

Sustainability & Responsible Investment Policy



Rijnstraat 8, the Hague, the Netherlands

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1.0 Introduction

1.1 About Invesis

Invesis transforms lives through sustainable infrastructure. We are a global investor and developer in infrastructure assets that create a lasting legacy for future generations. Our experts manage all aspects of an investment from development and financing to design, construction, maintenance, operations through to hand back.

We work with public sector partners and clients to deliver essential social and civil infrastructure, from roads, railways, tunnels and bridges, to hospitals, schools, courts, correctional facilities and government buildings.

1.2 Our values

Our values are the foundation of everything we do. They guide how we work with our clients, partners, and communities, and shape the decisions we make across every investment and partnership.



We believe in **Long-Term Collaboration** and building trusted partnerships. We act with **Integrity**, holding ourselves accountable to the highest ethical standards. Our **Drive for Excellence** motivates us to deliver exceptional results throughout the investment lifecycle. We lead with **Respect and Responsibility**, ensuring fairness, care, and sustainability are at the heart of our work.

Together, these values define who we are and how we help build a better future.

1.3 Purpose and scope

The purpose of this policy is to demonstrate how Environmental Social and Governance (ESG) principles and practises are integrated into our business strategy and how they are an integral part of our responsible investment approach throughout the entire investment lifecycle, starting from when we identify potential investment opportunities all the way through to the delivery phase of the assets. We also recognise that responsible investment is not only the right thing to do but can help manage risks and create value.

This Invesis Group BV policy applies to all Invesis employees, business units and entities and to our investment activities throughout the investment lifecycle. We also expect our partners and suppliers to uphold the same standards and commitments.

2.0 Our commitment to sustainability

2.1 Commitment to sustainability

We are committed to operating as a responsible business and to supporting the transitions that are necessary to limit climate change impacts, use resources efficiently and limit degradation of and where possible enhance biodiversity. We are also committed to creating a positive social impact through our investments and to avoiding negative impacts in our value chain. We view sustainability as a driver for creating long term value for our stakeholders (our shareholder, clients, end users of assets and the communities they serve) and the long term success of our business. Integrating sustainability factors throughout the investment lifecycle is therefore critical. Sustainability factors include environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters and data security and privacy matters.

Invesis will reduce the negative environmental and social impacts of our business activities and maximise the positive impacts which our investments have on the environment and society.

Our core principles for sustainability are:




- We invest in infrastructure that promotes positive environmental and social outcomes.
- We integrate material sustainability factors throughout the investment lifecycle.
- We promote good governance practices across the business and within our investments.
- We are transparent, about how we do business, and strive to communicate regularly with stakeholders about our performance, our Sustainability strategy and our progress.

2.2 UN Sustainable Development Goals




We are committed to ensuring that material sustainability factors are assessed for all investments and that focus is given to each of our strategic themes as part of the investment lifecycle. The UN Sustainable Development Goals (“SDGs”) help to guide our approach to ensuring we and our investments have a positive impact on society and the environment. We have identified 7 priority SDGs where we believe we can have an impact through our investments and the way we operate as a business. We recognise as an individual organisation that our impact is limited, but we can contribute to the aims of the SDGs and in some cases, specific targets.

We have summarised this below.

We aim to measure our alignment and impact and report on this through our corporate disclosures.

SDG	Contributing to specific targets	Invesis’ investment alignment
 <p>3 GOOD HEALTH AND WELL-BEING</p>	<p>Target 3.c Substantially increase health financing.</p>	<p>Investing in developing, operating and upgrading high quality sustainable public health care facilities for use by the communities they are located in.</p> <p>Promoting high levels of health, safety and wellbeing for our own employees, our partners and the end users of our assets.</p>
 <p>4 QUALITY EDUCATION</p>	<p>Target 4 Build and upgrade education facilities that are inclusive and effective learning environments for all.</p>	<p>Investing in developing, operating and upgrading high quality, sustainable education facilities which provide pupils with access to effective learning environments.</p>
 <p>7 AFFORDABLE AND CLEAN ENERGY</p>	<p>Target 7.2 Increase share of renewable energy.</p> <p>Target 7.3 Double rate of improvement in energy efficiency.</p>	<p>Investing in developing and operating assets which incorporate on site renewable energy generation, retrofitting renewable generation to existing sites and helping to grow the market for renewable energy through influencing procurement decisions at asset level.</p> <p>Promoting energy efficiency as a core aspect of the design of new infrastructure and investing in the reduction of energy intensity for existing assets.</p>

