognized methodology.</p>	2025
	<p>Any actions to monitor results and changes</p>	Information not presented	N/A	Work in progress	<p>RGREEN INVEST is natively aligned with the Paris Agreement. Work is underway to formalize this within the framework of a recognized methodology.</p>	2025

	The frequency of the evaluation, the estimated dates of updating and the relevant factors of evolution retained	Information not presented	N/A	Work in progress	RGREEN INVEST is natively aligned with the Paris Agreement. Work is underway to formalize this within the framework of a recognized methodology.		2025
<b>7°: Strategy for alignment with long-term objectives related to biodiversity. The entity provides a strategy for alignment with the long-term objectives related to biodiversity, specifying the scope of the value chain chosen, which includes objectives set for 2030, and then every five years, on the following elements</b>	Measurement of compliance with the objectives set out in the Convention on Biological Diversity adopted in 1992 <i>This requirement applies to all FMCs regardless of their activity (e.g. real estate PMS)</i>	Information presented	Part 1				
	Analysis of the contribution to the reduction of key pressures and impacts on biodiversity identified by the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services	Information presented	Part 1				
	Mention of the reliance on a biodiversity footprint indicator and, where applicable, how this indicator measures compliance with international biodiversity-related targets	Information presented	Part 1				
<b>8°: Approach to taking into account environmental, social and governance quality criteria in</b>	The process of identifying, assessing, prioritizing and managing risks related to the consideration of ESG criteria, how risks are integrated into the entity's conventional risk management framework, and how this process responds to the recommendations of the European Supervisory Authorities of the European System of Financial Supervision	Information presented	Part 1				

<p><b>risk management. In line with Article 3 of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019, the disclosure of information on the consideration of environmental, social and governance criteria in risk management shall include in particular physical, transition and liability risks related to climate change and biodiversity and, in particular</b></p> <p><b>The publication of the various information must comply with the requirements of 8bis of Article D-533-16-1 of the CMF</b></p>	<p>Description of the main ESG risks considered and analyzed. This description includes for each of the risks:- a characterization (in particular current or emerging character, endogenous or exogenous to the entity, occurrence, intensity and time horizon)- a segmentation (according to the typology: physical risk, transition risk and litigation or liability risk related to environmental factors)- a descriptive analysis associated with each main risk- an indication of the economic sectors and geographical areas concerned by these risks, their recurrent or one-off nature and their possible weighting - and an explanation of the criteria used to select the main risks</p>	Information presented	Part 1				
	<p>An indication of the frequency of review of the risk management scope document</p>	Information presented	Part 1				
	<p>An action plan to reduce the entity's exposure to the key environmental, social and governance risks taken into account</p>	Information presented	Part 1				
	<p>A quantitative estimate of the financial impact of the main ESG risks identified and the proportion of assets exposed, and the time horizon associated with these impacts at the level of the entity and the assets concerned, including the impact on the valuation of the portfolio. In the event that a qualitative statement is issued, the entity shall describe the difficulties encountered and the measures envisaged to quantitatively assess the financial impact of these risks</p>	Information presented	Part 1				
	<p>An indication of the evolution of methodological choices and results</p>	Information presented	Part 1				



**Annex G - Description of the main adverse impacts on sustainability factors (Annex 1 of EU Regulation 2022-1288)**

- Do you perform PAI reporting according to A4 of Regulation (EU) 2019/2088 (SFDR)?
  - YES
- Is your PAI reporting under the A4 SFDR mandatory or voluntary?
  - Obligatory

What is the period covered by your PAI reporting?

- Start date : 01/01/2023
- End date: 31/12/2023

## Summary

This document includes RGREEN INVEST's Statement on Principal Adverse Sustainability Impacts (PAI), in accordance with the European Commission's Regulation (EU) 2019/2088 on disclosures on sustainable finance ("SFDR"). RGREEN INVEST takes into account the main negative impacts of its investments on the environment and society. The following statement covers the main adverse impacts of all funds managed by RGREEN INVEST.

