

SIMCo Infrastructure Income Fund Sustainability-Related Disclosure

Summary

The SIMCo Infrastructure Income Fund (the “Fund”), seeks to promote ESG characteristics, with a focus on environmental, but it does not have sustainable investment as its objective.

The Fund incorporates the three following criteria in the selection of underlying assets for its portfolio in order to promote the environmental characteristics it has set:

1. Negative Screening
2. Thematic Investing (Positive Screening)
3. ESG Scoring

The negative screens are binding on the Fund, some of which are related to the promotion of environmental characteristics. For instance, the Fund does not invest in infrastructure related to mining thermal coal.

The Fund maintains three ESG positive investment themes, two of which focus on the energy transition and decarbonisation.

To determine the ESG risks and opportunities associated with a company, Sequoia Investment Management Company (the “Investment Adviser”, “SIMCo”) uses a proprietary ESG scoring methodology. The methodology blends the “E”, “S” and “G” components, with modifiers across all metrics that do not allow strength in one area to offset entirely weakness in another. The final ESG score of an investment or potential investment must be taken into account in the investment process. This ESG Scorecard is designed to attribute more significance to an investment’s environmental “E” factors. The aim to increase the portfolio’s weighted average ESG score would result in the increased promotion of environmental characteristics.

Good governance is integrated into SIMCo’s ESG Scorecard and further monitored on an ongoing basis. The Investment Adviser actively engages with borrowers with the aim of positively influencing the ESG-related performance and overall impact of the investees. During the legal due diligence, the Investment Adviser pays close attention to how the borrower is managed and ensures all companies are compliant with minimum human rights and labor standards.

The Fund invests in a diversified portfolio of senior and subordinated economic infrastructure debt investments. The detailed asset allocation limits to which the Fund adheres are set out in its investment objective and policy in the Fund’s prospectus.

ESG performance and credentials are monitored regularly for each investment in the semi-annual monitoring process. External controls may also be applied to monitor the environmental characteristics of the Fund.

Each sustainability indicator has its own methodology; the main methodology used by SIMCo to measure the attainment of the environmental characteristics is its ESG Scorecard. The Investment Adviser ensures that the Fund’s portfolio complies with the negative screening criteria at all times. The Fund will calculate both the percentage of the portfolio that falls within each positive investment theme and the weighted averaged ESG Score of the portfolio based on NAV as at financial year end.

The Investment Adviser predominantly uses internal data sourced directly from borrowers, collected through its detailed due diligence exercise and ongoing monitoring of all investments, and as such data are not always fully available.

SIMCo takes a proactive approach to managing its loan book and engages with borrowers to encourage and promote positive behaviour. The range of engagement strategies used includes embedding sustainability-related loan covenants, adopting financial ratchets based on sustainability performance, and requesting borrowers to complete annual post-investment sustainability questionnaires.

No index is designated as a benchmark for determining the sustainability of the Fund, as an internal methodology is used instead.

Additional information on how the Investment Adviser integrates sustainability into its investment process to ensure that it is applied on a continuous basis, and in particular its approach to due diligence and ongoing monitoring of investments, can be found at www.SIMCoFunds.com.

Translations of this Summary into i) French, ii) German, iii) Swedish, iv) Danish, v) Finnish, vi) Dutch, and vii) Norwegian are available in the Appendix of this document.

No sustainable investment objective

The financial product seeks to promote ESG characteristics, with a focus on environmental, but it does not have sustainable investment as its objective. The Fund's investment objective is to provide investors with strong current income from a diversified debt portfolio backed by predominantly economic infrastructure and project finance assets primarily located in the United States with a focus on private debt.

Environmental or social characteristics of the financial product

The SIMCo Infrastructure Income Fund (the "Fund") incorporates the three following criteria in the selection of underlying assets for its portfolio in order to meet its three ESG goals:

1. Negative Screening
2. Thematic Investing (Positive Screening)
3. ESG Scoring

Deriving from the above criteria, the Fund seeks to promote specific environmental characteristics by applying the following:

1. excluding certain positions determined to cause negative or adverse environmental impact based on negative screening;
2. assessing the underlying asset's capability to contribute towards determined positive ESG themes; and
3. making investment decisions that can increase the portfolio's overall weighted average ESG score.

The sustainability indicators used to measure the attainment of the environmental and social characteristics promoted by this financial product are:

1. the percentage of the portfolio that complied with negative screening over the course of the financial year;
2. the percentage of the portfolio covered by thematic investing as at financial year end; and
3. the portfolio's weighted average ESG score as at financial year end.

Investment Strategy

The full investment strategy of the Fund is set out in the Fund's prospectus, and the investment strategy used to attain the environmental and social characteristics promoted by the Fund is further detailed in the Fund's Sustainability Policy.

The ESG principles are applied in three ways to the portfolio in order to meet our three ESG goals:

1. Comply with Negative Screening criteria

The Fund's investment policy excludes the following asset types or sub-sectors:

- Upstream infrastructure related to the exploration and production of oil and gas, such as oil rigs and platforms, fracking facilities, and facilities involved in tar sands;
- Thermal coal mining and directly related infrastructure, for example a dedicated thermal coal transportation asset like a railroad or wagons;

- Power generation from coal and any asset using thermal coal; and
- Permanent military infrastructure for active operational forces or military production.

Additionally, the Fund's investment criteria limits investment to only certain types of infrastructure. This means many harmful or controversial asset types are already excluded de facto, for example: alcohol production, tobacco production, gambling operations, pornography and adult entertainment, controversial and conventional weapons.

2. Progress Thematic Investing (Positive Screening)

Alongside the Fund's four investment themes (see asset allocation below), the Fund has defined three ESG themes:

- Renewable energy, such as solar, wind and geothermal generation, and directly related businesses including companies that supply renewable energy;
- Enabling the transition to a lower carbon world, such as grid stabilisation, electric vehicles, traffic congestion reduction, and the substitution of coal by gas; and
- Infrastructure with social benefits, which provides for basic human needs (such as clean water and food security) or brings a positive change by addressing social challenges and inequalities (such as healthcare, education and affordable housing) or advancing society as a whole (such as progressing telecommunications).

Positive screening will be employed to progress these themes, subject to concentration limits.

The Fund is not, however, bound to invest only in accordance with the positive screening criteria and, subject to the application of the negative screens and the Scorecard, may invest more widely than the types of asset listed in the positive screening criteria.

