

Cordiant Digital Infrastructure Limited

Sustainability-Related Disclosures (SFDR Disclosures)

**Website Product Disclosure for Financial Products that Promote
Environmental or Social Characteristics**

v1.0

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Version History

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Website Product Disclosure

Cordiant Digital Infrastructure Limited (“**CORD**” or the “**Company**”) is required to make this disclosure under Regulation (EU) 2019/2088 and the subsequent Delegated Act as the financial product is marketed into EU Member States by Cordiant Capital Inc, the investment manager, through a National Private Placement Regime (“**NPPR**”). The following disclosure has been made in line with the adopted Regulatory Technical Standards.

The “**Investment Manager**” refers to Cordiant Capital Inc. (registered as a Portfolio Manager and an Exempt Market Dealer with the Autorité des Marchés Financiers, the Ontario Securities Commission and other Canadian regulators as well as a Registered Investment Advisor with the U.S. Securities and Exchange Commission and as an Investment Fund Manager in Quebec and Ontario); Cordiant Luxembourg S.A. (regulated as an AIFM by the Commission de Surveillance du Secteur Financier of Luxembourg); Cordiant Digital Infrastructure Management LLP as well as affiliated entities.

Summary

The Company has been designated as an Article 8 financial product, promoting environmental and social characteristics, but not having as its objective sustainable investment. The Company and Investment Manager each seek to promote both responsible investing approaches and sustainable objectives. The Investment Manager has long been committed to sustainable and responsible investing, incorporating ESG risk mitigation and impact investing into traditional investment analysis to help drive profitable investment strategies. CORD’s and the Investment Manager’s respective Responsible Investment Policies and the processes outlined in the Investment Strategy, are applied by the Investment Manager and govern the integration and the incorporation of ESG into the investment process. The Investment Manager seeks to integrate ESG consideration, and impact consideration, throughout the investment process, utilising recognised best practice in support of the Investment Manager’s proactive and on-going engagement focused approach.

The Company will principally make direct equity or structures with equity-like characteristics investments in operating digital infrastructure assets, with a predominant focus on data centres, mobile telecommunications and broadcast towers and fibreoptic network assets, primarily located in the United Kingdom, the European Economic Area, the United States of America and Canada. As a result, investee companies are typically not of the stage, size, location or have the capacity to meet or implement the stringent criteria for Taxonomy-alignment. Due to these requirements the Company’s investments are unlikely to be determine as Taxonomy-aligned. The Company will not currently make a commitment to target a certain percentage of alignment to the EU Taxonomy within the portfolio.

No sustainable investment objective

This financial product promotes environmental or social characteristics but does not have as its objective sustainable investment.

Environmental or social characteristics of the financial product

Economies and society are increasingly reliant on digital infrastructure to facilitate the flow of data and communication globally. With an investment strategy focused on the digital infrastructure sector, the Company and the Investment Manager seek to contribute to the effort to increase connectivity, data availability and access to communication technology. Whilst also being cognisant of the energy burden and the associated environmental impact of the sector. To mitigate these impacts the Investment Manager seeks to reduce the carbon footprint and increase the energy efficiency of the assets and networks within the Company’s portfolio.

The Investment Manager, to mitigate these risks and other ESG outcomes as well as support positive impacts, integrates ESG risk management and impact analysis procedures throughout the investment process - as detailed in the following sections. Furthermore, the Investment Manager and the Company, seek to encourage investee companies to mitigate their ESG impacts by adopting sustainable operating practices. The Investment Manager assists companies in adopting sustainability policies and responsible behaviour towards their stakeholders, with a focus on employees and local communities.

As a sector focused fund manager, the Investment Manager seeks to promote key sector-specific sustainable outcomes within and via investee companies. These characteristics are the Investment Manager's 'Guiding Principles', tailored to the digital infrastructure sector, which the Investment Manager seeks to promote on behalf of the Company:

- i. The need to reduce the carbon footprint of the digital economy, focusing on:
 - Enabling efficient network design – i.e., supporting the integration of 5G and broadcast
 - Integrating renewable energy where possible
 - Energy efficiency at the network component level – i.e., more efficient data centres
- ii. The need to reduce the carbon footprint of society, through enhanced communications that diminish the need for unnecessary travel and shrink pollution-causing congestion.
- iii. The need to better connect under-served businesses and households to the digital economy, thereby supporting enhanced opportunity and economic activity.

No index has been designated as a reference benchmark for the purpose of meeting the environmental and/or social characteristics promoted by this financial product.