This document includes the statement of the principal adverse sustainability impacts of RGREEN INVEST, in accordance with the European Commission's Regulation (EU) 2019/2088 on disclosure of information on sustainable finance ("SFDR Regulation"). This declaration covers the period from 1 January 2022 to 31 December 2022.

### Description of the method of monitoring the PAIs by RGREEN INVEST

RGREEN INVEST has integrated ESG issues into all stages of the investment process. Our approach to responsible investment is outlined in our Responsible Investment Policy, which is an integral part of our environmental and social management system. In accordance with RGREEN INVEST's Environmental and Social Management System (ESMS), all investments must follow a multi-step process to assess ESG issues. All investments are evaluated during the due diligence phase. In addition, projects will be reassessed (1) annually based on new information and (2) at the end of the life of the investment. RGREEN INVEST supports portfolio companies through recurring data collection meetings.

Among other important ESG factors, PAIs are assessed as part of the process explained above for all potential and existing investments. RGREEN INVEST monitors the impact of its portfolio in relation to the 14 mandatory PAIs and the 2 voluntary PAIs presented in the table below.

### Impact on the climate and the environment

RGREEN INVEST mainly finances renewable energy projects that promote the energy transition, climate change adaptation and mitigation (wind, solar, biogas, etc.). Investing in fossil fuels is prohibited and therefore we have no exposure to the fossil fuel sector in our portfolio (PAI 4). Our management company's exclusion list also prohibits any investment in ammunition and weapons, ensuring that our exposure to controversial weapons is zero (PAI 14).

Renewable energy technologies have a significant impact on the climate because they help avoid emissions from fossil fuels. As a result, the direct impact of renewable energies on greenhouse gas (GHG) emissions is very low. However, there may still be a negative climate impact related to the value chain and manufacturing of renewable energy technologies, such as the manufacture and transportation of wind turbines or solar panels. RGREEN INVEST assessed that the climate impact presented in PAIs 1, 2 and 3. However, awareness-raising work is being carried out to raise awareness among companies about the carbon footprint of their value chain.

As the projects we finance only produce renewable energy, the share of non-renewable energy consumption and production (PAI 5) is 0%. In some cases, the companies we invest in consume non-renewable energy for their service activities, such as offices. However, this amount is insignificant and therefore not visible in the aggregate figures. We present the energy intensity for the high climate impact sector D - SUPPLY OF ELECTRICITY, GAS, STEAM AND AIR CONDITIONING (PAI 6). Energy intensity is considered low due to a portfolio of energy-efficient activities.

Renewable energy projects can have a negative impact on local biodiversity if the impacts are not avoided and mitigated appropriately. RGREEN INVEST assessed whether the projects it funded have a negative impact on sensitive areas from a biodiversity point of view (PAI 7). First, we checked whether projects were located in biodiversity-sensitive areas and, if so, whether the required mitigation measures were in place and in line with the Environmental Impact Assessment and the Environmental

Management Plan. In 2022, none of our projects were assessed as having a negative impact on sensitive areas from a biodiversity perspective. Renewable energy projects generally have a low impact on emissions to water (PAI 8) and hazardous waste generation (PAI 9). The responses from our participations for 2022 confirmed our understanding and the impact of our projects is minimal.

### **Social impact**

In our ESG monitoring activities and annual survey of investee companies, there were no breaches of the principles of the United Nations Global Compact and the OECD Guidelines for Multinational Enterprises (PAI 10). However, according to our assessment, about one-third of the companies we invest in still lack adequate processes and compliance mechanisms to monitor adherence to the principles of the United Nations Global Compact and the OECD Guidelines for Multinational Enterprises (IAP 11).

We want to help the companies we invest in move forward on the path to diversity and equality. According to 2022 data, men still earn 9% more than women based on an unadjusted calculation of the gender pay gap (PAI 12). In addition, women hold only 21 per cent of positions in governance bodies (PAI 13). We are increasingly including clauses aimed at promoting gender diversity within companies.

