

Responsible Investment

Atrato Responsible Investment Policy

Introduction

Atrato group is an investment and advisory group established in December 2016.

Atrato group comprises, amongst other entities, Atrato Partners Limited (“Atrato Partners” or “the Company”) and Atrato Capital Limited (“Atrato Capital”) (together “Atrato”). Atrato Partners is authorised and regulated by the Financial Conduct Authority (FRN 830613), Atrato Capital (FRN 777587) is an appointed representative of Atrato Partners.

Atrato Partners and Atrato Capital, each advise a closed-ended listed fund (together our “funds”). The funds that we advise invest in assets which support sustainable development and provide essential societal services (such as grocery and renewable energy). As of June 2024, Atrato group has over £2bn in total assets under advisement.

Our Listed Funds

SUPR ○○○

SUPERMARKET INCOME REIT

- Supermarket Income REIT:
 - Advised by Atrato Capital
 - FTSE 250
 - Dedicated to investing in supermarket property forming a key part of the future model of grocery.

ROOF ○○○

ATRATO ONSITE ENERGY

- Atrato Onsite Energy Plc:
 - Advised by Atrato Partners
 - London Stock Exchange's Green Economy Mark
 - Invests in behind-the-meter Solar PV systems and associated infrastructure.

Policy Purpose

This Responsible Investment Policy (the “Policy”) has been developed to detail and disclose Atrato’s approach to responsible investment. The Policy sets out our responsible investment commitments and overarching process.

About us

At Atrato we have targeted responsible investing since our inception.

We believe we have a duty to uphold responsible investment practices and act in the long-term interests of all of our stakeholders. This belief is reflected in our purpose statement:

Our purpose is to identify and support responsible investment opportunities creating long-term value and contributing to a sustainable future.

Our approach to responsible investment includes commitments against all three fundamental ESG pillars:

- **Environment:** Reducing our emissions and mitigating the environmental impact of our business (including with respect to the climate, water, waste, pollution and biodiversity).
- **Social:** Acting in accordance with our purpose and values, respecting human rights and delivering broader value to all our stakeholders.
- **Governance:** Strengthening our ESG performance and upholding responsible business practices.

Principles for Responsible Investment

Both Atrato Partners and Atrato Capital have been signatories to the Principles for Responsible Investment ("PRI") since May 2022. As PRI signatories, Atrato Partners and Atrato Capital have committed to adopting the six Principles for Responsible Investment (see **Appendix A** for details). Atrato Partners and Atrato Capital are also endorsers of PRI's Spring stewardship initiative for nature.

Net Zero Asset Managers initiative

In addition, Atrato Partners and Atrato Capital have been signatories to the Net Zero Asset Managers initiative ("NZAM") since March 2023. As NZAM signatories, we support investing aligned with net zero emissions by 2050 or sooner. This reflects our commitment to the goal of net zero emissions with the aim of mitigating financial risk and to maximising long-term asset value for ourselves and for our clients.

UN Sustainable Development Goals

Our approach to sustainability aims to support the most material UN Sustainable Development Goals (SDGs) to our business, namely:

- SDG 8: Decent work and economic growth
- SDG 10: Reduced inequalities
- SDG 11: Sustainable cities and communities
- SDG 13: Climate action

We have also supported our Funds to align their sustainability strategies with those SDGs that are most relevant.

Task Force on Climate-related Financial Disclosures

We are proud to publicly support the Task Force on Climate-related financial Disclosures (TCFD) and the Paris Agreement. We have supported both our listed Funds to report in line with the TCFD recommendations within their Annual Reports, to improve disclosure of climate-related risks and opportunities.

UN Global Compact

In May 2024, we joined the United Nations Global Compact initiative — a voluntary leadership platform for the development, implementation and disclosure of responsible business practices. The UN Global Compact is a call to companies everywhere to align their operations and strategies with ten universally accepted principles in the areas of human rights, labour, environment and anti-corruption, and to take action in support of UN goals and issues embodied in the SDGs. We are proud to join thousands of other companies globally committed to taking responsible business action.

For further information on ESG activities and initiatives at Atrato, including within our workplace, please see Atrato's Responsible Investment Report.

Responsible Investment Commitments

As a future focused alternatives investment advisory group, we believe that by incorporating environmental, social and governance (ESG) factors into investment policies, practices and processes, we can enhance returns and better manage risks over the long-term.

Specifically, Atrato is committed to:

- Transparency of approach;
- Engagement with stakeholders;
- Adherence to a robust governance framework that includes the consideration of ESG risks and opportunities;
- Integrating ESG into day-to-day operations through alignment with Atrato's core values;
- Ongoing training on ESG issues; and
- Implementation of ESG objectives in the performance plans of key individuals.

We are committed to continually improving our Responsible Investment approach and activities in line with best practice and as our business evolves.

Responsible Investment Process

Our responsible investment process aims to:

1. Avoid, mitigate and manage potential ESG risks associated with assets; and
2. Optimise the ESG potential of investments at all stages of the investment cycle.

