

Brussels, 6.4.2022 C(2022) 1931 final

ANNEX 1

### **ANNEX**

to the

Commission Delegated Regulation (EU) .../...

supplementing Regulation (EU) 2019/2088 of the European Parliament and of the Council with regard to regulatory technical standards specifying the details of the content and presentation of the information in relation to the principle of 'do no significant harm', specifying the content, methodologies and presentation of information in relation to sustainability indicators and adverse sustainability impacts, and the content and presentation of the information in relation to the promotion of environmental or social characteristics and sustainable investment objectives in precontractual documents, on websites and in periodic reports

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### **ANNEX I**

### Template principal adverse sustainability impacts statement

For the purposes of this Annex, the following definitions shall apply:

- (1) 'scope 1, 2 and 3 GHG emissions' means the scope of greenhouse gas emissions referred to in points (1)(e)(i) to (iii) of Annex III to Regulation (EU) 2016/1011 of the European Parliament and of the Council<sup>1</sup>;
- (2) 'greenhouse gas (GHG) emissions' means greenhouse gas emissions as defined in Article 3, point (1), of Regulation (EU) 2018/842 of the European Parliament and of the Council<sup>2</sup>;
- (3) 'weighted average' means a ratio of the weight of the investment by the financial market participant in an investee company in relation to the enterprise value of the investee company;
- (4) 'enterprise value' means the sum, at fiscal year-end, of the market capitalisation of ordinary shares, the market capitalisation of preferred shares, and the book value of total debt and non-controlling interests, without the deduction of cash or cash equivalents;
- (5) 'companies active in the fossil fuel sector' means companies that derive any revenues from exploration, mining, extraction, production, processing, storage, refining or distribution, including transportation, storage and trade, of fossil fuels as defined in Article 2, point (62), of Regulation (EU) 2018/1999 of the European Parliament and of the Council<sup>3</sup>;
- (6) 'renewable energy sources' means renewable non-fossil sources, namely wind, solar (solar thermal and solar photovoltaic) and geothermal energy, ambient energy, tide, wave and other ocean energy, hydropower, biomass, landfill gas, sewage treatment plant gas, and biogas;
- (7) 'non-renewable energy sources' means energy sources other than those referred to in point (6);
- (8) 'energy consumption intensity' means the ratio of energy consumption per unit of activity, output or any other metric of the investee company to the total energy consumption of that investee company;

Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds and amending Directives 2008/48/EC and 2014/17/EU and Regulation (EU) No 596/2014 (OJ L 171, 29.6.2016, p. 1).

Regulation (EU) 2018/842 of the European Parliament and of the Council of 30 May 2018 on binding annual greenhouse gas emission reductions by Member States from 2021 to 2030 contributing to climate action to meet commitments under the Paris Agreement and amending Regulation (EU) No 525/2013 (OJ L 156, 19.6.2018, p. 26).

Regulation (EU) 2018/1999 of the European Parliament and of the Council of 11 December 2018 on the Governance of the Energy Union and Climate Action, amending Regulations (EC) No 663/2009 and (EC) No 715/2009 of the European Parliament and of the Council, Directives 94/22/EC, 98/70/EC, 2009/31/EC, 2009/73/EC, 2010/31/EU, 2012/27/EU and 2013/30/EU of the European Parliament and of the Council, Council Directives 2009/119/EC and (EU) 2015/652 and repealing Regulation (EU) No 525/2013 of the European Parliament and of the Council (OJ L 328, 21.12.2018, p. 1).

- (9) 'high impact climate sectors' means the sectors listed in Sections A to H and Section L of Annex I to Regulation (EC) No 1893/2006 of the European Parliament and of the Council<sup>4</sup>;
- (10) 'protected area' means designated areas in the European Environment Agency's Common Database on Designated Areas (CDDA);
- 'area of high biodiversity value outside protected areas' means land with high biodiversity value as referred to in Article 7b(3) of Directive 98/70/EC of the European Parliament and of the Council<sup>5</sup>;
- (12) 'emissions to water' means direct emissions of priority substances as defined in Article 2(30) of Directive 2000/60/EC of the European Parliament and of the Council<sup>6</sup> and direct emissions of nitrates, phosphates and pesticides;
- 'areas of high water stress' means regions where the percentage of total water withdrawn is high (40-80%) or extremely high (greater than 80%) in the World Resources Institute's (WRI) Water Risk Atlas tool "Aqueduct";
- (14) 'hazardous waste and radioactive waste' means hazardous waste and radioactive waste;
- 'hazardous waste' means hazardous waste as defined in Article 3(2) of Directive 2008/98/EC of the European Parliament and of the Council<sup>7</sup>;
- (16) 'radioactive waste' means radioactive waste as defined in Article 3(7) of Council Directive 2011/70/Euratom<sup>8</sup>;
- (17) 'non-recycled waste' means any waste not recycled within the meaning of 'recycling' in Article 3(17) of Directive 2008/98/EC;
- (18) 'activities negatively affecting biodiversity-sensitive areas' means activities that are characterised by all of the following:
- (a) those activities lead to the deterioration of natural habitats and the habitats of species and disturb the species for which a protected area has been designated;
- (b) for those activities, none of the conclusions, mitigation measures or impact assessments adopted pursuant to any of the following Directives or national provisions or international standards that are equivalent to those Directives have been implemented:

Regulation (EC) No 1893/2006 of the European Parliament and of the Council of 20 December 2006 establishing the statistical classification of economic activities NACE Revision 2 and amending Council Regulation (EEC) No 3037/90 as well as certain EC Regulations on specific statistical domains Text with EEA relevance (OJ L 393, 30.12.2006, p. 1–39).

Directive 98/70/EC of the European Parliament and of the Council of 13 October 1998 relating to the quality of petrol and diesel fuels and amending Council Directive 93/12/EEC (OJ L 350, 28.12.1998, p. 58).

Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy (OJ L 327, 22.12.2000, p. 1).

Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives (OJ L 312, 22.11.2008, p. 3).

Council Directive 2011/70/Euratom of 19 July 2011 establishing a Community framework for the responsible and safe management of spent fuel and radioactive waste (OJ L 199, 2.8.2011, p. 48).

