



## **Article 10 (SFDR) Website disclosure for an Article 9 fund**

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**Franklin Templeton Social Infrastructure Fund SCA SICAV-SIF  
(the “Fund”)**

**Product name: Franklin Templeton  
Social Infrastructure Fund SCA SICAV-  
SIF**

**Legal entity identifier:  
54930003ZSQTQR8OEC29**

**Does this financial product have a sustainable investment objective?**

Yes

No

It will make a minimum of **sustainable investments with an environmental objective: \_%**

in economic activities that qualify as environmentally sustainable under the EU Taxonomy

in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

It will make a minimum of **sustainable investments with a social objective: 80%**

It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of \_\_\_% of sustainable investments

with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy

with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

with a social objective

It promotes E/S characteristics, but **will not make any sustainable investments**



**A. Summary**

The Fund has a sustainable investment objective in accordance with Article 9 of the Sustainable Finance Disclosure Regulation (the “SFDR”).

In its implementation of the Fund’s Impact strategy, the Investment Manager pursues a social objective and seeks to invest in and improve the quality of social infrastructure assets. Moreover, while not having sustainable investments with an environmental objective within the meaning of the SFDR, the Fund seeks, where appropriate, to improve assets’ environmental performance.

To create meaningful social and environmental impact, the Portfolio Manager identifies the environmental and community challenges the Fund seeks to address and looks for the best ways to allocate efforts and investors’ capital. By identifying and directly addressing community and environmental challenges, the Fund can increase access to quality healthcare, housing, education and civic services while also enhancing the resource efficiency of the Fund's assets.

To track performance, the Fund utilizes an impact-rating system that measures the current and projected state of each asset’s community value. Progress towards impact objectives is quantified, and key performance metrics are tracked over time.

To assess the attainment of its sustainable investment objective, the Fund measures the share of assets contributing to positive social outcome areas across Good Health and Wellbeing, Quality Education, Decent Work and Economic Growth, Sustainable Cities and Communities and Peace, Justice, and Strong Institutions.

The Investment Manager ensures that its sustainable investments do not cause significant harm through risk assessment and the reporting and monitoring of Principle Adverse Impacts (the "PAIs").



## B. No significant harm to the sustainable investment objective

### How are the indicators for adverse impacts taken into account?

The investment team builds on its experience and expertise to conduct a thorough fundamental analysis which includes identifying potential external negative impacts, direct or indirect, on environmental and social sustainable objectives associated with each asset such as:

Fossil Fuels – Exposure to energy-inefficient real estate assets	The portfolio of the Fund has zero exposure to real estate assets that are involved in the extraction, storage, transport, or production of fossil fuels.
Energy efficiency – Exposure to energy-inefficient real estate assets	<p>While not binding, reducing energy and carbon intensity is a core environmental characteristic of the Fund. The Fund looks to “unstrand” stranded assets as measured by available data input into the Carbon Risk Real Estate Monitor (“CRREM”) tool.</p> <p>The Fund also aims to:</p> <ul style="list-style-type: none"> <li>- reduce the portfolio’s net energy consumption by 2.5% per annum; and</li> <li>- reduce CO2-intensity by 5% per annum.</li> </ul> <p>These targets are above the reduction rates required of real estate in order to align with the 2015 Paris Agreement.</p>
Energy consumption intensity	<p>The Fund aims to reduce the energy consumption by 2.5% per annum.</p> <p>This target is above the reduction rate required of real estate in order to align with the 2015 Paris Agreement.</p>

### Are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?

Not applicable as the Fund does not invest in companies.



## C. Sustainable investment objective of the financial product

### What is the sustainable investment objective of this financial product?

The Fund's investment objective is to invest in social infrastructure assets. In addition, the Fund has sustainable investment (within the meaning of the Disclosure Regulation) as its objective and seeks to improve the quality of social infrastructure assets. Moreover, while not having sustainable investments with an environmental objective within the meaning of the Disclosure Regulation, the Fund seeks, where appropriate, to make improvements in the social infrastructure assets that contribute to reduce pollution, reduce net water, support biodiversity and sustainable cities and communities. These goals and characteristics were created in direct response to research citing the lack of quality social services across Europe, as well as the need to improve the environmental impact of social infrastructure assets. The Fund's impact strategy has two vectors: community and environment.

