

ESG Policy (“the Policy”)

A. Purpose

The Company is aware that its ability to manage the risks and opportunities of material ESG considerations is fundamental to the delivery of long-term sustainable returns for its investors and that its activities and its method of delivery have the potential to impact on a broad range of stakeholders. It does not believe that strong financial performance and sustainable businesses are mutually exclusive.

The Company has therefore sought to put ESG principles at its core reflecting them in its Investment Objective in the form of a commitment to integrate ESG best practice.

The Policy sets out how the Company will deliver on that commitment.

B. ESG Principles

In order to focus the Company's ESG activities and maximise the value delivered in the context of its investment objective, it has identified four ESG principles (the **ESG Principles**), linked to the UN Sustainable Development Goals (**SDGs**), that it believes are specifically relevant to its activities.

1. Climate Action

Support the attainment of the UK emissions targets through the creation of new sustainable energy resource.

UN SDGs



Affordable and clean energy: Ensure access to affordable, reliable sustainable and modern energy for all (UN SDG 7).



Climate action: take urgent action to combat climate change and its impacts (UN SDG 13).

2. Sustainability

Facilitate the efficient and considered use of finite resources.

UN SDGs



Responsible production and consumption: ensure sustainable consumption and production patterns (UN SDG 12).



Life on land: Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss (UN SDG 15).

3. Social responsibility

Bring value to the communities in which we are active

UN SDGs



Gender equality: achieve gender equality and empower all women and girls (UN SDG 5).



Decent work and economic growth: promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all (UN SDG 8).

4. Ethical Governance

Deliver the Company's investment objective through a robust governance framework that recognises its moral and ethical responsibilities to all stakeholders.

C. Responsibility

Responsibility for delivery of the Company's ESG policy and attainment of the objectives resides with the Board.

Day-to-day responsibility for the Company's operations has however been delegated to the Investment Adviser, which has appointed Steve Windsor as its ESG lead.

The Board will appoint a representative to provide oversight of the Investment Adviser including ensuring that the Investment Adviser maintains its own ESG Policy

The Investment Adviser publishes its ESG policy via its website at www.atratogroup.com

D. Monitoring

In order to demonstrate the Company's progress against the identified ESG Principles, the Company intends to report against a comprehensive framework of tailored metrics. The Company will adopt a transparent approach to reporting its progress against these metrics. The metrics are set out in Appendix 1.

The Board will require the Investment Adviser to report against these at each quarterly Board meeting as a minimum and to reflect the impact on each metric on the portfolio in the context of each Investment Committee decision.

The Company acknowledges that it will have regard to best practice external reporting frameworks including TCFD and (in the case of the Investment Adviser) UN PRI.

E. Investment Decisions

The Company will require that the Investment Adviser embeds best practice ESG risk and opportunity assessment into investment analysis and that the outcome of that assessment is recorded in the investment committee papers. This should include but not be limited to

1. Screening for excluded activities
2. Review of asset exposure to climate change impacts
3. Estimate of avoided greenhouse gas emissions

4. Modern slavery screening
5. Consideration of maintenance, decommissioning and component recycling
6. Health and safety review

F. Charitable Giving

The Company intends to make a commitment a charitable giving commitment each year. The quantum and nature of that commitment will be reviewed annually by the Board on the advice of the Investment Adviser.

G. Constant Improvement

This ESG Policy is reviewed annually. More frequent updates maybe made in response to best practice and regulatory changes or other improvements introduced by the Investment Adviser.

Date: 29th October 2021