

TEMPORIS OPERATIONAL RENEWABLE ENERGY STRATEGY LP SFDR DISCLOSURE STATEMENT

1. Introduction

This website disclosure statement is made in accordance with the requirements as set out in Article 10 of the EU Sustainable Finance Disclosure Regulation (“SFDR”) and its accompanying Regulatory Technical Standards.

The statement relates to Temporis Operational Renewable Energy Strategy LP (“TORES”). It should be noted that TORES is no longer open to new investors.

TORES is managed by Temporis Investment Management Limited (“Temporis” or the “Manager”), which is registered as an Alternative Investment Fund Manager (“AIFM”) with the Central Bank of Ireland.

2. Summary

Temporis invests in and manages renewable infrastructure assets on behalf of its clients. Temporis has integrated a number of global sustainability initiatives into its investment processes: for example, it is a signatory of the Principles for Responsible Investment (“PRI”). Temporis seeks to integrate ESG considerations into its investment processes to support the delivery of long term, sustainable value. Its Responsible Investment (“RI”) approach aims to systematically identify and manage ESG risks and opportunities as part of its broader investment decision-making and asset management activities.

This section summarises the key information referred to in the remaining sections of this statement.

Classification	The Fund has been classified as a fund that has sustainable investments as its objective under Article 9 of SFDR.
No significant harm to the sustainable investment objective	Temporis has integrated the ‘do no significant harm test’ into its investment due diligence process. The Manager assesses the test by reference to the principal adverse impact (“PAI”) indicators. Temporis has in place a sustainability due diligence policy, which is contained as an appendix to its ESG Policy, and carries out a due diligence process in respect of the environmental impacts of its investments. For ‘do no significant harm purposes’, the Manager sets its own subjective threshold of what it considers to be significant harm. If a particular potential investment is assessed by Temporis to do significant harm against the relevant PAI indicator(s), then it will be excluded from being treated as a “sustainable investment”.
Sustainable investment objective of the financial product	The Fund’s investment objective is to acquire, operate and improve operational renewable energy generation projects in the United Kingdom and Western Europe.

Investment Strategy	<p>The strategy of the Fund is geared towards managing a portfolio of renewable energy assets in a way that generates attractive returns for investors whilst bringing wider community benefits, e.g., contributing positively towards the transition to a zero-carbon economy.</p> <p>Temporis, together with the TORES portfolio companies it manages, is committed to complying with all national laws and regulations in the jurisdictions in which it operates and applies a set of ESG guidelines, seeking specialist third party advice where necessary.</p>
Proportion of investments	Temporis invests 100% of the Fund's investments in sustainable investments. These are sustainable investments with an environmental objective.
Monitoring of sustainable investment objective	The sustainability objective of mitigating climate change is monitored by way of obtaining and reviewing performance data on the clean energy generated for each asset individually and across the fund portfolio, together with figures on cumulative CO ₂ emissions savings, expressed both in tonnage and as an annual equivalent of homes powered.
Methodologies	The sustainability performance metrics and the data referred to herein are used to measure the attainment of the sustainable investment objective as set out herein. CO ₂ emission savings will be achieved for each kWh generated by the investments that are developed, constructed, and/or operated by the Fund. The CO ₂ emission savings arising from the development, construction and/or future operations of renewable energy schemes will be forecast by reference to the annual estimated generation of the schemes over their operational lifespan.
Data sources and processing	Temporis utilises the estimates of annual generation of the schemes constructed by an independent technical advisor and Department for Business Energy & Industrial Strategy's forecasts.
Limitations to methodologies and data	<p>Data from the turbine's Supervisory Control and Data Acquisition ("SCADA") systems and electricity export meters accurately measure all clean energy generated. There is no generation that is not independently checked and verified by a third-party power purchaser.</p> <p>The method involved in forecasting the CO₂ displacement of the schemes developed and constructed by the Fund relies on an estimation of the future generation. This estimate is always performed by an independent technical advisor.</p> <p>Whilst the government / third party statistics on carbon emissions in the UK per kWh do contain some estimates and assumptions, they are outside the control of the Fund.</p>
Due diligence	<p>Temporis' sustainability due diligence policy is contained as an appendix to its ESG Policy.</p> <p>The assessment of relevant ESG factors and benefits applies throughout the investment cycle. For new assets, it includes deal screening and due diligence processes; for existing portfolio investments, it includes asset management protocols and controls, monitoring, reporting and exit processes (as appropriate).</p>

Engagement policies	Engagement in relation to the renewable assets held by the Fund principally takes the form of board-level involvement in portfolio companies and, where relevant, engagement with operators and service providers on environmental, social and governance matters. This engagement supports the Fund's sustainable investment objective and includes engagement with local communities and other relevant stakeholders, where relevant.
Attainment of sustainable investment objective	An index has not been designated as a reference benchmark in respect of the Fund.