- (i) Directive 2009/147/EC of the European Parliament and of the Council<sup>9</sup>;
- (ii) Council Directive 92/43/EEC<sup>10</sup>;
- (iii) an Environmental Impact Assessment (EIA) as defined in Article 1(2), point (g), of Directive 2011/92/EU of the European Parliament and of the Council<sup>11</sup>;
- (iv) for activities located in third countries, conclusions, mitigation measures or impact assessments adopted in accordance with national provisions or international standards that are equivalent to the Directives and impact assessments listed in points (i), (ii) and (iii);
- 'biodiversity-sensitive areas' means Natura 2000 network of protected areas, UNESCO World Heritage sites and Key Biodiversity Areas ('KBAs'), as well as other protected areas, as referred to in Appendix D of Annex II to Commission Delegated Regulation (EU) 2021/2139<sup>12</sup>;
- 'threatened species' means endangered species, including flora and fauna, listed in the European Red List or the IUCN Red List, as referred to in Section 7 of Annex II to Delegated Regulation (EU) 2021/2139;
- (21) 'deforestation' means the temporary or permanent human-induced conversion of forested land to non-forested land;
- (22) 'UN Global Compact principles' means the ten Principles of the United Nations Global Compact;
- 'unadjusted gender pay gap' means the difference between average gross hourly earnings of male paid employees as a percentage of average gross hourly earnings of male paid employees;
- (24) 'board' means the administrative, management or supervisory body of a company;
- 'human rights policy' means a policy commitment approved at board level on human rights that the economic activities of the investee company shall be in line with the UN Guiding Principles on Business and Human Rights;
- (26) 'whistleblower' means 'reporting person' as defined in Article 5(7) of Directive (EU) 2019/1937 of the European Parliament and of the Council<sup>13</sup>;

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Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds (OJ L 20, 26.1.2010, p. 7).

Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (OJ L 206, 22.7.1992, p. 7).

Directive 2011/92/EU of the European Parliament and of the Council of 13 December 2011 on the assessment of the effects of certain public and private projects on the environment (OJ L 026, 28.1.2012, p. 1).

Commission Delegated Regulation (EU) 2021/2139 of 4 June 2021 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to climate change mitigation or climate change adaptation and for determining whether that economic activity causes no significant harm to any of the other environmental objectives (OJ L 442, 9.12.2021, p. 1).

Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law (OJ L305, 26.11.2019, p. 17).

- 'inorganic pollutants' means emissions within or lower than the emission levels associated with the best available techniques (BAT-AEL) as defined in Article 3, point (13) of Directive 2010/75/EU of the European Parliament and of the Council<sup>14</sup>, for the Large Volume Inorganic Chemicals- Solids and Others industry;
- 'air pollutants' means direct emissions of sulphur dioxides (SO<sub>2</sub>), nitrogen oxides (NO<sub>x</sub>), non-methane volatile organic compounds (NMVOC), and fine particulate matter (PM<sub>2,5</sub>) as defined in Article 3, points (5) to (8), of Directive (EU) 2016/2284 of the European Parliament and of the Council<sup>15</sup>, ammonia (NH<sub>3</sub>) as referred to in that Directive and heavy metals (HM) as referred to in Annex I to that Directive;
- (29) 'ozone depletion substances' mean substances listed in the Montreal Protocol on Substances that Deplete the Ozone Layer.

For the purposes of this Annex, the following formulas shall apply:

(1) 'GHG emissions' shall be calculated in accordance with the following formula:

$$\sum_{n}^{i} \left( \frac{current \ value \ of \ investment_{i}}{investee \ company's \ enterprise \ value_{i}} \times investee \ company's \ Scope(x) \ GHG \ emissions_{i} \right)$$

(2) 'carbon footprint' shall be calculated in accordance with the following formula:

$$\frac{\sum_{n}^{i} \left(\frac{current\ value\ of\ investment_{i}}{investee\ company's\ enterprise\ value_{i}} \times investee\ company's\ Scope\ 1, 2\ and\ 3\ GHG\ emissions_{i}\right)}{current\ value\ of\ all\ investments\ (\not\in M)}$$

(3) 'GHG intensity of investee companies' shall be calculated in accordance with the following formula:

$$\sum_{n}^{i} \left( \frac{current \ value \ of \ investment_{i}}{current \ value \ of \ all \ investments} \left( \in M \right) \times \frac{investee \ company's \ Scope \ 1, 2 \ and \ 3 \ GHG \ emissions_{i}}{investee \ company's \ \in M \ revenue_{i}} \right)$$

(4) 'GHG intensity of sovereigns' shall be calculated in accordance with the following formula:

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Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial emissions (integrated pollution prevention and control) (OJ L 334, 17.12.2010, p. 17).

Directive (EU) 2016/2284 of the European Parliament and of the Council of 14 December 2016 on the reduction of national emissions of certain atmospheric pollutants, amending Directive 2003/35/EC and repealing Directive 2001/81/EC (Text with EEA relevance ), *OJ L 344*, *17.12.2016*, *p. 1–31* 

$$\sum_{n}^{i} \left( \frac{current \ value \ of \ investment_{i}}{current \ value \ of \ all \ investments} ( \in \! M ) \right) \times \frac{The \ country's \ Scope \ 1, 2 \ and \ 3 \ GHG \ emissions_{i}}{Gross \ Domestic \ Product_{i}} ( \in \! M )$$

(5) 'inefficient real estate assets' shall be calculated in accordance with the following formula:

((Value of real estate assets built before 31/12/2020 with EPC of C or below) + (Value of real estate assets built after 31/12/2020 with PED below NZEB in Directive 2010/31/EU)) Value of real estate assets required to abide by EPC and NZEB rules

For the purposes of the formulas, the following definitions shall apply:

- (1) 'current value of investment' means the value in EUR of the investment by the financial market participant in the investee company;
- (2) 'enterprise value' means the sum, at fiscal year-end, of the market capitalisation of ordinary shares, the market capitalisation of preferred shares, and the book value of total debt and non-controlling interests, without the deduction of cash or cash equivalents;
- (3) 'current value of all investments' means the value in EUR of all investments by the financial market participant;
- (4) 'nearly zero-energy building (NZEB)', 'primary energy demand (PED)' and 'energy performance certificate (EPC)' shall have the meanings given to them in paragraphs 2, 5 and 12 of Article 2 of Directive 2010/31/EU of the European Parliament and of the Council<sup>16</sup>.

### Table 1

### Statement on principal adverse impacts of investment decisions on sustainability factors

### **Financial market participant** [MERIDIAM]

### Summary

Meridiam considers principal adverse impacts of its investment decisions on sustainability factors. The present statement is the consolidated statement on principal adverse impacts on sustainability factors of *MERIDIAM SAS*.

Directive 2010/31/EU of the European Parliament and of the Council of 19 May 2010 on the energy performance of buildings (recast) (OJ L 153, 18.6.2010, p. 13)

This statement on principal adverse impacts on sustainability factors covers the reference period from 1 January to 31 December 2023.