3. Over time, increase portfolio weighted average ESG Score

Investment decisions follow the Fund's proprietary ESG scoring methodology ("ESG Scorecard") which measures the ESG characteristics of every investment, with a particular weighting towards environmental indicators.

Following an assessment, a score is assigned to every investment, with regular subsequent monitoring of ESG performance and credentials and a semi-annual review of the score. The ESG Scorecard is used to measure various sustainability metrics for each investment, including:

- Environment indicators and modifiers, such as: exposure to particular sectors and sub-sectors (e.g. solar, wind, hydro, energy transition assets, biofuels, aircrafts, nuclear energy generation), air pollution, water pollution;
- Social indicators, such as: job creation in socially deprived areas, health and safety policies, and engagement with local communities; and
- Governance indicators, such as: independent board members, effective whistleblowing policies, internal audit function.

The ESG Scorecard enables the Fund to allocate capital between projects and to measure its progress over time quantitatively. SIMCo's proprietary ESG scoring methodology has been designed to be as objective as possible. The score primarily reflects the current ESG performance of the investment but also reflects, to a limited extent, the "direction of travel". For example, a business that currently contributes to climate change will receive some credit if it is investing meaningfully to reduce its contribution; the timeframe of such initiatives and amount being invested is judged on a materiality basis specific to the company.

The methodology blends the environmental, social, and governance (“E”, “S” and “G”) components without allowing strength in one area to offset entirely weakness in another. For example, a polluting company will be allocated a poor score, even if it has excellent social and governance policies. Moreover, the Fund’s policy is not to lend to companies with a very low E score, of less than one, regardless of the overall ESG score.

Note that the ESG score is distinct to a credit rating. Some elements of ESG scoring will directly affect a borrower’s credit rating (for example, weak corporate governance has a negative contribution to credit quality) but nonetheless it is entirely possible for a business with a weak ESG score to have a strong credit profile, and vice versa. The risk of climate litigation and/or state sanctions would be considered in the credit rating and/or ESG scoring processes if this is a material risk to the company.

Applying the ESG Scorecard throughout the investment process, SIMCo will prioritise transactions with higher ESG scores. When considering the potential disposal of investments, SIMCo will prioritise transactions with lower ESG scores, whilst taking disposal decisions based on financial metrics. By investing in higher-scoring opportunities, and disposing of lower-scoring opportunities, the aim is to improve the ESG score of our loan book over time. Albeit there will naturally be fluctuations in the portfolio ESG score over time rather than a monotonically increasing ESG score. Given that certain aspects of the average ESG score of a portfolio may rest on external factors, such as unexpected early repayments, if on any given year the average ESG score does not increase year-over-year, an explanation will be provided.

SIMCo’s approach to ESG is maintained on a continuous basis from pre-acquisition stage, through engagement with borrowers to assess their continued performance. The Investment Adviser may require borrowers to include particular sustainability-related KPIs in the loan documentation to meet determined targets and to report on these periodically. As part of the investment process, and in line with the ESG Scorecard, the Investment Adviser puts an emphasis on the demonstration of strong governance during the due diligence process.

Additional information on how the Investment Adviser integrates sustainability into its investment process to ensure that it is applied on a continuous basis, and its approach to due diligence and ongoing monitoring of investments, can be found at www.SIMCoFunds.com.

Good Governance

As part of our investment due diligence process, corporate governance is assessed prior to investment on a case-by-case basis, meaning no designated benchmark is used. During the legal due diligence, we pay close attention to how our borrower is managed, assessing any JV agreements that may be in place, how the board is elected, voting rights, majority requirements, etc. In addition to KYC, this due diligence process will also highlight anything in the histories of key members of management, past bankruptcies, or lack of compliance with law.

Additionally, every company’s ESG performance is assessed using our proprietary ESG scoring methodology, which includes a modifier of between +1 and -1 reflecting the borrower’s corporate governance (the “G score”).

Governance is monitored on an ongoing basis, for instance through our annual post-investment sustainability questionnaire that is sent to all borrowers. This includes questions related to areas such as board independence, management structure and diversity, the internal audit function, remuneration of staff, and community relations. Any changes to the governance are reflected in updates to the company’s ESG score, which could provide a source for engagement.

The Fund's Sustainability Policy includes a range of possible engagement strategies designed to encourage and promote positive behaviour in the companies that it lends to. Where appropriate, loan terms should include covenants or repeated representations to ensure that the borrower complies with its stated ESG objectives and to encourage it to improve its standards over time. These could include obligations to adopt or continue good governance policies.

Proportion of investments

As explained in the investment policy of the Fund's prospectus, the Fund invests in a diversified portfolio of senior and subordinated infrastructure debt investments. The detailed asset allocation limits to which the Fund adheres are set out in its investment objective and policy in the Fund's prospectus. The Fund's objective is to maintain its portfolio so that no more than 7.5 percent, by value of the Fund's investments (at the time of the investment) consists of securities or loans relating to any one individual infrastructure asset.

The Fund is not currently committed or bound to provide capital to 'sustainable investments' within the definition of Article 2(17) of Regulation (EU) 2019/2088 (SFDR), and there is no minimum proportion of 'sustainable investments' that will or may be held by the Fund. Through the positive screening model, the Fund aims to increase its exposure to predefined ESG themes. The Fund's approach to committing to investing in 'sustainable investments' may change over time and this disclosure will be updated accordingly.

SIMCo Infrastructure Income Fund does not commit to a minimum proportion of investments of the financial product used to meet environmental or social characteristics promoted by the Fund in accordance with the binding elements of the investment strategy. Whilst 100% of assets will undergo the ESG risk assessment, the Fund considers the investments that have an ESG Score of less than 50 not to be aligned with the promotion of environmental characteristics. SIMCo anticipates this may equate to roughly 15% of the investments (measured by NAV and direct exposures) which sits in "#2 Other". In pursuit of our goal to raise the average ESG score of our portfolio, the lowest ESG scored positions will be looked to as a priority when considering disposals, whilst taking disposal decisions based on financial metrics. The remaining estimated 85% of investments is considered as "#1B Other E/S characteristics". Note, these percentages are indicative and are not absolute commitments. The percentage of NAV in the lowest quartile of ESG scores for the portfolio may be more or less than 15% at any given time.

To the extent that the Fund is not fully invested in senior and subordinated infrastructure debt investments, it may hold cash with well-rated institutions for liquidity purposes and not for the attainment of the environmental characteristics of the Fund.

