PANTHEON INFRASTRUCTURE PLC

SFDR Periodic Report

Product name: Pantheon Infrastructure PLC

Legal entity identifier: 213800CKJXQX64XMRK69

Sustainable investment

means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Environmental and/or social characteristics

Did this financial product have a sustainable investment objective?
[tick and fill in as relevant, the percentage figure represents sustainable investments]

●● ☒ **Yes**

☒ It made **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 made **sustainable investments with a social objective: %**

●○ ☐ **No**

☐ It promoted Environmental/Social (E/S) characteristics and while it did not have as its objective a sustainable investment, it had a 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 promoted E/S characteristics, **but did not make any sustainable investments**

Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.

To what extent were the environmental and/or social characteristics promoted by this financial product met?

Through its investments in certain portfolio companies, Pantheon Infrastructure Plc ("PINT" or the "Company") invests across sectors with a focus on renewables and efficiency. Pantheon, in its capacity as Investment Manager to the Company, and PINT's Sponsor partners work together to map the Company's investments to at least one of the following United Nations Sustainable Development Goals ("SDGs") (together the "E/S Characteristics"):

- SDG 7: Affordable and Clean Energy
- SDG 8: Decent Work and Economic Growth
- SDG 9: Industry, Innovation and Infrastructure
- SDG 11: Sustainable Cities and Communities
- SDG 12: Responsible Consumption and Production

The Company's strategy of co-investment, coupled with single asset secondaries, means that whilst the investment manager does not have direct control over assets, Pantheon measures and monitors PINT's investments against key sustainability indicators, as agreed with PINT's Sponsor partners at the time of investment. This ensures that we align ourselves with Sponsors who share our commitment to delivering positive outcomes on environmental, social and governance ("ESG") issues.

How did the sustainability indicators perform?

In order to ensure that the E/S Characteristics continue to be met, Pantheon uses the below sustainability indicators to monitor PINT's existing investments. The table below sets out the results of PINT's investments against the sustainability indicators.

(i) Environmental:

Portfolio emissions	Scope	Value (2023)	Coverage (2023)
GHG emissions (tCO2e)	Scope 1	214,477	100%
	Scope 2	6,109	100%
	Scope 3	61,523	100%
	Total GHG emissions	**282,110**	**100%**
Total Carbon footprint tCO_2e/£m NAV	**Total GHG carbon footprint**	**602**	**100%**
Weighted average carbon intensity tCO_2e/£m revenue	**Total WACI**	**1,050**	**100%**

Notes:

1. Coverage refers to the % of NAV for which the Sponsors have provided the GHG emissions value, or where an estimate is available. Values provided by the Sponsors may be estimates or actuals. Some of the emissions figures provided are as of 2022, and therefore have been extrapolated to 2023.
2. In one instance, Scope 3 emissions have not been provided by the Sponsor and have been estimated by a third party.
3. Due to rounding, the sum of scope 1, 2 and 3 GHG emissions may not exactly match the total GHG emissions.
4. Revenue figures are latest available as at December 31, 2023. NAV figures are as at December 31, 2023.
5. Carbon intensity shown as a weighted average by NAV.

(ii) Governance

The table below sets out the percentage of investments with a Health & Safety ("H&S") or Diversity & Inclusion ("D&I") policy.

	# of assets (% of assets)
Health & Safety	13 (100%)
Diversity & Inclusion	13 (100%)

(iii) Social

The table below sets out the gender diversity statistics at the underlying Portfolio Company and board level.

	Total Representation (%)					
	>50%	**40-50%**	**30-40%**	**20-30%**	**10-20%**	**<10%**
	# of assets (% of assets)					
Women Board Members	-	1 (8%)	1 (8%)	1 (8%)	7 (54%)	3 (23%)
Women FTE[1]	-	-	3 (23%)	7 (54%)	1 (8%)	2 (15%)

Notes:

1. Data is best available for 2023, with data from one portfolio companies as of 2022.

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

…and compared to previous periods?

