Digital 9 Infrastructure plc
(the Company)

Sustainability Disclosures

Sustainability information disclosed pursuant to Regulation (EU) 2019/2088 on sustainability‐related disclosures in the financial services sector ("Sustainable Finance Disclosure Regulation" or "SFDR") and Regulation (EU) 2020/852 on the establishment of a framework to facilitate sustainable investment ("Taxonomy Regulation" or "TR").

This disclosure is in-line with the requirements of Article 6 and Article 8.

Contents

Integration of sustainability risks

In line with the requirements of Article 6 of the SFDR, the Investment Manager (Triple Point) must disclose the manner in which it integrates sustainability risks into investment decisions and disclose the results of the assessment of the likely impacts of sustainability risks on the returns of the financial products they make available.

For the purposes of this disclosure and in line with the SFDR definition, the Investment Manager considers a sustainability risk to be an environmental, social or governance ("ESG") event or condition that could have a material negative impact on the value of one or more investments in the Company's portfolio.

The Investment Manager's approach to sustainability risk integration aims to identify, monitor and manage ESG issues to minimise the risk of investing in ways that could undermine ESG principles, or miss sources of investment opportunity. The Investment Manager recognises that a failure to integrate ESG issues may risk harm to wider stakeholders, which undermines the financial objectives of the Company's investments and could adversely affect their performance.

The Investment Manager's ESG Integration Policy ensures that all investment processes have sound and appropriate integration of sustainability risks and opportunities, implemented by its investment teams and overseen by the Investment Manager's Sustainability Group. The aim of ESG integration is to ensure that the Investment Manager is aware of, and takes informed investments decisions with knowledge of key sustainability risks and looks to identify and capture where ESG presents value creation.

The Investment Manager integrates sustainability risks at each stage of the investment process, taking into account the potential impacts on asset success of a range of ESG factors. The Company's approach to sustainability risk analysis is material in nature, whereby it considers the individual nature of the target asset, for example, the size and type of asset, region, operational environment and stage of project cycle to guide the nature of the analysis and the expectations it places around engagement.

The Investment Manager assesses the likely impacts that sustainability risks may have on its returns, and considers a range of sustainability risks to be material to the Company's investments, including, but not limited to:

- the power supply to digital infrastructure assets may be affected by adverse environmental changes and weather patterns decreasing the amount of electricity produced by renewable energy infrastructure, particularly if extreme weather conditions arising from climate change lead to prolonged or widespread disruption of electricity;
- the infrastructure of the network may be compromised by climate-related impacts on assets, in particular rising sea levels or changing air temperature;
- improper maintenance or human error could lead to a failure in the infrastructure and technology to provide a highly reliable service;
- the infrastructure of the network creates a carbon footprint (also addressed below);
- digital infrastructure assets may be exposed to breaches of data security, client and data protection and associated risks;

- given the complexity and geographical scope of the supply chain, it may not be possible to identify all exposures to modern slavery risk, which could impact the long-term security of the supply chain and, in turn, expose the Company to reputational and regulatory risks;
- the Company may incur liability for health and safety incidents which could have an adverse effect on its business, financial position, results of operations and business prospects;
- digital infrastructure assets may be considered a source of nuisance, pollution or other environmental harm, and the Company may incur liability in respect of any environmental damage (including contamination of hazardous substances) which may occur on-site;
- the Company's investments may be exposed to issues concerning labour relations, including workforce strikes;
- a failure to implement strong stakeholder engagement in asset construction and management can result in project delays and longer term running issue; and
- risk of unforeseen seismic activity and other physical risks, such as volcanic activity.

The Investment Manager also recognises that, while investment in digital infrastructure produces significant social benefits, given that it is becoming a basic need for citizens to participate fully in society, digital infrastructure is resource and energy intensive. At a time when energy use is under severe scrutiny and greenhouse gas (“GHG”) emissions must be reduced (for example, due to the UK Government’s statutory obligation to reduce GHG emissions to net zero by 2050), it is essential that the energy consumption of digital infrastructure is minimised. Such issues present sustainability risks that the Investment Manager must effectively manage on behalf of the Company in order to limit their impact on long-term returns. In particular, future government policy in relation to energy consumption may require the Company to reduce rapidly the energy use and/or improve the energy efficiency of its digital infrastructure assets.