UN Sustainable Development Goals continued

SDG	Contributing to specific targets	Invesis' investment alignment
9 INDUSTRY, INNOVATION AND INFRASTRUCTURE 	Target 9.1 & 9.4 Develop quality, reliable, sustainable and resilient infrastructure.	Investing in developing and operating new roads and tunnels. Working with clients to upgrade existing infrastructure assets with increased resource-use efficiency and greater adoption of clean technologies, creating sustainable and better connected communities.
11 SUSTAINABLE CITIES AND COMMUNITIES 	Target 11.1 Access to adequate, safe and affordable housing. Target 11.2 Provide access to sustainable transport systems.	Investing in social housing to provide affordable, efficient and sustainable homes to communities. Investing in urban and intercity rail transportation to provide efficient and sustainable transport options to the public and to business, contributing to economic growth and reducing emissions.
16 PEACE, JUSTICE AND STRONG INSTITUTIONS 	Target 16.3 Promote the rule of law and ensure access to justice.	Investing in developing and operating high quality modern and sustainable correctional facilities, police stations and courts which contribute to a safer society and promote the rule of law. Investing in developing and operating sustainable public administration facilities for use by local and national governments.

2.3 Sustainability knowledge sharing and capacity building

At Invesis, we facilitate knowledge sharing on sustainability across the business and with the teams managing our portfolio companies. Sustainability updates and knowledge sharing form part of our Management Board meetings and Origination and Delivery team meetings. Subject specific and cross company working groups are established to review our approach and/or develop improvement proposals on key topics as the need arises.

Sustainability related training is delivered when needed, both in house and via expert third parties and is considered as part of employees personal and professional development plans. We also encourage and enable our teams to learn from each other's best practices and drive continuous improvement in sustainability performance for our portfolio of assets.

2.4 Risk Management

Risk Management is integrated into the way we do business. We identify, quantify and define action plans to mitigate the negative impact of sustainability risks, and to support the achievement of our business goals, creating and protecting long term value for our stakeholders. Invesis considers sustainability risks alongside traditional financial metrics when evaluating potential investments (as outlined in section 4 below). These risks are financially important and we assess how they might significantly affect our investment decisions. To strengthen this process, the business performed a double materiality assessment, considering both financial risks to the company and risks to environment and society. The outcomes have informed our approach and are reviewed annually.

We assess the climate related physical risks of all current investments, taking into account different climate change scenarios and time frames. Working with industry leader Munich RE, we aim to evaluate each investment (including multiple physical locations where an investment is made up of several physical assets).

3.0 Our key sustainability themes

Our sustainability strategy focuses on five key themes which address the most material sustainability factors for our business.



Climate and Environment



People



Health and Safety



Communities



Governance

Below we outline the policies and commitments under each key theme of our strategy, detailing the factors we deem most material to our business and stakeholders. We will further develop our commitments and targets and update our stakeholders via this policy and corporate disclosures and communications.



3.1 Climate and Environment

Invesis is committed to doing our part in combating climate change and in protecting the environment. We recognise that climate change can impact our business and that the development and operation of infrastructure assets can have a negative impact on the environment and communities around our investments. Our goal is to have a positive environmental impact across all our operations and our portfolio.

We work with our investment partners, clients and subcontractors to minimise the impact from the development of new assets and to improve the performance of existing infrastructure and buildings. **Where we have influence, we aim to:**

- decarbonise our activities and portfolio in line with the commitments made by the Paris Agreement, to achieve net zero emissions by 2050;
- ensure our portfolio companies and subcontractors operate to high standards of environmental management, including as a priority minimising pollution (to air, ground and water) and ensuring safe handling of any hazardous substances.
- improve energy efficiency and reduce energy use intensity (EUI) across our portfolio where we are responsible for energy using systems and engaging with end users and partners to reduce their use of energy;
- increase on-site renewable energy generation to reduce carbon emissions and provide energy security for assets and end users;
- where we control the supply of energy from a grid for end users, source energy from 100% renewable sources and where we do not control supplies, influence them to switch to renewable supplies;
- eliminate avoidable waste during the development, refurbishment and management of our assets, and achieve the highest possible rates of reuse, recycling and diversion from landfill for any waste created;
- minimise the use of resources, including virgin materials where possible and have a preference for products from certified responsible sources;
- minimise the use of water where possible;
- reduce embodied carbon (from materials and construction) impacts over the lifecycle of assets, through considered design, efficient construction and by employing circular economy principles;
- mitigate negative impacts on biodiversity from the development of new assets, ideally creating a net positive biodiversity impact and enhance biodiversity at and around existing assets in our portfolio.



