

## ANNEX IV

### Template periodic disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

**Product name:** Sequoia Economic Infrastructure Income Fund

**Legal entity identifier:** 2138006OW12FQHJ6PX91

## Environmental and/or social characteristics

### Did this financial product have a sustainable investment objective?



Yes



It made **sustainable investments with an environmental objective:** \_\_\_\_%



in economic activities that qualify as environmentally sustainable under the EU Taxonomy



in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy



It made **sustainable investments with a social objective:** \_\_\_\_%



No



It **promoted Environmental/Social (E/S) characteristics** and while it did not have as its objective a sustainable investment, it had a proportion of \_\_\_\_% of sustainable investments



with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy



with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy



with a social objective



It promoted E/S characteristics, but **did not make any sustainable investments**

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

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



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

The Sequoia Economic Infrastructure Income Fund ("SEQI", the "Fund") incorporates the three following criteria in the selection of underlying assets for its portfolio:

1. Negative Screening
2. Thematic Investing (Positive Screening)
3. ESG Scoring

Deriving from the above criteria, the Fund seeks to promote ESG characteristics, with a focus on environmental, by applying the following ESG principles:

1. excluding certain positions determined to cause negative or adverse environmental impact based on negative screening;
2. assessing the underlying asset's capability to contribute towards three pre-determined positive ESG themes; and
3. making investment decisions which take into account ESG scores (based on the Fund's proprietary ESG scoring methodology) and prioritising transactions which achieve a higher ESG score.

The Fund's investment policy precludes investing in companies with a very low E score (<1), irrespective of the overall ESG score.

The ESG principles were applied to the portfolio in order to meet our three ESG goals: 1) Comply with negative screening criteria, 2) Progress thematic investing (positive screening), and 3) Over time, increase portfolio weighted average ESG score.

The ESG characteristics promoted by the Fund were met as the exclusions continued to be fully applied; the percentage of thematic investments showed a small increase year-on-year; and ESG scores were taken into account in the investments process with respect to both potential investments and disposals, which resulted in an increase in the average ESG score for the portfolio.

#### ● ***How did the sustainability indicators perform?***

For the reference period 1 April 2024 to 31 March 2025, 100% of projects were compliant with the Fund's negative screening criteria. During the period, the Fund did not finance any projects that initially do not meet the negative screening criteria but have the aim of transitioning to a more sustainable and compliant business model.

As at 31 March 2025, thematic investing covered 71% of the Fund's investment portfolio.

As at 31 March 2025, the average weighted ESG score for the Fund's portfolio was 64.70.

KPMG provided independent limited assurance under ISAE (UK) 3000 over the three ESG goals or KPIs. This confirmation is contained in the Company's 2024/25 Annual Report. The reporting criteria and KPMG's limited assurance opinion are available in the Sustainability Publications section of our website: [www.seqi.fund/sustainability/publications/](http://www.seqi.fund/sustainability/publications/)

Performance in line with these sustainability indicators does not necessarily equate to a guaranteed year-on-year increase in the ratio of investments that promote ESG characteristics.

#### ● ***...and compared to previous periods?***

The process of reducing the exposure to assets not permitted under the negative screening, through disposal of assets and planned repayments of loans commenced in 2021 and was completed by 31 March 2022. Since then the Fund reached full

compliance with the negative screening criteria and has maintained 100% compliance since, including throughout FY 24/25.

The portion of the portfolio covered by thematic investing is measured as at 31 March each year. This had consistently increased over recent years: 59% (2021), 61% (2022), 72% (2023), until a small dip last year: 70% (2024). The portion of thematic investments this year was 71%, a small year-on-year increase as the as the Fund nears a well-weighted balance across the three ESG investment themes.

The weighted average ESG score for the Fund's portfolio measured as at 31 March each year has consistently increased: 60.59 (2021), 61.88 (2022), 62.29 (2023), 62.77 (2024).

	31 Mar 2022	31 Mar 2023	31 Mar 2024	31 Mar 2025
Negative screening	100%	100%	100%	100%
Thematic investing	61%	72%	70%	71%
Weighted-average portfolio ESG Score	61.88	62.29	62.77	64.70

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

N/A – Sequoia Economic Infrastructure Income Fund does not have a formal objective or commitment to make ‘sustainable investments’ within the definition of Article 2(17) of Regulation (EU) 2019/2088 (SFDR) or the definition set out by the EU Taxonomy.

