

Transparency of the promotion of environmental or social characteristics (Website Disclosure)

OGCI Climate Investments Decarbonization Fund (Luxembourg) SCSp (the "DAF"/"Fund")

EU Sustainable Finance Disclosure Regulation ("SFDR"), Article 10

This website disclosure is required to be disclosed pursuant to Article 10 Regulation (EU) 2019/2088 and in accordance with Chapter IV of Commission Delegated Regulation (EU) 2022/1288. As such, this is a legal disclosure document and should not be considered as a marketing document nor to constitute an offer.

Summary

The Fund qualifies as a financial product as referred to in Article 9 of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector ("**SFDR**"). The Fund's sustainable investment objective is reducing carbon emissions and focussing on low carbon emission exposure in view of achieving the long-term global warming objectives of the Paris Agreement, in accordance with Art 2(17) SFDR and Art 9(3) SFDR.

The Fund expects all of its investments to generate a substantial positive impact on the sustainable investment objective. The Fund's investment strategy is to deliver measurable, quantifiable greenhouse gas ("**GHG**") emissions reductions and attractive, risk-adjusted financial returns. The Fund has a 10-year life and plans to make investments in growth-stage companies with proven technologies or solutions where there is a compelling case to accelerate commercialization at scale. To achieve this, the Fund will target at least 120 million tonnes (Mt) of cumulative CO₂e reduction over the life of the Fund.

The Fund will assess whether potential investments contribute to its sustainable investment objective by leveraging the Project Frame methodology, an EU-Paris aligned Benchmark under Title III, Chapter 3a, of Regulation (EU) 2016/1011. Project Frame is an open-source initiative dedicated to building a standardized approach to GHG impact measurement. Further information on Project Frame can be found here:

The Fund exclusively looks for investment opportunities that have a quantifiable GHG impact and contribute to climate change mitigation. When it comes to not causing significant harm to other environmental and social objectives, the Fund considers certain principal adverse indicators ("**PAIs**") as set out in Tables 1 and 2 of Annex I of Commission Delegated Regulation (EU) 2022/1288 ("**RTS**").

Climate Investments Management Company (USA), LLC (the "**Manager**") has adopted and implemented a number of policies which in turn determine the internal compliance expectations of investee companies including in respect of business conduct, anti-bribery and corruption, information security and records, data protection and conflicts of interest. Examples of such policies include an ABC policy, an Insider Trading policy and a Data Privacy policy. Investee companies are expected to implement or have implemented such policies to at least an equivalent standard.

Each investment opportunity is assessed for its planned and potential impact by the Fund's Investment Committee. The Project Frame methodology is incorporated into all aspects of the pre- and post-acquisition investment process, including identification of investment opportunities and

risk management. Accordingly, all GHG related aspects will be captured in the impact analysis and taken into account with regards to avoided emissions. Other non-GHG aspects of sustainability will be captured by technology and commercial diligence. Consideration of PAI Indicators is also incorporated into the investment process both at the acquisition stage and on an ongoing basis.

The Fund expects to be 100% invested in '#1 Sustainable' investments.

No significant harm to the sustainable investment objective

The sustainability indicators used by the Fund to assess whether the sustainable investments cause significant harm to the sustainable investment objective include the following PAIs as set out in Tables 1 and 2 of Annex I of the RTS: GHG emissions, carbon footprint, share of renewables, energy consumption and GHG intensity of investee companies. These indicators are all factored into the GHG emissions impact analysis and are incorporated into the acquisition and asset management process.

The Manager has adopted and implemented a number of policies which in turn determine the Fund's expectations of investee companies in relation to business conduct, anti-bribery and corruption, information security and records, data protection, conflicts of interest and other areas of compliance. These include an ABC policy, an Insider Trading policy and a Data Privacy policy. Investee companies are expected to implement or have implemented these policies to at least an equivalent standard.

The Manager's overarching Code of Conduct also sets out the Fund's commitment to the UN Guiding Principles on Human Rights and Modern Slavery, and addresses conflicts of interest and good practices when engaging with business partners. During the ownership period, the Fund monitors on a regular basis the governance practices of its underlying investments and promotes good governance practices through its active ownership activities.

Sustainable investment objective of the financial product

The Fund's sustainable investment objective is reducing carbon emissions and focussing on low carbon emission exposure in view of achieving the long-term global warming objectives of the Paris Agreement.

The Fund's sustainable investments will contribute to its sustainable investment objective of reducing carbon emissions by utilising the methodology set out in Project Frame, an EU-Paris aligned Benchmark.

Investment strategy

The Fund aims to deliver quantifiable GHG emissions reductions and attractive, risk-adjusted financial returns. The Fund has a 10-year life and plans to invest in growth-stage companies with proven technologies or solutions where there is a compelling case to accelerate commercialization at scale. The Fund will target at least 120 million tonnes (Mt) of cumulative CO₂e reduction over the life of the Fund. The Fund will seek to invest in solutions that lower the cost of industrial decarbonization to enable corporations to achieve their carbon reduction goals.