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

Investment strategy

The Company principally makes direct equity or structures with equity-like characteristics investments to acquire or construct operating, cash flow generating Digital Infrastructure Assets (either individually or by acquiring entities owning portfolios of such assets). The Company principally invests in operational Digital Infrastructure Assets, primarily located in the United Kingdom, the European Economic Area, the United States of America and Canada, with a predominant focus on:

- data centres – edge, colocation, interconnectivity, carrier hotels or hyperscale;
- mobile telecommunications/broadcast towers – including digital antenna systems (or DAS), broadcast towers, rooftops, small cells and in-building systems and other related infrastructure; and
- fibre-optic assets and networks – municipal, metro, data centre connectivity and long-haul regional, international and sub-sea networks.

The Company seeks to make investments entailing 100 per cent ownership or majority control by the Company and intends to hold its digital infrastructure assets over the long term.

Integration of ESG and impact into the investment process to promote environmental and social characteristics

The Investment Manager, in line with its capabilities, integrates ESG and impact throughout the investment process, basing its approach on three key lynchpins: (1) screening; (2) management; and (3) tracking. The Investment Manager's approach is integrated into the investment strategy through processes and tools which support the lynchpin concepts. An ESG and Impact Officer, assigned to the investment, implements these processes, supported by the Investment Manager's ESG and Impact Team. The processes and tools used to integrate ESG considerations into the investment process and their applicable dates are detailed below.

Screening

Exclusion List:	Prospective investments are subjected to an initial negative exclusion screening process, outlining activities and operations that present significant ESG risks.
ESG Risk and Impact Identification:	Investments are evaluated based on the country(s) and sector(s) of operation to identify potentially material risk factors. Alignment to the SDGs is also assessed at this stage.
ESG Due Diligence:	The Investment Manager conducts an ESG due diligence process, covering sector-specific and sector-neutral sustainability factors. Due diligence is tailored for the investment and the sector.
Risk Categorisation:	Based on identified material risks, ESG due diligence and additional supporting information, a risk level is attributed to the prospective investment.

Management

Gap Analysis:	Based on the ESG due diligence, the Investment Manager identifies negative and/or positive 'gaps' in a company's ESG performance. Necessary measures or appropriate remediation policies are outlined by the ESG team and communicated to the investee company.
Engagement:	The Investment Manager actively engages with investee companies concerning ESG and impact matters. As part of its engagement efforts, the Investment Manager seeks to aid investee companies: (i) identify and mitigate ESG risks; (ii) assess and act upon impact opportunities; (iii) improve ESG characteristics; and (iv) specify and build understanding on the indicators required to track ESG and impact performance. If concerns are highly material, an ESG Action Plan will be developed to improve an investee company's ESG performance to meet the Investment Manager's expectations. If required, the hiring of third-party E&S experts will be considered. Engagement efforts are anchored by the Investment Manager's Engagement Policy.

Tracking

On-Going Monitoring and Evaluation:	The Investment Manager conducts on-going monitoring and evaluation to track the ESG and impact performance of investee companies and to ensure actions are consistent with agreed-upon ESG plans. The Investment Manager's Senior Management and Investment Committee will be alerted to risks arising during the lifetime of an investment. The Investment Manager will conduct a yearly review of performance.
Transparency:	The Investment Manager discloses its approach to responsible investment and the integration of ESG risks and/or opportunities and impact objectives throughout the investment process.

Disclaimer

Please note that as the ESG and Responsible Investment sphere continues to evolve and develop at a rapid pace the Investment Manager will continue to evolve its processes, and develop supporting proprietary tools, to enhance these processes, in line with its capabilities and any relevant obligations. As such the application of the Investment Manager's processes may differ depending on the date of the investment. Where appropriate these processes and tools have been applied to current investee companies to ensure consistency and help facilitate portfolio baselining processes. When updates to the process have been made, details on the changes and their implementation have and will be included with the disclosures.

What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

The Investment Manager will adhere to the binding elements of the Company's investment strategy, detailed in the Company's prospectus. The Investment Manager will supplement rigorous investment analysis of digital infrastructure assets with a consideration of material ESG factors and impact investing principles. The Investment Manager will seek to implement this consideration through the elements detailed within this disclosure. The specifics of these processes may be subject to updates and revisions to ensure best practice, in line with the capability of the Investment Manager are implemented.

What is the policy to assess good governance practices of the investee companies?