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

N/A – Sequoia Economic Infrastructure Income Fund does not have a formal objective or commitment to make ‘sustainable investments’ within the definition of Article 2(17) of Regulation (EU) 2019/2088 (SFDR) or the definition set out by the EU Taxonomy.

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

Principal adverse impacts (PAIs) on sustainability factors have not been taken into account pursuant to Article 4(1)(a) of SFDR for this financial product as the Fund is not subject to mandatory consideration and disclosure of principal adverse impacts under Article 4(1)(a) of SFDR.

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

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



The UN Guiding Principles on Business and Human Rights and OECD Guidelines for Multinational Enterprises have not been formally embedded into the Fund’s investment process. As a result of the negative screening and ESG scoring methodology applied by the Fund, it is however anticipated that companies that may be in breach of international norms described in the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights may have been excluded during the course of the Fund investment process.

The Fund sought assurance as to portfolio company compliance with minimum human rights and labour standards.

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

The Fund does not consider the principal adverse impacts (“PAIs”) of its investment on sustainability factors. The Fund does not commit to make ‘sustainable investments’ per the definition of Article 2(17) of Regulation (EU) 2019/2088 (SFDR) and, as such, does not calculate or report the PAI indicators for the Fund.

The list includes the investments constituting the **greatest proportion of investments** of the financial product during the reference period which is: 1 April 2024 to 31 March 2025



**What were the top investments of this financial product?**

Largest investments	Sector	% Assets	Country
1	Renewables	4.35	UK
2	Digitalisation	4.33	US
3	Utility	4.00	UK
4	Renewables	3.75	US
5	Digitalisation	3.61	US
6	Transport – vehicles	3.60	US
7	Power	3.41	Germany
8	Power	3.26	US
9	Digitalisation	3.16	US
10	Digitalisation	3.10	Holland
11	Transport – systems	3.02	Belgium
12	Transport – systems	2.94	Denmark
13	Other	2.86	US
14	Digitalisation	2.83	Switzerland
15	Digitalisation	2.77	US

These percentages have been calculated by averaging the Net Asset Value (“NAV”) as at each quarter end for the reference period.

describes the share of investments in specific assets.



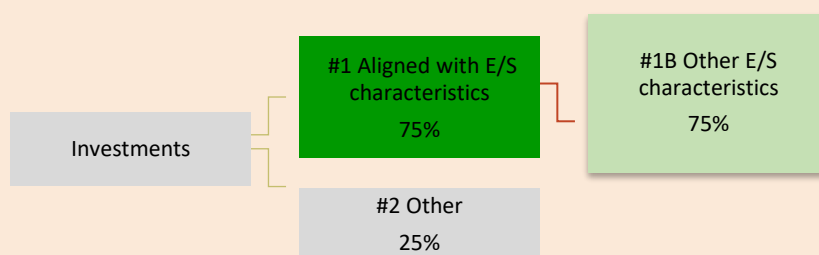
### What was the proportion of sustainability-related investments?

Sequoia Economic Infrastructure Income Fund does not commit to a minimum proportion of investments of the financial product used to meet environmental or social characteristics promoted by the Fund in accordance with the binding elements of the investment mandate.

Note, there were no sovereign exposures.

- **What was the asset allocation?**

The Fund invests in economic infrastructure private loans and bonds across a range of industries in stable, low-risk jurisdictions, creating equity-like returns with the protections of debt. It is the only London Stock Exchange listed fund investing exclusively in economic infrastructure debt.



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

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

The category **#1 Aligned with E/S characteristics** covers:

- The category **#2 Aligned with E/S characteristics** covers:
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

● *In which economic sectors were the investments made?*

Sector		Sub-sector	
Accommodation	6.63%	▪ Health care	5.22%
		▪ Student housing	1.42%
Other	11.52%	▪ Agricultural infra	0.06%
		▪ Hospitality	0.52%
		▪ Hospitals	0.92%
		▪ Schools	1.92%
		▪ Smart metering	0.30%
		▪ Social infra	0.89%
		▪ Residential infra	3.07%
		▪ Waste-to-energy	3.78%