The impact objective of the Fund is aligned with 7 of the 17 United Nations Sustainable Development Goals ("SDGs"), particularly the following goals:

<b>3</b> GOOD HEALTH AND WELL-BEING 	<b>Good Health and Well-Being</b> Ensure healthy lives and promote well-being for all ages.	<b>8</b> DECENT WORK AND ECONOMIC GROWTH 	<b>Decent Work and Economic Growth</b> Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.
<b>4</b> QUALITY EDUCATION 	<b>Quality Education</b> Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all.	<b>11</b> SUSTAINABLE CITIES AND COMMUNITIES 	<b>Sustainable Cities and Communities</b> Make cities and human settlements inclusive safe, resilient sustainable.
<b>6</b> CLEAN WATER AND SANITATION 	<b>Clean Water and Sanitation</b> Ensure availability and sustainable management of water and sanitation for all.	<b>16</b> PEACE, JUSTICE AND STRONG INSTITUTIONS 	<b>Peace, Justice and Strong Institutions</b> Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels.
<b>7</b> AFFORDABLE AND CLEAN ENERGY 	<b>Affordable and Clean Energy</b> Ensure access to affordable, reliable, sustainable and modern energy for all.		

No reference benchmark has been designated for the purpose of attaining the sustainable investment objective.



## D. Investment strategy

### What investment strategy does this financial product follow?

The Fund’s investment strategy is to invest in social infrastructure assets. An asset is investable for the Fund if the majority of the space either by rent or by area is classified as social infrastructure and where invested capital is expected to contribute towards at least one of the seven previously identified SDGs.

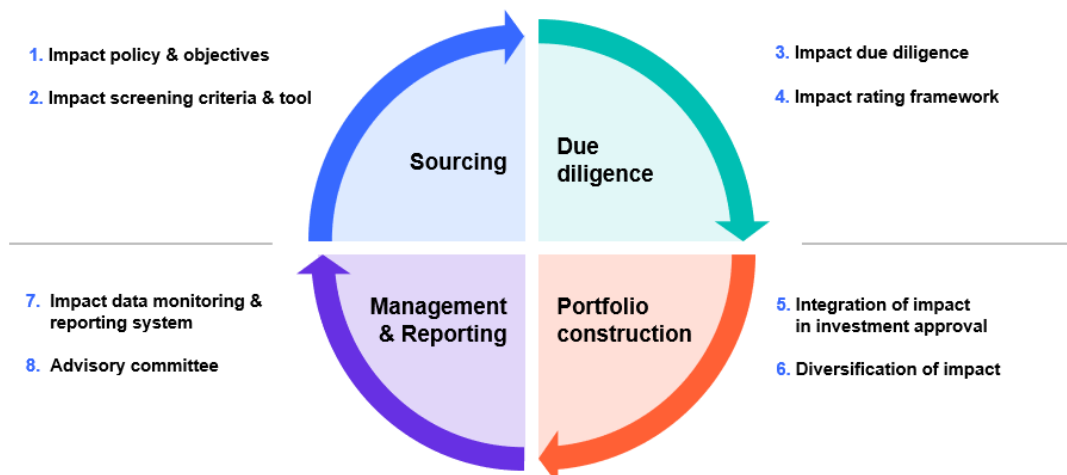
In addition, the Fund has sustainable investment (within the meaning of the Disclosure Regulation) as its objective and seeks to improve the quality of social infrastructure assets. In addition to the social sustainability objective, the Fund seeks, where applicable, to make environmental improvements in the social infrastructure assets that reduce pollution, energy and net water usage and support biodiversity and sustainable cities and communities.

As a part of the reduction of negative externalities and impact return objectives, the investment team sets out measurable targets including a target for carbon emissions. The investment team seeks an average annual reduction of 5% CO<sub>2</sub> equivalent Kg/M<sup>2</sup> of existing assets in the Fund’s portfolio. The investment team measures Operational carbon as categorized by the Greenhouse Gas Protocol using all available data on grid energy and gas and electricity usage at each asset. The investment team measures year-over-year change on a best effort basis using all available data, which may include utility bill information, smarter meter data, or estimates using the latest Environmental Performance Certificates (“EPCs”) and data from the investment team’s sustainability due diligence reporting.

### Impact Management Process

In addition, the strategy fully integrates impact analyses at each stage of the investment process. The tailored and integrated Impact Measurement and Management (IMM) system emphasizes transparency, rigor and accountability.

#### Integrating impact management throughout the investment process



## 1. Sourcing

The impact management system begins with sourcing investments that not only meet all of the requirements of the investment process, but also meet the impact objectives of the Fund. This means the social impact objectives must be met. The investment team utilizes a high-level screening of investment opportunities to ensure they are appropriate for the Fund, and that there is opportunity to add value through one or more of the value-add mechanisms laid out in the impact objectives.

