ANNEX V

Periodic disclosure for the financial products referred to in Article 9, paragraphs 1 to 4a, of Regulation (EU) 2019/2088 and Article 5, first paragraph, of Regulation (EU) 2020/852

Product name: NESF ("NextEnergy Solar Fund" or "the Fund")

Legal entity identifier: 213800ZPHCBDDSQH5447

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 include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Sustainable investment objective

Does this financial product have a sustainable investment objective?

☒ **Yes**	☐ **No**
☒ It will make a minimum of **sustainable investments[1] with an environmental objective:** 95% ☒ in economic activities that qualify as environmentally sustainable under the EU Taxonomy[2] ☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☐ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum 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 will make a minimum of **sustainable investments with a social objective:** __0_%	☐ It promotes E/S characteristics, but **will not make any sustainable investments**

[1] **Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, as measured, for example, by key resource efficiency indicators on the use of energy, renewable energy, raw materials, water and land, on the production of waste, and greenhouse gas emissions, or on its impact on biodiversity and the circular economic, or an investment in an economic activity that contributes to a social objective, in particular an investment that contributes to tackling inequality or that fosters social cohesion, social integration and labour relations, or an investment in human capital or economically or socially disadvantaged communities, provided that such investments do not significantly harm any of those objectives and that the investee companies follow good governance practices, in particular with respect to sound management structures, employee relations, remuneration of staff and tax compliance.

[2] 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 include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

To what extent was the sustainable investment objective of this financial product met?

Sustainable investment objective pursued by the NESF

Sustainability indicators measure how the sustainable objectives of this financial product are attained.

NESF is a listed solar investment fund, which is currently active both in the acquisition of solar PV assets on the secondary market, as well as investing in solar PV assets that are under development (e.g., at the stage of origination, project planning or construction) when acquired.
The NESF fund sustainable investment objectives are:

- Committing to support UK governmental ambitions of bringing greenhouse gas emissions to net zero by 2050; and
- To substantially contribute to the environmental objective of climate change mitigation within the meaning of the EU Taxonomy regulation.

Together, these fund objectives contribute to the Article 9 qualification, under "economic activities that qualify as environmentally sustainable under the EU Taxonomy[3]" and more specifically, qualifies as contributing substantially to climate change mitigation.

NESF's integration of ESG factors, including its development activities, is driven by a consistent internal due diligence process ensuring ESG factors are fully integrated into investment decision-making. The due diligence's objective is to identify any potential ESG risks and put forward adequate mitigation to achieve compliance with national legislation and planning permission, as well as align to NextEnergy Capital's Sustainable Investment Policy and solar industry best practices. The due diligence covers various environmental, social and governance factors, including climate change, biodiversity, supply chain, circular economy, health&safety, labor conditions and stakeholder engagement amongst others. These factors are consistent with the principles of "do not do significant harm" and minimum safeguard of the EU Taxonomy for Solar PV activities.

Monitoring of progress against the sustainable investment objectives is primarily based on the calculation of GHG emissions and fossil fuel volume avoided by utilization of the solar assets and their output in MW. Data can be used to create forecasts or can be based on actual historic power output data to provide GHG emission and fossil fuel avoided figures.

The positive impacts of the NESF biodiversity commitments are also being monitored to understand if they can be quantified and include the contribution toward climate change mitigation within future NESF reports.

How did the sustainability indicators[3] perform?

The table below provides historical performance indicators (GHG emission avoided) up to the current reporting year.

Metric	Units	FY 2022	FY 2023
GHG Avoided	$ktCO_2e$	328.7	363.0
NO_x Avoided	tonnes	269.3	331.1
SO_x Avoided	tonnes	549.7	612.4
$PM_{2.5}$	tonnes	25.2	28.3
PM_{10}	tonnes	6.2	6.9
Fossil Fuels avoided	kilotonnes oil equivalent (ktoe)	142.8	160.3
	Millions of barrels	1.0	1.2

The latest numbers are based on the renewable electricity generation (GWh) related to 2023 tax year (i.e. 1st April 2022 to 31st March 2023)[4].