Principal adverse impacts of investment decisions on sustainability factors have been monitored for the year 2023 for the financial product and cover:

A. All the mandatory indicators for principal adverse impacts on sustainability factors listed in Table 1 of Annex I of the delegated regulation 2022/1288 supplementing SFDR:

- 1. GHG emissions (Scope 1, 2 and 3 Total GHG emissions)
- 2. Carbon footprint
- 3. GHG intensity of investee companies
- 4. Exposure to companies active in the fossil fuel sector
- 5. Share of non-renewable energy consumption and production
- 6. Energy consumption intensity per high impact climate sector
- 7. Activities negatively affecting biodiversity-sensitive areas
- 8. Emissions to water
- 9. Hazardous waste and radioactive waste ratio
- 10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises
- 11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises
- 12. Unadjusted gender pay gap
- 13. Board gender diversity
- 14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)
- B. The following relevant additional indicators listed in Tables 2 of Annex I of the same delegated regulation:
- 7. Investments in companies without water management policies
- C. The following relevant additional indicators listed in Tables 3 of Annex I of the same delegated regulation:
- 3. Number of days lost to injuries, accidents, fatalities, or illness
- 4. Lack of a supplier code of conduct (Tier 1: SPV's first subcontractors and suppliers of materials and services)

As an infrastructure and long-term asset manager, the principal adverse impacts linked to Meridiam's activities pertain directly to the characteristics of the natural and social environment in which the project is implemented, its scale as well as the project end-use. Whether the project is a brownfield or a greenfield also influences the significance of the potential impacts and the necessary mitigation measures.

Typically, Meridiam's activities can be divided into three main categories: sustainable transport, critical public services and innovative-low carbon solutions. These categories tend to have similar and distinct potential impacts that will be managed differently.

Commonly and because of the wide footprint inherent to infrastructure projects in general, there is always a focus on: managing the impacts on biodiversity and the natural habitat as well as the potential social impacts on the communities the infrastructure serves, ensuring sustainable resources' consumption, and avoiding and minimizing any sources of pollution including noise, water and air pollution.

Some examples of distinct features related to specific asset types might include the following:

- transportation assets tend to have a bigger footprint as they extend many kilometers and are more likely to impact natural habitats as they cross a variety of areas to provide critical links. As such there will be an emphasis on ensuring natural habitat connectivity and managing impacts such as noise, water and air pollution;
- Hospitals and schools generally are developed in more urbanized areas with a focus on ensuring resources consumption efficiency and managing waste including hazardous and radioactive waste.

#### Résumé

Meridiam prend en compte les principales incidences négatives de ses décisions d'investissement sur les facteurs de durabilité. La présente déclaration est la déclaration consolidée sur les principales incidences négatives des facteurs de durabilité de MERIDIAM SAS.

Cette déclaration sur les principales incidences négatives des facteurs de durabilité couvre la période de référence du 1er janvier au 31 décembre 2023. Les principaux impacts négatifs des décisions d'investissement sur les facteurs de durabilité ont été suivis pour l'année 2023 pour le produit financier et couvrent :

A. Tous les indicateurs obligatoires relatifs aux principales incidences négatives sur les facteurs de durabilité énumérés dans le tableau 1 de l'annexe I du règlement délégué 2022/1288 complétant la SFDR :

- 1. Émissions de GES (champs d'application 1, 2 et 3 émissions totales de GES)
- 2. Empreinte carbone
- 3. Intensité des GES des entreprises bénéficiaires
- 4. Exposition aux entreprises actives dans le secteur des combustibles fossiles
- 5. Part de la consommation et de la production d'énergie non renouvelable
- 6. Intensité de la consommation d'énergie par secteur à fort impact climatique
- 7. Activités ayant une incidence négative sur les zones sensibles du point de vue de la biodiversité
- 8. Émissions dans l'eau

- 9. Taux de déchets dangereux et de déchets radioactifs
- 10. Violations des principes du Pacte mondial des Nations unies et des principes directeurs de l'Organisation de coopération et de développement économiques (OCDE) à l'intention des entreprises multinationales
- 11. Absence de procédures et de mécanismes de contrôle du respect des principes du Pacte mondial des Nations unies et des principes directeurs de l'OCDE à l'intention des entreprises multinationales
- 12. Écart de rémunération non ajusté entre les hommes et les femmes
- 13. Diversité des sexes au sein du conseil d'administration
- 14. Exposition à des armes controversées (mines antipersonnel, armes à sous-munitions, armes chimiques et biologiques)
- B. Les indicateurs supplémentaires pertinents suivants, énumérés dans les tableaux 2 de l'annexe I du même règlement délégué :
- 7. Investissements dans des entreprises n'ayant pas de politique de gestion de l'eau
- C. Les indicateurs supplémentaires pertinents suivants, énumérés dans les tableaux 3 de l'annexe I du même règlement délégué :
- 3. Nombre de jours perdus en raison de blessures, d'accidents, de décès ou de maladies
- 4. Absence de code de conduite des fournisseurs (niveau 1 : premiers sous-traitants et fournisseurs de matériaux et de services du SPV)

En tant que gestionnaire d'infrastructures et d'actifs à long terme, les principaux impacts négatifs liés aux activités de Meridiam sont directement liés aux caractéristiques de l'environnement naturel et social dans lequel le projet est mis en œuvre, à son échelle ainsi qu'à son utilisation finale. Le fait que le projet soit développé sur une friche industrielle ou un site vierge influe également sur l'importance des incidences potentielles et sur les mesures d'atténuation nécessaires. En règle générale, les activités de Meridiam peuvent être divisées en trois catégories principales : le transport durable, les services publics essentiels et les solutions innovantes à faible émission de carbone. Ces catégories tendent à avoir des impacts potentiels similaires et distincts qui seront gérés différemment.

En général, et en raison de la vaste empreinte inhérente aux projets d'infrastructure, l'accent est toujours mis sur la gestion des impacts sur la biodiversité et l'habitat naturel ainsi que sur les impacts sociaux potentiels sur les communautés desservies par l'infrastructure, sur la garantie d'une consommation durable des ressources et sur l'évitement et la minimisation de toute source de pollution, y compris la pollution sonore, la pollution de l'eau et la pollution de l'air.

Voici quelques exemples de caractéristiques distinctes liées à des types d'actifs spécifiques :

- les infrastructures de transport ont tendance à avoir une plus grande empreinte puisqu'elles s'étendent sur plusieurs kilomètres et sont plus susceptibles d'avoir un impact sur les habitats naturels puisqu'elles traversent une variété de zones pour assurer des liaisons essentielles. Il faudra donc veiller à assurer la connectivité des habitats naturels et à gérer les impacts tels que le bruit, la pollution de l'eau et de l'air ;
- Les hôpitaux et les écoles sont généralement construits dans des zones plus urbanisées, l'accent étant mis sur l'efficacité de la consommation des ressources et la gestion des déchets, y compris les déchets dangereux et radioactifs.