## 2. Due Diligence

A full impact assessment is completed prior to an investment.

The assessment includes: information on the community value and environmental performance of the asset, an internal rating system that reflects the current performance of the asset, and the investment team's projection for how the asset should perform after the Fund's contributions are made.

In this way, social and environmental indicators are identified and must be met prior to investment.

Analysis and due diligence will be conducted to consider the PAIs per Annex 1 of the RTS through use of proprietary data, research and analysis. Each investment is unique, and the investment team will seek to obtain the data relevant to PAIs which are most material to the Fund's investments. Some data may be incomplete, a proxy, or unobtainable. The investment team will seek to disclose the data analysis on a best-efforts basis, with transparency of reporting.

Where there is potential negative impact based on the PAIs, investments are excluded.

FRAA's approach to addressing negative impact and impact risks can be broken down into two categories: asset underwriting and asset management.

### Asset Underwriting

During the underwriting process the investment team identifies potential risks associated with the acquisition of the asset. In the asset holding period, FRAA define specific CAPEX programs aimed at mitigating or eliminating any of the risk previously identified in the underwriting process.

In the asset underwriting prior to acquiring an asset period, FRAA conduct thorough due diligence on the physical aspects of each building to identify potential risks and negative impacts.

This diligence includes:

- *Environmental and Technical Due Diligence*

Technical and environmental reports are commissioned by the Fund and executed by third party firms with deep expertise in the space. The reports provide an analysis of the relevant property's current state as well as likely items which will require remediation and their corresponding costs. These reports address risks related to the building itself, the systems within the building, health and safety of the occupants, and accessibility.

- *Impact Due Diligence Reports*

FRAA commission a bespoke impact due diligence report to further address impact risks and opportunities. In regard to risks, the reports highlight various forms of pollution in and around each asset, they benchmark energy and water usage while identifying underperforming systems, they measure and benchmark waste and recycling practices, and measure the biodiversity, or lack thereof, of each asset.

- *Impact Risk Reporting*

A part of the ex-ante impact assessment for each asset is a section devoted to risk.

#### Asset Management

Once negative risks are identified through internal and third-party due diligence pre-acquisition, FRAA incorporate solutions and improvements into the capex plan of each building and are responsible for addressing the negative impacts when feasible. The Fund has a dedicated asset management team which works with property managers and tenants to identify and address any additional negative impacts associated with the built environment throughout the holding period.

The investment team reduces impact risk through the investment team's screening, due diligence and management of each asset.

The investment team conducts third-party Technical, Environmental and Sustainability Due Diligence reports all of which help the investment team identify any red flag risks that would lead to the Fund not investing, and the investment team's own impact assessment of each asset includes analysis of impact risks, as guided by the fifth dimension of impact from the impact management process. Once the Fund purchases a building, the investment team works with tenants and property managers to understand and reduce PAIs and rectify any negative impacts that arise over our holding period.

The assessment includes investment team's projected performance score after the Fund's contributions are made.

### **3. Portfolio Construction**

With a dual mandate, the FRAA management team seeks to recommend portfolios that achieve both the financial and impact objectives of the Fund.

FRAA will seek to prioritise its impact objectives by investing across asset types and balancing opportunities to create impact across the seven targeted SDGs depending on the type of asset as each will exhibit unique characteristics.

### **4. Management & Reporting**

FRAA and the Portfolio Manager monitor each asset and the Portfolio Manager reports to Investors on an ongoing basis while the business plan for each asset is being implemented. The progress towards impact objectives is tracked over time and quantified in the community and environmental rating system and key performance metrics, many of which are sourced from the Impact Reporting and Investment Standards ("IRIS").

Reassessments of impact strategies is made if or when opportunities to improve outcomes, in a financially viable manner, are uncovered.

The Fund reports annually on impact performance to Investors and seeks guidance from the Fund's Advisory Committee on ways to enhance FRAA's and the Portfolio Manager's approach to IMM.

**What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?**

Investments of the Fund must be linked to the SDG targets through a theory of change that highlights how investments and asset management contribute to an improved social outcome.

The investment team acknowledges that with a dual-return objective – financial and impact – some impact related contributions may not be economically viable. To this end, the investment team created an internal impact rating system that measures the current and projected state of each asset’s community and environmental performance. The rating system is based on a set of predefined community and environmental factors. Progress towards impact objectives can be quantified and key performance metrics can be tracked over time.

