Sustainability Framework

Effective Date: June 2021 I Next Review Date: October 31st, 2024 I Policy No.: 2021113

Versioning

Version	Author	Date	Change /Notes
0.1	John Klein	01.06.2021	Author
0.2	Jan-Michael Dierkes	01.07.2022	Author
0.3	Martin Klima	01.07.2022	Approval
0.4	Jan-Michael Dierkes	14.09.2022	Update
0.5	Martin Klima	14.09.2022	Update approved
0.6	Jan-Michael Dierkes	19.12.2022	Annual review
0.7	Martin Klima	19.12.2022	Approval
0.8	Jan-Michael Dierkes	22.03.2022	Update
0.9	Martin Klima	22.03.2022	Approval
1.0	Jan-Michael Dierkes	29.09.2023	Update
1.1	Martin Klima	31.10.2023	Approval

Contents

Principles

In their performance of investment advisory processes in relation to Digital Infrastructure Vehicle II SCSp SICAV-RAIF ('DIV II'), DTCP Growth Equity III SICAV-RAIF ('GE III') and DIV II Matrix Co-Invest II SCSp ('Co-Invest II) as well as to any potential additional funds to be advised in the future (collectively referred to as the 'Funds'), Digital Transformation Capital Partners Luxembourg S.à r.l. (the 'Main Advisor') strives to apply this *Sustainability Framework*. In this document 'we', 'us' and 'our' shall relate to the Main Advisor.

Through our investment advisory processes, we seek to identify, grow, and improve the Funds' portfolio companies, ensuring long-term sustainable value creation. We recognize that environmental, social, and governance (ESG) principles can contribute to creating value for investors and all other stakeholders – both in terms of mitigating risks and seizing opportunities. We strive to incorporate ESG criteria within our investment advisory processes, and also apply the same standards within our firm, on a non-binding basis and taking into account the principles of proportionality and materiality.

We believe that proactive engagement on ESG matters throughout the investment cycle has not only societal benefits, but ultimately leads to higher valuations and better investment outcomes. Companies that conduct their business in an environmentally sustainable and socially responsible way significantly diminish their business risk and achieve better financial results.

Our understanding of transparency as a business imperative, coupled with regulatory standards, forms the basis for this Sustainability Framework. The first part presents the Sustainable Investment Framework, including our threefold commitment to different aspects of sustainability. The second part encompasses our Sustainable Finance Framework, which describes the methodology and procedures used to classify the financial structures in the context of sustainable finance. The third part focuses on reporting and disclosure related to sustainability.

1 Sustainable Investment Framework

1.1 Our objectives

Our main objective is to create long-term value for our shareholders and investors. We can only achieve this goal by combining excellent financial performance with responsible and sustainable business practises that consider environmental objectives, social, and governance factors.

The Sustainable Investment Framework sets out the guidelines that enable us to build sustainable businesses and to ensure that a positive contribution is made with every recommendation.

In pursuit of excellence we have,

- defined values and principles that we commit to in our daily operations to embrace all aspects of sustainability;
- signed the UN Principles for Responsible Investment ('UN PRI') on behalf of DIV II and have implemented these across our areas of business to contribute to a sustainable financial system.

1.2 Our understanding

We believe that proactive engagement on sustainability has societal benefits and leads to higher valuations and better investment outcomes for our investors and stakeholders. ESG is part of our recommendation process and value creation approach. We focus on the integration of both macro-level and company specific ESG considerations throughout the full investment life cycle. We aim to build a sustainable future by accelerating connectivity around the world, creating economic growth, and protecting natural resources.

1.3 General Values

We actively promote responsible business practises and put sustainability at the core of our operations. We carry out our investment and exit recommendations, value creation measures, and other business activities in accordance with our values:

- *Corporate governance*: We comply with all legal and statutory regulations governing the management and supervision of companies as well as with internationally recognised standards of good and responsible corporate governance.
- *Business relations*: Trust and fairness in business decisions determine how we deal with our business partners.
- *Avoidance of conflicts of interest*: We expect that the personal interests of directors, officers and employees do not conflict with the interests of DTCP.
- *Dealing with information and data*: We place great emphasis on data security, data protection and general confidentiality of all our employees.
- *Dealing with sustainability*: We are committed to creating long-term value for our shareholders and investors.
- *Accountability*: We make promises we can keep to our investors, our portfolio, our communities, and to ourselves.