3. No Significant Harm to the Sustainable Investment Objective

One element of the definition of a “sustainable investment” is that the investment must do no significant harm (“DNSH”) to environmental or social objectives (the “DNSH test”). Temporis has therefore embedded the assessment of “do no significant harm” (“DNSH”) into the Fund’s investment due diligence process, decision-making and ongoing monitoring processes, in line with its ESG Policy and sustainability risk management framework.

For the purposes of DNSH, Temporis considers the mandatory and relevant additional principal adverse impact indicators as part of the investment due diligence process. These are comprised of (i) all of the mandatory indicators as specified in Table 1 of Annex I of the SFDR Regulatory Technical Standards (Commission Delegated Regulation (EU) 2022/1288) (the “RTS”), and (ii) certain relevant indicators from Table 2 and Table 3 of Annex 1 of the RTS. These are set out below.

Mandatory (from Table 1 of Annex I of the RTS)	
1.	GHG emissions
2.	Carbon footprint
3.	GHG intensity of investee companies
4.	Exposure to companies active in the fossil fuel sector
5.	Share of non-renewable energy consumption and production
6.	Energy consumption intensity per high impact climate sector
7.	Activities negatively affecting biodiversity-sensitive areas
8.	Emissions to water
9.	Hazardous waste and radioactive waste ratio
10.	Violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises
11.	Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises
12.	Unadjusted gender pay gap
13.	Board gender diversity
14.	Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)
15.	GHG intensity
16.	Investee countries subject to social violations
Additional (from Table 2 of Annex I of the RTS)	
1	8. Exposure to areas of high-water stress.
2	14. Natural species and protected areas.
Additional (from Table 3 of Annex I of the RTS)	
1	4. Lack of a supplier code of conduct.
2	10. Lack of due diligence (on human rights impacts)

The Manager sets its own subjective threshold of what it considers to be significant harm. If a particular potential investment is assessed by Temporis to do significant harm against the relevant PAI indicator(s), then it is excluded from being treated as a “sustainable investment”.

For DNSH purposes, the Manager assesses whether potential adverse impacts identified through the relevant PAI indicators would constitute significant harm, taking into account the characteristics of the investment and the feasibility of avoiding or mitigating such impacts. Where a potential

investment is assessed as likely to cause significant harm to an environmental or social objective, and such harm cannot be adequately avoided or mitigated, the investment is not considered to qualify as a sustainable investment and will not be pursued by the Fund.

Compliance with minimum safeguards is also assessed as part of the DNSH framework. The Manager evaluates whether investee entities follow good governance practices, including sound management structures, compliance with applicable laws, respect for human rights, and alignment with international standards such as the UN Global Compact principles and the OECD Guidelines for Multinational Enterprises. Investments that are materially misaligned with these standards, or that fall within the Manager’s exclusion policy, are excluded from the Fund’s potential investments.

DNSH considerations continue to apply throughout the life of each investment. The Manager monitors environmental and social performance at asset level, reviews incidents and compliance with permit conditions, engages with operators and contractors, and periodically reassesses sustainability risks as part of its ongoing asset management and ESG oversight processes. Where new information indicates that an investment may cause significant harm to an environmental or social objective, appropriate remedial actions are considered and the investment’s continued qualification as a sustainable investment is reassessed.

4. Sustainable Investment Objective of the Financial Product

The Fund’s investment objective is to acquire, operate and improve operational renewable energy generation projects in the United Kingdom and Western Europe.

For the purposes of the Taxonomy Regulation, Temporis has taken the view that the investments underlying the Fund contribute positively to climate change mitigation, an environmental objective as set out in the SFDR.

5. Investment Strategy

The strategy of the Fund is geared towards managing a portfolio of renewable energy assets in a way that generates attractive returns for investors whilst bringing wider community benefits, e.g., contributing positively towards the transition to a zero-carbon economy.

Sustainability considerations are integrated throughout the investment lifecycle, including at the screening and due diligence stage for new investments, and through ongoing asset management, monitoring and engagement for existing portfolio investments. The assessment of relevant environmental, social and governance factors form part of the investment decision-making process and is reviewed by the relevant Investment Committee prior to commitment of capital.