Impact performance is measured at three levels: at the portfolio level, at the SDG level, and at the individual asset level. Metrics are reported in the Fund’s Annual Impact Report. The report offers insights into the Fund’s impact framework, including how the community and environmental impact of acquired assets are measured.

In addition, the Fund excludes investments in assets that, at the Fund’s initial investment therein include adult entertainment, alcohol production, palm oil production, tobacco production, unconventional or nuclear weapons production or distribution.

**What is the policy to assess good governance practices of the investee companies?**

The assessment of the investee companies’ good governance practices is not applicable as the Fund does not invest in companies.

**Does this financial product consider principal adverse impacts on sustainability factors?**

Yes

The Fund will maintain no exposure to companies and tenants involved in the extraction, storage, transport, or manufacture of fossil fuels. To address energy intensity and exposure to energy inefficient buildings, the Fund looks to “unstrand” stranded assets as measured by available data input into the Carbon Risk Real Estate Monitor (“CREEM”) tool. The Fund does not avoid inefficient buildings, but instead may choose to purchase these buildings with a plan to improve their efficiency over time.

No

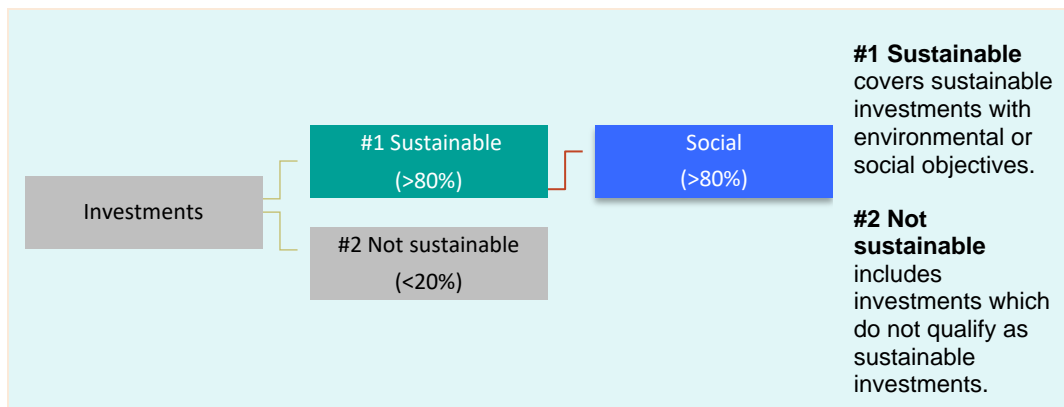




## E. Proportion of investments

### What is the planned asset allocation for this financial product?

80% of the investments of the Fund will qualify as sustainable investments with a social objective.



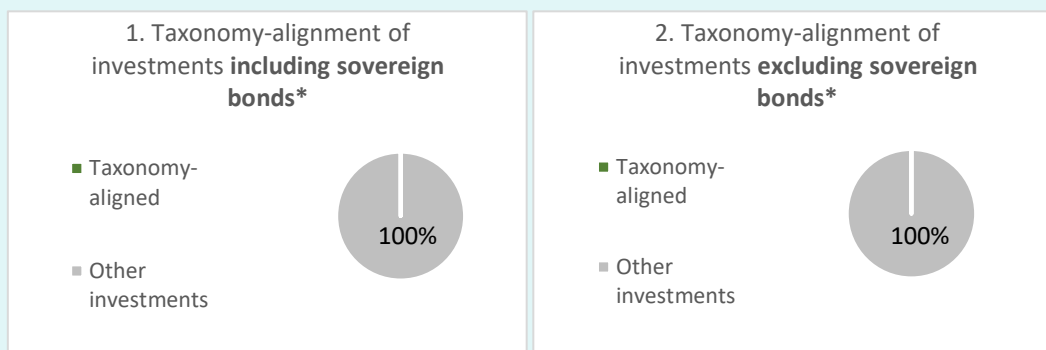
### How does the use of derivatives attain the sustainable investment objective?

Not applicable.

**What is the minimum share of investments with an environmental objective aligned with the EU Taxonomy? (including what methodology is used for the calculation of the alignment with the EU Taxonomy and why; and what the minimum share of transitional and enabling activities)**

Not applicable as the sustainable investments of the Fund are not aligned with the EU Taxonomy.