Power	15.89%	<ul style="list-style-type: none"> <li>Base load</li> <li>Energy efficiency</li> <li>Energy transition</li> <li>Nuclear power</li> <li>Other electricity generation</li> <li>Power services</li> <li>Standby generators</li> </ul>	6.82% 0.68% 1.05% 0.69% 5.02% 0.82% 0.80%
Renewables	9.52%	<ul style="list-style-type: none"> <li>Landfill gas</li> <li>Solar &amp; wind</li> </ul>	4.35% 5.17%
Digitalisation	22.82%	<ul style="list-style-type: none"> <li>Broadband &amp; fibre</li> <li>Data centres</li> <li>Telecom towers</li> </ul>	3.01% 12.70% 7.10%
Transport - systems	8.60%	<ul style="list-style-type: none"> <li>Ferries</li> <li>Port</li> <li>Rail</li> <li>Road</li> </ul>	2.94% 3.02% 2.50% 0.13%
Transport - vehicles	10.30%	<ul style="list-style-type: none"> <li>Aircraft</li> <li>Health &amp; safety</li> <li>Rolling stock</li> <li>Specialist shipping</li> </ul>	1.60% 1.19% 2.20% 5.32%
Utility	14.73%	<ul style="list-style-type: none"> <li>Renewable electricity supply</li> <li>Midstream</li> <li>Utility services</li> </ul>	1.56% 5.37% 7.81%

These percentages have been calculated by averaging the NAV as at each quarter end for the reference period.

During the reference period, the Fund had eight investments across four companies which derive revenues from exploration, mining, extraction, production, processing, storage, refining or distribution, including transportation, storage and trade, of fossil fuels. This averaged at 13.4% of the portfolio NAV over the year. Note, this includes for instance a port owner and operator that represents on average 3.02% of the portfolio; the company derive ~2.5% of their revenues from customers that use them to handle/store a limited amount of coal. There were no new investments in these type of companies during the year.



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

Sequoia Economic Infrastructure Income Fund does not commit to a minimum share of 'sustainable investments' with an environmental objective aligned with the EU Taxonomy.

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

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

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

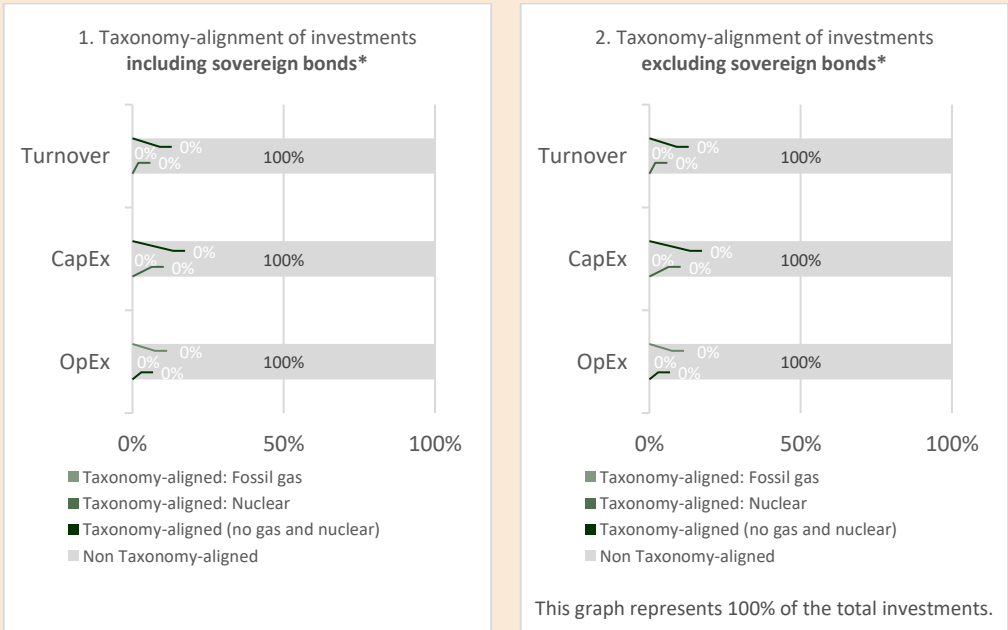
● **Did the financial product invest in fossil gas and/or nuclear energy related activities complying with the EU Taxonomy<sup>1</sup>?**

- ☐ Yes:

☐ In fossil gas
☐ In nuclear energy
- ☒ No

Whilst the financial product makes investments related to fossil gas and nuclear energy, the Fund does not measure or track investments in activities by reference to EU Taxonomy compliance.

*The graphs below show in green the percentage of investments that were aligned with the EU Taxonomy. As there is no appropriate methodology to determine the taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.*



*\*For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures*

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

Sequoia Economic Infrastructure Fund does not measure its share investments in ‘transitional’ and ‘enabling’ activities as per the definition under the EU Taxonomy.