In addition, the Fund does not intend to use hedging or derivatives for investment purposes, but it does intend to engage in currency hedging with a view to protecting the level of dividends and other distributions to be paid by the Fund.

Monitoring of environmental or social characteristics

ESG performance and credentials are regularly monitored for each investment in the semi-annual monitoring process. Where a borrower's ESG Score deteriorates, SIMCo will seek to collaborate with the investee's management to improve the ESG performance of the investment. If this strategy does

not prove efficient, depending on the gravity of the situation, SIMCo may dispose of the asset or add it the runoff portfolio.

External controls may also be applied to monitor the environmental characteristics of the Fund. This may include, for instance, engaging an external auditor to provide independent limited assurance under ISAE (UK) 3000 on the ESG scores for the portfolio, which has been applied to other funds managed by SIMCo, such as SEQI.

As part of its ongoing monitoring and reporting of environmental characteristics, the Fund's Sustainability Policy includes a range of engagement strategies designed to encourage and promote positive behaviour in the companies that it lends to, as described in the "Engagement policies" section below.

Methodologies

The methodologies to measure the attainment of the social or environmental characteristics promoted by the Fund are also described in the "monitoring of environmental or social characteristics" and "due diligence" sections of this disclosure.

Compliance with the negative screening criteria is maintained on an ongoing basis. The Fund will calculate the percentage of the portfolio that complied with the negative screening criteria over the course of the financial year.

Each investment that falls into one of the three positive screening investment themes is tagged accordingly. This log is kept up to date on an ongoing basis, and the percentage of the portfolio that falls within each theme is calculated based on NAV as at financial year end.

The main methodology used by SIMCo to measure the attainment of the environmental characteristics is its ESG Scorecard. The full methodology is published [here](#). At financial year end, the average ESG score is calculated for the portfolio weighted by NAV. The investment decision making process and engagement practices that are in place aim to improve the ESG score of our loan book over time. Albeit there will naturally be fluctuations in the portfolio ESG score over time rather than a monotonically increasing ESG score, for instance due to external factors such as unexpected early repayments.

Data sources and processing

The Investment Adviser predominantly uses internal data sourced directly from borrowers, collected through its detailed due diligence exercise and ongoing monitoring of all investments.

Data quality is ensured by engagement with borrowers and internal and external review-based control measures.

Data are collected, reviewed by the Investment Adviser teams, and stored on secure internal systems and are not shared with any external parties.

Given the limited publicly available data related to the types and classes of asset in which the Fund invests, no data has been estimated, as this would likely be highly inaccurate and thus compromise data quality.

Limitations to methodologies and data

A portion of our borrowers cannot or do not provide certain data and evidence we require to fully assess their environmental characteristics using our ESG Scoring methodology. The Investment Adviser regularly reviews its metrics and the application of its ESG Scorecard and continuously seeks to improve its data coverage. Data and/or evidence limitations do not affect the promotion of environmental characteristics because no credit is given on the ESG Scorecard where such data/evidence is missing.

Due diligence

The Investment Adviser evaluates all project risks it believes are material to making an investment decision and will assess how those risks are mitigated. Where appropriate, it will supplement its analysis through the use of professional third-party professionals, including technical consultants, financial and legal advisers, and valuation and insurance experts.

These providers will be engaged to conduct further due diligence that is intended to provide an additional and independent review of key aspects and risks of a project, providing comfort as to the level of risk mitigation and the project's ongoing performance. In addition, the Investment Adviser will, where appropriate, conduct site visits and meetings with the management of the Borrower and/or its advisers.

The sustainability-related due diligence is carried out by way of the use of the ESG Scorecard, which must be taken into account during the investment process.

Engagement policies

SIMCo takes a proactive approach to managing its loan book and engages with borrowers in relation to sustainability-related topics on a regular basis as per the Fund's Sustainability Policy and on an ad-hoc basis as appropriate, for instance in the case of sustainability-related controversies in investee companies. SIMCo's range of engagement strategies are designed to encourage and promote positive behaviour in the companies that it lends to, some of which are described below.

Where appropriate, loan terms may include covenants or repeated representations to ensure that the borrower complies with its stated ESG objectives and to encourage it to improve its standards over time.

The Investment Adviser can also consider adopting financial terms in a loan where (for example) the interest rate might fluctuate depending upon the borrower's performance on an environmental metric such as carbon emissions.

In addition, where appropriate, loan terms may include an obligation on the borrower to report suitable ESG metrics.

Borrowers are also asked to complete annual post-investment sustainability questionnaires. These will cover quantifiable ESG metrics/KPIs when appropriate, such as CO₂ emissions, health and safety records, and Board independence, as well as confirmation of the borrower's overall ESG policies and procedures. The Fund requires supporting documentation and/or external verification to evidence borrowers' ESG claims.

Designated reference benchmark

Currently (as of July 2025), no index is designated as a benchmark for determining the sustainability of the Fund. No prescribed benchmark is used in the ESG scoring assessment, as instead an internal methodology is used with a relative environmental score from 1-5 based on sub-sector. Benchmarking may be used on a case-by-case basis to assess positive/negative score modifiers, which could include, for example, research on the borrower's peer group or reference to government statistics.

Appendix i – French

Résumé

Le Fonds SIMCo Infrastructure Income (le « Fonds ») cherche à promouvoir des caractéristiques ESG, avec un accent particulier sur l'environnement, mais il n'a pas pour objectif l'investissement durable.

Le Fonds intègre les trois critères suivants dans la sélection des actifs sous-jacents de son portefeuille afin de promouvoir les caractéristiques environnementales qu'il a définies :

- 1. Filtrage négatif*
- 2. Investissement thématique (filtrage positif)*
- 3. Notation ESG*

Les filtres négatifs sont contraignants pour le Fonds, dont certains sont liés à la promotion de caractéristiques environnementales. Par exemple, le Fonds n'investit pas dans des infrastructures liées à l'extraction de charbon thermique.

Le Fonds maintient trois thématiques d'investissement ESG positives, dont deux sont axées sur la transition énergétique et la décarbonation.