- Since last year's report, we have collated and reported PINT's Scope 3 portfolio emissions and refined the calculation of PINT's portfolio emissions to closer align with the PCAF methodology, following consultation with external advisers. In 2022, PINT's reported total emissions, which included Scope 1 and 2 only, was 445,926 tCO2e. The portfolio carbon intensity was reported as 4,662 tCO2e/£m revenue, and the portfolio carbon footprint as 1,478 tCO2e/£m NAV. These emissions were attributed to PINT on the basis of % equity ownership, however, our methodology for 2023 has now been better aligned with PCAF and incorporates Enterprise Value (EV) instead. We also note that in the prior year, the revenue figure used within the calculation for Calpine's GHG emissions related to the commodity margin, which this year has been updated to reflect top-line revenue, again to better align with PCAF methodology.
- In 2022, the coverage of portfolio companies that had a H&S policy was 89%. This has improved to 100% coverage in 2023.
- In 2022, the coverage of portfolio companies that had a D&I policy was 67%. This has improved to 100% coverage in 2023.
- Representation of women across portfolio company Board Members has reduced, noting that in the previous year, 44% of portfolio companies had >40% women, which has now reduced to 16%.
- Representation of women across portfolio company FTEs has reduced, noting that in the previous year, 39% of portfolio companies had >40% women, which has now reduced to 23%.

What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?

N/A

How did the sustainable investments that the financial product partially made not cause significant harm to any environmental or social sustainable investment objective?

N/A

What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?

N/A

- How were the indicators for adverse impacts on sustainability factors taken into account?

  N/A

- Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:

  N/A

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific Union criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

How did this financial product consider principal adverse impacts on sustainability factors?

N/A

What were the top investments of this financial product?

The top assets by NAV are listed below. Please note, the percentages set out in the table below relate to the proportion of the assets against total NAV as at Q4 2023, and for prior periods total NAV as at Q4 2022.

The list includes the investments constituting **the greatest proportion of investments** of the financial product during the reference period which is: 1 January 2023 – 31 December 2023.

Largest investments – 2023	Sectors	% Assets	Country
Calpine Corp.	Power & Utilities	11%	United States
National Broadband Ireland (NBI)	Digital – Fibre	9%	Ireland
Primafrio	Transport & Logistics	9%	Spain
Fudura	Renewables & Energy Efficiency	9%	Netherlands
National Gas Grid	Power & Utilities	9%	United Kingdom
GD Towers	Digital – Towers	8%	Germany
Zenobe	Renewables & Energy Efficiency	7%	United Kingdom
Cartier Energy	Power & Utilities	6%	United States
Vertical Bridge	Digital – Towers	5%	United States
CyrusOne	Digital – Data Centres	5%	United States

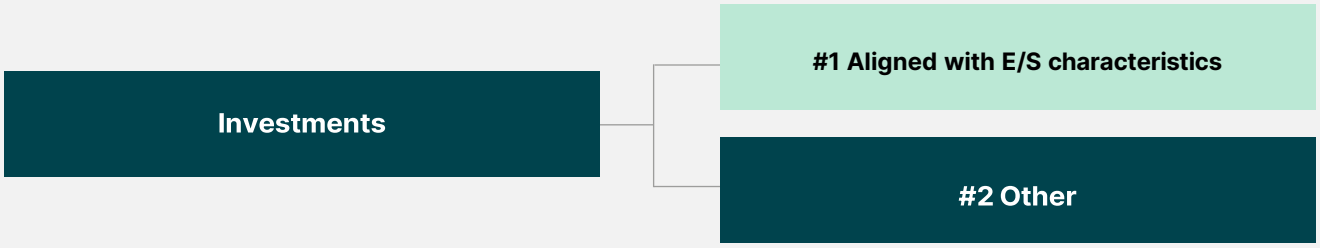
As reference, the investments constituting **the greatest proportion of investments** of the financial product during the reference period which is: 1 January 2022 – 31 December 2022 was as follows.