### Description of the principal adverse impacts on sustainability factors

Indicators applicable to investments in investee companies									
Adverse sust	ainability indicator	Metric	Impact [2023]	Impact [2022]	Explanation	Actions taken, and actions planned and targets set for the next reference period			
	CLIMA'  1. GHG emissions	ΓΕ AND OTHER EN		LATED INDICATO	T				
Greenhouse gas emissions	1. OHO chiasions	Scope 1 GHG emissions	1 823 796 t-CO2e	695 048 t-CO2e	The overall carbon footprint of Meridiam	Meridiam set two clear overarching			
		Scope 2 GHG emissions	530 039 t-CO2e	361 515 t-CO2e	increased. Two main factors can	objectives as part of its new			
		Scope 3 GHG emissions	15 871 489 t- CO2e	1 554 400 t-CO2e	explain the variations: i) an increase of the	mission objectives to 2030 at both			
		Total GHG emissions	18 225 324 t- CO2e	2 610 964 t-CO2e	reference base - 21 assets that	governance and asset levels to			
	2. Carbon footprint	Carbon footprint	530 t-CO2 / mn- euros invested	302 t-CO2 / mn- euros invested	have reached financial close were analysed for the first time contributing to	address climate related issues: At governance level, by Q2 2024,			

			overall carbon	commits to
			footprint of	formalize its
			Meridiam. ii) a	overall Climate
			change in	Strategy,
			methodology:	providing
			Between 2022	details on how
			and 2023,	climate-related
			Meridiam	concerns and
			fundamentally	actions are
			changed the	embedded in all
			allocation of its	its activities and
			assets greenhouse	processes as
			gas (GHG)	well as
			emissions to	additional
			Meridiam's	information to
			consolidated	all its
			emissions. In	stakeholders on
			2022, the GHG	our
			emissions	commitments,
			attributed to an	the governance
			asset were	structure
			determined by the	responsible for
			ratio of	the
			Meridiam's	implementation
			financial	of the Climate
			commitment at	Strategy, and
			closing (or	the monitoring,
			equivalent) to the	reporting
			total project cost	processes and
			at closing. 2023	the tools used to
			disclosures were	measure
			prepared using	progress.
			the "enterprise	Aditionally,

			value" and the	Meridiam is
			"current value of	systematically
			investment" in	deploying
			accordance with	decarbonization
			the Sustainable	efforts at asset
			Finance	level. At this
			Disclosure	level and in line
			Regulation	with
			(SFDR). The	Meridiam's
			considerable	NZAMI
			variance between	ambitions, by
			the data for 2022	Q2 2025,
			and 2023	Meridiam
			primarily stems	commits to
			from this	disclose its
			methodological	Decarbonizatio
			transition, which	n Trajectory,
			now incorporates	the result of the
			the fair value of	Meridiam Asset
			the asset, along	Decarbonizatio
			with its debt and	n (MAD)
			cash, rather than	initiative
			solely relying on	launched in
			the initial	November 2023
			investment ratio.	with all its
			Regarding the	assets. This will
			raw underlying	enable
			carbon data, in	Meridiam to
			2023, 17 carbone	disclose its
			footprint were	overall
			updated and 21	decarbonisation
			first analysis were	trajectory to be
L			carried. Among	

			the 17 updated: for 9 assets, the carbon footprint has decreased. Among them: 6 roads, 1 hospital,1 tram network and 1 railway network. This was due in part to a decrease in traffic volumes. For 8 assets, the carbon footprint has increased. Among them: 3 roads, 1 airport, 1 geothermal power plant, 1 freight port, 1 railway network and 1 methanation plant. This was	achieved by 2030.  The above mentioned Meridiam Asset Decarbonizatio n (MAD) initiative, is deployed through 3 phases, namely: (i) each asset first needs to exhaustively analyze its scope 1, 2 and 3 carbon footprint in order to (ii) develop a context-specific and relevant decarbonization plan with
			port, 1 railway network and 1 methanation	develop a context-specific and relevant decarbonization

3. GHG intensity of investee companies	GHG intensity of investee companies	125 419 t-CO2 / mn – euros turnover	1 891 t-CO2 / mn – euros turnover	The above explained methodological adaptation accounts for the vast majority of the GHG intensity of the underlying investee companies' performance evolution.  Beyond this, a part of the underlying change is driven by a number of assets which have started their operations within the course of 2023 and which are now, as a result, generating negligable revenue as they haven't reached their full rampup. These assets therefore appear to be significantly more carbon	solutions to reduce its carbon footprint following best practices and efficient decarbonization drivers such as state of the art energy saving features, integration of on-site power generation, optimization of infrastructures' share of renewable energy in its global energy mix, development of energy management system, etc. The last phase consists of (iii) modelizing these decarbonization plan into a trajectory which will then be
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				intensive then the portfolio average, impacting Meridiam's global performance.	aggregated at Meridiam level. Meridiam mandated an external consultant to deploy the initiative and accompany its assets in the exercise. To date, out of the 99 assets covered by the initiative, 94 already initiated contact with this external consultant of which 24 signed agreements and are starting the process.
4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	0%	0%	Meridiam commits through its exclusion list to not knowingly finance, directly or indirectly projects related to the extraction,	n/a

				processing or production of coal, oil and other fossil fuels nor assets using coal as the main energy source. Meridiam will also not invest in projects that are mainly dedicated to transporting coal or fossil fuels.	
5. Share of non-renewable energy consumption and production	Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage of total energy sources	Consumption 66% Production 8,43%	Consumption: 80%	The variations in terms of share of non-renewable energy in the total energy consumption has been evolving positively. This has been driven mainly by assets that have implemented measures to lower their energy consumption such as installing energy-efficient systems and	Increasing the share of renewable energy consumption in investee companie's total energy consumption is part of Meridiam's mission objectives. When undergoing asset's performance reviews on an

			technologies (LED lighting, intelligent	anual basis, Meridiam and the project
			lighting systems, and energy- efficient HVAC	(asset) will systematically study the
			systems), as well	posibilities for
			as by assets that have also	optimizing the renewable
			integrated renewable energy	energy mix,
			sources in their	depending on the asset's
			energy consumption mix.	reality and context. Taking
			This positive drop has also been	the example of Meridiam
			possible thanks to	Infrastructure
			assets that have optimized their	Africa Funds (MIAF), The
			existing systems and processes.	Bus Rapid Transit is
			Lastly,	exploring the
			the positive change is also due	possibility to connect directly
			to Meridiam's	to a solar plant to have 100%
			strategic investment in	renewable energy in the
			green assets that generate	coming years. Once in
			renewable energy. These assets are	operation,
			integral to the	Kinguele and Biokala will

		energy transition, contributing significantly to the production of clean energy. This shift allows Meridiam to support the broader adoption of renewable energy technologies and reduce reliance on non-renewable sources, thereby playing a crucial role in advancing sustainable	also reach 100% renewable energy consumption. The four scaling solar that are part of the funds are entirely auto- consuming.
		energy practices at Meridiam level.  A vast majority of assets reporting a positive nonrenewable energy production are Waste to Energy Power plants for which the nature of the inputs define their ratio of renwable vs.	