Afin de déterminer les risques et opportunités ESG associés à une entreprise, Sequoia Investment Management Company (le « Conseiller en investissement », « SIMCo ») utilise une méthodologie propriétaire de notation ESG. Cette méthodologie combine les composantes « E », « S » et « G », avec des modificateurs appliqués à l'ensemble des indicateurs qui ne permettent pas à la solidité dans un domaine de compenser entièrement une faiblesse dans un autre. La note ESG finale d'un investissement ou d'un investissement potentiel doit être prise en compte dans le processus d'investissement. Cette grille de notation ESG est conçue pour accorder une importance accrue aux facteurs environnementaux (« E ») d'un investissement. L'objectif d'augmenter la note ESG moyenne pondérée du portefeuille se traduirait par une promotion accrue des caractéristiques environnementales.

La bonne gouvernance est intégrée dans la grille de notation ESG de SIMCo et fait l'objet d'un suivi continu. Le Conseiller en investissement s'engage activement auprès des emprunteurs dans le but d'influencer positivement la performance ESG et l'impact global des entités financées. Lors de la due diligence juridique, le Conseiller en investissement accorde une attention particulière à la manière dont l'emprunteur est géré et veille à ce que toutes les entreprises respectent des normes minimales en matière de droits humains et de droit du travail.

Le Fonds investit dans un portefeuille diversifié de dettes d'infrastructures économiques, seniors et subordonnées. Les limites détaillées d'allocation d'actifs auxquelles le Fonds se conforme sont définies dans son objectif et sa politique d'investissement, tels qu'exposés dans le prospectus du Fonds.

La performance et les références ESG sont suivies régulièrement pour chaque investissement dans le cadre du processus de suivi semestriel. Des contrôles externes peuvent également être mis en place afin de surveiller les caractéristiques environnementales du Fonds.

Chaque indicateur de durabilité dispose de sa propre méthodologie ; la principale méthodologie utilisée par SIMCo pour mesurer l'atteinte des caractéristiques environnementales est sa grille de notation ESG. Le Conseiller en investissement veille à ce que le portefeuille du Fonds respecte en permanence les critères de filtrage négatif. Le Fonds calculera à la fois le pourcentage du portefeuille relevant de chaque thématique d'investissement positive et la note ESG moyenne pondérée du portefeuille sur la base de la valeur liquidative (VL) à la fin de l'exercice financier.

Le Conseiller en investissement utilise principalement des données internes provenant directement des emprunteurs, collectées dans le cadre de son processus approfondi de due diligence et du suivi continu de l'ensemble des investissements ; à ce titre, les données ne sont pas toujours entièrement disponibles.

SIMCo adopte une approche proactive dans la gestion de son portefeuille de prêts et s'engage auprès des emprunteurs afin d'encourager et de promouvoir des comportements positifs. Les stratégies d'engagement mises en œuvre comprennent notamment l'intégration de clauses de prêts liées à la durabilité, l'adoption de mécanismes d'ajustement financier fondés sur la performance en matière de durabilité, ainsi que la demande faite aux emprunteurs de remplir des questionnaires annuels de durabilité post-investissement.

Aucun indice n'est désigné comme référence pour déterminer la durabilité du Fonds, une méthodologie interne étant utilisée à cette fin.

Des informations complémentaires sur la manière dont le Conseiller en investissement intègre la durabilité dans son processus d'investissement afin d'en assurer l'application continue, et en particulier sur son approche en matière de due diligence et de suivi continu des investissements, sont disponibles sur le site www.SIMCoFunds.com.

Appedix ii – German

Zusammenfassung

Der SIMCo Infrastructure Income Fund (der „Fonds“) verfolgt das Ziel, ESG-Merkmale zu fördern, mit einem besonderen Schwerpunkt auf Umweltaspekten, hat jedoch kein nachhaltiges Investitionsziel.

Der Fonds berücksichtigt die folgenden drei Kriterien bei der Auswahl der zugrunde liegenden Vermögenswerte für sein Portfolio, um die festgelegten Umweltmerkmale zu fördern:

- 1. Negatives Screening*
- 2. Thematisches Investieren (positives Screening)*
- 3. ESG-Bewertung*

Die negativen Ausschlusskriterien sind für den Fonds verbindlich, wobei einige davon mit der Förderung von Umweltmerkmalen zusammenhängen. So investiert der Fonds beispielsweise nicht in Infrastrukturen, die mit dem Abbau von thermischer Kohle in Zusammenhang stehen.

Der Fonds verfolgt drei positive ESG-Investitionsthemen, von denen zwei auf die Energiewende und die Dekarbonisierung ausgerichtet sind.

Zur Ermittlung der mit einem Unternehmen verbundenen ESG-Risiken und -Chancen verwendet die Sequoia Investment Management Company (der „Investmentberater“, „SIMCo“) eine proprietäre ESG-Bewertungsmethodik. Diese Methodik kombiniert die Komponenten „E“, „S“ und „G“ und wendet über alle Kennzahlen hinweg Modifikatoren an, die es nicht zulassen, dass Stärken in einem Bereich Schwächen in einem anderen Bereich vollständig ausgleichen. Der finale ESG-Score einer bestehenden oder potenziellen Investition ist im Investitionsprozess zu berücksichtigen. Diese ESG-Scorecard ist so konzipiert, dass den Umweltfaktoren („E“) einer Investition ein höheres Gewicht beigemessen wird. Das Ziel, den gewichteten durchschnittlichen ESG-Score des Portfolios zu erhöhen, führt zu einer verstärkten Förderung der Umweltmerkmale.

Gute Unternehmensführung ist in die ESG-Scorecard von SIMCo integriert und wird darüber hinaus fortlaufend überwacht. Der Investmentberater tritt aktiv mit den Kreditnehmern in den Dialog, mit dem Ziel, die ESG-bezogene Leistung und die Gesamtauswirkungen der Investitionsobjekte positiv zu beeinflussen. Im Rahmen der rechtlichen Due Diligence legt der Investmentberater besonderes Augenmerk auf die Unternehmensführung des Kreditnehmers und stellt sicher, dass alle Unternehmen die Mindeststandards in Bezug auf Menschenrechte und Arbeitsrechte einhalten.

Der Fonds investiert in ein diversifiziertes Portfolio aus vorrangigen und nachrangigen wirtschaftlichen Infrastruktur-Fremdkapitalinvestitionen. Die detaillierten Vermögensallokationsgrenzen, an die sich der Fonds hält, sind in seinem Anlageziel und seiner Anlagepolitik im Verkaufsprospekt des Fonds festgelegt.