3.2 People

Our people are our greatest asset as a business and we aim to create a working environment that supports them to deliver their best.

We recognise the importance of the welfare, wellbeing and development of our employees who are critical to the success of our business. Their experience and contribution to the business is essential to the delivery of our business strategy and sustainability commitments. **We aim to attract, develop and retain talent and are committed to:**

- clear and open communication and engagement;
- promoting our values and a shared set of behaviours;
- supporting equality and increasing diversity to bring a greater range of skills and perspectives to the organisation and the work it does;
- providing an inclusive work environment where everyone feels valued, respected, and permitted to contribute their talents and perspectives;
- ensuring a good pipeline of talent by supporting employees to engage in continued personal and professional development, supporting them to gain new qualifications and offering training;
- developing our performance management systems to improve over time;
- offering valuable and fair benefits, rewards and incentives to reward and encourage the highest levels of performance and ensure high levels of wellbeing.

We also recognise the significant role our employees play in creating positive social value. We actively encourage and support employee-led initiatives that contribute to the well-being of our local communities. This translates into a diverse range of volunteer activities, from lending a hand at local schools and farms to participating in cultural events. These actions not only strengthen our connection to the communities we operate within but also inspire our employees to make a meaningful difference.



3.3 Health and Safety

3.3.1 Health, Safety and Wellbeing at Invesis

The safety and wellbeing of our staff and visitors is of paramount importance to the company and we want to ensure our culture and our actions set a high standard of HS&W across our business.

Invesis has a Health and Safety Policy Statement which is implemented across our business. The CEO is ultimately accountable for the health, safety and wellbeing of employees, and a dedicated Business Partner – Health and Safety is responsible for implementing, monitoring and reporting on Health and Safety best practises. Invesis is ISO-45001 certified and annually audited by external auditors. We track all corporate and safety matters and incidents. We act as required to ensure a safe working environment for our employees.

Everyone at Invesis has a responsibility for helping to create a healthy and safe working environment. Employees are expected to take ownership of their safety and are encouraged and empowered to report any concerns.

3.3.2 Health and Safety at Investment Level

At investment level, the focus on health and safety extends to the communities and environments that may be affected by our investment activities. We track all investment level health and safety matters and incidents as well as site inspections via our own application which enables staff to report on incidents and also record inspections carried out.

We work with our partners, subcontractors and the end users of assets to improve performance and take action as required to ensure a safe working environment is realised for all, including the communities we serve. By prioritizing health and safety at investment level, our portfolio companies not only enhance their own resilience and performance but also contribute to the overall wellbeing of the communities we serve, reinforcing our commitment to responsible and sustainable investment.



3.4 Communities

Invesis aims to create a lasting positive social impact for communities by investing in and operating essential infrastructure which enhances peoples' lives. We strive to improve the social impact of the investments and assets we manage by promoting health, safety and wellbeing and identifying opportunities for community engagement.

3.4.1 Communities we invest in

Invesis invests in infrastructure assets which deliver positive social impacts to both the many people using them and the communities that surround them. We recognise the interrelation between our investments, the end users of the assets we manage and the communities in which they are based. **Therefore we aim to:**

- support socially impactful initiatives directly related to the use of the assets in our portfolio;
- ensure we and our subcontractors develop and maintain positive relationships with local communities, including residents, occupiers and adjoining businesses and to consult with our communities where appropriate;
- maintain or enhance biodiversity in or around assets, and contribute to local air quality improvement for the health and wellbeing of end users and communities;
- support charities and not-for profit groups in the communities in which we invest;
- encourage our supply chain and partners to support the local economy by offering employment and training opportunities to local people and to source locally; and
- encourage consultants and contractors to have a positive social impact through delivery of their services.