To mitigate sustainability risks, the Investment Manager is committed to robust ESG analysis as part of the due diligence process. This includes a comprehensive assessment of environmental and social risks, such as those relating to pollution, water use, labour and human rights, health & safety, and data security/protection. In the event that sustainability risks are identified during the due diligence process, the issues are flagged for additional scrutiny and, if appropriate, the Investment Manager rejects the investment opportunity, or will look to implement an action plan for improvement by working collaboratively with the management of the investee company to develop robust policies and practices to mitigate risk.

The Investment Manager also carries out a review of the climate risk exposure of the assets, aligned to the Recommendations of the Task Force on Climate-related Financial Disclosures (TCFD), which integrates physical and transition risks into Governance, Strategy, Risk Management, and Metrics & Targets.

Environmental / social characteristics of the fund

The SFDR requires additional disclosures under Article 8 of the SFDR where a financial product, such as the Company, promotes, among other characteristics, environmental or social characteristics, or a combination of those characteristics, provided that the companies in which the investments are made follow good governance practices.

The Investment Manager commits to making sustainable investments which are aligned with Sustainable Development Goal 9: Industry, Innovation and Infrastructure, specifically:

1. increase access to information and communication technology through our platforms increasing connectivity and reducing digital shortfall, with preference for those assets which can demonstrate the ability to improve digital access, for all sections of society.
2. decarbonisation of digital infrastructure use through assets with the most advanced energy efficiency and low carbon practices, or where strong improvements can be achieved.

To ensure this investment objective is not harmed, the Investment Managers Investment team apply a purpose-driven overlay in advance of any investment which establishes the SDG alignment to one or both of these statements, before proceeding with any further financial or ESG due diligence. Where an investment does not align to either of the purpose statements, and evidence of potential, or actual, negative alignment with no opportunity to create improvement exists for either one, then the Investment Manager will not invest. Where the team proceed with the investment, the purpose-driven alignment is logged.

Investment strategy

The Investment Manager's purpose-driven investment strategy is to invest in critical digital infrastructure including sub-sea and terrestrial fibreoptic cables, wireless networks and data centres to help address the critical demand for global digital communications to drive an interconnected world underpinning economic growth and sustainable development. The Company seeks to improve the accessibility of reliable, functional internet to billions of people – including developing countries – globally. Assets invested in comprise of future proofed, non-legacy, scalable platforms and technologies that facilitate communications, data transfer, interconnectivity and data storage through the following target sectors:

- Data centres;
- Subsea fibre optic networks;
- Terrestrial fibre optic networks; and
- Wireless networks

The Investment Manager will focus, primarily, on digital infrastructure investments which are operational and have secured medium to long-term contracts underpinned by investment grade counterparties or from a diversified portfolio of shorter-term contracts providing essential underlying services.

Also integral to the investment strategy is the integration of ESG throughout the decision-making process. The Investment Manager and Company believe taking these ESG issues into account throughout the investment process goes beyond responding to industry expectation. The Investment Manager and Company believe it is critical for risk mitigation and when done well can contribute to enhanced returns as well as preserve value for our investors. ESG factors are assessed equally, and adjusted to reflect the material issues of greatest relevance in each of the investment sub sectors. The factors considered can broadly be described as follows:

Environmental: GHG emissions and air pollution, their creation, management and monitoring during build and asset life. Use, generation and intensity of energy, and the nature of the energy (e.g. renewable) along with water use and its pollution. We also look at levels of waste generated, avoided and disposed of, approach to raw material sourcing and supply chain sustainability, and build impacts on biodiversity and habitat by understanding management and protection measures.

Social: the relevance and appropriateness of the asset to the locality. Assurance of good customer and stakeholder relations, including management of land rights and social inclusion through access to the asset. We expect strong management and reporting of health and safety (during and after build) as well as good labour management including staff wellbeing, good diversity and inclusion practices, appropriate training, and presence of fair pay, including reassurance of the absence of modern slavery.