### **Data quality and coverage**

RGREEN INVEST has collected data from its holdings and counterparties in order to report on the main negative impacts. The average coverage for all indicators is 80% of assets under management. For some specific IAP indicators, RGREEN INVEST carried out the assessment directly from estimates based on reliable data. The calculation methodology is available in the "Explanation" column of the table.

We work on continuous improvement of the quality and completeness of the data collected.

<b>Table 1</b>						
<b>Indicators for investments in companies</b>						
<b>Indicators of negative impact on sustainability</b>		<b>Measuring element</b>	<b>Impact [year n]</b>	<b>Impact [year n-1] (voluntary information)</b>	<b>Explanation</b>	<b>Actions taken, planned actions and targets identified for the next reporting period</b>
Greenhouse gas emissions	1. GHG emissions	Scope 1 GHG emissions in tonnes of CO2 equivalents	2081	2 322	The KPI covers 100% of assets under management and the information is based on RGREEN INVEST's valuation. The carbon footprint is calculated by RGREEN INVEST for all infrastructure projects based on the technology used, the capacity of the projects and the theoretical operating hours of each project. The emission factors are provided by ADEME. Emissions are annualised over the life of the assets. The emission factor is based on the total emissions over the lifetime of each technology (such as solar PV or wind), so the emission factor does not distinguish between Scope 1, 2 and 3 emissions.	<p>RGREEN INVEST mainly finances projects that contribute to reducing the amount of greenhouse gases in the atmosphere. However, the projects we fund still have an impact in terms of GHGs, mainly across the manufacturing value chain of renewable energy technologies such as solar panels and wind turbines.</p> <p>RGREEN INVEST carried out the first assessment of its carbon footprint in 2022, covering the year 2021. The calculation methodology and robustness of the data were further developed for the second evaluation carried out in 2023. RGREEN INVEST called on an external consulting firm, Carbometrix, to cross-check the internal calculation made. Until the quality and comparability of the data are confirmed,</p> <p>RGREEN INVEST encourages its holdings to give preference to local suppliers and service providers, for example with regard to the manufacture of solar panels or batteries.</p>
		Scope 2 GHG emissions in tonnes of CO2 equivalents	1 387	1 548		
		Scope 3 GHG emissions in tonnes of CO2 equivalents	65 885	73 533		
	2. Carbon footprint	Carbon footprint in tonnes of CO2 equivalents per million euros invested	40	47	To validate the calculation made by RGREEN INVEST, all companies in the portfolio are asked to present their own carbon footprint each year. This assessment must present Scopes 1, 2 and 3., RGREEN INVEST has carried out an estimated distribution of Scopes 1, 2 and 3 emissions.	

					Funds that are in the start-up phase are more volatile and may have biases in valuation, making it difficult to compare new funds with more mature funds.	RGREEN INVEST is working to encourage its participations in setting decarbonization targets, particularly with regard to the supply chain.
	3. GHG intensity of investee companies	GHG intensity of investee companies	1 930	1 208	The KPI covers 100% of assets under management and the information is based on RGREEN INVEST's valuation. It should be noted that the GHG intensity calculation includes calculated emissions for all projects in operation and under construction. Projects under construction generally do not generate revenue, and projects in operation for the first year generate only low revenues in some cases. The GHG intensity is therefore expected to be relatively high. The GHG intensity is expected to be even higher for senior debt funds that only finance the construction of infrastructure projects and therefore generate little or no revenue in the base year.	
	4. Exposure to companies active in the fossil fuel sector	Share of investment in fossil fuel companies (%)	0%	0%	The KPI covers 100% of assets under management and the information is based on RGREEN INVEST's valuation. RGREEN INVEST does not invest in fossil fuel-related activities. Our exclusion list at the management company level prohibits us from investing in	RGREEN INVEST analyses the activities of each new investment according to its exclusion policy. All existing investments are required to comply with RGREEN INVEST's exclusion policy as part of their contractual agreement.