Die ESG-Leistung und -Merkmale werden für jede Investition im Rahmen des halbjährlichen Überwachungsprozesses regelmäßig kontrolliert. Zusätzlich können externe Kontrollen eingesetzt werden, um die Umweltmerkmale des Fonds zu überwachen.

Jeder Nachhaltigkeitsindikator verfügt über eine eigene Methodik; die wichtigste von SIMCo verwendete Methodik zur Messung der Erreichung der Umweltmerkmale ist die ESG-Scorecard. Der Investmentberater stellt sicher, dass das Portfolio des Fonds jederzeit den negativen Screening-Kriterien entspricht. Der Fonds berechnet sowohl den prozentualen Anteil des Portfolios, der auf jede positive

Investitionsthematik entfällt, als auch den gewichteten durchschnittlichen ESG-Score des Portfolios auf Basis des Nettoinventarwerts (NAV) zum Ende des Geschäftsjahres.

Der Investmentberater nutzt überwiegend interne Daten, die direkt von den Kreditnehmern stammen und im Rahmen der umfassenden Due-Diligence-Prüfung sowie der laufenden Überwachung aller Investitionen erhoben werden; daher sind diese Daten nicht immer vollständig verfügbar.

SIMCo verfolgt einen proaktiven Ansatz bei der Verwaltung seines Kreditportfolios und tritt mit den Kreditnehmern in den Dialog, um positives Verhalten zu fördern und zu unterstützen. Zu den eingesetzten Engagement-Strategien zählen unter anderem die Einbindung nachhaltigkeitsbezogener Kreditklauseln, die Anwendung finanzieller Anpassungsmechanismen auf Grundlage der Nachhaltigkeitsleistung sowie die Aufforderung an Kreditnehmer, jährliche Nachhaltigkeitsfragebögen nach der Investition auszufüllen.

Es ist kein Index als Referenzbenchmark zur Bestimmung der Nachhaltigkeit des Fonds festgelegt, da stattdessen eine interne Methodik verwendet wird.

Weitere Informationen darüber, wie der Investmentberater Nachhaltigkeit kontinuierlich in seinen Investitionsprozess integriert, insbesondere in Bezug auf Due Diligence und die laufende Überwachung der Investitionen, sind unter www.SIMCoFunds.com abrufbar.

Appendix iii – Swedish

Sammanfattning

SIMCo Infrastructure Income Fund ("Fonden") strävar efter att främja ESG-egenskaper, med särskilt fokus på miljöaspekter, men har inte hållbara investeringar som sitt mål.

Fonden tillämpar följande tre kriterier vid urvalet av underliggande tillgångar i portföljen för att främja de fastställda miljöegenskaperna:

- 1. Negativ screening*
- 2. Tematiska investeringar (positiv screening)*
- 3. ESG-bedömning*

De negativa urvalskriterierna är bindande för Fonden, varav vissa är kopplade till främjandet av miljöegenskaper. Fonden investerar exempelvis inte i infrastruktur som är relaterad till utvinning av termiskt kol.

Fonden har tre positiva ESG-investeringsteman, varav två är inriktade på energiomställning och dekarbonisering.

För att identifiera ESG-risker och möjligheter kopplade till ett bolag använder Sequoia Investment Management Company ("Investeringsrådgivaren", "SIMCo") en egenutvecklad metodik för ESG-bedömning. Metodiken kombinerar komponenterna "E", "S" och "G" och tillämpar justeringsfaktorer över samtliga mätetal som inte tillåter att styrkor inom ett område helt kompenserar svagheter inom ett annat. Den slutliga ESG-poängen för en investering eller en potentiell investering ska beaktas i investeringsprocessen. Denna ESG-poängmodell är utformad för att ge större vikt åt en investerings miljöfaktorer ("E"). Målsättningen att öka portföljens viktade genomsnittliga ESG-poäng leder till ett ökat främjande av miljöegenskaper.

God bolagsstyrning är integrerad i SIMCos ESG-poängmodell och övervakas dessutom löpande. Investeringsrådgivaren för en aktiv dialog med låntagare i syfte att positivt påverka ESG-relaterad prestation och den övergripande påverkan hos de investerade bolagen. Under den juridiska due diligence-processen ägnar Investeringsrådgivaren särskild uppmärksamhet åt hur låntagaren styrs och säkerställer att samtliga bolag uppfyller minimistandarder avseende mänskliga rättigheter och arbetsrätt.

Fonden investerar i en diversifierad portfölj av seniora och efterställda skuldfinansieringar inom ekonomisk infrastruktur. De detaljerade tillgångsallokeringsgränser som Fonden följer anges i Fondens investeringsmål och investeringspolicy i Fondens prospekt.

ESG-prestanda och -meriter följs regelbundet upp för varje investering inom ramen för den halvårsvisa uppföljningsprocessen. Externa kontroller kan också tillämpas för att övervaka Fondens miljöegenskaper.

Varje hållbarhetsindikator har sin egen metodik; den huvudsakliga metod som SIMCo använder för att mäta uppnåendet av miljöegenskaperna är dess ESG-poängmodell. Investeringsrådgivaren säkerställer att Fondens portfölj vid alla tidpunkter uppfyller kriterierna för negativ screening. Fonden kommer att beräkna både den procentuella andelen av portföljen som omfattas av varje positivt investeringstema och den viktade genomsnittliga ESG-poängen för portföljen baserat på substansvärdet (NAV) vid räkenskapsårets slut.

Investeringsrådgivaren använder huvudsakligen interna data som erhålls direkt från låntagare, insamlade genom en omfattande due diligence-process och löpande uppföljning av samtliga investeringar. Dessa data är därför inte alltid fullständigt tillgängliga.

SIMCo tillämpar ett proaktivt angreppssätt vid förvaltningen av sin låneportfölj och för en dialog med låntagare för att uppmuntra och främja positivt beteende. De engagemangsstrategier som används omfattar bland annat införande av hållbarhetsrelaterade lånevillkor, tillämpning av finansiella justeringsmekanismer baserade på hållbarhetsprestanda samt krav på att låntagare fyller i årliga hållbarhetsenkäter efter investering.

Ingen indexreferens har fastställts som jämförelseindex för att bedöma Fondens hållbarhet, eftersom en intern metodik används i stället.

Ytterligare information om hur Investeringsrådgivaren integrerar hållbarhet i sin investeringsprocess för att säkerställa en kontinuerlig tillämpning, särskilt vad gäller due diligence och löpande uppföljning av investeringar, finns på www.SIMCoFunds.com.