Temporis, together with the TORES portfolio companies it manages, is committed to complying with all national laws and regulations in the jurisdictions in which it operates and seeks to comply with ESG standards as outlined in the guidelines below. These guidelines inform investment selection, structuring and oversight and are applied alongside the Fund’s sustainable investment objectives and “do no significant harm” assessment.

ESG Guidelines	
Environmental	<ul style="list-style-type: none"> Temporis will seek to comply with all applicable laws relating to the environment, climate change and planning as administered by environmental and health protection agencies, local authorities, energy regulators and other relevant regulatory bodies.

	<ul style="list-style-type: none"> • Temporis will seek to take appropriate steps to avoid or mitigate unacceptable environmental impacts on biodiversity, ecology, air quality, noise, waste management and archaeology as applicable to the particular asset or investment. • Temporis will seek to ensure contractors and operators apply appropriate industry standards in respect of the environment and will seek to ensure that data provided to applicable regulators complies with relevant quality assurance standards
Social	<ul style="list-style-type: none"> • Temporis will seek to adhere to all applicable laws relating to employment, health & safety, human rights, and public safety. • Temporis will seek to engage with local communities positively at an early stage and incorporate feedback on investments where appropriate. • Temporis will seek to ensure that all obligations with respect to planning, land and access are properly observed, and assets are managed in accordance with applicable planning laws and relevant permits.
Governance	<ul style="list-style-type: none"> • Temporis will seek to ensure that its corporate governance arrangements comply with mandatory statutory standards and to operate in accordance with applicable guidelines of relevant regulatory bodies with jurisdiction over the investment / asset. • Temporis will seek to operate in accordance with applicable laws and its internal policies relating to anti-financial crime and conflicts of interest. • Temporis has taken steps to assess the alignment of its remuneration policy and governance structures with this ESG Policy.

6. Proportion of Investments

#1 Sustainable: Temporis invests 100% of the Fund's investments in sustainable investments. These are sustainable investments with an environmental objective, as detailed below.



The EU Taxonomy is a classification system of environmentally sustainable economic activities which applies to sustainable investments with environmental objectives initially.

The Fund contributes to the climate-change-mitigation environmental objectives under the Taxonomy Regulation. Various types of renewable energy are subject to the technical screening criteria for economic activities that contribute substantially to climate change mitigation.

Temporis currently invests a minimum of 92% of the Fund's investments in sustainable investments that are aligned with the EU Taxonomy. Temporis will continue to evaluate data providers for EU Taxonomy data to ensure the most appropriate source is used.

In relation to the 8% of the Fund's investments that are not currently EU Taxonomy-aligned, the necessary data is not readily accessible for technical screening purposes. While Temporis does not class them as being Taxonomy-aligned, these investments, which are in hydro, generate clean electricity.

For sustainable investments within the scope of the Taxonomy Regulation and in taxonomy-aligned activities, prior to making the investment, Temporis will, in accordance with the criteria in the Taxonomy Regulation, ensure that the investment does no significant harm to other environmental objectives. For all other investments, prior to making the investment, Temporis will apply the do no significant harm test.

7. Monitoring of Sustainable Investment Objective

The sustainability objective of mitigating climate change is monitored by way of obtaining and reviewing performance data on the clean energy generated for each asset individually and across the fund portfolio, together with figures on cumulative CO₂ emissions savings, expressed both in tonnage and as an annual equivalent of homes powered.

8. Methodologies

The sustainability performance metrics referred to in Section 7 above and the data referred to in Section 9 below are used to measure the attainment of the sustainable investment objective as set out therein. Sustainability performance is reported to fund investors on a quarterly basis.

9. Data Sources and Processing

The Fund has invested in the acquisition of operational renewable energy projects. CO₂ emission savings will be achieved for each kWh generated by the investments that are operated by the Fund. The CO₂ emission savings arising from future operations of renewable energy schemes will be forecast by reference to the annual estimated generation of the schemes over their operational lifespan.

The annual estimated generation is always computed by an independent technical advisor who utilises local long term wind resource data, often onsite met mast wind resource data collected over at least 12 months, topographical information about the land on which the site is situated (with most importance given to the topography in the predominant wind direction) and turbine-specific energy production curves to make a forecast of the statistical long-term average generation (known as the "the P50 generation"). The operational lifespan of mainstream renewable energy schemes is expected to be at least 30 years. The Department for Business Energy & Industrial Strategy's annual emissions statistic for "all non-renewable fuels" (in tonnes of carbon dioxide per GWh of electricity), supplied in the [Digest of UK Energy Statistics](#), details the CO₂ emissions that could be displaced by each kWh generated by the Fund's investments in each year of operation.