	non-renewable
	energy
	production. For
	instance, Suez
	operates waste-to-
	energy facilities
	where non-
	recyclable waste
	is incinerated to
	produce
	electricity and
	heat. This process
	can involve the
	combustion of
	waste that is not
	considered
	entirely
	renewable.
	Marginally some
	assets have non-
	renewable energy
	sources for auto-
	consumption.
	This may be for
	reasons of
	reliability as a
	result of assets
	being located in
	regions where
	renewable energy
	infrastructure is
	underdeveloped
	or where there is

				a lack of reliable energy supply as well as operational needs.	
6. Energy consumption intensity per high impact climate sector	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector	D: 0,1 GWh / mn – euros H: 0,03 GWh / mn - euros F: 0,02 GWh / mn - euros E: 0,12 GWh / mn - euros	D: 0,84 GWh / mn-euros H: 0,29 GWh / mn-euros F: 0,59 GWh / mn-euros E: 0,12 GWh / mn-euros	The observed discrepancy primarily stems from a modification in the allocation methodology, now in strict adherence to the Sustainable Finance Disclosure Regulation (SFDR). This adjustment covers minor fluctuations in both revenue and energy consumption of the underlying assets. The main underlying reason for energy consumption variations stems from (i) evolutions of	Studying optimization in terms of energy consumption at asset-level is systematically done on a yearly basis when assets' review their performance which is evaluated using Simpl.'s methodology. The tool provided to all assets allow them to identify areas of improvement and build related action plans which will then be monitored by Meridiam and updated on a

					assets' development phases (eg. heavy construction vs. operation), (ii) assets' initiatives to curb the energy consumption through various levers explained in PAI 5.	yearly basis. The target is focused around continuous improvment.
Biodiversity	7. Activities negatively affecting biodiversity-sensitive areas	Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas	8.46%	15%	Meridiam's average global decrease is mostly the result of a significant amount of work undertaken by underlying assets to avoid negatively affecting those biodiversity-sensitive areas. Indeed, in 2022, various mitigation measures were implemented in order to avoid, minimize and compensate said impacts. For	Meridiam's Impact on biodiversity is a main focus when assessing investment's environmental risks and is managed at all investment and asset management stages. Prior to the funds projects' development, all assets, in collaboration with relevant external consultants,

Γ			exemple a	have conducted
			number of assets	the necessary
			translocated	Environmental
			biodiversity-	and Social
			sensitive	Impact
			components to	Assessment
			new areas, other	(ESIA) in line
			modified the	with the local or
			design of the	most stringent
			infrastructure to	performance
			minimize the	standards. This,
			impacts, and	in order to
			others yet built	identify
			specific structures	appropriate
			to avoid the	measures to
			impacts, such as	protect
			viaducts, artificial	biodiversity,
			ponds etc.	species, and
			Specific examples	natural habitats
			include both the	so that they are
			Transgabonaise	integrated into
			and the	projects
			Transgabonais	management
			Railway projects	plans. All
			within Meridiam	underlying
			Infrastructure	assets with
			Africa Fund II -	biodiversity-
			the funds with the	related impacts
			most impact on	have
			biodiversity	implemented
			(82%) - who have	specific
			taken actions to	mitigation
			mitigate their	measures. As an

		impacts and enhance their	example, Kinguele's
		approach on this issue. The former	Biodiversity Action Plan has
		proposed to	considered an
		finance studies	avoided loss
		with local NGOs	rationale to
		to better find	demonstrate the
		solutions for	feasibility of no
		mitigation of	net loss for
		impacts on	natural habitat
		chimpanzee	and net gain for
		(through regional	critical habitat
		plan for great	through both an
		apes) and	'habitat'
		elephants. The	approach, based
		latter has	on habitat
		implemented a	preservation,
		policy to combat	and a species
		trafficking in wild	approach
		and protected	(including anti-
		wildlife as part of	poaching and
		the fight against	plant
		poaching. The	conservation
		objective is to preserve	actions). The Ministry of
		terrestrial wildlife	Environment
		from the impacts	validated the
		of its activities.	SPV's
		or its activities.	compensation
			calculation
			methodology
			and agreed to

			secure a
			1917.5ha area
			with similar
			ecosystem
			located 5km
			away from the
			project site.
			This secured the
			+25% Net Gain
			target required
			by lenders
			under IFC PS6,
			with a 1:8 ratio
			for National
			Habitat
			compensation.
			In accordance
			with the BAP,
			the SPV and the
			EPC contractor
			have undertaken
			the
			translocation of
			critical species
			from
			construction site
			to conservation
			nurseries built
			for the project
			(up to 2,200
			vegetation
			collected).

			Some assets are
			going even
			further in terms
			of mitigatation,
			for instance
			assets in the
			Meridiam
			Infrastructure
			Africa Funds -
			the second
			highest in terms
			of share for this
			indicator are
			planning to
			develop very ambitious
			restoration
			actions that
			goes beyond the
			regulatory
			requirements.
			Madagascar
			airports asset is
			preparing the
			ecological
			restoration of
			30 Ha of
			mangroves and
			70 Ha of
			secondary
			forest. Owendo
			Port is currently

						developping a biodiversity action plan and Kinguele is planning strategic biodiversity knowledge sharing and management enhancement.
Water	8. Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	4,05 tonnes / mn – euros invested	7 tonnes / mn – euros invested	The decrease in tonnes of emissions to water generated at Meridiam level is mostly explained by a wrong interpretation of the perimeter or the definition of emissions to water by assets in 2022. Additionally, MSWWF composed of Suez, is the funds with the highest share. Conscious of its impact on	Most of the assets within the portfolio are not generating emissions to water of nitrates, phosphates, pesticides and other priority substances. Ensuring proper water management is essential to infrastructures' proper operations and is part of the conduct of their

		the water	activities.
		resource, Suez	Meridiam
		innovates to	ensures that
		recover	each asset
		phosphorus from	complies with
		wastewater to both reduce its	relevant local, national and
		emissions to	international
		water and recycle	water quality
		phosphorus that's	regulations and
		becoming scarce	standards and
		with the	are
		Phosphogreen	implementing
		process. With this	the correct
		cutting-edge	mitigation
		technolohy,	strategies in
		Phosphogreen is	place to prevent
		estimated to	and mitigate
		recover 20% of	pollution.
		the current global	
		demand for	
		Phosphorus. Suez	
		also focuses on	
		reducing	
		accidental	
		pollution of water	
		and/or land from	
		overflows and	
		leaks during	
		extreme weather	
		conditions and	
		events.	