Governance: Management's responsibility and ability to promote a corporate governance structure that is accountable and responsive to stakeholders by addressing issues such as Boards & Trustees, pay structure, ownership and accounting practices, and commitment to implementation of circular design. An examination of data security practice, client data protection and associated risks. Seek reassurance on a company's business ethics, through evidence of best practice in approaches to tax policy, management of bribery and corruption, conflicts of interest and appropriate senior level ownership of ESG issues.

Proportion of investments in ESG vs. non ESG assets

All entities invested in by the Investment Manager on behalf of the Company are through direct exposure as a result of taking debt or equity positions in the entities. All entities will undergo ESG assessment and must satisfy a number of ESG-related criteria to be eligible for investment.

Monitoring of environmental or social characteristics

The Investment Manager considers and monitors ESG at every stage of the investment process:

- **Sourcing:** All investments are assessed for alignment to one of the two 'purpose driven themes', which are 1. Increase access to information and communication technology through the Company's platforms increasing connectivity and reducing digital shortfall with a preference for investing in those assets who can demonstrate the ability to improve digital access, for all sections of society, and 2. Environmental sustainability with a focus on decarbonisation of digital infrastructure use: targeting assets with the most advanced energy efficiency practices, or where strong improvement can be achieved. These themes have been selected with the explicit purpose of aligning to UN SDG 9: Industry, Innovation and Infrastructure.

- **Due Diligence:** Once aligned purpose is identified, a company's ESG is systematically considered. All companies are assessed for their alignment to a range of industry best practice and in particular, to the ten principles of the UN Global Compact, to ensure due attention to the key areas of Human Rights, Labour, Environment and Anti-Corruption. A deep bespoke analysis, is then conducted, of industry specific ESG themes and topics which are guided by Sustainable Accounting Standards Board (SASB), Sustainable Digital Infrastructure Alliance (SDIA), and the TCFD Recommendations for management of climate risk. Analysis is conducted through an ESG tracker, which enables the aggregation of company performance data across the range of ESG factors under scrutiny. It drives a consistent and repeatable approach to assessment through a structured assessment framework, which contains guidance on expected corporate behaviours and how to score them. Each question is scored across three dimensions: policy, leadership, and evidence, to ensure a full picture of the company's behaviour is established. It is through this framework that any possible concerns or areas for further interrogation are identified, in preparation for our engagement process. Should the ESG tracker flag nine or more areas of concern, then the deal must be presented to the Investment Manager's Sustainable Investment Subgroup for review and discussion before it can progress to Investment Committee.
- **Preparation for approval:** Once it is decided to progress with an opportunity, a comprehensive review is conducted by the Investment Manager which may also include a site visit. At this stage clarification is sought on any areas of concern previously identified, and where applicable a further ESG site check list is completed.
- **Investment Committee Review:** A summary of the outcomes of the sourcing, due diligence and prep for approval analysis are presented to the Investment Manager's Investment Committee, along with access to the ESG tracker. All Investment Manager IC members receive specialist ESG training, to ensure they fully understand the ESG integration approach in place for this Company and can assess investment opportunities in the correct context.
- **Execution:** At this stage the Investment Manager establishes with the entity the metrics to be collected over time and provide results of the areas of improvement identified and recommendations for responding to these findings.
- **Holding & exit strategy:** During the Company's ownership the Investment Manager looks to drive ESG performance improvements which can be evidenced through KPI data comparison over time. If an asset is decommissioned during ownership endeavours are made for best practice in any dismantling and component recycling. The Investment Manager, has also committed to seeking buyers for assets who will look to support companies continuing to uphold the highest standards of ESG within their business conduct. Finally, the Investment Manager intends to examine the ESG data-set over time to understand the value-add the investment approach brings.
- **Monitoring & Reporting:** The Investment Manager is held to account on these commitments through the monitoring and reporting carried out. Monitoring of entities is on-going, and Sustainability data will be reported annually.

Methodologies used to assess and monitor Article 8 criteria

Each of the stages of ESG integration, applied throughout the Investment Manager’s investment process, contribute to the ability to monitor Article 8 criteria as they relate to entities in which the Investment Manager, on behalf of the Company, invests.

