EUROPEAN
COMMISSION

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ANNEXES 1 to 4

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COMMISSION DELEGATED REGULATION (EU) .../...

amending and correcting the regulatory technical standards laid down in Delegated Regulation (EU) 2022/1288 as regards the content and presentation of information in relation to disclosures in precontractual documents and periodic reports for financial products investing in environmentally sustainable economic activities

ANNEX V

Template 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: OGCI Climate Investments Decarbonization Fund (Luxembourg) SCSp (the "Fund")
Legal entity identifier: 984500D9CE37f47C3758

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

Did this financial product have a sustainable investment objective?

☒ **Yes**	☐ **No**
☒ It made **sustainable investments with an environmental objective:** 100%	☐ It **promoted Environmental/Social (E/S) characteristics** and while it did not have as its objective a sustainable investment, it had a proportion of ___% of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☒ in economic activities that do not 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 made **sustainable investments with a social objective:** ___%	☐ It promoted E/S characteristics, but **did not make any sustainable investments**

To what extent was the sustainable investment objective of this financial product met? *The Fund's sustainable investment objective is reducing carbon emissions 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 (other than liquid investments) will contribute to its sustainable investment objective of reducing carbon emissions by using the methodology, Project Frame, when carrying out its investment strategy, which qualifies as an EU-Paris aligned Benchmark under Title III, Chapter 3a, of Regulation (EU) 2016/1011.*

During the year ended 31 December 2025, the Fund made three investments into JessCo, Zetiveiw, and Xnrgy. During due diligence, the products and services of each company were evaluated using the Firm's GHG Impact methodology - published on our website and aligned with Project Frame - to ensure that the potential investments met the planned impact hurdle. Rigorous screening and diligence on all other key aspects of the potential investments was conducted to ensure they had the potential scale and economic viability to achieve their impact goals.

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

How did the sustainability indicators perform? *The Fund made three investment in the period 1st January 2025 – 31st December 2025 as stated above and the fund has a total of four portfolio companies.*

- *Cumulative Impact in 2033 is projected to be 250-280 MT CO2e.*
    - *Impact is measured and forecasted using CI's GHG impact methodology which is aligned with Project FRAME.*
- *The total GHG emissions was 176,009 tCO2e, as stated in Annex 1, driven by scope 3 emissions from 2 portfolio companies.*

…and compared to previous periods?

- *Cumulative Impact in 2033 was projected to be 8-11 MT CO2e.*
- *The total GHG emissions was 2,047tCO2e.*

It is important to note that indicators for the previous period were only for one investment: XOcean. The increase in projected cumulative GHG impact is due to the addition of three new companies to the portfolio, especially JessCo.

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.

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

Prior to the investment, during due diligence, the Firm gathered data from potential investments regarding performance against the adverse impacts on sustainability factors and concluded that the investments were sustainable and did not cause significant harm to any sustainable investment objectives.

As part of this process, the Fund first assessed whether the investment made a positive contribution to the Fund's climate mitigation objective. This included a GHG impact assessment aligned with Project Frame, which is used to confirm that each investment meets the Fund's minimum impact threshold and is expected to contribute to emissions reductions.

The Fund then assessed whether the investment could cause significant harm to other sustainability objectives by reviewing the principal adverse impact indicators set out in Annex I to the SFDR RTS, together with selected additional indicators relevant to the Fund's investment strategy. This assessment covered, where relevant, issues such as GHG emissions, fossil fuel exposure, energy use, biodiversity, water, waste, governance, anti-corruption, and social and employee matters.

Where relevant data was not directly available from a portfolio company, the Fund carried out its own materiality assessment and additional research to assess the likelihood of significant adverse impacts and determine whether any data gaps could affect the DNSH conclusion.

On the basis of this due diligence, the Fund concluded that the sustainable investments made during the reference period contributed to the climate mitigation objective and did not significantly harm any other sustainable investment objective.