II Waste	dioactive ratio  Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average	euros invested	1,12 tonnes / mn – euros invested	Global average hazardous and radioactive waste generation decreased between 2022 and 2023 due to underlying assets' activities' variation (eg. different construction phase).	Ensuring proper waste management is essential to infrastructures' proper operations and is part of the conduct of their activities. Some infrastructure will inherently produce hazardous waste such as lead rechargeable batteries, absorbents and filters with kerosene for exemple. This is the case of airports, hospitals or construction sites for instance. Beyond
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						minimizing the production, sound disposal processes and management is essential.  Assets' comply with regulated disposal requirements and ensure this is done as per the most stringent performance requirements
INDICATORS	S FOR SOCIAL AND EM	PLOYEE, RESPEC	T FOR HUMAN RI MATTERS	GHTS, ANTI-COR	RUPTION AND AN	NTI-BRIBERY
Social and employee matters	10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	0%	2%	Meridiam's assets have developed a comprehensive set of procedures that demonstrates their commitments to not being involved in violations of the UNGC principles	As required by Meridiam's Human Rights policy that has been disclosed in February 2024, each asset must ensure to respect and fulfilled Meridiam's

П			or the OECD	commitments in
			Guidelines for	regards to
			Multinational	_
				human rights,
			Enterprises.	labor rights,
			These set of	environment,
			policies and	anti-corruption
			procedures	etc. Each asset
			typically cover	of the funds will
			topics such as	continue to
			human rights	develop and /or
			issues, labor right	reinforce their
			issues, health &	procedures in
			safety at work,	that regards to
			diversity, equity	guarantee being
			and inclusion,	compliant with
			employment &	the UN Global
			industrial	Compact
			relations,	principles and
			consumer	OECD
			interests, fair	Guidelines for
			competition,	Multinational
			employees' rights	Enterprises.
			at work, taxation,	1
			etc. A vast	
			majority of the	
			underlying assets	
			also implemented	
			a code of conduct	
			that all employees	
			and management	
			must adhere to,	
			reflecting these	
			principles.	
Ш			principies.	

11. Lack of processe complia mechani monitor complia UN Glo Compact principle OECD Guidelin Multina Enterpri	investments in invest	68%	The share of underlying assets' which have implemented policies or code of conduct allowing them to monitor compliance with international guiding principles on human rights positively increased.	As required by Meridiam's Human Rights policy that has been disclosed in February 2024, each asset must ensure to respect and fulfilled Meridiam's commitments in regards to human rights, labor rights, environment, anti-corruption etc. Each asset of the funds will
	OECD Guidelines for Multinational Enterprises			of the funds will continue to develop and /or reinforce their procedures in that regards to guarantee being compliant with the UN Global Compact principles and OECD

					Multinational Enterprises.
12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	8%	2%	The average evolution of the portfolio is driven by three main factors: (i) As market practices evolve, educating the assets on the proper methodology for capturing this data is still ongoing. As a result, some assets were still reporting the gender pay gap last year rather then the unadjusted one. (ii) Some assets have had evolutions in terms of their employees turnover. (iii) Some assets, despite having a balanced gender hiring practice,	As required by Meridiam's Human Rights policy, disclosed in February 2024, each asset must, when relevant and to the best of its ability, implement a gender fair wage policy. Meridiam strongly recommends each asset to install a monitoring system that aims both at rightfully assess the unadjusted pay gap (rather than the adjusted one), and to identify and implement corrective measures.

				still have difficulties to hire women for management positions, which has a negative impact on the average gender pay gap.	Meridiam supports each asset in deploying best practices to align with its performance requirements.
13. Board gender diversity	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members	16%	12%	Global average for this indicator increased slightly illustrating the underlying assets' continuous efforts in promoting women in the board of directors.	Across all projects, Meridiam fostered a stronger involvement in promoting gender diversity, namely by formalizing more internal commitments, in addition to providing more monitoring and auditing mechanisms. One of Meridiam's new Mission Objectives to 2030 addresses

					specifically this KPIs. The target set by 2030 is to reach at least 30% of the share of women in the board of directors of assets (12% in 2022).
14. Exposure to controversial weapons (antipersonnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investments in investee companies involved in the manufacture or selling of controversial weapons	0%	0%	Meridiam commits through its exclusion list to not knowingly finance, directly or indirectly projects related to the manufacture or selling of controversial weapons	Meridiam commits through its exclusion list to not knowingly finance, directly or indirectly projects related to the manufacture or selling of controversial weapons

# Other indicators for principal adverse impacts on sustainability factors

[Information on the principal adverse impacts on sustainability factors referred to in Article 6(1), point (a) in the format in Table 2]

[Information on the principal adverse impacts on sustainability factors referred to in Article 6(1), point (b), in the format in Table 3]

[Information on any other adverse impacts on sustainability factors used to identify and assess additional principal adverse impacts on a sustainability factor referred to in Article 6(1), point (c), in the format in Table 2 or Table 3]

 $\label{eq:Table 2} \mbox{Additional climate and other environment-related indicators}$ 

Indicators applicable to investments in investee companies						
Adverse sustainability indicator	Metric	Impact [2023]	Impact [2022]	Explanation	Actions taken and actions planned and targets set for the next reference period	
	E AND OTHER EN	VIRONMENT-REI	LATED INDICATO	ORS		
Investments in companies without water management policies	Share of investments in investee companies without water management policies	25%	58%	Global average for this indicator increased positively as a result of several assets having implemented a	Ensuring asset's maturity in terms of resources' management is an essential part of	

Γ		at asset level to
		ensure the
		proper
		optimization of
		existing
		systems.
		Developing
		water
		management
		policies is not
		only relevant
		but critical to
		formalize
		efficient
		systems aiming
		at consuming
		water wisely
		on site. As
		such,
		Meridiam will
		work to deploy
		this best
		practice across
		the portfolio
		and make it a
		requirement
		when
		developing
		projects. Sofia
		airport for
		exemple has a
		Water
		Protection
L		Tiotection

and actions planned and targets set for the next reference						Program based on Water Consumption Study with measures identified to reduce water consumptions and ensuring higher efficiency of operations and maintenance of water supply systems.
and actions planned and targets set for the next reference			pect for human right	<u> </u>	•	
	Adverse sustainability indicator	Metric	Impact [2023]	Impact [2022]	Explanation	planned and targets set for the next