<sup>1</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation”) and do no significant harm to any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

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

N/A



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

Sequoia Economic Infrastructure Income Fund does not commit to a minimum share of 'sustainable investments' with an environmental objective that are not aligned with the EU Taxonomy.



**What was the share of socially sustainable investments?**

Sequoia Economic Infrastructure Income Fund does not commit to a minimum share of 'socially sustainable investments'.



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

The "#2 Other" investments includes the lowest quartile of ESG scores, which represented 25% of the Fund's portfolio by NAV as at 31 March 2025. The Fund aims to increase the portfolio's average ESG score over time, whilst anticipating natural fluctuations and recognising this may not always be possible given market circumstances and the objective of diversifying across sector and investment type. Further, when considering disposals, the Fund aims to prioritise the lower ESG-scoring assets, whilst making disposal decisions based on financial metrics.

The purpose of these investments is diversification. As specified in the Investment Criteria, the Fund will invest across different sectors and sub-sectors to ensure the portfolio is sufficiently diversified. As certain sectors and sub-sectors are more aligned with environmental characteristics than others, there will always be a spread in ESG scores within the portfolio.

Compliance with minimum environmental or social safeguards cannot be reliably measured, due to the unavailability of reliable data and evidence. Many investee companies still lack the sufficient resources and/or capabilities to be able to ensure compliance with minimum safeguards throughout their value chains.

Nonetheless, all potential investments undergo our three-part sustainability assessment of negative screening, thematic investing (positive screening), and ESG scoring, as described in the Fund's Sustainability Policy. This means that assets not meeting the Fund's Investment Criteria and negative screening criteria will be excluded, thus making an investment in an asset not meeting minimum environmental or social safeguards unlikely.

Furthermore, where appropriate, loan terms will target to include covenants or repeated representations to ensure that the borrower complies with any stated ESG objectives and, where feasible, to encourage it to improve its sustainability credentials over time as per the Fund's Sustainability Policy. These could include obligations to meet minimum environmental safeguards.

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



Borrower engagement on sustainability matters is part of the ongoing monitoring process. For example, sustainability questionnaires are sent to all borrowers, which includes questions related to the maintenance of minimum safeguards. The responses are not mandatory but we encourage borrowers to do so and are committed to aiming to maintain our high response rate to our annual sustainability questionnaire.



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

The Fund continued to make investment decisions this year in line with its three ESG Goals. Based on the Fund's investment strategy, when evaluating potential investments, the Investment Adviser prioritised new transactions with higher ESG scores, and when considering the potential disposal of investments, the Investment Adviser prioritised transactions with lower ESG scores, whilst taking disposal decisions based on financial metrics.

The Investment Adviser continued to take a proactive approach to managing the loan book and engage with borrowers in relation to sustainability-related topics on a regular basis as per the Fund's Sustainability Policy. The Fund's range of engagement strategies are designed to encourage and promote positive behaviour in the companies that it lends to, and some of those that were employed during this reference period are described below.

Where appropriate, loan terms included covenants or repeated representations to ensure that the borrower complies with its stated ESG objectives where feasible and to encourage it to improve its sustainability credentials over time. In addition, where appropriate, loan terms included an obligation on the borrower to report selected ESG metrics on a "best-efforts" basis.

Borrowers were invited to complete annual post-investment ESG questionnaires. These cover quantifiable ESG metrics/KPIs when appropriate, CO<sub>2</sub> emissions, health and safety records, etc, as well as confirmation of the borrower's overall sustainability policies and procedures. The Fund seeks supporting documentation and/or external verification to evidence borrowers' sustainability claims. Action plans are created for all assets, which identify areas of improvement in borrowers' sustainability credentials and/or the additional evidence that would be required to be able to fully assess certain indicators within the ESG scoring framework. These lists of actionable areas formed the basis of the ongoing engagement with the borrowers over the course of the year with the aim of making improvements, collecting more evidence of initiatives that are said to be in place, or mitigating risks.

The environmental characteristics of the Fund and sustainability indicators used to measure this were met through a combination of investing in higher scoring opportunities, disposing of lower-scoring opportunities, and using a range of engagement strategies with borrowers to support improvement of their sustainability credentials.

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



### **How did this financial product perform compared to the reference benchmark?** Sequoia Economic Infrastructure Income Fund does not use a specific index designated as

a reference benchmark to determine whether the product is aligned with the environmental and/or social characteristics it promotes.

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

N/A

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

N/A

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

N/A

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

N/A