How were the indicators for adverse impacts on sustainability factors taken into account? Prior to the investment, during due diligence, the Firm gathered data from potneital investments regarding performance against the adverse impacts on sustainability factors. Factors taken into account include all those shown in Annex I, Table 1, of the RTS as well as additional indicators from Annex I, Tables 2 and 3.

The assessment was based on information obtained through due diligence, information provided by investee companies and, where direct data was not available, the Fund's own materiality assessment and additional research.

The manager concluded that the investments were sustainable and did not cause significant harm to any sustainable investment objectives. These indicators have been incorporated into the asset management process.

Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details: *Yes. The Fund assessed investee companies for alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights through due diligence on good governance, business conduct, anti-bribery and corruption, human rights and workplace practices, and monitoring for any known violations of the UN Global Compact principles or OECD Guidelines. No portfolio company was identified as being involved in such violations during the reference period.*

How did this financial product consider principal adverse impacts on sustainability factors? *The Fund refers to the indicators for adverse impacts on sustainability factors set out in Annex I, Table 1, of the RTS as well 3 additional indicators from Annex I, Table 2, of the RTS: "Share of investments in investee companies without water management policies", "Investments in companies without workplace accident prevention policies" and "Lack of anti-corruption and anti-bribery policies". These are used to assess whether the sustainable investments cause any significant harm to environmental or social investment objective and these indicators are incorporated into the asset management process. During due diligence, the Fund Manager assesses any potential investment on the principal adverse impacts on sustainability factors and takes this into account before making any investment decision.*

What were the top investments of this financial product?

Shown for the investment period 1st January 2025 – 31st December 2025.

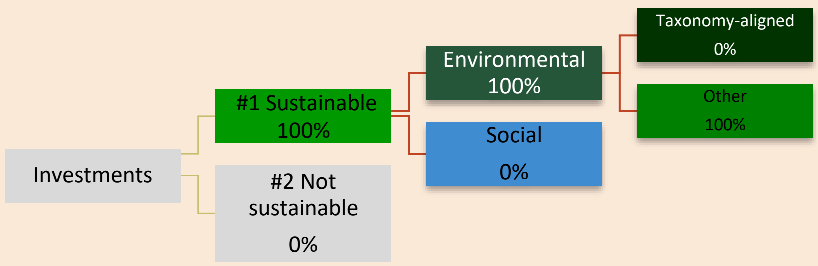
The list includes the investments constituting **the greatest proportion of investments** of the financial product during the reference period which is: *Year ended 31 December 2025*

Largest investments	Sector	% Assets	Country
XOCEAN	*Marine services*	*32% of invested assets*	*Ireland*
JessCo	*Environmental equipment & services*	*14% of invested assets*	*United States*
Zeitview	*Infrastructure inspection*	*18% of invested assets*	*United States*
Xnrgy	*HVAC equipment*	*36% of invested assets*	*United States*

Asset allocation describes the share of investments in specific assets.

What was the proportion of sustainability-related investments? 100% of investments made during the period 1 January 2025 – 31 December 2025. Each new investment must pass a minimum planned GHG impact threshold, ensuring each investment contributes towards climate mitigation.

What was the asset allocation?



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

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

In which economic sectors were the investments made?

Sector	***Sub-sector***	***Proportion of investments***	***% of invested Assets***
Marine services	*Offshore data acquisition & monitoring*	*25%*	*38%*
Environmental equipment & services	*Emissions-control equipment & services*	*25%*	*12.7%*
Infrastructure inspection	*Renewable assets monitoring & analytics*	*25%*	*16.43%*
HVAC equipment	*Thermal management equipment*	*25%*	*32.9%*

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

While the Fund anticipated that the sustainable investments made during the period ending 31 December 2025 were aligned with the EU taxonomy, a full assessment was not conducted against the technical screening criteria. The Fund therefore reports 0% alignment to the EU taxonomy.