2. Number of days lost to work-related injuries, accidents, ill health and fatalities	Number of workdays lost to work-related injuries, accidents, ill health or fatalities of investee companies	8892 days	276 LTIFR	In 2022, following market practice, the data used was the LTIFR (Lost Time Injury Frequency Rate), which was computed the following way: ([Number of lost time injuries in the reporting period] x 1,000,000) / (Total hours worked in the reporting period). In 2023, Meridiam aligned its approach with regulatory recommendations and chose to report on the number of workdays lost to work-related injuries. As such, the comparaison	As an infrastructure developer, health and safety on site is one of Meridiam's top priorities. Although there are no comparability between the last two years for the PAI, one of the fund's social objective is to assess the level of commitment of a given asset towards health and safety, reported through a given asset's accident frequency rate (LTIFR), as

				between these two years is not possible.	set in the fund's SFDR precontractual RTS. As such, Meridiam tracks the yearly evolutions and ensure proper remediation processes are set in place to reinforce health and safety practices when a given asset's performance is below optimal.
3. Lack of a supplier code of conduct	Share of investments in investee companies without any supplier code of conduct (against unsafe working conditions, precarious work, child labour and forced labour)	4%	1%	Global average for this indicator increased negatively as a result of a new developing investments which are not yet up to date with Meridiam's standards.	Meridiam ensures to integrate Human Rights issues in its investment procedures. During the investment process, Meridiam requests its assets, in case

F			f high hymnon
		0.	f high human
		rı	ghts risk
			dentified, to
			onduct a
			edicated due
		d	iligence on
		n	nain partners
			nd their Tier
		1	contractors
		as	s well as to
		re	einforce their
		C	ontractual
		c	lauses
		(i	including
		te	ermination
			lauses for
			uman rights
			efault).
		$\Box$	Ouring
			onstruction
			nd operation,
		N	Meridiam
			nsures that
			ssets develop
		aı	nd implement
		p	olicies and
		n	rocedures
		ir	ncluding a
		SI	upplier code
		0	f conduct that
			romote
			ppropriate
			nanagement
L		11	ianagement

	of human
	rights risks at
	the asset level
	and within the
	supply chain.

### Description of policies to identify and prioritise principal adverse impacts on sustainability factors

As defined in the Principle Adverse Impacts Policy formalized and approved by Meridiam's governing bodies in 2021, the 4-step evaluation of every potential investment opportunity described earlier in this document has been an integral part of Meridiam's investment process. The recent regulation has formalized the disclosure process, but identifying and managing negative impacts through ESG risk evaluation has been part of Meridiam's procedures since inception. These procedures are part of Meridiam's ISO 9001 system and their implementation are overseen by the ESG and compliance team as well as the Executive committee, the Management review committee and the Investment committee as defined within Meridiam's ISO book of procedures. Meridiam uses specific ESG indicators in the detailed evaluation of potential investments and several of these indicators are directly related to the sustainability of the asset as indicated in the tables below. For example, the impact on the physical environment (air quality, noise, water quality, soil, etc.), the impact on the fauna and flora, the sustainable use of resources or the vulnerability to climate change and climate-related physical risks. It would be challenging to list all the potential PAI and associated management measures for all types of asset classes Meridiam invests in, but the table below provided a sample of PAI-related issues for some of our asset classes. As showed in the table, specific environmental and social management plans (ESMPs) are developed to address the PAIs, each containing a detailed description of the adverse impacts it addresses, the measures implemented to limit and/or compensate the impacts, the implementation schedule and responsibility matrix, and the monitoring plan.

Asset class	Examples of PAI Risks related to sustainability	Examples of Environmental and Social Management Plans (ESMPs)
Roads	Air quality, Dust, Noise, Waste, Water quality, Soil contami- nation, Slope stabilisation, Biodiversity, Resettlement	Water quality and wastewater MP, Air emission, noise and dust MP, Biodiversity Action Plan, Resettlement Action Plan
Airports	Noise, Air emissions, GHG, Bird hazards, Soil contamination, Hazardous waste	Water quality and wastewater MP, Air emission, noise and dust MP, GHG emissions reduction plan, Waste MP, Bird hazards MP
Urban mobility	Disposal of batteries, noise and dust during construction and operation	Air emission, noise and dust MP, Waste and hazardous waste MP
Port	Coastal erosion, Waste and hazardous waste, Water quality, Biodiversity	Erosion control and restoration plan, Biodiversity Action Plan, Waste and hazardous waste MP, Wastewater and surface water MP
Railways	Noise and vibrations, Encroachment in natural habitats, Land acquisition and expropriation, Hazardous waste, Water quality	Noise and vibration MP, Biodiversity Action Plan, Land acquisition and resettlement Action Plan, Hazardous waste MP, Water and wastewater MP
Student accommodation	Disturbances linked to noise and traffic in the vicinity of buildings, Energy and water consumptions	Air emission noise and dust MP, Energy efficiency and consumption MP, Wate consumption reduction plan
Hospitals	Biomedical and hazardous waste, Noise and disturbance due to ambulances and traffic increase	Air emission, noise and dust MP, Biomedical and hazardous waste MP Traffic MP
Data center	Energy consumption, Heat waste and water consumption (for cooling), E-waste, Noise	Energy MP, Water consumption MP, Noise MP, Waste and e-waste MP

Hydropower plant	Impact of the reservoir on aquatic biodiversity, Encroachment in natural habitats, Riverine erosion, GHG emissions from and mercury bioaccumulation in the reservoir, Land acquisition and resettlement, Water quantity and quality	Biodiversity Action Plan, Soil stability and erosion MP, GHG emissions mana- gement and monitoring plan, Mercury monitoring and MP, Land acquisition and resettlement Action Plan, Water MP including climate modelling
Solar power plant	Visual impact, Land acquisition and resettlement, Encroachment in natural habitats, Panels disposal	Hazardous waste MP, Land acquisition and resettlement Action Plan, Biodiversity Actiion Plan, Visual integration plan
Waste to energy	Air and odour emissions, Traffic increase due to waste transport, Water and wastewater	Air emission, noise and dust MP, Traffic MP, Water consumption and wastewater MP

All these PAIs are evaluated regarding their level of risk and project-specific measures are taken to address them. Meridiam's approach towards these PAI is to avoid, reduce, and compensate PAI.

Here are some exa	mples:	
Avoid	Light Rail Transit in Florence, Italy	The project was redesigned when archaeological works unearthed cultural artefacts on the site of the original tramway line.
Minimize	Kinguélé Aval Hydropower Plant, Gabon	The initial design was double the actual size in height, energy capacity (MW), height of the dam and surface of retention basin. This meant the basin would have covered the outskirts of a national park. As such, the conception of the project was revised and the project halved in height, energy capacity and retention basin to avoid undue potential negative impacts on natural habitats.
Compensate	A5 Ostregion, Austria	The project company protected or restored 267 hectares of green areas that are now under its management. This represents a compensation of 168% of habitat areas that were considered destroyed during the construction of the highway.