We have the desire to learn and improve and are accountable to our recommendation, our portfolio companies, our communities and to ourselves. We are working towards performance goals to achieve best-of-class results.

1.4 Commitments to responsible investment

We are committed to certain guiding principles in all our actions, as well as to principles for our investment advisory activity. Moreover, DIV II is partnering with the UN PRI. Therefore, this Sustainability Framework is structured around the six principles of the PRI.

Independent of the Funds' investment activity, we will always:

- comply with relevant laws, regulations and appropriate best practises governing the protection of human rights, occupational and public health and safety, the environment, and the labour and business practises of the jurisdictions in which we conduct business;
- adhere to the highest standards of conduct intended to avoid corrupt business practises or practises involving conflicts of interest;
- regard implementation of our ESG engagement activities as an integral part of how we do business.

Our investment activity is guided by the following principles:

Principle 1: We will incorporate ESG issues into investment analysis and decision-making processes.

Our advice will support the Funds to create a digital society, to encompass assets in digital infrastructure, software, and adjacent sectors through its investments. Across this investment universe, we encounter companies of varying degrees of maturity and different sizes, resulting in a large variation of the depth of ESG processes and reporting already in place. We therefore believe in a materiality-based approach, taking into consideration the specific risk profile of a specific investment.

We incorporate ESG analysis of an investment during the due diligence process. Due diligence is performed under consideration of the ESG investment committee (the ***ESG Committee***) and along with external consultants and lawyers where required, in order to identify specific business risks and opportunities, outstanding liabilities, and any compliance obligations associated therewith. Results of that review are documented, shared with the deal team, and presented at Investment Committee meetings. When relevant, operating and capital expenditures relating to ESG issues are included in the target company's business plan (*e.g.,* asset maintenance or upgrades to improve a company's environmental or safety performance).

As part of a materiality-based and proactive approach to ESG, we will not automatically exclude companies with a deficient ESG track record from Investment Committee consideration, if we believe that we can enhance value through addressing potential issues and see opportunity for improvement.

Principle 2: We will be active owners and incorporate ESG issues into our ownership policies and practises.

Our advice will relate to the Funds as active owners of assets and depending on the individual circumstances of the investment, their influence on corporate decisions may vary. We will in any case seek to promote ESG matters of portfolio companies.

Such processes begin immediately after the closing of the investment. Where relevant, we will use the findings of the ESG due diligence as a foundation to establish a dialogue with the company. We strive to raise further awareness for ESG matters in the portfolio companies' daily businesses and we will seek to implement – if not in place – a plan to establish ESG processes as well as a performance plan for material ESG issues. The ESG Committee jointly with the investment team will periodically review progress.

Towards the exit of an investment, the ESG Committee jointly with the investment team may draw up a document summarising progress made, as to facilitate the assessment of a buyer.

Furthermore, we will actively engage with other companies and stakeholders on ESG issues and the constantly evolving market practises in this regard.

Principle 3: We will seek appropriate disclosure on ESG issues by the entities in which we invest.

Where implemented by the portfolio companies, we will establish an effective system to monitor ESG performance plans. We will seek to obtain mandatory, itemised information from portfolio companies to assess ESG performance and will encourage portfolio companies to use standardised reporting tools.

Principle 4: We will promote acceptance and implementation of responsible investment principles within the investment industry.

We will promote an active engagement by co-investors, corporate partners, limited partners and other stakeholders to support sustainable practises and responsible investment. We will also use our memberships of industry associations to advance the cause of responsible investment.

Principle 5: We will work together to enhance our effectiveness in implementing the Principles.

We will seek to collaborate with industry groups and peers in order to inform, develop, and promote the widespread adoption of responsible investment strategies.

Principle 6: We will each report on our activities and progress towards implementing the Principles.

We will report on our progresses and achievements relating to these Principles and disclose where we fail to meet our own expectations.

1.5 Commitment to sustainable investment

DTCP is dedicated to foster sustainable practices across all types of business activities. We are convinced that our engagement in ESG matters is a prerequisite for the sustainable performance and attractiveness of our portfolio companies and reducing the overall exposure to risk.