Governance evaluation can include the assessment of an investee company's leadership, remuneration of staff, audits, internal controls, anti-corruption measures, tax compliance and relations with other stakeholders. Prior to an investment being made, the Investment Manager assesses the governance practices of prospective investments during due diligence, including a Know Your Client ("KYC") review. Furthermore, the ESG Due Diligence Questionnaire addresses whether:

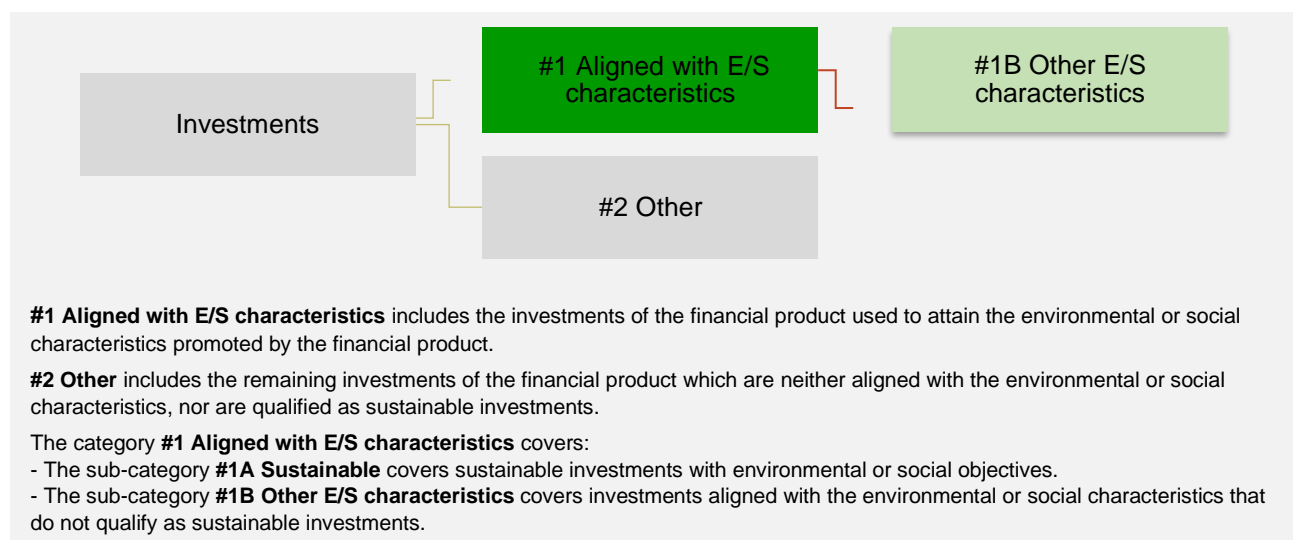
- i. Investee companies properly address business ethics;
- ii. Endeavour to exhibit honesty, integrity, and fairness in their business dealings; and
- iii. Exhibit relevant best practice standards, applicable to the size of the company, in relation to corporate governance and analyse potential investments for risks associated with governmental corruption and/or politically exposed persons (so-called PEPs).

The Investment Manager reviews its approach on an on-going basis and will enhance its processes when it believes it can make improvements to better mitigate risk, add value and ensure best practices, in line with the Investment Manager's capabilities, are implemented.

Proportion of investments

The Company will principally make direct equity or structures with equity-like characteristics investments in operating digital infrastructure assets, with a predominant focus on data centres, mobile telecommunications and broadcast towers and fibreoptic network assets, primarily located in the United Kingdom, the European Economic Area, the United States of America and Canada. The Company will seek to make investments entailing 100 per cent ownership or majority control by the Company. Investments will be subject to the ESG procedures and practices of the Investment Manager, which are detailed in the investment strategy and specified in CORD's and the Investment Manager's respective Responsible Investment Policies, to ensure ESG risks are identified and managed, and impact generation opportunities are targeted to help ensure environmental and social characteristics are promoted.

The Company will promote environmental and/or social characteristics without having as its objective sustainable investment. The Company will not commit to a minimum percentage of sustainable investments with environmental and/or social objectives.



