

NIBC INFRASTRUCTURE
PARTNERS I B.V.
SUSTAINABILITY (SFDR)-
RELATED DISCLOSURE

REGARDING

NIBC EUROPEAN
INFRASTRUCTURE
FUND I C.V.

January 2022

NIBC Infrastructure Partners I B.V. (the "**Fund Manager**") is registered with the Dutch Authority for the Financial Markets (*Autoriteit Financiële Markten*) under the AIFMD registration or light regime as alternative investment fund manager of NIBC European Infrastructure Fund I C.V. ("**NIBC European Infrastructure Fund**" or the "**Fund**"). The Fund Manager is an NIBC group company. It is not (in)directly held by NIBC Bank N.V. The Fund is the sole fund managed by the Fund Manager.

The Fund is a closed-ended investment institution under Dutch law registered with the Dutch Authority for the Financial Markets under the AIFMD registration or light regime, with vintage year 2007. The Fund has only been open to professional, non-retail, investors. The commitment period and investment period of the Fund have closed several, i.e. over 10, years ago which entails that it is not marketed to any investors, respectively that no new investments or investment decisions will be made by or for the Fund.

Pursuant to the

- Sustainable Finance Disclosure Regulation (Regulation (EU) 2019/2088, "SFDR"); as amended by the Taxonomy Regulation (EU) 2020/852 on the establishment of a framework to facilitate sustainable investment, supplementing and amending the SFDR, ("Taxonomy Regulation"); and
- Taxonomy Regulation, and as both (in draft) supplemented by the
- draft Regulatory Technical Standards, and specifically Section 5. of which, with regard to the content and presentation of disclosures pursuant to Article 8(4), 9(6) and 11(5) of SFDR, the ESAs' Final Report on which was published 22 October 2021, amending and consolidating the draft Regulatory Technical Standards with regard to the context, methodologies and presentation of disclosures pursuant to Article 2a(3), Article 4(6) and (7), Article 8(3), Article 9(5), Article 10(2) and Article 11(4) of SFDR, the ESAs' Final Report on which was published 4 February 2021 (jointly, the "draft consolidated SFDR RTS"),
- the Fund Manager considers and discloses as set out hereinbelow.

Transparency of sustainability risk policies

As indicated no new investment decisions and investments can be made by the Fund where the Fund's investment period has closed several years ago. Investment decisions on previously made investments of the Fund were subject to robust policies for among others risk mitigation through its due diligence and investment decision-making processes, as laid down in the Fund's documentation. Prior to a decision to invest, investment prospects were subject to a pre-screening process by the Fund Manager, and assessment in terms of its compliance with the general investment criteria, acceptability of the estimated risk / return profile, probability of success, bid resourcing and development cost requirements and strategic development considerations. Early screening was considered by the Fund Manager as an essential, challenging and robust exercise to ensure a focussed approach and efficient employment of resources to achieve the investment aims of the Fund. Then the investments ultimately made were subject to the requirement of prior unanimous approval of the Investment Committee of the Fund Manager. Another requirement was to have a continuous dialogue between the Fund Manager's team and the Investment Committee on the pipeline of investment opportunities being pursued. The Investment Committee could, at any time prior to an opportunity being formally referred to it, direct that a project not be pursued any further.

The following exclusions among others, aligned with NIBC's documented sustainability policy framework and mitigating sustainability risks, apply to the assets held by the Fund:

- (a) No new fossil fuel exploration or production investments;

- (b) No coal and large scale hydro-electric power generation;
- (c) No nuclear power generation;
- (d) No development, manufacturing, marketing and supply of assault weapons and munitions including, but not limited to, anti-personnel mines, cluster weapons, weapons utilising depleted uranium, nuclear weapons, white phosphorus bombs, as well as civilian firearms and any weapons banned by international treaties and protocols;
- (e) No mining of, and trade in, coal, uranium, as well as minerals produced in zones of military conflicts and areas designated by the UN as “war zones”;
- (f) No production and trade in prohibited chemicals and chemicals restricted by the Montreal Protocol 1987 (as amended) or any similar international treaties (such as polychlorinated biphenyl, dichlorodiphenyltrichloroethane, chlorofluorocarbons, halons and asbestos);
- (g) No production of tobacco and controlled substances (as such term is defined in the US Controlled Substances Act, as amended), except for production of licensed medical cannabinoids and their derivatives in accordance with the relevant national legislation;
- (h) No gambling operations and ownership or control (i.e. the direction or influence of policies and decisions) in respect of casinos, online gambling and platforms, as well as production of equipment and software related to gambling;
- (i) No activities adversely affecting animal welfare including animal testing for consumer goods, fur trade, exotic wild animal trade, overfishing in breach of regulatory quotas or in restricted areas and use of animals for entertainment;
- (j) No activities damaging biodiversity as described in the Montreal Protocol 1987 (as amended), the Convention on Biological Diversity (1992) or any similar international treaties;
- (k) No anti-social publishing (including internet publications), pornography and prostitution;
- (l) No payday lending, fraudulent and coercive loan origination, highly speculative financial operations and activities facilitating or enabling illegal non-payment or underpayment of taxes.

No consideration of sustainability adverse impacts

Pursuant to Article 4(1)(b) SFDR and Article 4(3)(b) jo. Article 11 draft consolidated RTS SFDR, the Fund Manager indicates that it

does not currently consider adverse impacts of its investment decisions on sustainability factors.

The Fund Manager does not currently do so because as indicated no new investment decisions and investments can be made where the investment period of the Fund has closed several years ago. It is therefore not considered possible or proportionate, also more generally given the stage of the Fund and the size, nature and scale of the activities for the Fund, to consider adverse impacts of any investment decisions on sustainability factors as set out in Article 4 paragraph 1 (a) SFDR as amended or supplemented by Article 11 of the draft consolidated RTS SFDR. It is for the same reasons neither expected that the Fund Manager will or can later consider any such adverse impacts by reference to among others the indicators in Table 1 of Annex I of the draft consolidated RTS DFSR. These disclosures will be reviewed at least annually.

Transparency of remuneration policies in relation to the integration of sustainability risks

Pursuant to such Article 5(1) SFDR, the Fund Manager informs that the NIBC employees working for the Fund are subject to the NIBC Employee Remuneration Policy which in its key principles integrates sustainability risks. These key principles apply, *mutatis mutandis*, as remuneration policies for the

mentioned employees regarding their activities for the Fund and supplement the requirements under the Fund's documentation, strategy and governance for alignment with the interests of the Fund's investors.

Transparency of the integration of sustainability risks; and of adverse sustainability impacts at financial product level

As indicated above, the Fund is a closed-ended fund under the AIFMD registration regime whose commitment period has closed several years ago. It is therefore not open to accept commitments from new investors and is not marketed. Per consequence **pre-contractual disclosures**, like the Fund's private placement memorandum from 2007, are no longer in use for marketing nor provided to any investors and accordingly the matters set out in Article 6(1)(a) and (b) and 7 SFDR are not included in the Fund's pre-contractual disclosures referred to in Article 6(3) and 7 SFDR.

Transparency of the financial product in periodic reports

For completeness it is noted as follows regarding the Fund's periodic reports. Pursuant to Article 7 Taxonomy Regulation (which refers to Article 6(3) SFDR regarding marketing materials and to Article 11(2) SFDR regarding annual reports for investment funds), the Fund will, although as indicated above refrain from making disclosures in marketing materials no longer in use due to ceased marketing, for transparency disclose in its **periodic reports**, more specifically in its annual reports, the statement that: 'The investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.'