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



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

**What is the minimum share of sustainable investments with a social objective?**

The Fund commits to invest a minimum of 80% of its portfolio in sustainable investments with a social objective.

**What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

Cash: up to 20%.

Cash percentage can be substantial although cash is typically held for very short periods of time where capital is called ahead of each asset purchase.

Due to the neutral nature of the asset, no minimum environmental or social safeguards have been put in place.



## F. Monitoring of sustainable investment objective

### What sustainability indicators are used to measure the attainment of the Fund's sustainable investment objective?

To measure the attainment of the Fund's sustainable investment objective, the Fund will measure the share of assets contributing to positive social outcome areas across the UN Sustainable Development Goals: Good Health and Wellbeing, Quality Education, Decent Work and Economic Growth, Sustainable Cities and Communities and Peace, Justice, and Strong Institutions.

In addition, the Fund will monitor three key performance metrics at the portfolio level to assess the environmental impact of social infrastructure assets:

- carbon intensity,
- net energy consumption intensity and
- water usage intensity.

### How are the sustainable investment objective and the sustainability indicators monitored throughout the lifecycle of the financial product and the related internal/external control mechanism?

The sustainable investment objective and the sustainability indicators (including PAIs indicators) are monitored throughout the lifecycle of the product.

The Fund has developed an extensive framework that outlines its process for identifying asset-level impact. A part of that framework is identifying the specific contributions that the Fund can make towards positive outcomes for communities and the environment without doing significant harm. Each of the expected contributions for each asset are articulated and subsequently captured in an impact-assessment report and investment-committee memorandum.

- **Pre-Acquisition**

Impact screenings of investments are performed during the initial acquisition phase.

Prior to investment, the Portfolio Manager screens all potential investments to confirm they meet the Fund's criteria and to confirm the portfolio remains in compliance with its policies. This includes confirming contribution to the sustainable investment objective as well as PAIs and good governance assessment to ensure that the Fund's sustainable investments do not cause significant harm to any environmental or social sustainable investment objective as described under the section "B. No significant harm to the sustainable investment objective." In addition, the Portfolio Manager ensures that the Fund does not invest in the exclusion list.

The impact-assessment reports offer insights into the Fund's ex ante and systemic approach to measuring and managing impact. The Fund's assessments are backed by asset-level data, demographic data and market research to ensure that the Fund's theory and actions are linked to meaningful outcomes.

- **Holding period**

Once investments have been made, ongoing monitoring and reporting are performed.

The Portfolio Manager produces annual impact update reports for each asset with revised or confirmed SDG and KPI information. The Portfolio Manager also produces a portfolio-

level impact report that tracks impact progress for each asset. The report highlights aggregated data, progress towards portfolio-level goals and summaries the Fund's contributions towards each of the pertinent SDGs.

- **Control mechanisms**

The Portfolio Manager is responsible for supervising and improving the implementation of the ESG policies and responsible investment process across all investments.

All binding elements of the Fund's Impact commitments are regularly reviewed and monitored as part of our Investment Compliance process.



## G. Methodologies

### What is the methodology to measure the attainment of the sustainable investment objective using the sustainability indicators?

To measure the attainment of the Fund's sustainable investment objective, the Fund measures the share of assets contributing to positive social outcome areas as identified by the following Sustainable Development Goals (SDGs) - Good Health and Wellbeing, Quality Education, Decent Work and Economic Growth, Sustainable Cities and Communities and Peace, Justice, and Strong Institutions.

Confirmation that each asset continues to contribute to the social SDGs and is doing no significant harm is conducted through ongoing engagement with tenants, confirmation of existing leases, and updated key performance indicators (KPIs). This updated information is captured and revised annually in each assets' impact update report and in the fund's annual impact report<sup>1</sup>.



## H. Data sources and processing

### What are the data sources used to attain the sustainable investment objective including the measures taken to ensure data quality, how data is processed and the proportion of data that is estimated?

- **Data sources**

The data sources used to attain the sustainable investment objective are smart meters and sensors, property managers, tenants, technical advisors and Moody's ESG Solutions (to create physical-risk data).

- **Measures to ensure data quality**

Data received at least annually from tenants is analysed for reasonableness and compared to other data sources when possible by the investment team.