Largest investments	Sectors	% Assets	Country
Calpine	Power & Utilities	15%	United States
National Broadband Ireland	Digital – Fibre	15%	Ireland
Fudura	Renewables & Energy Efficiency	13%	Netherlands
Primafrio	Transport & Logistics	13%	Spain
Cartier Energy	Power & Utilities	11%	United States
Vantage	Digital – Data Centres	9%	United States
Vertical Bridge	Digital – Towers	8%	United States
CyrusOne	Digital – Data Centres	8%	United States
Delta Fiber	Digital – Fibre	8%	Netherlands

Asset allocation describes the share of investments in specific assets.

What was the proportion of sustainability-related investments?

- **What was the asset allocation?**
  As at 31-Dec-23, 93% of PINT's assets were aligned with the E/S Characteristics, and 7% of PINT's assets related to "other" investments (as described below)



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low- carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

In which economic sectors were the investments made?

- As at 31-Dec-23, PINT's asset allocation was as follows:
- Digital Infrastructure: 42%
- Power & Utilities: 26%
- Renewables & Energy Efficiency: 16%
- Transport & Logistics: 9%

To what extent were the sustainable investments with an environmental objective aligned with the EU Taxonomy?

The Company does not take into account the criteria for environmentally sustainable economic activities as defined in the EU Taxonomy, and therefore the Company does not target investments in EU Taxonomy-aligned assets as part of its investment strategy. Therefore, in accordance with the European Commission's Decision Notice of 13 May 2022 (C(2022) 3051), Pantheon expects that PINT's investments will be 0% Taxonomy-aligned.

Taxonomy-aligned activities are expressed as a share of:

- **Turnover** reflecting the share of revenue from green activities of investee companies
- **Capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy
- **Operational expenditure** (OpEx) reflecting green operational activities of investee companies

Did the financial product invest in fossil gas and/or nuclear energy related activities complying with the EU Taxonomy[1]?

☐ Yes

☐ In fossil gas ☐ In nuclear energy ☒ No

The graphs below show in green the percentage of investments that were 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.





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

[1] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

Are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under Regulation (EU) 2020/852.

What was the share of investments made in transitional and enabling activities?

N/A

How did the percentage of investments that were aligned with the EU Taxonomy compare with previous reference periods?

N/A

What was the share of sustainable investments with an environmental objective not aligned with the EU Taxonomy?

N/A

What was the share of socially sustainable investments?

N/A

What investments were included under "other", what was their purpose and were there any minimum environmental or social safeguards?

In relation to "other" investments, as at 31-Dec-23, 7% of PINT's assets related to cash held and cash equivalents held in a money market fund. These assets were held for the purpose of liquidity.

What actions have been taken to meet the environmental and/or social characteristics during the reference period?

Pantheon has a long track record of managing Infrastructure investments, all of which are subject to its investment process with sustainability considerations formally integrated. The Company's strategy of co-investment, coupled with single asset secondaries, means that whilst the investment manager does not have direct control over assets, Pantheon measures and monitors PINT's investments against key sustainability indicators, as agreed with PINT's Sponsor partners at the time of investment.

In 2023, Pantheon introduced its Sustainability Scorecards to provide clarity and transparency on sustainability maturity across PINT's Sponsor partners, to support effective benchmarking and engagement, and improved reporting. PINT is now utilising the ESG Data Convergence Initiative ('EDCI') template, with Scope 3 emissions now included within the 2023 report following increased engagement with Sponsors.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

How did this financial product perform compared to the reference benchmark?

No reference benchmark was designated for the Company.

How does the reference benchmark differ from a broad market index?

N/A

How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the environmental or social characteristics promoted?

N/A

How did this financial product perform compared with the reference benchmark?

N/A

How did this financial product perform compared with the broad market index?

N/A