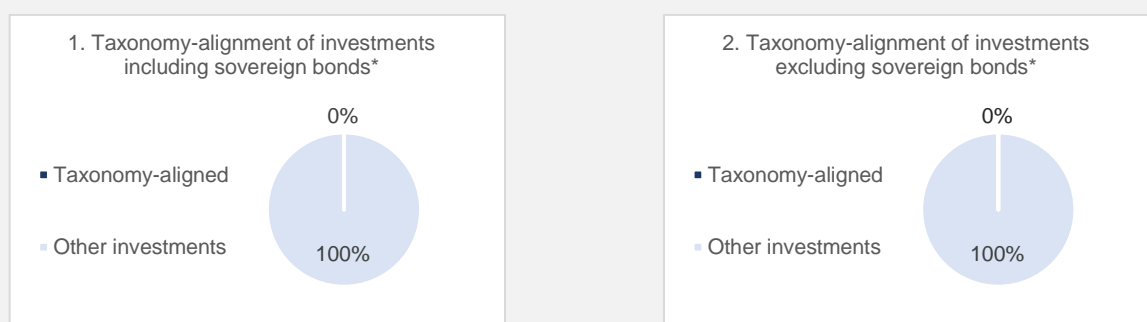
How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The Company may invest in currencies or derivatives with a view to hedge investments and the Company's currency exposure. The Company will not use currencies and derivatives to attain the environmental and social characteristics promoted by the financial product.

To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The Company's investment mandate focuses on private equity investments to mid-market companies in Europe and North America. As a result, investee companies are typically not of the stage, size, location or have the capacity to meet or implement the stringent criteria for Taxonomy-alignment. Due to these requirements, the Company's investments are unlikely to be determined as Taxonomy-aligned. Whilst this may change in the future, the Company will not currently make a commitment to target a certain percentage of alignment to the EU Taxonomy within the portfolio. The Investment Manager will review updates to the regulation and respond accordingly. Furthermore, the Company and the Investment Manager seek to promote environmental and social characteristics but have not committed to making sustainable investments. As such the minimum extent of the sustainable investments with an environmental objective made by the Company that are aligned with the EU Taxonomy is 0%. For the purposes of clarity, the Company will not make investments in sovereign bonds*.

The two graphs below show in green the minimum percentage of investments that are 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 is the minimum share of investments in transitional and enabling activities?

The Company does not expect to make Taxonomy-aligned investments due to the stage, size, location or capacity of target companies. Therefore, the minimum share of transitional activities is 0%, while the minimum share of enabling activities is 0%.

What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

The Company does not make investments classified as sustainable investments. As such, the minimum share of the Company's investments that are sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 0%.

What is the minimum share of socially sustainable investments?

The minimum share of socially sustainable investments is 0%.

What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

The Company may invest in currencies and derivatives. These investments are not used to attain the environmental and social characteristics promoted by the financial product and are included as “#2Other”.

Monitoring of environmental or social characteristics

The Investment Manager to measure the attainment of the promoted environmental and social characteristics of the Company, both the implementation of ESG processes and the Guiding Principles, will track the following indicators:

- Percentage of prospective investments and investee companies that have had the ESG processes, detailed in the Investment Strategy, applied;
- Percentage of portfolio companies reporting on GHG emissions;
- Portfolio companies' GHG Emissions;
- Percentage of renewable energy in portfolio companies' energy mix;
- Area coverage of towers held by portfolio companies;
- Number of portfolio companies' points of presence;
- Number of portfolio companies' interconnections; and
- Length of portfolio companies' fibre networks.

Monitoring portfolio companies

As part of the initial assessment of an investee company, the Investment Manager assesses the mitigation of key identified ESG risks and the maturity of ESG policies and awareness of the prospective investment. The Investment Manager will then monitor remediation measures implemented by the portfolio company, including physical measures to mitigate risks, and the inception and adoption of policies and operating standards.

Furthermore, the Investment Manager is initiating the use of a combination of ESG indicators. The basis of these sets of indicators are being formed by relevant SASB industry standards applicable to the investment. The Investment Manager is currently in the process of complimenting these indicators with further metrics to assess both the internal and external positive impact promoted through engagement.

On an on-going and ad-hoc basis, the Investment Manager's ESG and Impact Team and Investment Team will engage with investee companies to discuss previously identified ESG risks and opportunities and any arising issues are considered and are monitored appropriately. The Investment Manager's Investment Committee will be made aware of arising ESG risks and opportunities.

Methodologies for environmental or social characteristics

The processes outlined in the Investment Strategy and Monitoring Sections, detail the methods integrating ESG considerations into the investment decision-making process and the tracking of indicators and actions by investee companies. Performance against identified indicators in combination with risk mitigation actions and qualitative information gathered from the investee company via reports and meetings with management teams will be assessed by the Investment Manager's ESG and Impact Team and Investment Team.