					projects emitting more than 250 gCO <sub>2</sub> e/kwh.	
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	5. Share of non-renewable energy consumption and production	Share of energy consumption and production of investee companies from non-renewable energy sources, compared to renewable energy sources, expressed as a percentage of total energy sources (%)	Consumption: 33.29% Production : 0%	Consumption: Not available Production : 0%	<p>1) Consumption</p> <p>For consumption, the KPI covers 64% of assets under management.</p> <p>Energy consumption</p> <p>RGREEN INVEST has invested in the construction and operation of facilities that store electricity and subsequently release it as electricity, such as energy storage in batteries and charging of electric vehicles. These projects are not perceived as producing electricity and are therefore not represented in the electricity production indicator of the RGREEN INVEST portfolios.</p> <p>Guarantees of origin (GOO) or renewable energy certificates (RECs) were not taken into account in the calculation. The renewable energy consumed is based on the owned companies' self-consumption from their own renewable electricity production (almost all portfolios).</p> <p>2) Production</p> <p>On the production side, the KPI covers 100% of assets under</p>	<p>The energy consumption of our investments is generally low. Most of the energy is consumed in the context of facilities services or company cars.</p> <p>We encourage our holdings to implement energy efficiency measures related to their facilities and to prefer sustainable means of transport to internal combustion vehicles.</p>
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					<p>management.</p> <p>Energy production</p> <p>RGREEN INVEST invests mainly in renewable energy production and does not invest in fossil fuel-related activities. The production of fossil energy in our portfolio is therefore 0%.</p>	
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	6. Energy Intensity by High Climate Impact Sector	Energy consumption in GWh per million euros of turnover of companies benefiting from investments, by sector with a high climate impact	0,55	1,1	<p>Sector with a high climate impact D - SUPPLY OF ELECTRICITY, GAS, STEAM AND AIR CONDITIONING</p> <p>The coverage of information received directly from the investee companies is 58% of assets under management.</p>	<p>As part of its ESG due diligences, RGREEN INVEST encourages its holdings and counterparties to reduce their energy consumption by improving their energy efficiency and taking energy sobriety measures – depending on each situation.</p> <p>In addition, RGREEN INVEST invests mainly in companies with a positive impact on the climate.</p>
Biodiversity	7. Activities that negatively affect biodiversity-sensitive areas	Share of investments made in companies with sites/establishments located in or near biodiversity-sensitive areas, if the activities of these companies have a negative impact on these areas (expressed in %)	0%	0%	The coverage of information received directly from invested companies is 100% of assets under management.	<p>Today, we qualitatively monitor the impact of our investments on biodiversity. The first impact indicator is the footprint of our projects. In addition, we check whether our companies' assets are located in sensitive areas from a biodiversity perspective and whether appropriate impact assessments and potential mitigation mechanisms are in place to control and minimize the impact of projects on flora and fauna. We work with our partners to ensure that adequate wildlife impact assessments are conducted, even when in some situations local regulations do not require such assessments to be carried out. RGREEN INVEST is working on the development of a biodiversity indicator and also plans to use external methodologies such as the <i>Global Biodiversity Score</i>. We plan to detail the indicator during 2024. This approach is currently being</p>

						examined as part of a broader effort to strengthen our strategy.
Water	8. Releases to water	Tonnes of discharges to water from investee companies, per million euro invested, weighted average	0,0	0,0	Renewable energy projects are not expected to generate emissions to water in the form of nitrates, phosphates and pesticides. Data collection covers 100% of assets under management.	RGREEN INVEST monitors the level of water use and wastewater emissions of its holdings as much as possible.
Rubbish	9. Ratio of hazardous waste to radioactive waste	Tonnes of hazardous and radioactive waste generated by investee companies, per million euro invested, weighted average	0,005	0,1	Renewable energy projects should generate a low or minimal level of hazardous waste. Data collection covers 100% of assets under management.	RGREEN INVEST monitors as much as possible the quantity and types of waste generated by its holdings.
<i>Indicators related to social, personnel, human rights and anti-corruption and anti-corruption issues</i>						