We are committed to make recommendation on investments with exceptional growth potential and giving companies tools they need to achieve sustainability-focused goals. Thus, we recommend a comprehensive assessment of target companies, with particular focus on ESG aspects, before making any investment, and carefully consider the findings in future investment decisions. We have set investment standards for each ESG aspect, which are described in the following sections.

1.5.1 Environmental investment standards

We believe that an economically efficient, sustainable global financial system is a necessity for long-term value creation. Economic and ecological performance are equally important for lasting success; therefore, we take our responsibility to the environment seriously and ensure that our portfolio companies comply with applicable environmental regulations.

We understand environmental issues as climate change through greenhouse gas emissions and water management, the responsible use of energy and resources as well as technological innovation, which will have a long-term effect on future generations. For DIV II, our actions/investments take into account the following indicators::

- Energy consumption and renewable energy use;
- Greenhouse gas emissions;
- Water consumption.

1.5.2 For GE III and CO-Invest II, we may collect data for these indicators, but they are not necessarily binding for the investment decision. Social investment standards

We recognise that business can reap substantial long-term benefits from acting in a socially responsible manner. We consider people to be our most valuable asset, and the motivation and well-being of our employees is therefore our highest priority. We understand social issues as human rights, diversity, and labour standards as well as a strong health and safety culture. Beyond our internal relationships, we consider certain topics such as customer satisfaction, data protection, government, and community relations as inherent parts of acting in a socially responsible manner.

At DTCP, and at our portfolio companies, we remain committed to:

- Promoting diversity;
- Respecting human rights and labour practices (e.g., fair pay, absence of modern slavery, etc.);
- Providing a safe and healthy workplace for employees;
- Facilitating training and competence development;

We take responsibility for ensuring that appropriate social standards prevail in all our portfolio companies, in line with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

1.5.3 Governance investment standards

DTCP strives to increase the value of portfolio companies through improved management that emphasises non-financial aspects like corporate social responsibility, reputation, social participation, and stakeholder accountability. To achieve this, we have aligned our operations and investment recommendations with the highest legal and ethical standard.

We understand governance commitment to be a management's responsibility and ability to promote integrity and a strong corporate governance and compliance structure throughout our portfolio companies. Whenever possible, our actions take into account the following points:

- Corporate governance;
- Business ethics, including anti-bribery and anti-corruption;
- Data protection and data security.

We take responsibility for ensuring that appropriate corporate governance standards prevail in all our portfolio companies, in line with the OECD Corporate Governance Principles.

We recommend appropriate Due Diligence (DD) in all investment cases and financial analyses and monitoring of portfolio investments by considering ESG relevant factors.

We promote the use of best corporate governance practises in our own operations and in our portfolio companies' practises. We have established an ESG Committee that applies high due diligence standards to potential investee companies, including ESG due diligence to ensure that sustainability aspects are considered alike and are correctly implemented at company level. After the investment is made, the committee conducts ongoing monitoring of investee companies, with particular focus on appropriate disclosures of ESG-related information.

1.6 Extra Commitment to SDGs and “sustainable Investments” by DIV II

DIV II pursues slightly more ambitious sustainability strategy than the other funds by (i) by aligning each investment recommendation with the achievement of one or more SDGs and (ii) by committing to at least 20% sustainable investments within the meaning of Art. 2 (17) of the EU Sustainable Finance Disclosure Regulation (EU 2088/2019) (‘SFDR’) and Art. 3 EU-Taxonomy Regulation (EU 2020/852) (‘EU Taxonomy’).

1.6.1 Commitment to SDGs alignment

For DIV II we align our activities with the UN Sustainable Development Goals (SDGs) to ensure that financial flows simultaneously contribute to achieving human development goals and to maintaining the capacity of natural systems to provide the resources and ecosystem services which economies and societies depend on.

Our investment activities are guided by the SDGs to help translate this intention into action. Positive contributions and avoiding harm are realised through effective management and decision-making. We actively seek investments that can make a positive contribution or at least make sure we are avoiding harm and therefore work directly with companies to help them do so.