Appendix iv – Danish

Resumé

SIMCo Infrastructure Income Fund ("Fonden") søger at fremme ESG-karakteristika med særligt fokus på miljøforhold, men har ikke bæredygtige investeringer som sit mål.

Fonden anvender følgende tre kriterier ved udvælgelsen af de underliggende aktiver i porteføljen for at fremme de fastsatte miljømæssige karakteristika:

- 1. Negativ screening*
- 2. Tematiske investeringer (positiv screening)*
- 3. ESG-vurdering*

De negative screeningskriterier er bindende for Fonden, hvoraf nogle er relateret til fremme af miljømæssige karakteristika. Fonden investerer eksempelvis ikke i infrastruktur, der er relateret til udvinding af termisk kul.

Fonden opretholder tre positive ESG-investeringstemaer, hvoraf to er fokuseret på energiomstillingen og dekarbonisering.

For at fastlægge de ESG-risici og -muligheder, der er forbundet med en virksomhed, anvender Sequoia Investment Management Company ("Investeringsrådgiveren", "SIMCo") en proprietær ESG-vurderingsmetodik. Metodikken kombinerer "E"-, "S"- og "G"-komponenterne og anvender justeringsfaktorer på tværs af alle målepunkter, som ikke tillader, at styrker på ét område fuldt ud opvejer svagheder på et andet. Den endelige ESG-score for en investering eller potentiel investering skal indgå i investeringsprocessen. Denne ESG-scorecard er udformet til at tillægge en investerings miljømæssige faktorer ("E") større betydning. Målsætningen om at øge porteføljens vægtede gennemsnitlige ESG-score vil medføre en øget fremme af miljømæssige karakteristika.

God selskabsledelse er integreret i SIMCos ESG-scorecard og overvåges yderligere løbende. Investeringsrådgiveren engagerer sig aktivt med låntagere med henblik på positivt at påvirke ESG-relateret performance og den samlede effekt hos investeringsobjekterne. Under den juridiske due diligence lægger Investeringsrådgiveren særlig vægt på, hvordan låntageren ledes, og sikrer, at alle virksomheder overholder minimumsstandards for menneskerettigheder og arbejdsforhold.

Fonden investerer i en diversificeret portefølje af senior- og efterstillet gæld inden for økonomisk infrastruktur. De detaljerede grænser for aktivallokering, som Fonden overholder, er fastsat i Fondens investeringsmål og investeringspolitik i Fondens prospekt.

ESG-performance og -kendetegn overvåges regelmæssigt for hver investering som led i den halvårige overvågningsproces. Eksterne kontroller kan også anvendes til at overvåge Fondens miljømæssige karakteristika.

Hver bæredygtighedsindikator har sin egen metodik; den primære metodik, som SIMCo anvender til at måle opfyldelsen af de miljømæssige karakteristika, er dets ESG-scorecard. Investeringsrådgiveren sikrer, at Fondens portefølje til enhver tid overholder kriterierne for negativ screening. Fonden vil beregne både den procentvise andel af porteføljen, der falder inden for hvert positivt investeringstema, og den vægtede gennemsnitlige ESG-score for porteføljen baseret på nettoaktivværdien (NAV) ved regnskabsårets afslutning.

Investeringsrådgiveren anvender overvejende interne data, der stammer direkte fra låntagere og indsamles gennem den detaljerede due diligence og den løbende overvågning af alle investeringer, og sådanne data er derfor ikke altid fuldt tilgængelige.

SIMCo anvender en proaktiv tilgang til forvaltningen af sin låneportefølje og engagerer sig med låntagere for at tilskynde til og fremme positiv adfærd. De anvendte engagementstrategier omfatter blandt andet indarbejdelse af bæredygtighedsrelaterede låneklausuler, anvendelse af finansielle justeringsmekanismer baseret på bæredygtighedsperformance samt krav om, at låntagere udfylder årlige bæredygtighedsspørgeskemaer efter investering.

Der er ikke udpeget noget indeks som benchmark for vurdering af Fondens bæredygtighed, idet der i stedet anvendes en intern metodik.

Yderligere oplysninger om, hvordan Investeringsrådgiveren integrerer bæredygtighed i sin investeringsproces for at sikre, at den anvendes løbende, og navnlig om tilgangen til due diligence og den løbende overvågning af investeringer, findes på www.SIMCoFunds.com.

Appendix v – Finnish

Yhteenveto

SIMCo Infrastructure Income Fund ("Rahasto") pyrkii edistämään ESG-ominaisuuksia, erityisesti ympäristöön liittyviä ominaisuuksia, mutta sillä ei ole kestäväää sijoittamista sijoitustavoitteenaan.

Rahasto soveltaa seuraavia kolmea kriteeriä valitessaan salkkunsä kohde-etuuksia edistääkseen asettamiaan ympäristöominaisuuksia:

- 1. Negatiivinen seulonta*
- 2. Temaattinen sijoittaminen (positiivinen seulonta)*
- 3. ESG-arviointi*

Negatiiviset seulontakriteerit ovat Rahastoa sitovia, ja osa niistä liittyy ympäristöominaisuuksien edistämiseen. Esimerkiksi Rahasto ei sijoita infrastruktuuriin, joka liittyy lämpöhiilen louhintaan.

Rahastolla on kolme positiivista ESG-sijoitusteemaa, joista kaksi keskittyy energiasiirtymään ja hiilidioksidipäästöjen vähentämiseen.

Määrittääkseen yritykseen liittyvät ESG-riskit ja -mahdollisuudet Sequoia Investment Management Company ("Sijoitusneuvoja", "SIMCo") käyttää omaa ESG-arviointimenetelmäänsä. Menetelmä yhdistää "E"-, "S"- ja "G"-osa-alueet ja soveltaa mukautustekijöitä kaikkiin mittareihin siten, ettei vahvuus yhdellä osa-alueella voi täysin kompensoida heikkoutta toisella osa-alueella. Sijoituksen tai mahdollisen sijoituksen lopullinen ESG-pistemäärä on otettava huomioon sijoitusprosessissa. Tämä ESG-pistekortti on suunniteltu antamaan suurempi painoarvo sijoituksen ympäristötekijöille ("E"). Tavoite nostaa salkun painotettua keskimääräistä ESG-pistemäärää johtaa ympäristöominaisuuksien lisääntyneeseen edistämiseen.

