

PENTA INFRA WEBSITE DISCLOSURE ON SUSTAINABLE RISK FINANCE DISCLOSURE REGULATION (2019/2088) (“SFDR”)

Photon Capital B.V. and Penta CV and its affiliated companies (“Penta Infra”) make the following disclosures in accordance with articles 3(1), 4 (1) (b) and 5(1) of the SFDR.

Penta Infra strives to be a frontrunner in its market and aspires to invest and operate in a sustainable and responsible manner and to manage Environmental, Social and Governance (“ESG”) risks on a structural basis. Penta Infra has taken up the mission to do its part to set us on course to a sustainable future. Since the start Penta Infra committed herself to execute initiatives to reduce her ecological footprint. Penta Infra is continuously researching methods to lower its carbon footprint by reducing and recycling energy and water consumption at its locations. To reach this goal, Penta Infra considers the entirety of its production chain and invest into innovative ways to reach climate neutrality.

Penta Infra intends to integrate ESG in every step of its business and investment process, during screening and due diligence, during ownership and of course fundamentally, in its culture. The Penta Infra employees are provided with the necessary tools to integrate ESG in their activities. During sourcing and screening, Penta Infra will adhere to the Penta Infra Code of Conduct. For potential new investments, Penta Infra will perform a pre-investment ESG scan and - where appropriate - develop an ESG strategy roadmap as an integral part of the post-closing action plans and all suppliers of Penta Infra have to concur with the Penta Infra Code of Conduct. The efforts with respect to ESG will be reported annually towards Penta Infra’s investors.

SUSTAINABILITY RISK POLICIES

A sustainability risk means “an environmental, social or governance event or condition that, if it occurs, could cause an actual or potential material negative impact on the value of the investment”.

Before any investment decisions are made, Penta Infra performs a due diligence investigation which covers financial, legal, fiscal and sustainability (ESG) issues, and is performed by external advisors when necessary. Any material risks associated with the proposed investment are identified and sustainability risks and considerations are integrated in investment due diligence report. These risks and considerations form part of the overall investment analysis and are assessed alongside other relevant factors. Following this assessment, investment decisions are made having regard to the relevant fund’s investment policy and objectives, taking into account relevant sustainability risks and considerations and Penta Infra’s wider policies and procedures on responsible investing.

When Penta Infra identifies material ESG risks in a potential investment opportunity, it will further investigate the situation and determine how to proceed. In the cases where Penta Infra concludes that the risks are too high, it will not invest in the opportunity. In those instances where Penta Infra concludes that these risks are manageable, they can be considered in the investment thesis as appropriate and/or Penta Infra can decide to enhance ESG monitoring of the investment and/or address the situation directly.

REMUNERATION POLICY

Penta Infra’s remuneration policy is based on sustained, long-term performance and encourages retention. Penta Infra pays parts of its staff a combination of fixed remuneration (salary and benefits) and variable remuneration (including bonus) that reflect the success of Penta Infra and its portfolio companies along multiple parameters, including the implementation of the ESG policy. Variable remuneration for relevant staff is determined in a fair, appropriate and objective manner and takes into account compliance with all Penta Infra’s policies and procedures, including those relating to the impact of sustainability risks on the investment decision making process. Penta Infra monitors its remuneration policy regularly and, if necessary, Penta Infra will update its remuneration policy in order to be compliant with applicable laws, regulations and market principles.

Last update: 23.12.2021