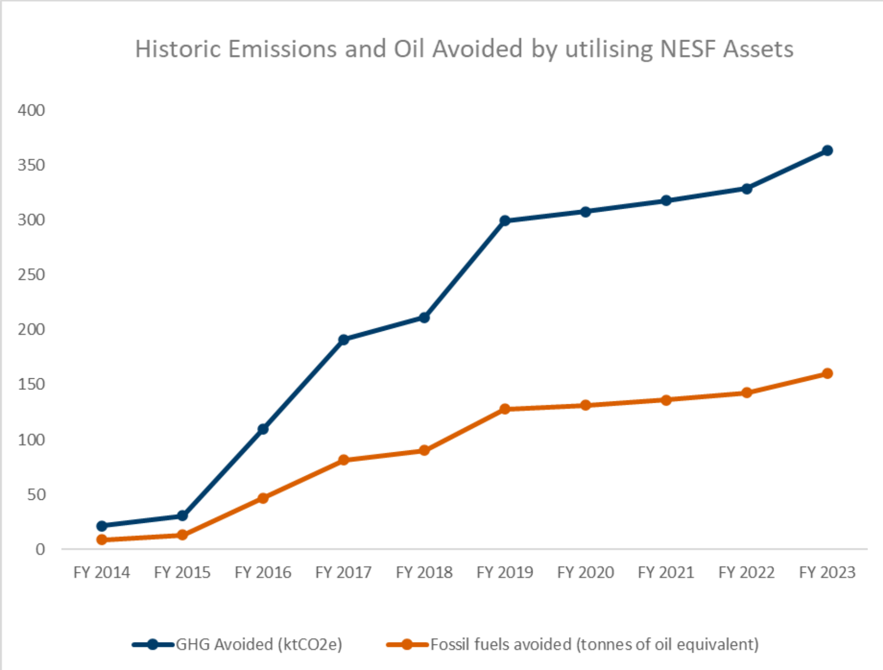
As indicated in the table, up to 363.0 ktCO2e of emissions and up to 160.3 kt of oil equivalent has been avoided.

…and compared to previous periods?

The historical data has been calculated in 2023 which includes data from the 2014 financial year onwards. This can be seen in the graph below:

[3] **Sustainability indicators** measure how the sustainable objectives of this financial product are attained.

[4] *The 363,000 tCO2e avoided figure provided within this report and the Annual Report for the year ended 31 March 2023 is calculated based on a total generation of 869.96 GWh for the year ended 31 March 2023, which includes all assets that have reached connection date (COD) at 31st March 2023.



As dsemonstrated in the graph, annual emissions avoided and fossil fuel use avoided increases in line with the growth of AuM by NESF and summarizes the contribution of the NESF assets toward climate change mitigation.

How did the sustainable investments not cause significant harm to any sustainable investment objective?

NESF's investment decision-making process ensures that investments do not only contribute to climate objectives, but also cause no significant harm to other environmental objectives as defined by the EU taxonomy and are conducted in accordance with minimum safeguards on matters such as social responsibility, human rights and labour conventions. A robust due-diligence process captures all the relevant key risks associated with the Solar PV industry. The risks are aligned with the Do No Significant Harm (DNSH) approach of the Taxonomy (with extension beyond) and include:

- Climate change;
- Circular economy;
- Biodiversity and ecosystems.

In the event that any risks were identified, these were captured/recorded and either mitigated against or the transactions were halted and not progressed.

From a climate change mitigation perspective, NESF substantially contributes to the objective by avoiding CO_2e emissions to atmosphere and fossil fuel use. NESF reports the amount of CO_2e avoided consistently year on year.

For more information on the NEC/NESF due-diligence process, please refer to the ESG Disclosure document on the [NESF](#) and [NEC websites.](#)

How were the indicators for adverse impacts[5] on sustainability factors taken into account?

Principal Adverse Impacts (PAI) are considered throughout all stages of the investment process.

NESF predominantly invests in utility-scale solar PV assets and complementary technologies, such as energy storage assets, and the investment decision is based on the outcome of due diligence which includes ESG adverse impacts as explained above. The due diligence process, as detailed in the Sustainable Investment Policy and NESF ESG Disclosure document, reviews all aspects of the asset(s) and counterparties (seller, contractors, and suppliers) and the associated adverse impacts (including environmental, social and employee, human rights, anti-corruption etc.) during the pre-investment stage. When gaps are identified, mitigation measures are proposed, and action plans are agreed during the approval process. Cost for implementation of ESG actions are also allocated into the financial model, to ensure capital can be deployed for these activities during the lifetime of the asset.