3.4.2 Human rights and modern slavery

We believe strong human rights practices are not just ethical, but essential for a stable investment environment. We understand that potential risks related to human rights and modern slavery exist in the geographies we invest in and the supply chains related to our investments. We strive to ensure the highest ethical standards are upheld by our portfolio companies and that our partners and suppliers are aware of and able to deal with any risks related to human rights and modern slavery. We promote open communication and transparency and actively engage with our p portfolio companies, encouraging them to implement strong human rights policies and effective robust systems and controls to prevent any occurrence of modern slavery within our operations or supply chains. We assess potential human rights risks during investment due diligence and continuously improve our practices to stay ahead of evolving challenges.

4.0 Our Responsible Investment Approach

At Invesis, we recognise that integrating sustainability factors across the entire lifecycle of our investments creates long term value and is essential to mitigate risks and realise opportunities. This includes considering sustainability when shaping our strategy, developing our approach to risk management, when identifying potential investment opportunities, during due diligence and post investment during the delivery phase of assets.

Our responsible investment approach is guided by our purpose to invest in and develop sustainable infrastructure which has a positive impact on society, and in doing so generate long term value for our shareholder.

As an infrastructure investor, we work with public sector clients to deliver their infrastructure needs. This can limit our ability to influence all aspects of a new investment. In these cases, we seek to use our expertise and influence to enhance an investment's ultimate sustainability performance. We also seek to influence at the policy and industry level to promote more sustainable approaches to infrastructure development.

4.1 Identification of investment opportunity

ESG considerations are integrated into the initial risk review and due diligence we undertake when pre-selecting a potential investment and then making a case to further pursue it. We use both positive and negative screening to inform our initial decision to pursue an investment, taking into account and evaluating material sustainability factors.

4.1.1 Negative screening and exclusions

As a first step in considering any potential investment opportunity, we carry out screening against exclusion criteria. This aligns with our shareholders exclusion list and is subject to periodic review. Where investments may involve activities related to exclusions, we seek to mitigate these. Therefore there is an element of judgement taken by our Management Board, Investment Committee and shareholder.

Exclusions and negative screening are based on the following:

Environmental grounds:

- Exploration, mining, extraction, refining or (specific) distribution of coal and lignite;
- Exploration, mining, extraction, refining or (specific) distribution of oil or other forms of liquid fossil fuels;
- Exploration, extraction or trade of gas or any form of gaseous fossil fuels; and
- Unmitigated destruction of critical habitats or significant loss of biodiversity.

Governance grounds:

- Key stakeholder involvement in money-laundering, fraud or other financial crimes; and
- Key stakeholder involvement in corruption and bribery or financing crime or terrorism.

Social grounds:

- Manufacture or trade of arms or controversial weapons (not excluding the provision of accommodation facilities for defence forces);
- Breach of international standards for human rights (as defined by the UN Global Compact);
- Unmitigated forced resettlement.
- Modern slavery and forced labour.
- Pornography and adult entertainment.
- Tobacco production or distribution; and
- Facilitation of gambling.

4.1.2 Positive screening

In addition to negative screening and exclusions, we consider the positive impact that investments will have. We use the 7 UN SDGs we have identified to assess opportunities, ensuring that they align with or can directly contribute to at least one goal. In many cases, individual investment opportunities will align with multiple goals and targets, for example through developing new education facilities that are resilient to climate change and contribute to renewable energy generation and enhanced energy efficiency.

4.2 Investment pre-selection – Gate 1 Investment Approval

We consider sustainability factors during the origination phase of our investments. Our risk and opportunities (R&O) assessment process includes an initial assessment of the potential material sustainability risks and opportunities. Teams use their judgement to assess R&Os but guidance is provided to them to identify relevant issues for different asset types. Examples of the issues to be considered are provided below.

Our origination team consider the significance of R&Os related to an investment opportunity, and must demonstrate in their investment proposals that these can be effectively managed / realised or how measures could be implemented to mitigate risks going forward. All findings are document in a R&O register for the investment opportunity.

At this stage we seek to identify partners to deliver investments with. We use World Check (a public screening and information platform) to ensure we only work with partners who operate to high and ethical standards. We also inform partners of our sustainability commitments and expect them to share these or we aim to influence them to align in time.

Examples of sustainability factors considered



Climate and Environment R&Os

- Greenhouse gas emissions (from the construction or operation of assets).
- Decarbonisation / Preparedness for net zero by 2050.
- Impacts on biodiversity and ecosystems.
- Resource consumption and efficiency.
- Generation of renewable energy and improved energy efficiency.
- Physical climate risks.