Social and personnel issues	10. Violations of the principles of the United Nations Global Compact and the OECD Guidelines for Multinational Enterprises	Share of investment in companies that have been involved in breaches of the UN Global Compact Principles or the OECD Guidelines for Multinational Enterprises (expressed in %)	0%	0%	The KPI covers 100% of assets under management.	RGREEN INVEST has implemented a strict exclusion policy, a CSR charter, ESG clauses in the contractual documentation and sets up a continuous monitoring of the portfolio companies with regular meetings.
	11. Lack of processes and compliance mechanisms to monitor compliance with the principles of the UN Global Compact and the OECD Guidelines for Multinational Enterprises	Share of investment in companies that do not have a policy to monitor compliance with the principles of the UN Global Compact or the OECD Guidelines for Multinational Enterprises, or mechanisms for dealing with complaints or disputes to address such violations (expressed in %)	38%	30%	The KPI covers 100% of assets under management. To ensure alignment between the different companies, RGREEN INVEST has carried out its own assessment for all portfolio companies. We reviewed the policies and procedures in place regarding ESG matters. The assessment takes into account the size and impact of the business. RGREEN INVEST will continue to collaborate with portfolio companies to improve data quality and ensure that the required procedures and processes are in place.	RGREEN INVEST monitors the policies and procedures put in place by the companies financed. RGREEN INVEST requires invested companies to have a CSR or ESG policy in place covering human rights, a sustainable supply chain management process and a complaints mechanism. The level of requirement is adapted to the size and impact of the company.

	12. Unadjusted gender pay gap	Unadjusted average gender pay gap in investee companies (expressed as a monetary amount converted into euro)	10%	9%	The KPI covers 67% of assets under management.	<p>According to the IEA, the energy sector is mainly made up of men. We work to raise awareness and advance our participation on diversity and equality issues.</p> <p>RGREEN INVEST measures the gender pay gap for all new investments.</p>
	13. Gender diversity in governance bodies	Average gender ratio in the governance bodies of the companies concerned, as a percentage of the total number of members	27%	21%	The KPI covers 68% of assets under management.	<p>According to the IEA, the energy sector is essentially made up of men. This is particularly true for the management bodies. We want to help our holdings move forward on the path to diversity and equality, starting with the boardroom.</p> <p>RGREEN INVEST measures the gender distribution on the boards of its investments. We are signatories of the France Invest charter on gender parity and we are therefore committed to promoting gender diversity within our own management company and among our holdings. As part of this, we aim to have at least 30% of the under-represented gender in the management bodies (management positions, including executive and non-executive members) of our investments by 2030. All funded companies that do not have a management body composed of at least 30% members of the under-represented sex will have to explain the reasons for this. In addition, they will need to take</p>

						comprehensive measures to achieve these goals.
	14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons or biological weapons)	Share of investment in companies involved in the manufacture or sale of controversial weapons (expressed in %)	0%	0%	The KPI covers 100% of assets under management. RGREEN INVEST does not invest in controversial weapons.	

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

Our approach to responsible investment is outlined in our Responsible Investment Policy, which is an integral part of our environmental and social management system. This document was last updated and validated in June 2023.

RGREEN INVEST finances infrastructure projects that promote the energy transition, climate change mitigation and adaptation. Since its creation, RGREEN INVEST has targeted the production of decarbonized and local energy associated with a significant and tangible reduction in CO2 emissions. RGREEN INVEST is committed to promoting growth and local employment through the direct and indirect impacts of the infrastructure projects financed. In addition, it is essential for us to minimize social risks and impacts related to the local communities affected by the project, the direct employees of our companies, and the employees of their subcontractors and supply chain. The main indicators of negative impact have been identified according to the sectors, technologies and geographies in which we invest.