These government forecasts are updated periodically, and our calculations are updated accordingly. The gross CO₂ displacement for a new renewable energy scheme created by the Fund is forecast as the P50 generation multiplied by the lifespan of the project multiplied by the displaced CO₂. The net CO₂ displacement is calculated by deducting the estimated emissions associated with construction and operations. Given that the Fund acquired operational projects rather than undertaking construction, we do not consider the CO₂ emissions that would have previously been incurred during construction.

The CO₂ emission savings achieved each year by the Fund's operational renewable energy schemes is calculated by reference to the actual export from the schemes, rather than the forecast P50 generation. The method of capturing generation data varies by renewable energy technology. For wind schemes, software from each wind turbine is reported each 10 minutes over the entire life of the wind farm by a SCADA system. Data can be monitored on a real time basis by way of a performance dashboard via a dedicated portal run by each turbine manufacturer. Additionally, all operational wind investee companies employ software created by Greenbyte called "Breeze" to analyse and present generation data—again in real time and on a granular basis. This data is "pulled" from the turbines via internet connections. For hydro assets, generation data is available online through web portals. For all operational projects, the measurement of the actual exported power to the grid (i.e. less the losses caused by resistance in the cables between the turbines and the meters) is also captured. Third-party electricity offtakers also have access to the meters and pay the investee companies for the electricity generated, which acts as a further control on data accuracy.

10. Limitations to Methodologies and Data

The data from the turbine's SCADA systems and electricity export meters accurately measure all clean energy generated. There is no generation that is not independently checked and verified by a third-party power purchaser who, once satisfied, then agrees to pay the Fund's investee company for said generation.

The method involved in forecasting the CO₂ displacement of the schemes developed and constructed by the Fund relies on an estimate of the average future generation. This estimate is always performed by an independent technical advisor using onsite data, long term reference data and the characteristics of the specific turbine and the topography of the site.

Whilst the government / third party statistics on carbon emissions in the UK per kWh do contain some estimates and assumptions, they are outside the control of the Fund.

11. Due Diligence

The Manager applies sustainability due diligence as an integral part of the Fund's investment process, with the objective of identifying, assessing and managing material environmental, social and governance risks and impacts associated with potential and existing investments. Sustainability due diligence is conducted in accordance with the Manager's Sustainability Due Diligence Policy, which forms part of the Temporis ESG Policy, and is applied in a manner proportionate to the nature, scale and stage of each investment.

For new investments, sustainability due diligence is undertaken as part of the pre-investment screening and detailed due diligence process. This includes an assessment of compliance with applicable environmental, social and governance laws and regulations, review of relevant planning

permitting requirements, and evaluation of material sustainability risks and impacts relevant to the asset or investment. Where appropriate, the Manager draws on specialist third-party advisers for technical, environmental and legal advice to support its assessment.

Findings from sustainability due diligence are considered by the relevant Investment Committee prior to any decision to proceed with an investment.

Following acquisition, sustainability considerations continue to be monitored throughout the holding period. The Manager oversees environmental and social performance at asset level, reviews compliance with relevant permit conditions and contractual obligations, and engages with operators, contractors and other relevant counterparties where appropriate. Sustainability risks are reassessed periodically and where new information becomes available that may indicate heightened risk or adverse impacts, the Manager considers appropriate actions in line with the Fund's investment framework.

Where sustainability-related issues are identified during due diligence or ongoing monitoring, the Manager assesses their materiality and the feasibility of implementing appropriate mitigation or remedial measures. If identified issues cannot be satisfactorily addressed, the Manager may determine not to proceed with an investment or, in the case of existing investments, may reassess the investment's continued alignment with the Fund's sustainable investment objective.

12. Engagement Policies

Engagement forms part of the Manager's approach to ensuring that investments remain aligned with the Fund's sustainable investment objective throughout the holding period. In line with the Temporis ESG Policy, where portfolio companies are established to hold physical assets, the Manager is actively involved in their oversight and typically holds one or more board positions. This enables direct engagement on governance, environmental and social matters in the context of corporate strategy and operational performance. The Manager also engages, where appropriate, with operators, contractors and key service providers appointed by portfolio companies on matters relevant to environmental and social performance, health and safety and community impacts.

Further, Temporis engages with local communities throughout the life of the assets and responds quickly and sympathetically to public enquiries. Community benefit schemes, which vary from site to site, are often a critical part of sharing economic benefit locally by supporting local priorities.

13. Attainment of Sustainable Investment Objective

An index has not been designated as a reference benchmark in respect of the Fund.

31st January 2026