Social R&Os

- Negative impacts from construction or operations on communities.
- Health and Safety.
- Ethical supply chains.
- Corruption.
- Positive impacts on communities from education, job creation and economic growth.



Governance R&Os:

- Compliance with laws and regulations.
- Data security and privacy.
- Ethical performance of potential partners (World/Partner check).
- Compliance with Invesis Code of Conduct.
- Reputational impacts.

4.3 Due Diligence

Once the initial investment proposal, including a risk assessment has been presented to the Management Board and Investment Committee, a decision to pursue is made. Further due diligence is undertaken and expert third parties may be commissioned to perform additional in-depth analysis.

Due diligence includes financial, commercial, technical and insurance related issues in addition to sustainability. The sustainability R&Os identified through the Gate 1 process are reviewed in more detail where needed and plans are further developed to address these. The R&O register is updated to reflect any changes.

Working with our in-house sustainability experts, the origination team will also undertake a physical climate-related risk analysis to identify any potential risks and opportunities of an investment over time and considering different climate change scenarios. Any identified risks (which have not already been mitigated or taken into account) can then be addressed by incorporating mitigation or adaptation measures in proposals to clients.

4.4 Management Board Approval and Investment Committee – Gate 2 Investment Approval

Sustainability due diligence findings and mitigation plans to be implemented post-investment approval are documented in our Gate 2 investment proposal which is submitted to the Management Board and Investment Committee for approval. The R&O assessment will be updated where relevant and any targets or plans that are proposed for investments to mitigate risks or realise opportunities identified in the previous stages will be presented. For example to minimise greenhouse gas emissions, there may be a target for no new fossil fuels to be designed into an asset and for incorporation of on-site renewable energy generation. Where biodiversity may be at risk, a plan may be proposed to both mitigate the impact and enhance biodiversity in other areas.

The Management Board specifically signs off on investment proposals, which all include sustainability elements.

While it is unlikely following the previous stages of due diligence, if there is no acceptable way to address and mitigate existing sustainability risks, the investment would not be aligned with Invesis purpose and values. The Management Board and Investment Committee may therefore make a decision to walk away from the investment.

4.5 Financial Close – Gate 3 Investment Approval

After submission of a bid and a decision by a public sector authority to award preferred bidder status to a bidding consortium, the origination team works with our delivery teams towards financial close. During this stage permits may need to be obtained and a funding competition may be required to select debt funders for the investment.

A final review of proposed sustainability plans and targets is undertaken with investment partners, clients and funders. This will include confirmation that there have been no material changes to the Gate 2 proposals and plans. In the unlikely event that there has been a material change, an explanation must be provided and a request made for re-approval.

As part of the transition from origination to delivery, plans are developed including draft sustainability plans (e.g. targets, requirements, standards to be met). This will set out relevant mitigants to risks and outline monitoring and reporting requirements over the life of the investment (through construction and operation). This will set out the minimum sustainability requirements agreed with all parties and the plans to deliver on these.

4.6 Stewardship and Engagement

Inveis seeks to actively engage with stakeholders to improve sustainability performance of our portfolio of investments and the wider infrastructure sector.

For the majority of investments in our portfolio, we hold at least one seat on the board of portfolio companies and can therefore directly influence and engage to some degree, although we have more influence when we are a majority or sole shareholder. In such cases, we have direct oversight of how investments are operated in line with the public sector client's requirements. Where we are a minority shareholder or provide management services for other investors, we seek to influence improvements in sustainability performance where ever possible.

Either directly or via our shareholder, we engage with relevant standards, ratings and benchmarking bodies (such as GRESB) to share experiences and provide feedback to inform improvements that could be made.

We view collaboration as a key aspect of stewardship, where we work with internal stakeholders, public sector clients and subcontractors to improve sustainability performance of investments and engage with peers or industry bodies to share experiences which help to improve practices more broadly.

4.7 ESG monitoring and reporting

Inveis recognises the importance of continuous monitoring and transparent reporting of our ESG performance. We are committed to improving the measurement of ESG impacts and performance over time and to implementing appropriate tools to collect and manage ESG data for our own operations and our portfolio.

We set key performance indicators (KPIs) at the corporate level, including for environmental performance and health and safety.

At the investment level, our portfolio companies submit regular reports that include dedicated sustainability performance updates for both internal and external stakeholders.