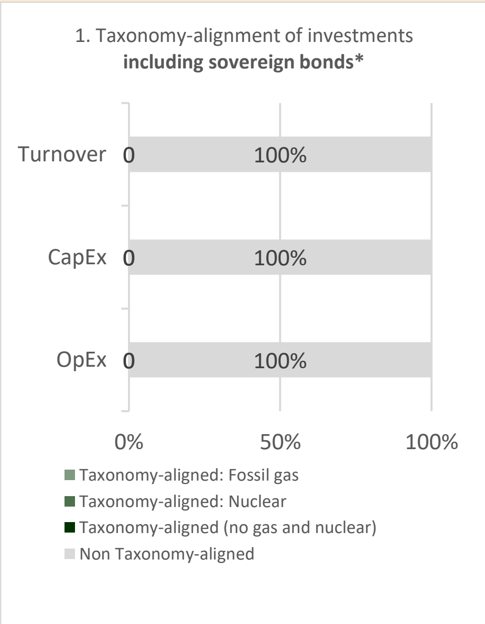
- **Did the financial product invest in fossil gas and/or nuclear energy related activities complying with the EU Taxonomy[12]?**

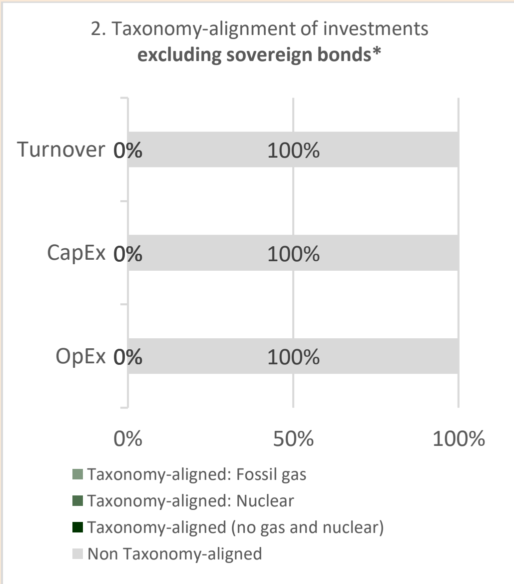
☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

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.





This graph represents 100% of the total investments.

* *For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.*

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.

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.

[12] 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.

- ***What was the share of investments made in transitional and enabling activities?***
  50% of investments are made in enabling activities.

  XOCEAN, the only investment made during the period ending 31 December 2024, enables faster development, greater asset uptime, and better monitoring and inspection of offshore infrastructure assets such as wind farms and offshore carbon capture and storage projects, thus enabling customers to realize efficiencies and reduce emissions.

  Zeitivew, the only enabling invesment made in the period ending 31st December 2025 offers automated inspection software for renewable energy and infrastructure, using AI to provide insights that lower maintenance costs and improve asset performance. This enables lower renwable asset downtime and greater output of renewable energy.

- ***How did the percentage of investments aligned with the EU Taxonomy compare with previous reference periods?*** *The percentage of investments aligned with the EU Taxonomy was 0% in 2025 and 0% in the previous reference period, as no full EU Taxonomy technical screening assessment was completed in either period*

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? *100%*

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? *Not applicable.*

What actions have been taken to attain the sustainable investment objective during the reference period? *The Manager of the Fund evaluated and conducted due diligence on numerous investment opportunities during the reference period, in accordance with the investment strategy and investment process detailed in the pre-contractual disclosures of the Information Memorandum of the Fund.*

How did this financial product perform compared to the reference sustainable benchmark? *This is not applicable, as no benchmark was identified in the precontractual disclosures of the Information Memorandum for the Fund.*

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

- ***How did the reference benchmark differ from a broad market index?*** *Not applicable per the answers above.*

- ***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?*** *Not applicable per the answers above.*

- ***How did this financial product perform compared with the reference benchmark?***
  Not applicable per the answers above.

- ***How did this financial product perform compared with the broad market index?***
  Not applicable per the answers above.