Hyvä hallintotapa on sisällytetty SIMCon ESG-pistekorttiin ja sitä seurataan lisäksi jatkuvasti. Sijoitusneuvoja käy aktiivista vuoropuhelua lainanottajien kanssa tavoitteenaan vaikuttaa myönteisesti ESG-suoriutumiseen ja sijoituskohteiden kokonaisvaikutukseen. Oikeudellisen due diligence -prosessin aikana Sijoitusneuvoja kiinnittää erityistä huomiota siihen, miten lainanottajaa johdetaan, ja varmistaa, että kaikki yhtiöt noudattavat vähimmäisvaatimuksia ihmisoikeuksien ja työoikeuden osalta.

Rahasto sijoittaa hajautettuun salkkuun, joka koostuu ensisijaisista ja toissijaisista taloudellisiin infrastruktuurihankkeisiin liittyvistä velkasijoituksista. Rahaston noudattamat yksityiskohtaiset omaisuusalokaatorajat on esitetty Rahaston sijoitustavoitteessa ja sijoituspolitiikassa Rahaston esitteessä.

ESG-suoriutumista ja -ominaisuuksia seurataan säännöllisesti kunkin sijoituksen osalta osana puolivuositapaista seurantaprosessia. Ulkoisia valvontamekanismeja voidaan myös käyttää Rahaston ympäristöominaisuuksien seuraamiseksi.

Jokaisella kestävyysindikaattorilla on oma menetelmänsä; SIMCon ensisijaisesti käyttämä menetelmä ympäristöominaisuuksien saavuttamisen mittaamiseen on sen ESG-pistekortti. Sijoitusneuvoja varmistaa, että Rahaston salkku noudattaa negatiivisen seulonnan kriteerejä kaikkina aikoina. Rahasto laskee sekä kunkin positiivisen sijoitusteeman piiriin kuuluvan salkun osuuden että salkun painotetun keskimääräisen ESG-pistemäärän perustuen nettoarvoon (NAV) tilikauden lopussa.

Sijoitusneuvoja käyttää pääasiassa sisäisiä tietoja, jotka saadaan suoraan lainanottajilta ja kerätään perusteellisen due diligence -prosessin sekä kaikkien sijoitusten jatkuvan seurannan yhteydessä; tästä syystä tiedot eivät aina ole täysin saatavilla.

SIMCo noudattaa ennakoivaa lähestymistapaa lainasalkkunsä hallinnoinnissa ja käy vuoropuhelua lainanottajien kanssa kannustaakseen ja edistääkseen myönteistä toimintaa. Käytössä oleviin vaikuttamisstrategioihin kuuluvat muun muassa kestävyteen liittyvien lainaehtojen sisällyttäminen, kestävyysuoriutumiseen perustuvien taloudellisten mukautusmekanismien käyttöönotto sekä lainanottajien velvoittaminen täyttämään vuosittaiset sijoituksen jälkeiset kestävyyskyselyt.

Rahaston kestävyden arvioimiseksi ei ole nimetty vertailuindeksiä, koska käytössä on sen sijaan sisäinen menetelmä.

Lisätietoja siitä, miten Sijoitusneuvoja integroi kestävyden sijoitusprosessiinsa varmistaakseen sen jatkuvan soveltamisen, ja erityisesti sen lähestymistavasta due diligence -prosessiin ja sijoitusten jatkuvaan seurantaan, on saatavilla osoitteessa www.SIMCoFunds.com.

Appendix vi – Dutch

Samenvatting

Het SIMCo Infrastructure Income Fund (het “Fonds”) heeft tot doel ESG-kenmerken te bevorderen, met een bijzondere focus op milieuaspecten, maar heeft duurzaam beleggen niet als beleggingsdoelstelling.

Het Fonds past de volgende drie criteria toe bij de selectie van de onderliggende activa voor zijn portefeuille om de vastgestelde milieukenmerken te bevorderen:

- 1. Negatieve screening*
- 2. Thematisch beleggen (positieve screening)*
- 3. ESG-beoordeling*

De negatieve screeningscriteria zijn bindend voor het Fonds, waarvan sommige verband houden met het bevorderen van milieukenmerken. Zo investeert het Fonds bijvoorbeeld niet in infrastructuur die verband houdt met de winning van thermische steenkool.

Het Fonds hanteert drie positieve ESG-beleggingsthema's, waarvan er twee gericht zijn op de energietransitie en decarbonisatie.

Om de aan een onderneming verbonden ESG-risico's en -kansen te bepalen, maakt Sequoia Investment Management Company (de “Beleggingsadviseur”, “SIMCo”) gebruik van een eigen ESG-beoordelingsmethodologie. Deze methodologie combineert de “E”-, “S”- en “G”-componenten en past over alle maatstaven heen correctiefactoren toe die niet toestaan dat sterktes op het ene gebied zwaktes op een ander gebied volledig compenseren. De uiteindelijke ESG-score van een investering of potentiële investering moet in het beleggingsproces worden meegenomen. Deze ESG-scorecard is ontworpen om een groter gewicht toe te kennen aan de milieufactoren (“E”) van een investering. Het streven om de gewogen gemiddelde ESG-score van de portefeuille te verhogen, resulteert in een grotere bevordering van de milieukenmerken.

Goed bestuur is geïntegreerd in de ESG-scorecard van SIMCo en wordt daarnaast doorlopend gemonitord. De Beleggingsadviseur gaat actief in dialoog met kredietnemers met als doel de ESG-gerelateerde prestaties en de algehele impact van de investeringen positief te beïnvloeden. Tijdens de juridische due-diligencefase besteedt de Beleggingsadviseur bijzondere aandacht aan de wijze waarop de kredietnemer wordt bestuurd en wordt erop toegezien dat alle ondernemingen voldoen aan minimale normen op het gebied van mensenrechten en arbeidsrechten.

Het Fonds investeert in een gediversifieerde portefeuille van senior en achtergestelde schuldinvesteringen in economische infrastructuur. De gedetailleerde limieten voor de activaspreiding waaraan het Fonds zich houdt, zijn vastgelegd in de beleggingsdoelstelling en het beleggingsbeleid van het Fonds, zoals uiteengezet in het prospectus van het Fonds.