Climate and other environment-related indicators:

The purpose driven overlay considers climate impact and whether the entity has the most advanced energy efficiency practices in place or alternatively if strong improvement to energy efficiency can be made. An entity with an unmanageable negative climate impact would not be selected for investment. At the point of execution metrics are set to measure and monitor GHG emissions.

Impact on other environment-related indicators is assessed at the due diligence stage, with reporting metrics again selected at the point of execution. Analysis is shaped by the sub-sector of the entity. The Investment Manager, on behalf of the Company, invests in four sub-sectors: subsea fibre, terrestrial fibre, data centres and wireless technology. Impact on the environment varies according to these subsectors and also the quality of the company, and this is reflected in the due diligence analysis, the metrics set at execution, and the KPIs collected through engagement throughout the holding period.

Social and employee, respect for human rights, anti-corruption and anti-bribery matters:

Through due diligence process all companies are assessed for their alignment to a range of industry best practice and in particular, to the ten principles of the Global Compact, including Human Rights, Labour, and Anti-Corruption.

Data sources and processing

Where the Investment Manager, on behalf of the Company, makes an investment in an entity, the Investment Manager has direct access to a large amount of primary data from the entity as part of the purchase process. This information, along with interviews and/or follow-up questions with the entity's senior management provides the data to analyse the environmental and social characteristics of an entity. The ESG assessment is conducted by a member of the Investment Manager’s Sustainability team in close collaboration with the investment team to establish the behaviours of the entity and whether the areas flagged by the due diligence process constitute poor data quality or ESG risks outside of the appetite of the investment strategy, and if necessary pricing is adjusted. If the number of ESG flags reaches a threshold value, the Investment Manager’s investment team must also consult the Investment Manager’s Sustainable Investment Subgroup for a further opinion, before the deal can go to Investment Committee. Where investment proceeds, information relating to any flags is pursued and constitutes the basis of engagement with the entity.

Limitations to methodology and data

The Investment Manager’s assessment of alignment to SDG9 may rely on improvements the Company seeks to make through ownership. Circumstances may result in a failure to implement the desired improvements and hence a reduced level of SDG9 alignment. This limitation is addressed through a preference for assets which already show some level of alignment and where clear routes for improvement have already been identified, through a refusal to invest in any assets where there is negative alignment to SDG9, and through a clear engagement process with company management to set expectations at the point of execution.

The Investment Manager's approach to assessing an asset's broader environmental and social characteristics, has been carefully constructed to reflect best practice for the sector of operation as defined by reference standards including the UN Global Compact, SASB and the SDIA's net zero roadmap. This approach relies on such standards being up to date on all key sustainability factors, which creates a limitation. To manage this, the expertise and experience of the Investment Manager's investment team are used to sense check the ESG tracker for emerging issues, that sit outside of current existing best practice, and revise our tracker accordingly, this takes place quarterly. The analysis process also includes clear guidance on when to flag a topic for further action. This further manages the inherent limitation in any asset analysis that opinions will differ on the ESG quality of an asset.

Data used in the Investment Manager's ESG assessment methodology is collected directly from the entity as the assets are typically non-listed and often have a small number of employees. Furthermore, any external analysis on our target entities is not typically available. Any data limitations are overcome by conducting direct interviews with entities, seeking additional documentation or evidence if not originally supplied, and using the analysis process to clearly inform the engagement process.

Due diligence done on underlying assets regarding ESG criteria

The Investment Manager, on behalf of the Company, makes direct investments in assets, in some cases taking controlling stakes. All due diligence is conducted on the target asset. Before any investment is made, there are strict reviews of all documentation by our legal team, before the investment is presented to the Investment Committee for consideration, potential requests for further analysis and then sign off.

Engagement policies

An important part of the Investment Manager's ESG strategy is to influence investee companies to drive improvements in their ESG practice and outcomes. While the Investment Manager would not invest if there were any critical weaknesses identified, it is also recognised that many companies who have good practice can still do more across the full breadth of ESG topics to become leading practitioners. The Investment Manager's approach is not to overlook, or argue away weaknesses, but understand them and help identify a pathway for improvement through target setting and tracking. The process focuses improvement on ESG topics flagged during the ESG analysis process, with additional attention on the two topics of the purpose-driven overlay: access to information and communications technology, and decarbonisation of digital infrastructure energy use.