Post-acquisition of the assets, all relevant contractors who construct or operate the asset are requested to provide their ESG Key Performance Indicators (KPI). These include resource consumption, GHG scope 1, 2, and 3 emissions, Health&Safety, biodiversity, diversity, and other relevant ESG indicators at the asset level. A full set of KPI related to PAI has been developed consistently with the requirements of Table 1, Annex 1 of the Commission Delegated Regulation 2022/1288.

Further details on the reporting and KPI approach can be found in the NESF ESG Disclosure document on the [NESF](#) and [NEC websites.](#)

[5] **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.

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

Yes they were. NEC/NESF has a strong Sustainable Investment Policy and Human Rights Position Statement aligning with the associated requirements of OECD Guidelines for Multinational Enterprises and the UN Guiding Principles. In addition, NESF complies with the UK Modern Slavery Act and publishes an MSA Statement accordingly. NESF policies require NESF to perform due diligence on both its own activities and its business relationships with the objective of acting upon any findings. The due diligence focuses on environmental, social and governance factors that include but are not limited to impacts of the specific investments (solar asset) on biodiversity, climate change, waste and water management, health and safety, land management, community, and stakeholder engagement, grievance mechanism, labor and working conditions and more broadly human rights potential violation across the value chain. The due diligence applies to all counterparties involved in the investment, from the seller to contractors and subcontractors and suppliers. Should gaps with NESF policies be identified, an action plan will be presented prior to the acquisition, which will outline the actions needed to mitigate potential impacts, their frequency, and costs.

Additionally, the Fund ensures that investments are carried out in compliance with other minimum social safeguards, relating, in particular, to human rights matters, guided by the OCED Guidelines on Multinational Enterprise and the UN Guiding Principles on Business and Human Rights. Human rights are one of the three pillars of NEC's Sustainability Framework; under this framework, slavery, child and forced labour are screened out at very early stage of each investment as "no go". Furthermore, the due-diligence process aims to identify and mitigate any other potential human rights risks such as community displacement, poor labour and working conditions, as well as protection of minority and vulnerable communities.

For more information, please refer to the NEC Human Rights Position Statement on the adviser's website and to NESF UK Modern Slavery Act Statement .

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

Principal Adverse Impacts (PAI) are considered throughout all stages of the investment process.

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.

NESF predominantly invests in utility-scale solar PV assets and complementary technologies, such as energy storage assets, and the investment decision is based on the outcome of due diligence which includes ESG adverse impacts as explained above. The due diligence process, as detailed in the Sustainable Investment Policy and NESF ESG Disclosure document, reviews all aspects of the asset(s) and counterparties (seller, contractors, and suppliers) and the associated adverse impacts (including environmental, social and employee, human rights, anti-corruption etc.) during the pre-investment stage. When gaps are identified, mitigation measures are proposed, and action plans are agreed during the approval process. Cost for implementation of ESG actions are also allocated into the financial model, to ensure capital can be deployed for these activities during the lifetime of the asset.

Post-acquisition of the assets, all relevant contractors who construct or operate the asset are requested to provide their ESG Key Performance Indicators (KPI). These include resource consumption, GHG scope 1, 2, and 3 emissions, Health&Safety, biodiversity, diversity, and other relevant ESG indicators at the asset level. A full set of KPI related to PAI has been developed consistently with the requirements of Table 1, Annex 1 of the Commission Delegated Regulation 2022/1288.

Further details on the reporting and KPI approach can be found in the NESF ESG Disclosure document on the NESF and NEC websites.

What were the top investments of this financial product?

The list includes the investments constituting the **greatest proportion of investments** of the financial product during the reference period which is:

The list includes the investments constituting **the greatest proportion of investments** of the financial product during the reference period which is: FY 2023 (1st April 2022 to 31st March 2023)

Largest Investments	Sectors	% Assets	Country
Solar PV Assets and adjacent technologies	Solar PV	85.5%	UK
Solar PV Assets	Solar PV	10.2%	Italy
Solar PV Assets	Solar PV	0.8%	Spain
Solar PV Assets	Solar PV	0.7%	Portugal
Private Fund	Solar PV	2.7%	Global

These figures represent the percentage of capital invested by NESF. Note that 'adjacent technologies' includes energy storage technology, such as batteries. Please note also that figures are stated to the nearest 0.1% which may lead to rounding differences.