The list below demonstrates how DIV II strives to deliver important outcomes across key SDG themes:

	SDG	Our understanding
Primary focus	5 GENDER EQUALITY	We advocate equal career opportunities regardless of age, gender, race, or other socio-demographic characteristics and aim at promoting women's participation in leadership positions by actively supporting their developments.
	7 AFFORDABLE AND CLEAN ENERGY	We aim at significantly increasing the share of renewable energies in our energy mix while reducing our energy and electricity consumption. We strive to use energy more efficiently, especially within the IT and telecommunications infrastructure.
	9 INDUSTRY, INNOVATION AND INFRASTRUCTURE	We want to build resilient infrastructures, green industries, and drive innovation by drawing on the latest scientific and technological research. We empower people with cutting-edge technologies.
	12 RESPONSIBLE CONSUMPTION AND PRODUCTION	We believe that ubiquitous and affordable connectivity is a quintessential element that contributes to reduced digital inequality, by reducing the income gap, improving access to healthcare and education, and providing access to the many services available in a truly digital society. Technological progress is the foundation of efforts to achieve environmental objectives, such as increased resource and energy efficiency
	13 CLIMATE ACTION	We have incorporated climate protection measures into our corporate policy to respond to current challenges. We measure and take action to reduce our greenhouse gas emissions to combat climate change and its impacts. We strive to better educate and raise awareness among our employees on climate change mitigation, adaptation, impact reduction and protection.
Secundary	4 QUALITY EDUCATION	We consider quality education to be key to the sustainable development of society, and therefore want to make our contribution through promoting the long-term development of our employees through targeted training measures. We aim at providing people with the skills to develop innovative technologies that shape the future.

SDG	Our understanding
8 DECENT WORK AND ECONOMIC GROWTH	We take investments that promote inclusive and sustainable economic growth, create employment opportunities and decent work for all. We continue to expand our infrastructure investment business in private markets to increasingly focus on laying the foundations for a prosperous economy. We invest in technologies and innovations to accelerate the digital transformation of society and equip people with the tools and skills needed for a new tomorrow.
16 PEACE, JUSTICE AND STRONG INSTITUTIONS	We strive for strong corporate governance by implementing and formalizing practices that ensure inclusive corporate development, effective conflict management and accountability at all levels.

As part of our commitment to the sustainability agenda, we are dedicating time and effort to the engagement with the SDGs to align both fund strategies and reporting capabilities with global standards. We respond to the investors' increasing demand for ESG-related information as part of risk and strategy assessments. By publishing annual ESG report(s), we show how we map investments to SDG targets and apply KPI-based measurement methodologies across all investments. Most importantly, we reflect on our ambitions and activities by assessing the magnitude of contributions to sustainable development. The SDGs provide a common language to convey the progress made.

For GE III and Co-Invest II, the alignment with the SDGs is currently quired from potential portfolio companies via a data collection template, but for now this is a test phase to assess the data quality and availability from the respective portfolio companies. The obtained data is currently not necessarily binding for the investment decision.

1.6.2 Commitment to 20% "sustainable investments" pursuant to SFDR and EU Taxonomy

In relation to DIV II DTCP commits to reach up to 20% of sustainable investment within the meaning of Art. 2 (17) of SFDR and Art. 3 EU Taxonomy by setting the objective to commit to climate change mitigation by considerably reducing the GHG emissions along with science-based targets.

In order to assess the alignment of DIV II investments to climate change objectives, we will apply two methodologies. The first one will consider the percentage of alignment with the EU Taxonomy if the company's activity(ies) is covered by the EU Taxonomy. The second approach will be applicable if the activities of the potential investment are not covered by the Taxonomy. In this case, DTCP has developed its own methodology based on science-based targets.

For environmentally sustainable economic activities in relation to DIV II that are represented in the EU Taxonomy (Art. 2 (1) Taxonomy Regulation), it is to be assessed whether I) the individual activity makes a substantive contribution to one of six environmental objectives defined by the Technical Screening Criteria (TSC); II) the activity Does No Significant Harm to the other objectives and III) whether the Minimum Safeguards are met. For environmentally sustainable economic and/or social activities that are not yet represented in the EU Taxonomy, a methodology developed by DTCP is used for the purpose of evaluation (Art. 2 (17) SFDR).