To develop a better understanding of projects and inform the sustainability related risk assessments, teams carry out site visits, conduct meetings and discussions with other stakeholders, take into consideration the site history, and develop a list of action items. These additional steps strengthen and confirm the selection, identification and evaluation of the PAIs, considering their probability of occurrence, severity and potentially irremediable nature. As explained above, it results in dedicated measures that are compiled in specific environmental and social management plans that detail how each PAI related to ESG and/or sustainability is managed, when, and by whom. This allows Meridiam and other shareholders of the project company to track the implementation of each ESG/sustainability measure during the various phases of the project, from construction to operation. Each dedicated study is undertaken by highly specialized engineering consultants going on the terrain to gather appropriate data and using state-of-the-art tools to assess potential impacts, as such, the margin of error is very limited.

Once in portfolio, Meridiam monitors assets' PAIs through i) a reporting platform called Simpl. ® which gathers operational data at asset level on a yearly basis, and ii) through the carbon assessment of each asset in portfolio evaluated by an external consultant Carbone 4 following the Principles of the GHG Protocol.

## **Engagement policies**

[Information referred to in Article 8]

To follow-up and update our ESG and sustainability strategy, Meridiam has developed an active, hands-on asset management approach, ensuring an intimate proximity between Meridiam and its assets. Within all project companies, Meridiam will always be an active shareholder, playing a strong monitoring role on how the project is delivered and managed. This helps ensure its investments are managed transparently, especially for ESG and sustainability factors. Specifically, as a member of the project company's board, Meridiam personnel typically have veto rights on in most key decisions of the project company, and Meridiam also focuses carefully on governance and management issues within the project company board. As such, Meridiam ensures that, along with its partners, the project is designed and implemented considering all ESG and sustainability impacts, including all the PAIs Meridiam monitors. Meridiam also ensures that each project company has its own environmental and social management plan in place and is responsible for implementing it within its activities. A constructive dialogue with each project company is maintained throughout the construction and operation phases, allowing a close monitoring of the implementation of the environmental and social strategies and measures.

More specifically, Meridiam uses Simpl. ® to monitor each asset in portfolio on a yearly basis. It tracks and monitors the impact of a project using Meridiam's unique assessment framework against Environment, Social and Governance targets and the UN-SDGs.

Simpl. ® is designed to focus on the pre-assessed core and direct impacts of Meridiam's sectors of activities and uses data and KPIs available at the portfolio company level through an in-depth survey of over 200 indicators per asset class with a data visualization tool to rigorously monitor ESG criteria and identify each investments' relevant contribution to the SDGs. The tool also has a PAI module whereby Principal adverse impacts of investment decisions on sustainability factors are systematically monitored for each asset and cover:

- All the mandatory indicators for principal adverse impacts on sustainability factors listed in Table 1 of Annex I of the delegated regulation UE 2022/1288 supplementing SFDR
- The following relevant additional indicators listed in Tables 2 and 3 of Annex I of the same delegated regulation:
  - Investments in companies without water management policies
  - Number of days lost to injuries, accidents, fatalities, or illness
  - Lack of a supplier code of conduct (Tier 1: Project Company's first subcontractors and suppliers of materials and services).

The objective is to monitor these indicators throughout the life cycle of a given asset and to ensure its continuous improvement by setting up improvement plans developed in collaboration with the portfolio company and approved by its board. Similarly, if there are no reduction of the principal adverse impacts over more than one period reported on, when deemed relevant or when the performance isn't already optimal, Meridiam will integrate these as KPIs in the amelioration plans' framework and study with the asset existing levers to improve their performance and reduce these negative impacts.

The formalization of ESG demands towards our partners is a requirement of our procedures and commitments associated to environmental and social reporting. As such, Meridiam's approach to ESG management and SDG value creation is systematically incorporated within every project management strategy as agreed upon by a project company/consortium. Meridiam establishes collaborative agreements with its partners on the ESG measures to be implemented throughout the projects' construction and development phases as well as the monitoring and sustainability-related improvement plans inherent to Meridiam's management

processes. These agreements are formalized in the shareholder's agreement of each project and include specific performance and reporting requirements towards each project company.

#### References to international standards

[Information referred to in Article 9]

Meridiam is committed to respect fundamental social rights in alignment with OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation (ILO) on Fundamental Principles and Rights at Work and the International Bill of Human Rights. This commitment is demonstrated throughout the Business Approach:

- **During the investment process**: Meridiam ensures that its partners respect social standards in their HR policies and factor these risks when selecting main suppliers and subcontractors.
- **During the asset management process**: As a shareholder, Meridiam ensures that social standards are effectively applied by the main contractors and their subcontractors:
  - respect trade union rights and the promotion of a social dialogue;
  - prevent all types of discrimination and promotion of equal opportunities;
  - prevent the use of child labour or of any type of illegal labour;
  - implement acceptable working conditions: remuneration, social security, prevention of violence at work, termination provisions (local workforce);
  - promote the health and safety in the workplace including the prevention of occupational accidents and diseases;
  - apply the indicators of the UN-SDG tool to measure the involvement level of suppliers and subcontractors on health and safety and child labour monitoring, prevention, and mitigation.

Moreover, indicators for principal adverse impacts on sustainability factors are monitored at asset level. Namely:

• Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises;

• Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises.

Since 2019, Meridiam as a Net Zero Asset Manager Initiative signatory, has also set the objective to align all its portfolios with the goals of the Paris Agreement. To achieve this, Meridiam partnered with Carbone 4\* to develop a tailored Climate Impact Analytics for Real Assets' (CIARA) methodology in order to assess its portfolio's alignment with a 2-degree trajectory as well as their carbon footprint. Meridiam uses this methodology to report on all GHG-related PAIs (PAI to 3).

The carbon footprint analysis does not make use of scenarios. Calculations are based on assets' physical characteristics (kWh, m2, traffic etc.). Emission factors are taken from reference databases, such as ADEME, Ecoinvent, IEA depending on the asset's geography and characteristics. This means the methodology rely on "activity-based" and not 'financial-based' data, from this, good quality can be inferred from the models' results. This allows for an effective identification of emission reduction levers. Data score PCAF 1-2 on scopes 1-2 and score PCAF 2-3 on scope 3, so data quality is correct to date.

The 2°C assessment methodology uses one scenario based on the IEA's 2°C scenario (2DS) to 2060 developed within the IEA's Energy Technology Perspectives 2017 and modulated to reduce the IEA's energy efficiency ambition and increase that of sobriety (IEA's technological assumptions revised downwards).

### **Historical comparison**

[Information referred to in Article 10]

A historical comparision of all Principal Adverse Impact indicators can be found in the reporting section **Description of the principal adverse impacts on sustainability factors.**