We have invested in ESG aspects at all stages of the investment lifecycle. We seek to make progress on ESG aspects in line with the following Sustainable Development Goals: SDG2 - End hunger, achieve food security and improved nutrition and promote sustainable agriculture; SDG 7 - Ensure access to affordable, reliable, sustainable and modern energy for all; SDG 9 - Build resilient infrastructure, promote inclusive sustainable industrialization and foster innovation; SDG 12 - Ensure sustainable consumption and production patterns; SDG 13 - Take urgent action to combat climate change and its impacts.

We identify and assess the main negative impacts at each stage of the investment process:

- RGREEN INVEST has a company-wide exclusion policy. All potential investments are reviewed by RGREEN INVEST's ESG team based on this exclusion policy. This policy is a tool used to reduce the main negative impacts related to climate change, negative impact on biodiversity, business ethics and human rights violations. Our exclusion policy excludes weapons (PAI 14) and exposure to fossil fuels (PAI 4).
- All investable companies undergo a multi-stage ESG assessment. All investments are evaluated during the due diligence phase. In addition, projects are re-evaluated (1) annually based on new information and (2) at the end of the life of the investment. The ESG assessment makes it possible to assess in detail the main negative consequences of each investment.
- At the end of the ESG assessment, a personalised ESG action plan is developed for each investee company. This action plan asks them to address identified ESG gaps and integrate ESG best practices into their business model. The plan includes customized ESG aspects that RGREEN INVEST considers essential for the investment to meet the Fund's requirements for sustainable investing, the Greenfin label and the EU taxonomy, as well as to minimize the main negative impacts.
- RGREEN INVEST organises quarterly control meetings with the main participations in order to monitor the implementation of the ESG action plan. In addition, each invested entity must report on its progress and key indicators through annual data collection. Including key indicators of negative impact.
- RGREEN INVEST recognises that ESG factors can be important in the exit phase. During the exit phase, an updated ESG assessment of the investee company is carried out and communicated to the Investment Advisory Committee and the Investment Committee (via a score) and communicated to investors in order to report on the progress made in terms of ESG performance. The buyer may also be subject to an ESG assessment.

RGREEN INVEST has requested data from all invested companies in order to report on the main negative impacts as part of the annual data collection. The average coverage in 2023 for all indicators was above 80% of assets under management. Data is provided where possible and should not be audited. RGREEN INVEST analyses and validates the data to ensure its quality. For the specific IAP indicators, RGREEN INVEST has carried out an assessment or calculation on behalf of the invested entities to ensure the comparability and quality of the reported data. We have indicated in the Explanation column which PAIs are based on the calculation or evaluation of RGREEN INVEST.

RGREEN INVEST has only been collecting information on PAIs since 2022. We therefore plan to work on data quality, comparability and coverage with our grantees in the coming year, to refine our metrics and ensure certainty of our impacts. In addition, we intend to set specific targets and thresholds related to PAIs.

**Table 2 - At least one indicator from this table (at the choice of the actor) must be calculated and published as required by A6 1. a) SFDR RTS**

Indicators of negative impact on sustainability	Measuring element	Impact [year n]	Impact [year n-1] (voluntary information)	Explanation	Actions taken, planned actions and targets identified for the next reporting period
14. Natural species and protected areas	1. Share of investment in companies whose activities harm endangered species 2. Share of investment in companies that do not have a biodiversity protection policy covering operational sites that they own, lease or manage in or near a protected area or an area of high biodiversity value that is not a protected area	1) 0% 2) 99,74 %	1) Not available 2) Not available	The KPI covers 100% of assets under management.  The information provided is based on the evaluation of RGREEN INVEST.	Renewable energy projects have an impact on biodiversity and local species. The aim is to ensure that this negative impact on biodiversity is minimised and that the projects invested do not affect endangered species. The ESG Team assesses, prior to the investment, the level of impact of all targets/holdings, including reviewing environmental impact assessments and management plans to ensure that there is no major impact on biodiversity. The contractual documentation then requires reporting of material negative impacts / environmental incidents. If a negative impact materializes, the required safeguards and mitigation measures are deployed in accordance with the standards. Contractual documentation may require information or consultation with the ESG Team in the context of large projects or technologies with particular environmental risks.