The methodology is described as follows: When assessing the activities of portfolio companies that are not represented in the EU Taxonomy, we recommend the identification as well as quantification of levers related to greenhouse gas emissions. To assess a portfolio company's substantial contribution to an environmental objective we are guided by the goals of the Paris Agreement, which aim to limit global warming to well below 2 degrees Celsius by 2050, preferably 1.5 degrees Celsius compared to preindustrial levels. We, therefore, aim to identify and quantify ways in which greenhouse gas emissions can be limited to reduce the company's carbon footprint. We recommend our portfolio companies to develop to reduce their carbon footprint based on science-based targets as defined by the SBTi.

During the due diligence process, we prepare due diligence reports and collecting other informational materials from or related to the potential investments. We also strive to negotiate contractual commitments of each portfolio company to comply with these obligations on an ongoing basis and to identify any breaches of these obligations.

1.7 DTCP ambition level towards sustainable development

We strive to integrate sustainability at DTCP internally. For this purpose, we set ambitious goals for ourselves and our portfolio companies. In doing so, we take into account the individual characteristics and requirements of each funds and their investors. Furthermore, we strive for compliance with regulatory requirements related to sustainability, which is always reflected in our advisory concepts and likewise our recommendations. In particular, we refer to the integration of the SFDR, EU Taxonomy and UN PRI.

In sharpening our awareness of sustainability in the past and continuing to do so in the future, as well as in taking the UN SDGs into account in our business orientation, we have set a standard for transparency in sustainability, both for ourselves and for the Funds we advise. In doing so, we will continuously review and further develop our recommendations on pre-investment processes.

We have established a ESG tracking and reporting for ourselves and our portfolio companies. For assets with operational control, we advices on, e.g., how to develop and set individual targets to reduce GHG emissions. For assets without operational control, we will advise on how to use influence, especially, but not limited to, through the presence on the board, to encourage portfolio companies to set similar reduction targets. We encourage our portfolio companies to set their own targets, measure KPIs and improve operational performance. We also encourage them to regularly report company-specific performance data to the board.

In addition, we set ESG targets for DTCP and link them to personal remuneration whenever possible.

With DTCP's engagement we strive for the establishment of a long-term governance structure that supports sustainable development. Thereby, we are committed to achieve a 30 % reduction of GHG emissions by 2030 and achieve the net zero commitment by 2040 for DIV II, if possible, and by 2026 for ourselves.

2 Sustainable Finance Framework

2.1 Definition of sustainable finance

The Sustainable Finance Framework sets out our ESG approach and methodology, the eligibility criteria, the applicable environmental and social due diligence requirements and the screening process for sustainable finance. We are striving to be transparent about our definitions and approach, and the Sustainable Finance Framework serves as the basis for tracking and disclosing our performance against our sustainability commitments.

DTCP has adopted investment principles (i.e., UN PRI) and regulatory specifications (i.e., SFDR/ EU Taxonomy) in developing the Sustainable Finance Framework. We support the ongoing global harmonisation of sustainability taxonomies and implementation initiatives through enhanced data availability and corporate disclosures. We adhere to the legislative measures of the Action Plan on Sustainable Finance enforced by the European Commission to channel private sector capital flows towards sustainable investments, manage ESG risks and promote transparency and long-termism in our economic activities.

Also in defining key terms, we draw on the European Commission‘s proposed definition of sustainable finance as ‘the process of taking environmental, social and governance (ESG) considerations into account when making investment decisions in the financial sector, leading to more long-term investments in sustainable economic activities and projects.’

DTCP’s Sustainable Finance Framework is dynamic in its nature and is regularly reviewed and expanded to revise or add qualifying activities or criteria, and to meet any upcoming regulatory requirements. On these grounds, the Framework is supplemented by internal documents covering specific regulatory aspects of sustainable finance:

- The Sustainability Risk sets out DTCP’s approach to integrating sustainability risks into our investment decision-making process;
- The Requirements for financial products according to SFDR relate to product level disclosures arising from Articles 6-9 of this regulation;
- The Principles of aligning the remuneration policy with SFDR define how DTCP ensures consistency between our remuneration policy and the integration of sustainability risks.

The Sustainable Finance Framework is intended to serve as guidelines for supporting more sustainable investment projects that address specific environmental and social issues. As innovation in sustainable finance continues to accelerate and sustainability challenges evolve, we expect other investment objectives to be added to future versions of this framework.