Monitoring of sustainable investment objective

- Each initial investment in the Fund shall, in the reasonable opinion of the DAF Investment Committee using the sustainability indicators set out below ("the Indicators"), pass the forecast planned GHG impact hurdle of >5MT CO₂e cumulative net impact per annum from year of investment to 2034.
- The Fund as a whole will target at least 120 Mt of cumulative CO₂e reduction over the 10-year fund life.
- The Fund will track the GHG impact forecasts for each investee, and the Fund as a whole, and update the in-year forecast on a yearly basis during the calendar year. The Fund will also track and update annually the year 10 projections of impact.
- The Fund will monitor the Principal Adverse Impacts as set out in Tables 1 and 2 of the RTS, which includes the carbon footprint of investees, additional environmental considerations as well as social indicators
- The operations of the Fund itself, as opposed to its investees, will continue to be carbon neutral and the Manager shall seek to develop a net zero strategy, using the same Indicators.

Methodologies

The Manager leverages the Project Frame methodology to ensure that potential investments contribute to the objective of climate change mitigation. Project Frame is an open-source initiative for investors dedicated to building a standardized approach to GHG impact measurement. This methodology makes sure that the companies the Fund invests in are actively contributing to the emissions reduction required to meet the objectives of the Paris Agreement. Further detail on the Manager's impact approach and consideration of the Project Frame methodology can be found here: <https://www.climateinvestment.com/news/climate-investments-corporate-and-impact-report-2022-released>.

Data sources and processing

GHG impact, as required by the Project Frame methodology, is calculated using self-reported data from investees. Planned and potential GHG impact will be forecasted using estimates and assumptions where company data is unavailable.

PAI data is self-reported by investee companies through a software platform designed to support the collection of PAI data and SFDR reporting. The Manager will work closely with investee companies to review and sense check the data to ensure data quality. The data is then stored on the software platform to support the reporting processes.

Limitations to methodologies and data

Despite best efforts to ensure a standardized approach to GHG impact and PAI data collection, the Manager acknowledges the following limitations:

- Reporting of data by portfolio companies, while encouraged, is not enforced. This may lead to some gaps in the data.
- Some companies may not have the data readily available and may thus choose not to report select categories.
- The Manager relies on the self-reporting of PAI data which may lead to inaccuracies and bias.

- There are different methodologies to GHG emission reporting which is required for PAI reporting. While the Manager endeavours to use a single methodology (activity-based) across portfolio companies, some may self-select to use a spend-based approach given that this data may be more readily available.

The Manager is continuously seeking to address these limitations and thereby improve the quality of data collected. The limitations do not hinder the attainment of the sustainable investment objective as the data reported will be directionally accurate and, by virtue of the Manager's investment strategy, the Manager will exclusively invest in solutions with potential to contribute to climate change mitigation.

Due diligence

The investment process is managed against a four-part staged gate review (each a "Gate") to ensure consistency and quality of the Manager's overall evaluation. Each Gate is evaluated by the Investment Committee to determine if the deal team should continue pursuing the opportunity. Due diligence occurs throughout deal sourcing and screening, investment, closing and follow-on investments. Post-acquisition investments are routinely monitored for their GHG impact.

Engagement policies

The Manager has adopted and implemented a number of policies which in turn determine the internal compliance expectations of investee companies including in respect of business conduct, anti-bribery and corruption, information security and records, data protection and conflicts of interest. Examples of such policies include an ABC policy, an Insider Trading policy and a Data Privacy policy. Investee companies are expected to implement or have implemented such policies to at least an equivalent standard.

In addition, the Manager's representatives as Board Director or Board Observers at investee companies have certain obligations in relation to the sustainable investment objective including compliance monitoring and monitoring for material ESG-related risks and opportunities. The Director/Observer are also responsible for tracking news and events such as regulatory changes or stakeholder concerns that may risk the achievement of the sustainable investment objective.

Attainment of the sustainable investment objective

The Fund's sustainable investment objective is reducing carbon emissions and focussing on low carbon emission exposure in the view of achieving the long-term global warming objectives of the Paris Agreement in accordance with Art 2(17) SFDR and Art 9(3) SFDR.

The Fund's sustainable investments will contribute to its sustainable investment objective of reducing carbon emissions by using the methodology, Project Frame, , an EU-Paris aligned Benchmark under Title III, Chapter 3a, of Regulation (EU) 2016/1011 when carrying out its investment strategy.

The methodology behind Project Frame is described at <https://www.climateinvestment.com/news/climate-investments-corporate-and-impact-report-2022-released>. This methodology makes sure that the companies the Fund invests in are actively contributing to the emissions reduction required to meet the objectives of the Paris Agreement.

The sustainable investments underlying the Fund contribute to the environmental objective of climate change mitigation. The sustainable investments underlying the Fund are economic activities that qualify as environmentally sustainable because they contribute substantially to climate change

mitigation, they do not significantly harm any of the environmental objectives set out in Article 9 EU Taxonomy, they are carried out in compliance with the minimum safeguards laid down in Article 18 EU Taxonomy and they comply with technical screening criteria that have been established by the Commission in accordance with Article 10(3), 11(3), 12(2), 13(2), 14(2) or 15(2).