De ESG-prestaties en -kenmerken worden voor elke investering regelmatig gemonitord in het kader van het halfjaarlijkse monitoringproces. Daarnaast kunnen externe controles worden toegepast om de milieukenmerken van het Fonds te monitoren.

Elke duurzaamheidsindicator heeft zijn eigen methodologie; de belangrijkste methodologie die SIMCo gebruikt om het behalen van de milieukenmerken te meten, is de ESG-scorecard. De Beleggingsadviseur ziet erop toe dat de portefeuille van het Fonds te allen tijde voldoet aan de criteria voor negatieve screening. Het Fonds zal zowel het percentage van de portefeuille dat binnen elk positief

beleggingsthema valt als de gewogen gemiddelde ESG-score van de portefeuille berekenen op basis van de intrinsieke waarde (NAV) per einde van het boekjaar.

De Beleggingsadviseur maakt voornamelijk gebruik van interne gegevens die rechtstreeks van kredietnemers afkomstig zijn en worden verzameld via een uitgebreid due-diligenceproces en de voortdurende monitoring van alle investeringen; deze gegevens zijn daarom niet altijd volledig beschikbaar.

SIMCo hanteert een proactieve benadering bij het beheer van zijn leningenportefeuille en gaat in dialoog met kredietnemers om positief gedrag te stimuleren en te bevorderen. De toegepaste engagementstrategieën omvatten onder meer het opnemen van duurzaamheidsgerelateerde leenvoorwaarden, het toepassen van financiële aanpassingsmechanismen op basis van duurzaamheidsprestaties en het verzoek aan kredietnemers om jaarlijks duurzaamheidsvragenlijsten na de investering in te vullen.

Er is geen index aangewezen als benchmark voor het bepalen van de duurzaamheid van het Fonds, aangezien in plaats daarvan een interne methodologie wordt gebruikt.

Aanvullende informatie over de wijze waarop de Beleggingsadviseur duurzaamheid integreert in zijn beleggingsproces om een continue toepassing te waarborgen, en in het bijzonder over zijn aanpak van due diligence en de voortdurende monitoring van investeringen, is te vinden op www.SIMCoFunds.com.

Appendix vii – Norwegian

Sammendrag

SIMCo Infrastructure Income Fund («Fondet») har som mål å fremme ESG-egenskaper, med særlig fokus på miljøforhold, men har ikke bærekraftige investeringer som investeringsmål.

Fondet benytter følgende tre kriterier ved utvelgelsen av de underliggende eiendelene i porteføljen for å fremme de fastsatte miljøegenskapene:

- 1. Negativ screening*
- 2. Tematiske investeringer (positiv screening)*
- 3. ESG-vurdering*

De negative screeningskriteriene er bindende for Fondet, hvorav enkelte er knyttet til fremme av miljøegenskaper. Fondet investerer for eksempel ikke i infrastruktur som er relatert til utvinning av termisk kull.

Fondet opprettholder tre positive ESG-investeringstemaer, hvorav to er rettet mot energiomstillingen og avkarbonisering.

For å fastslå ESG-risikoer og -muligheter knyttet til et selskap benytter Sequoia Investment Management Company («Investeringsrådgiveren», «SIMCo») en proprietær ESG-vurderingsmetodikk. Metodikken kombinerer «E»-, «S»- og «G»-komponentene og anvender justeringsfaktorer på tvers av alle måleparametere som ikke tillater at styrker på ett område fullt ut kompenserer for svakheter på et annet. Den endelige ESG-scoren for en investering eller potensiell investering skal tas i betraktning i investeringsprosessen. Denne ESG-scorecarden er utformet for å tillegge en investerings miljøfaktorer («E») større vekt. Målet om å øke porteføljens vektete gjennomsnittlige ESG-score vil medføre økt fremme av miljøegenskaper.

God selskapsstyring er integrert i SIMCos ESG-scorecard og overvåkes i tillegg løpende. Investeringsrådgiveren engasjerer seg aktivt med låntakere med sikte på å påvirke ESG-relatert ytelse og den samlede effekten av investeringene på en positiv måte. Under den juridiske due diligence-prosessen legger Investeringsrådgiveren særlig vekt på hvordan låntakeren styres, og sikrer at alle selskaper overholder minimumsstandarder for menneskerettigheter og arbeidsforhold.

Fondet investerer i en diversifisert portefølje av senior og etterstilt gjeld innen økonomisk infrastruktur. De detaljerte grensene for aktivallokering som Fondet følger, er fastsatt i Fondets investeringsmål og investeringspolicy, slik disse er beskrevet i Fondets prospekt.

ESG-ytelse og -egenskaper overvåkes regelmessig for hver investering som del av den halvårlige overvåkingsprosessen. Eksterne kontroller kan også benyttes for å overvåke Fondets miljøegenskaper.

Hver bærekraftsindikator har sin egen metodikk; den viktigste metodikken som SIMCo benytter for å måle oppnåelsen av miljøegenskapene er ESG-scorecarden. Investeringsrådgiveren sikrer at Fondets portefølje til enhver tid oppfyller kriteriene for negativ screening. Fondet vil beregne både andelen av porteføljen som faller innenfor hvert positivt investeringstema og den vektete gjennomsnittlige ESG-scoren for porteføljen basert på netto aktivaverdi (NAV) ved regnskapsårets slutt.

Investeringsrådgiveren benytter hovedsakelig interne data som er innhentet direkte fra låntakere gjennom en grundig due diligence-prosess og løpende overvåking av alle investeringer, og slike data er derfor ikke alltid fullt ut tilgjengelige.

SIMCo har en proaktiv tilnærming til forvaltningen av sin låneportefølje og engasjerer seg med låntakere for å oppmuntre til og fremme positiv atferd. Engasjementsstrategiene som benyttes omfatter blant annet innarbeiding av bærekraftsrelaterte lånebetingelser, anvendelse av finansielle justeringsmekanismer basert på bærekraftig ytelse samt krav om at låntakere fyller ut årlige bærekraftsspørreskjemaer etter investering.

Det er ikke utpekt noen indeks som referansebenchmark for vurdering av Fondets bærekraft, ettersom det i stedet benyttes en intern metodikk.

Ytterligere informasjon om hvordan Investeringsrådgiveren integrerer bærekraft i sin investeringsprosess for å sikre kontinuerlig anvendelse, og særlig om tilnærmingen til due diligence og løpende overvåking av investeringer, er tilgjengelig på www.SIMCoFunds.com.