<sup>1</sup> <https://franklintempletonprod.widen.net/s/zklgkqqlbz/social-infrastructure-2q21-annual-impact-report>

- **Data processing**

Data is processed by aggregating across assets and weighted by area across the portfolio. Calculations for carbon are created by the investment team, annually, by manually inputting energy data into the Carbon Risk Real Estate Monitor (CRREM) tool, and all other calculations (water usage, energy usage, affordability, clean energy generation, number of beneficiaries, etc.) are completed by the investment team through spreadsheets. The director of impact validates the data inputs and outputs created by the investment team.



## I. Limitations to methodologies and data

**What are the limitations to the methodologies and data sources? (including how such limitations do not affect the attainment of the sustainable investment objective and the actions taken to address such limitations)**

- **Limitation to the methodology**

Inherent limitations to the methodology may exist. Social sustainability is multifaceted and bespoke for each asset making it difficult to aggregate. This makes it difficult for the Fund's robust, yet bespoke, methodology to create comparable and quantifiable data when looking across private real estate or across all sustainability strategies. For SFDR sustainability reporting, the Portfolio Manager overcomes these limitations by conducting assessments of every asset and of the overall portfolio and by reporting SDG-contributions - which are simple to quantify and report consistently.

- **Limitation to the data sources**

Inherent limitations to the data sources exist. Data availability and quality is a material limitation for all private real estate managers with third-party tenants since tenants are not obligated to share information under their control such as utility usage or social KPIs.

The Fund believes a critical element of its impact lies in building relationships with mission-aligned tenants which in turn allows us to acquire and procure more data to better support social sustainability claims and PAI mitigation claims.



## J. Due diligence

### What is the due diligence carried out on the underlying assets and what are the internal and external controls in place?

The Fund's diligence process is extensive and includes initial screening, environmental and technical due diligence, sustainability due diligence, internal impact assessments, and Investment Committee Approval.

#### **Impact-screening**

The Portfolio Manager screens pipeline deals to ensure strategic alignment with the Fund's objectives. A team member must affirm the applicability of an opportunity by answering the following questions:

- a. What purpose does the asset serve in the community?
- b. Who does the asset serve? How much demand is there for the service provided by the asset?
- c. How can Franklin Templeton contribute to the asset/tenant/community through this investment?
- d. In what ways does the tenant align/contribute to the SDGs?
- e. Are there any major impact risks with this investment?

#### **Environmental and technical due diligence**

Technical and environmental reports are commissioned by the Fund and executed by third-party firms with deep expertise in the space. The reports provide an analysis of the property's current state as well as items that are likely to require remediation and their corresponding costs. These reports address risks related to building itself, the systems within the building, accessibility, and the health and safety of the occupants.

#### **Sustainability due diligence**

The Fund commissions a bespoke impact due-diligence report to further address impact risks and opportunities. In regard to risks, these reports highlight various forms of pollution in and around each asset. They benchmark energy and water usage while identifying underperforming systems. They also measure and benchmark waste and recycling practices, and measure the biodiversity, or lack thereof, of each asset.

#### **Impact Assessment Report**

An investment team member creates an extensive impact assessment report for each asset. The report is structured around the Impact Management Project's Five Dimensions of Impact and includes an asset-specific theory of change, an assessment of the contributions to SDG targets, an assessment of sustainability risks and a business plan highlighting potential impactful improvements and initiatives.

#### **Investment committee approval (internal controls)**

The internal controlling entity, the Investment Committee, must approve each asset before investment and does so on the basis that the asset meets the dual-return objectives of the strategy - both financial and impact.

### External Controls

The Fund is a signatory to the Operating Principles for Impact Management<sup>2</sup> (OPIM). As a part of the OPIM, the fund management team discloses its approach to impact/sustainability and this approach is verified to be in alignment with the principles by a third-party verifier.

The Fund also has an advisory committee comprised of investors which review the Fund's sustainability results annually.



### K. Engagement policies

**Is engagement part of the environmental or social investment strategy?**

Yes

No

**If so, what are the engagement policies? (Including any management procedures applicable to sustainability-related controversies in investee companies)**

Core to the sustainability objective of the Fund is working with mission-aligned tenants and stakeholders to create superior social outcomes for local communities. This engagement is conducted directly and through property managers and includes ongoing dialogue concerning impact risks, opportunities and existing initiatives. If a controversy or negative issue arise, the Fund works with pertinent stakeholders to directly address the issue. If we are unable to adequately mitigate impact risk or adequately eliminate a problem deemed to do significant harm, the Fund will sell the asset.



### L. Attainment of the sustainable investment objective

**Has a reference benchmark been designated?**

Yes

No

<sup>2</sup> <https://www.impactprinciples.org/>