2.2 ESG Governance

We have established an ESG Committee composed of competent and experienced professionals. Our ESG Committee is responsible for guiding, implementing, and overseeing ESG integration. We have ensured an appropriate staffing of the ESG Committee in order to safeguard the effectiveness of its operations. The ESG Committee meets on a regular basis, but at least quarterly, and reports through its chair directly to the CEO.

2.3 Integration of Sustainable Risk

DTCP seeks to ensure the integration of material ESG risk factors into our activities in line with the principle of "double-materiality". We understand sustainability risks as environmental, social or governance events or conditions that, if they occur, could have an actual or a potential material adverse effect on the value of the investments and/or assets, the financial condition, operational results, or the reputation.

Our recommendation to managing sustainability risks builds on the Risk Policy provided by the AIFM. This sets out procedures and responsibilities for risk identification, evaluations, decision-making and ex-post controls. We recommend assessing each investment opportunity to determine whether it poses any risks to environmental, social or governance factors through screening, due diligence, stakeholder engagement in parallel to actively adding value to the investment.

We integrate sustainability risks into the investment decision-making process as follows:

- Potential sustainability risks should be identified, and their likelihood of occurrence and severity be assessed;
- Measures should be determined to eliminate or mitigate the sustainability risk or, if the risk is deemed too severe, a decision should be made not to proceed with the investment; and
- Sustainability risks associated with an investment should be presented to the relevant decision-making body, which makes the formal investment decision.

2.4 Sustainable due diligence

We see ESG as a key element of forward-looking strategic positioning rather than a backward-looking compliance consideration. Therefore, ex-ante screening is an important tool for identifying and understanding various sustainability-related risks. Appropriate due diligence procedures ensure that each investment complies with applicable national law as well as environmental and social regulations enforced by the European Union.

DTCP recommends conducting comprehensive ESG due diligence on each potential investment to ensure that ESG impacts have been identified and appropriately considered and that the potential investment is deemed acceptable.

2.5 Do No Significant Harm

For the investments by DIV II that pursue a sustainable investment objective, we adhere to the principle of *Do No Significant Harm* to ensure that neither environmental nor social sustainable objectives are materially harmed by the investment. All our sustainable investment activities are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

2.6 Principal Adverse Impacts

DTCP recognises that sustainability factors can have a direct impact on the return and cost structure of investments and indirect impacts on environmental, social, and employee matters. We strive to integrate sustainability considerations into our core business to create a strong culture that promotes environmentally and socially responsible practices at both DTCP and our portfolio companies.

However, DTCP does not currently consider the adverse impacts of our investment decisions on sustainability factors as defined by the SFDR. DTCP will consider the relevant adverse impacts for sustainable investments within the meaning of Art. 2 (17) SFDR.

We do, in our view, currently not have the means to obtain or measure all the data that would need to be reported under the PAI, or to do so systematically, consistently and at a reasonable cost across all client and investor investment strategies. This is partly because investments are generally not required to report this data and may not currently do so. We will re-evaluate the conditions end 2024. As soon as we start considering adverse sustainability impacts into our investment decisions, we shall disclose the relevant information to investors and on our website. Nevertheless, we recommend reporting on PAI on the fund level whenever possible.

2.7 Exclusion criteria

DCTP pursues an exclusion strategy to promote investments that do not cause harm to sustainability objectives or conflict with our values. This means that we apply restrictions to our investment recommendations to avoid ESG-related risks and for future purposes, adverse sustainability impacts.

The excluded activities and sectors are listed below:

- Any illegal economic activity (*i.e.*, any production, trade or other activity, which is illegal under the laws or regulations applicable to the respective portfolio company);
- the production of, and trade in, tobacco, distilled alcoholic beverages, other non-alcoholic recreational drugs, and related products;
- the financing and production of, and trade in, weapons and ammunition of any kind; or
- which has either its registered office, principal place of business or derives the majority of its revenue from any country subject to European Union or United Nations Sanctions.

In addition, Co-Invest II's lists of prohibited activities and sectors encompasses various activities related to fossil fuel-based energy production, as well as industries that are highly energy-intensive and/or produce significant amounts of CO2 emissions (as outlined in the terms of the partnership agreement).

3 Sustainable reporting and disclosures

We monitor the financial and non-financial performances of our Funds, whereby sustainability impacts are increasingly part of regular monitoring activities. We report annually on our progress of implementing the PRIs in our Funds activities.