15. Deforestation	Share of investment in companies without a deforestation policy (%)	98%	96%	<p>The KPI covers 100% of assets under management.</p> <p>The information provided is based on the evaluation of RGREEN INVEST.</p>	<p>Renewable energy projects have an impact on local biodiversity. We want to make sure that this impact is kept to a minimum and that the projects we invest in do not disproportionately contribute to deforestation and competition with food production. Today, we do not think that small and medium-sized developers are in the habit of implementing a formal policy to combat deforestation. We are working to assess the risks associated with potential deforestation and propose management plans to ensure that the required safeguard and mitigation measures are put in place, where appropriate.</p>
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**Table 3 - At a minimum, one indicator from this table (at the choice of the actor) must be calculated and published as required by A6 1. b) SFDR RTS**

Indicators of negative impact on sustainability	Measuring element	Impact [year n]	Impact [year n-1] (voluntary information)	Explanation	Actions taken, planned actions and targets identified for the next reporting period
4. Lack of a code of conduct for suppliers	Share of investment in companies without a supplier code of conduct (combating unsafe working conditions, precarious work, child labour and forced labour)	62,78%	Not available	<p>The KPI covers 100% of assets under management.</p> <p>The information provided is based on the evaluation of RGREEN INVEST.</p>	<p>The lack of a code of conduct/ethics for suppliers poses significant risks with respect to ethics, compliance, supply chain and human rights within the renewable energy value chain. RGREEN INVEST recognizes the importance of addressing this issue and has implemented a robust approach to manage these risks. In this context, RGREEN INVEST asks its targets/holdings to:</p>

					<ul style="list-style-type: none"> <li>• To set up a responsible purchasing policy in order to exclude service providers/suppliers at risk from an ESG point of view.</li> <li>• Adopt a code of conduct/ethics regarding the underlying suppliers. This Code of Conduct outlines the ethical standards and expectations in human rights, labour practices, environmental responsibility, and business ethics that suppliers must adhere to. It must be integrated into the contractual agreements concluded with all providers/suppliers. This commits suppliers to compliance with these environmental and social standards.</li> </ul> <p>By promoting the implementation of the Supplier Code of Conduct, RGREEN INVEST aims to reduce the risk of human rights violations and promote ethical practices along the renewable energy value chain. This proactive step is part of the company's commitment to responsible investment and sustainable development.</p>
9. Lack of a human rights policy	Share of investment in entities without a human rights policy expressed in %	61%	38%	<p>The KPI covers 100% of assets under management.</p> <p>The information provided is based on the evaluation</p>	<p>Negative human rights impacts, such as forced labour, are a risk related to the value chain of renewable energy projects. RGREEN INVEST has strengthened its management of social risks by creating a policy for managing the risk of forced labour.</p>

				<p>of RGREEN INVEST.</p>	<p>Today, we see that in the renewable energy sector, small and medium-sized developers do not systematically put in place a formal human rights policy within the supply chain and do not formalize human rights provisions in contractual agreements with suppliers. RGREEN INVEST works to ensure that all companies involved implement a sustainable purchasing policy and process covering the subject of forced labour. In addition, beneficiary companies are required to carry out risk mapping and assessment of their supply chain and, based on the risks, to carry out a full supply chain analysis of the materials to be purchased and to reserve the right to audit suppliers.</p> <p>RGREEN INVEST assesses all new investments based on the risk of negative impact on human rights and the existing management systems to address the topic. In the coming years, we will continue our work to raise awareness on the establishment and/or strengthening of the necessary human rights policies and procedures.</p>
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## RGREEN INVEST

Founded in 2013, RGREEN INVEST is a French independent mission-driven and B Corp Certified investment management company committed to helping investors channel their capital towards financing projects dedicated to accelerating the energy transition and adaptation to climate change.

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The funds managed by RGREEN INVEST are reserved for professional and similar investors only. Investing in these funds involves a significant risk of capital loss.