

# ATLAS GLOBAL INFRASTRUCTURE FUND

## INFORMATION RELATING TO THE EU SUSTAINABLE FINANCE

### DISCLOSURE REGULATION (EU) 2019/2088 OF THE EUROPEAN PARLIAMENT

This document has been prepared for the purpose of meeting the specific disclosure requirements set out in Articles 3 and 4 of the Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector, as may be amended, supplemented, consolidated, substituted in any form or otherwise modified from time to time (the "Disclosure Regulation").

Articles 3 and 4 of the Disclosure Regulation require financial market participants to publish certain information on their websites. Article 3 of the Disclosure Regulation requires the publication of information about policies on the integration of sustainability risks in the investment decision-making process. Article 4 of the Disclosure Regulation requires the publication of whether or not principal adverse impacts of investment decisions on sustainability factors are taken into account.

The ATLAS Global Infrastructure Fund (the "Fund") discloses under Article 8 Fund of the Disclosure Regulation. The Investment Manager of the Fund is ATLAS Infrastructure Partners (UK) Limited (the "Investment Manager"). The Fund promotes environmental characteristics and seeks to invest in companies which follow good governance practices within the meaning of Article 8 of the Disclosure Regulation. In seeking to achieve the investment objective of the Fund, the Investment Manager aims to deliver long-term sustainable investment outcomes through the incorporation of environmental, social and governance (ESG) risks into every stage of analysis and decision making in the investment process. There are four primary elements to this process whereby the Investment Manager:

1. considers the implications of each ESG factor at an individual portfolio company level. The Investment Manager assesses each company's ability to provide long term predictable cash flows, demonstrate adequate governance systems, its environment / climate transition strategy to comply with changes to regulation for each energy source, the potential physical risk exposure from climate change and the 'social contract' of each company (i.e., what service does it provide to society). The Investment Manager takes the above ESG factors into account through its modelling and the impacts of those factors on the portfolio companies' cash flows and asset stress testing. This includes the use of external ESG data providers to complement their internal process and analysis;
2. uses the results of the company level ESG due diligence in order to make portfolio investment decisions and to monitor and report ongoing portfolio risk to investors;
3. uses the ESG analysis to actively engage with portfolio companies to promote responsible and sustainable decision making by company management teams; and
4. establishes formal ESG governance structures and responsibilities to monitor the incorporation of ESG in the investment process and ensure that the portfolio outcomes are consistent with the sustainable objectives of the portfolio.

The Fund does not have sustainable investment as its objective and does not utilise a reference benchmark with defined sustainability characteristics for the purpose of attaining the environmental or social characteristics. The Investment Manager is an active member of industry groups and bodies that support ESG outcomes. The Investment Manager also seeks to ensure that its corporate culture and incentives promote the ESG outcomes of the Fund. The Investment Manager's approach to responsible investment forms part of its investment process and philosophy. The aim is to deliver long-term sustainable outcomes for investors in the Fund, incorporating the principles of responsible investing while minimising risk.

The Investment Manager believes that companies that make good long-term returns can only do so if they maintain and reinforce their 'social licence' to operate. This is particularly true in the infrastructure sector where companies are often managing vital assets that are directly or indirectly regulated by the state. The Investment Manager's approach to implementing the principles of responsible investing is to ensure that it captures and measures the positive and negative ways in which companies can influence society and the environment and that these impacts are reflected in forecasts of future returns and potential risks.

### **No Consideration of Principal Adverse Impacts Statement**

In accordance with the discretion granted pursuant to Article 4 of the Disclosure Regulation, the Investment Manager does not currently consider the adverse impacts of investment decisions on sustainability factors or issue a statement on its website in relation to the due diligence policies with respect to those impacts, in line with the specific requirements of the Disclosure Regulation. The market is developing to the point where appropriate and accurate data becomes more widely available/accessible such that the results of such an assessment would prove meaningful to investors. Following the adoption and coming into force of such regulatory technical standards, currently expected to be from 1 January 2023, the Investment Manager intends to comply with the Disclosure Regulation requirements in relation to the publication of adverse impacts in respect of the Fund and the prospectus and the Investment Manager's website shall be updated accordingly.

### **Remuneration Policy**

The Investment Manager's Remuneration Policy has been reviewed and where necessary updated to meet the requirements of the Disclosure Regulation. Accordingly, the management of long-term risks including sustainability risks are reflected within the remuneration policy.

### **Related Policies**

The Investment Manager has adopted a number of complimentary and related policies which provide a more detailed description of the extent to which environmental and social characteristics promoted by the Investment Manager, and how they are met can be found here <https://www.atlasinfrastructure.com/esg/> and will be also be made available as part of the Fund's periodic reports, as and when required.