The Investment Manager will assess the progress in reducing negative gaps identified through the Gap Analysis of a company's ESG processes. Where an ESG Action Plan has been implemented, the Investment Manager will assess the investee company's adherence to the implementation of the deliverables.

Data sourcing and processing

The Investment Manager will predominately use primary data from portfolio companies and prospective companies to measure the attainment of the environmental and social characteristics promoted by the Company. The Investment Manager will engage with the Company's portfolio companies to determine the indicators required to assess the promotion of environmental and social characteristics. The data requested will be a combination of relevant SASB metrics, industry neutral KPIs and indicators to assess impact generation and alignment. Where necessary the Investment Manager will use relevant databases produced by recognised and reputable bodies to aid the assessment of key ESG risks.

The Investment Manager's ESG and Impact Team, in coordination with members of the Investment Manager's Investment Team where necessary, will assess and evaluate the data received and where necessary will request further information to support identified indicators and ensure its quality.

Limitations to methodologies and data

The Investment Manager principally sources environmental and social data directly from investee companies and as a result is initially dependent on the maturity of ESG data collection processes of the investee company. As such, the Investment Manager may not have access to relevant ESG metrics prior to investing and engaging with the investee company, limiting the assessment of certain indicators and the establishment of baselines for an investee company's ESG performance in order to promote environmental and social characteristics. In addition, there may be time lags in monitoring as investee companies implement and establish data collection procedures and to enable data reporting. To minimise this scenario, the Investment Manager will engage with investee companies to facilitate the implementation process and, where necessary, engage third parties to assist with the collection processes.

The Company's investment strategy focuses on private equity and similarly structured investments in mid-market companies. Due to this and the maturity of investee companies and peer companies, external comparisons, and benchmarking of ESG performance may be limited. The Investment Manager where possible will seek to find relevant insights to inform decisions on ESG performance.

The Investment Manager seeks to review its ESG and impact frameworks and standards as approaches continue to develop to ensure the methodologies implemented follow best practice and are consistent with the Investment Manager's capabilities. Furthermore, the Investment Manager actively participates as a member of the GIIN to garner and share insights and best practices. During 2022, the Investment Manager initiated a program to improve the consistency in the application of its methodologies across current investee companies and future prospective companies. As a result, the Investment Manager has begun the assessment of current investee companies utilising the updated ESG and impact tools and processes.

Due diligence

The Investment Manager's ESG and Impact Team, in conjunction with the Investment Manager's Investment Team, conducts in-depth analysis on prospective investments to establish an understanding of key risks, issues, and opportunities. The processes used to conduct the ESG due diligence of a prospective company are specified in the investment strategy section under Screening. The Investment Manager's ESG due diligence approach focuses on the implementation of an exclusion list, risk identification, ESG maturity and mitigation, and risk level classification.

Engagement policies

The Investment Manager views engagement as a vital component of its integration of ESG and impact into the investment process and as such seeks to pro-actively engage with investee companies regarding ESG and impact risks and opportunities throughout the lifecycle of an investment. CORD's and the Investment Manager's respective Responsible Investment Policies detail the full approach the Investment Manager, on behalf of the Company, will take when engaging with investee companies. The key elements of which are:

- i. Information and data collection to enable a comprehensive assessment of baseline ESG performance prior to investment, with follow ups to discuss information gaps;
- ii. Gap analysis and discussion with investee companies concerning remediation measures to improve or mitigate adverse ESG risks or impact outcomes;
- iii. Engagement with investee companies' management to promote the adoption of policies, standards and best practice concerning governance and labour;
- iv. Development of ESG Action Plans to address highly material concerns, where necessary; and
- v. Periodically review management objectives in the context of the impact the company would like to achieve through the investment.

If deemed necessary or material, the Investment Manager will consider contracting an ESG and Impact-focused consultant. Consultants may be contracted for a number of reasons, such as but not limited to: Provide on-site visits to ensure accurate information is delivered to the Investment Manager; to evaluate the technology, materials, and equipment of the investee company to identify environmental risks and safeguards; Review and verify the existence and validity of EHS permits, licenses, and concessions according to the applicable national regulations and standards; and review relevant documentation, specifically in regards to Environmental, Health and Safety, Social, and Governance, to ensure standards are met by investee companies.

Designated reference benchmark

Not applicable. No index has been designated as a reference benchmark for the purpose of meeting the environmental and/or social characteristics promoted by this financial product.