Although we are currently facing a lot of ambiguity around the details and applicability of the SFDR, it will bring about a monumental change in the way we think and talk about sustainable investment. Essentially, we now classify financial products according to the three categories:

- Mainstream products;
- Products promoting environmental or social characteristics; or
- Products with sustainable investment objectives.

We adhere to the sustainability disclosure requirements set out in the SFDR, in conjunction with the Regulatory Technical Standards (EU 2022/1288), to enable investors to evaluate and compare financial products and to increase the overall market transparency.

3.1 Pre-contractual disclosure

We ensure the disclosure of information on the sustainability of financial products published in the pre-contractual documents, namely the *Private Placement Memorandum* (PPM), to help making better-informed investment decisions, but also to meet regulatory requirements.

3.2 Website disclosure

We strive sustainability-related information about financial products on our and the Fund's website in accordance with the SFDR. This information comprises the ESG characteristics/objectives promoted by the products and the methods used to assess, measure, and monitor these characteristics/objectives, including data sources, screening criteria and sustainability indicators.

3.3 Periodic reporting

DTCP will publish an annual ESG report, proofing our long-term commitment to responsible investment advice and portfolio-wide ESG integration. The reports are the main point of reference for our stakeholders on the sustainability performance of the portfolio companies and will be supplemented by the new materiality-based performance review of the portfolio companies in the upcoming years. The ESG reports will be found on our website https://www.dtcp.capital/.

In the periodic reports , we disclose information on the extent to which a financial product has fulfilled the sustainability promise made to an investor.

3.4 Sustainable investment governance

DTCP's philosophy is based on value creation through active participation. We focus on partnering with management teams to deliver long-term revenue and profit growth and build businesses through acquisition.

We provide recommendation on investments in equity instruments and are dedicated to support strong, ambitious teams with whom we have a good cultural fit. We strive to add value to portfolio companies through improved efficiency and management, with focus on non-financial aspects such as:

- Organisational performance and management processes;
- Corporate governance;
- Business relations and accountability to stakeholders;
- Corporate social responsibility and sustainability development;
- Innovation;
- Environment;
- ESG issues are also managed by our ESG committee, which are composed of seasoned operating and investment professionals.

The ESG Committee meets at regular intervals, but at least quarterly. It addresses all ESG-related matters affecting the Funds, the Main Advisor, the Sub-Advisors, the AIFM or the General Partner. It is responsible for developing an overall ESG strategy with respect to DTCP itself as well as with respect to the Funds. The ESG Committee continuously considers market developments in the field of ESG issues and reviews their relevance for DTCP's own ESG approach. On this basis, the ESG Committee provides recommendations that the Managers can follow independently.

In addition, where relevant, the ESG Committee is responsible for a robust and established communication process with the portfolio companies regarding ESG matters. On all of the above topics, the ESG Committee directly reports to Vicente Vento Bosch on an ad hoc basis.

3.5 Remuneration

DTCP addresses remuneration matters within the Sustainable Investment Framework to ensure that an appropriate remuneration framework is in place supporting strategic priorities.

DTCP's remuneration practices are designed to assure that employees are rewarded for maintaining a culture, which is aligned with stakeholder interests. Remuneration practices shall motivate employees to achieve individual and corporate performance targets that deliver long-term sustainable results, enhance the customer experience, comply with legal and regulatory requirements, promote sound and effective risk management - including sustainability risks - and avoid conflicts of interest. The Sustainable Investment Framework specifies as a recommendation how ESG-related risks are considered throughout the investment process to ensure that no risk appetite is promoted that is inconsistent with the risk profiles of the portfolios under management.

DTCP's recommendations and advisory approaches include taking sustainability risks into account in the remuneration of key employees who take investment decisions or provide investment advice. The variable components of remuneration and other benefits are determined by employee performance. Performance evaluations consider both financial metrics and qualitative performance criteria. These non-financial factors may include, for example, non-compliance with effective risk management and regulatory requirements, unethical or other behaviour inconsistent with DTCP's values, but also an individual's contribution to ESG-related efforts.

4 Continuous Development

We aim to continuously develop and improve this *Sustainability Framework* and the associated processes.