What was the proportion of sustainability-related investments?

As at the last reporting date (31 March 2023) before the publication of this Annex V, the portfolio allocation of the Fund using an average of the quarterly published Net Assets Value ("NAV") during the financial year, was:

- 98.4% of the Fund's NAV was sustainability-related. All of this investment is aligned with the EU Taxonomy;
- 1.6% of the Fund's NAV was held in cash, bank deposits and other cash equivalents for liquidity purposes, and held at an A+ credit-rated financial institution, hence classified as "non-sustainable".

Asset allocation describes the share of investments in specific assets.

What was the asset allocation?

In which economic sectors were the investments made?

The investments were made in the renewable energy sector.

#1 Sustainable covers sustainable investments with environmental or social objectives.

#2 Not sustainable includes investments which do not qualify as sustainable

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.

To what extent were sustainable investments with an environmental objective aligned with the EU Taxonomy?[6]

The NESF fund is 98.4% aligned with the EU Taxonomy. Specifically, 98.4% of NESF investment is designated for the acquisition of solar PV assets and associated facilities, while the other 1.6% is retained for liquidity purposes. Of the 98.4% of investment into solar PV and associated facilities, 100% are aligned with the EU taxonomy because i) they substantially contribute to climate mitigation through the generation of clean energy and avoidance of GHG emissions and fossil fuel; ii) they do not do significant harm to the other environmental objective of the taxonomy and iii) they meet minimum social safeguard.

a) The investment objective of climate mitigation was 100% attained through the generation of clean energy. In particular, the performance of the sustainability indicator, GHG emissions avoided, has been accounted for and reported annually. The objective of climate mitigation remains the core business of the funds' investments and 100% of asset allocation remains investing in renewable energy infrastructure.

b) Each NESF investment has to undertake a due diligence process pre-and post-investment which ensures that No Significant Harm (DNSH) is done to any other environmental objective considered material to the activity of the fund (Solar PV generation). These other objectives are climate change adaptation, biodiversity and circular economy.

c) The due diligence also considers additional safeguard such as human rights, community engagement, and labour conditions, amongst others. The due diligence is in alignment with the OECD Guidelines for

[6] Taxonomy-aligned activities are expressed as a share of:

(i) **turnover** reflecting the share of revenue from green activities of investee companies;

(ii) **capital expenditure (CapEx)** showing the green investments made by investee companies, e.g. for a transition to a green economy; and

(iii) **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

The relevant legislation does not provide a definition of "*investee company*", however, we have interpreted this term as intended to refer to an entity in which the relevant fund intends to make an investment, or has made an investment, on behalf of its investors, which would include the SPV which owns each asset.

Multinational Enterprises, the UN Guiding Principles on Business and Human Rights and other international conventions on human rights, as per NextEnergy Capital's Human Rights Position Statement.

Did the financial product invest in fossil gas and/or nuclear energy related activities complying with the EU Taxonomy[7]?

☐ Yes:

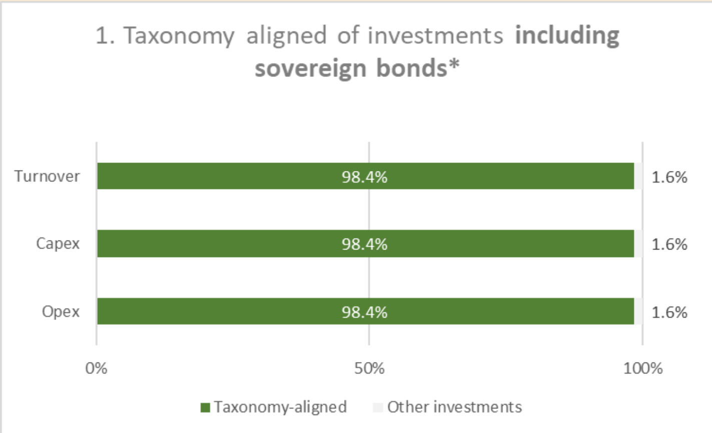
☐ In fossil gas ☐ In nuclear energy

☒ No

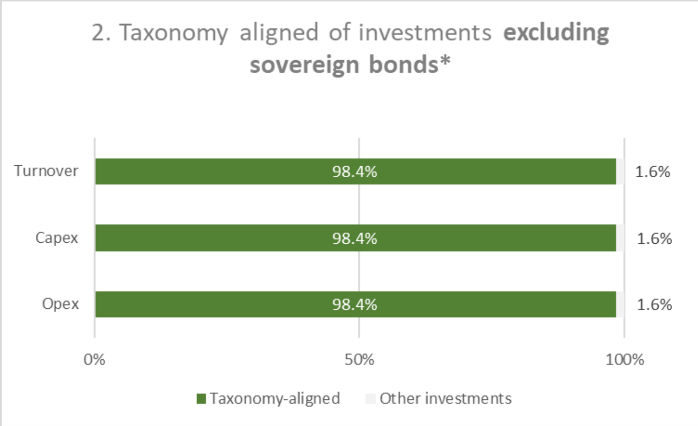
Taxonomy-aligned activities are expressed as a share of:
- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

The 98.4% indicated in the graph above, all of those investments are EU Taxonomy-aligned as at the date of publication of the present version of Annex V.

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.



[7] 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.



* *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[8]?

Battery storage investment- 6.62% of total investment.

How did the percentage of investments aligned with the EU Taxonomy compare with previous reference periods?

As of March 2022, the percentage of investments classified as 'sustainable' was 97.1%, while in March 2023 it was 98.4%. In both reporting years, 100% of these sustainable investments were aligned with the EU Taxonomy. Therefore the percentage of investments that were aligned with the EU taxonomy for the current reporting period has increased by 0.8%. However, please note that this percentage can increase or decrease depending on factors that are not related to the fund's intention to continue to attain the sustainable objective. In fact the minimum percentage of non-sustainable activities is not invested in other industrial activities but used to address liquidity issues.

None of the investments made are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

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

[8] **Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective, while **transitional activities** are activities for which low-carbon alternatives are not yet available and that have greenhouse gas emission levels corresponding to the best performance.

0%. The Fund solely invests in renewable energy assets and commits to Taxonomy-aligned investments. The share of sustainable investments with an environmental objective that are not aligned with EU Taxonomy is 0%.

What was the share of socially sustainable investments?

0%

What investments were included under "not sustainable", what was their purpose and were there any minimum environmental or social safeguards?

The investments of the Fund classified as "not sustainable" are composed of government bonds, fixed-income securities, money market instruments, such as units in money market funds and overnight and/or time deposits at credit institutions. Such investments were made to manage excess liquidity and to hedge currency/interest rate risks and thus to ensure efficient portfolio management by way of protecting and enhancing returns from the Fund's portfolio.

The investments of the Fund that were classified as "not sustainable" are composed of cash and cash-equivalents, which are for liquidity purposes and held at an A+ credit rated financial institution. Such investments were used for preference share dividends, fees (i.e. audit and regulatory fees), charitable donations and insurance.

What actions have been taken to attain the sustainable investment objective during the reference period?

NESF's objective to substantially contribute to climate change mitigation is met by generating clean sustainable energy and therefore reducing the amount of fossil fuel used to meet energy demand, along with avoiding emissions to air that would arise as a result. The commitment of the fund to continually invest and increase the amount of clean energy generation ensures contribution to climate mitigation. This is done, as explained above, in line with the principles of Do No Do Significant Harm and in respect of minimum safeguard.

Key indicators, such as GHG emissions avoided and fossil fuel avoided, are used to track and ensure continued progress against the climate mitigation objective. These indicators, along with annual performance against them, are released to the NESF Board and are detailed in the NESF Sustainability Report available on the NESF website. Progress on key indicators is also discussed through board /shareholder meetings as required and is also considered within the Annual Report release.

How did this financial product perform compared to the reference sustainable benchmark?

NESF has not designated a specific index as a reference sustainable benchmark.

- ***How did 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 sustainable investment objective?***

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

Josephine Bush – Chair of NextEnergy Solar Fund Limited ESG Committee

Josephine Bush

Reference benchmarks are indexes to measure whether the financial product attains the sustainable objective.

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