Inveis produces an annual sustainability report, detailing the progress we are making and is committed to evolving and improving our reporting over time and aligning with relevant frameworks and standards. We also take part in GRESB Infrastructure Benchmark and aim to improve performance over time.



► **Egied van Broeckhoven School**
Molenbeek-Saint-Jean, Belgium

A sustainable design with homage to the former Vandeneuvel brewery, thereby revitalising the social fabric of the surrounding area. Facilitating over 860 students.

5.0 Governance



5.1 Invesis corporate governance – Board composition and transparency

We are committed to implementing a strong corporate governance and risk management culture. Our Management Board, accountable to our Shareholder, comprises the CEO, CIO (Chief Investment Officer), and COO (Chief Operating Officer) and is responsible for the overall governance of Invesis, including approving Invesis strategy, monitoring its implementation and providing oversight and counsel to the management teams in our business units. The COO is ultimately accountable for sustainability, the implementation of initiatives and for reporting performance against relevant sustainability KPIs and ensures this Policy is implemented and staff members take ownership and adhere to it. Invesis management teams are responsible for developing and implementing Invesis strategy and for day to day management of the company.

Every monthly Management Board meeting includes dedicated agenda items for sustainability.

Meetings with Invesis’ Shareholder take place quarterly. A quarterly management report including a sustainability section is submitted for review and relevant issues related to performance, risks and opportunities are discussed as required.

At investment level, at least one Invesis delivery team member sits on the board of directors of our portfolio companies and in this way we ensure that sustainability is an agenda item and regularly discussed at board meetings. We aim to positively influence our portfolio companies’ management of sustainability risks and opportunities.

5.2 Compliance with laws and regulatory frameworks

Our commitment extends to all applicable laws and regulations, including those related to the environment, labour, health and safety matters, data security and privacy and sanctions as well as laws intended to prevent fraud, extortion, bribery, tax evasion, money laundering, terrorist financing and other financial crimes. Beyond compliance, we seek to enhance our commitments and practices to ensure the safety of our investments. Of particular importance in this regard is data security and privacy, where we have an ongoing focus beyond compliance practices only.

We continuously monitor evolving regulations in the regions we work, and integrate them into our investment practices, ensuring responsible and compliant decisions throughout the investment lifecycle.

5.3 Supply Chain

Invesis work with a broad and diverse range of suppliers and recognise our role to ensure ethical and responsible business practices throughout our supply chain, including prompt payment of invoices, in line with national prompt payment codes or similar best practices.

We expect our supply chain to uphold a strong commitment to sustainability, including:

- upholding the highest standards of Health and Safety and Environmental Management;
- measuring and reducing carbon emissions associated with business operations and seeking to work with suppliers who do the same;
- complying with all local legal requirements when employing people;
- minimising the use of agency workers;
- ensuring employees can work without risk of discrimination;
- reviewing their supply chains to ensure that their products and services are sourced from responsible sources; and
- ensuring that appropriate policies are in place to prevent and detect bribery, modern slavery and human trafficking and supporting and/or following key conventions including the UN Declaration on Human Rights.

5.4 Invesis policy framework

The Invesis Policy Framework is a cornerstone of our governance approach and builds on the principles set out in this overarching Sustainability and Responsible Investment policy. **The following policies, codes and statements are included:**

- Invesis Code of Conduct
- Speak Up (Whistleblower) Procedure
- Health and Safety Statement
- Alcohol & Drugs Policy
- Diversity & Inclusion Policy
- Anti-Bribery & Corruption policy
- Conflict of Interest Policy
- Commercial Agents Procedure
- Competition Policy
- Privacy Policy
- Press and Media Policy

The Invesis Policy Framework is overseen, managed and updated annually by our Corporate Counsel and signed off on by the Management Board. All employees are required to review and understand our policies and to uphold the practices they outline. The Invesis Policy Framework is shared via a dedicated internal SharePoint site and relevant policies are also shared on our corporate website.

6.0 Roles, Responsibilities and Review

The Management Board has ultimate oversight of and approves the Sustainability and Responsible Investment policy. The ESG team within Invesis, along with the COO who holds Board ESG responsibility, will review and where relevant propose updates to the policy on at least an annual basis. The implementation of the policy is the responsibility of all employees.

Version control

Version Number	Effective Date	Document owner	Approved by	Amendments
V1.0	1st June 2025	Head of ESG	Approved by Management Board	First issue



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