No benchmarking is applied to this Company.

Environmentally sustainable economic activities

Substantial contribution to the environmental objectives

The Company's investments aim to contribute substantially to the environmental objective relating to climate change mitigation. The Company seeks to achieve this objective by investing in data infrastructure assets such as data transmission (subsea fibre-optic networks, wireless networks and terrestrial fibres) and data storage (data centres) with the most advanced energy efficiency practices or where strong improvement can be achieved. The Investment Manager assesses the use, generation and intensity of energy (in particular renewable energy), with a goal of decarbonising digital infrastructure energy. The Investment Manager focuses in particular on investments in hyperscale data centres located in colder climates or near renewable power sources, which allow for optimal energy efficiency and, in turn, help the Company meet its sustainability objectives.

Data infrastructure assets used for data transmission and storage may be considered a transitional activity, as defined under Article 10(2), TR, where appropriate energy efficiency measures are implemented. As such, the Company seeks to ensure that best industry practices in relation to energy efficiency are followed across Data Infrastructure assets that comply with the EU criteria for environmentally sustainable economic activities.

The Investment Manager will undertake a detailed assessment of the Company's portfolio against the technical screening criteria ("TSC") laid out in Commission Delegated Regulation 2021/2139 to identify the extent to which its activities qualify as environmentally sustainable economic activities.

'Do no significant harm' assessment

The Investment Manager recognises that the Company's investments have the potential to harm the other environmental objectives under the Taxonomy Regulation. In evaluating an individual investment, the Investment Manager seeks to assess GHG emissions and, where possible, applicable air pollution during build and asset life, including their creation, monitoring and management, as well as physical climate-related risks. The asset's water use and pollution are also key considerations that the Investment Manager takes into account, by identifying and addressing environmental degradation risks related to preserving water quality and avoiding water stress.

The Investment Manager assesses levels of waste generated, avoided and disposed of, and takes a rigorous approach to raw material sourcing and supply chain sustainability. The Investment Manager also works closely with portfolio companies to implement processes for waste management across digital infrastructure assets to seek appropriate recycling at end of life of electrical and electronic equipment, in line with the relevant environmental standards. The Investment Manager also seeks to ensure that processes are in place to ensure that equipment for servers and data storage products meet the relevant environmental standards and does not contain any substances restricted under EU law. Where such equipment is not owned directly by the Company's investments, the Investment Manager works with portfolio companies to encourage them to engage with clients to improve the quality of their servers and end of life processes.

The Investment Manager assesses build impacts on biodiversity and natural habitats to understand which management and protection measures should be implemented. Recognising that sub-sea fibre-optic networks may adversely affect subsea bed integrity, the Investment Manager seeks to mitigate this risk by undertaking full environmental surveys before cable deployment and employ ecologists to accompany the deployment process.

The "do no significant harm" principle applies only to the Company's investments that take into account the EU criteria for environmentally sustainable economic activities. The remaining portion of the Company's investments does not take into account the EU criteria for environmentally sustainable economic activities.

Minimum safeguards

The Company and the Investment Manager have in place procedures to protect labour and human rights within the supply chain of Digital Infrastructure assets. The Investment Manager seeks assurance of good customer and stakeholder relations, including management of land rights, accessibility, and social inclusion of access to the asset. The Investment Manager expects strong management and reporting of health & safety (during and after build), as well as good labour management. This includes staff wellbeing, good diversity and inclusion practices, appropriate training, and presence of fair pay, including assurance of the absence of modern slavery. These procedures aim to ensure that the Company's investments are aligned to the UN Global Compact, OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

Proportion of Taxonomy-aligned investments

The Investment Manager intends to invest at least 25% of the Company's investments in environmentally sustainable economic activities, including 0% in enabling activities and 25% in transitional activities, in line with the current TSC. The Investment Manager has only included the Company's investments in data storage within this target. However, based on preliminary research into the energy efficiency of data transmission such as fibre optic networks, the Investment Manager believes that a significant proportion of such investments may also be considered environmentally sustainable economic activities, which the TSC do not currently address.