These aims are achieved through both ESG incorporation and stewardship activities, including:

	Definition	Activities
ESG incorporation	Assessing, reviewing and considering ESG factors in existing investment practices.	ESG integration through considering ESG issues in investment analysis and decisions to better manage risks and improve returns. Embedding ESG considerations in policies and processes.
Stewardship	Using influence to protect and enhance overall long-term value, including the value of common economic, social and environmental assets, on which returns and client and beneficiary interests depend.	<p>Engagement with stakeholders (including investors, policy makers/regulators and other key stakeholders) via written interactions and dialogue to improve practice on ESG factors as relevant to Atrato and its clients, make progress on sustainability outcomes and/or improve public disclosure.</p> <p>Collaboration with stakeholders to pool resources and enhance the effectiveness of pursuing stewardship objectives.</p>

Our approach to ESG incorporation and stewardship seeks to deliver real-world positive sustainability outcomes as far as possible.

The type and extent of ESG incorporation and stewardship activities differs per Fund, in line with the Fund’s investment objective(s), investment policy and restrictions.

Exclusions

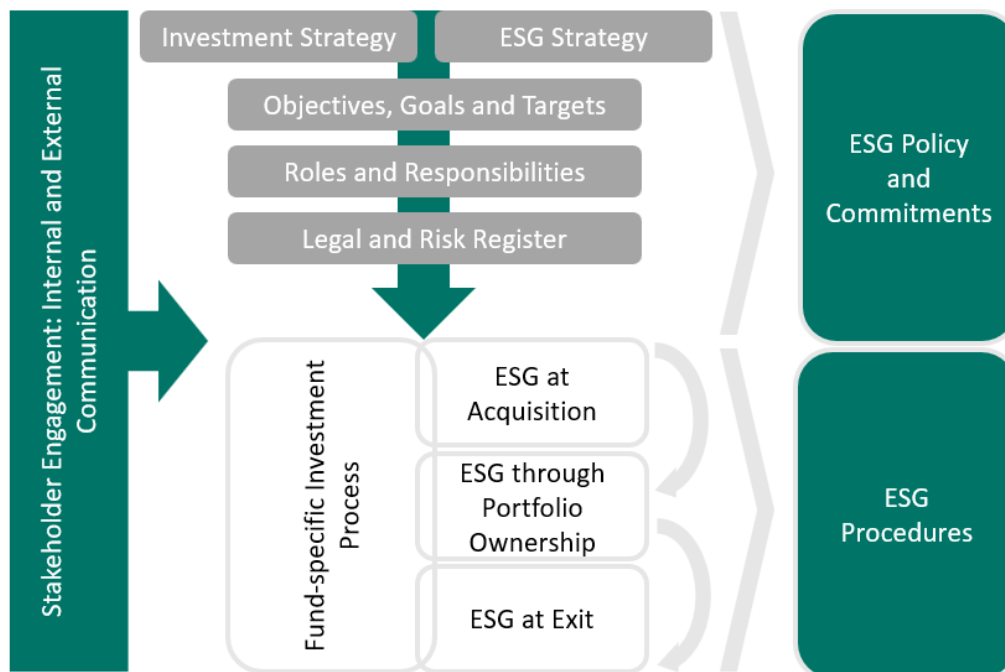
As our purpose statement reflects, we are committed to identifying and supporting responsible investment opportunities that create long-term value and contribute to a sustainable future.

Our listed Funds have defined investment policies which limit the scope of investments to certain asset classes. For example:

- SUPR has a defined investment policy to invest in property let to supermarket operators and other retailers.
- ROOF has a defined investment policy to invest in solar photovoltaic (PV) generation systems and associated infrastructure.

The below figure shows how Atrato’s Responsible Investment process is intertwined with core investment processes.

Figure 1: Responsible Investment Process



Atrato’s core Responsible Investment process involves:

- **Implementing Atrato’s ESG Strategy:** Our Funds invest in assets that support sustainable development and provide essential societal services (such as grocery and renewable energy). We look to identify and support new investment opportunities that create long-term value and forge a sustainable future, in line with our purpose and values.
- **ESG Due Diligence:** We conduct ESG assessments as part of the acquisition due diligence process for potential investments. The specific criteria of these assessments and the contents of the ESG section within Investment Committee reports is tailored for each Fund, depending on the type of investment being considered and reflected in their investment and asset management processes. Atrato’s Managing Director, ESG, conducts these assessments with support from the fund management teams, and is a standing attendee of Atrato’s Investment Committee meetings.
- **ESG Materiality:** As part of our due diligence process during the pre-investment phase, we analyse material ESG factors for the asset(s). This assessment differs by asset type but is informed by tools, standards and data such as the relevant Sustainability Accounting Standards Board (SASB)

standards, the UN Sustainable Development Goals (SDGs), the UN Guiding Principles on Business and Human Rights (UNGPs), EPC ratings/green building certifications, Task Force on Climate-Related Financial Disclosures (TCFD) recommendations, MSCI's Climate Value at Risk (VaR) tool and the UK Government's Flood Risk Map tool.

- **Fund Sustainability Strategies:** We develop and deliver specific sustainability strategies for each Fund, in conjunction with their relevant Board, reflecting the most material ESG risks and opportunities for the asset class. These are reviewed and updated annually, reflecting completed deliverables and changes to stakeholder expectations.
- **Monitoring and engagement:** We monitor the ESG performance of our Funds against industry and peer performance and conduct active stakeholder engagement on ESG issues. The specific indicators used to monitor performance and focus engagement are tailored for each Fund in line with best practice ESG standards and frameworks.

Responsibilities

Our fund management teams are responsible for assessing and monitoring investments. These teams report to the Atrato Senior Leadership Team who collectively oversee adherence to the Responsible Investment Policy, alongside Atrato's Managing Director, ESG.

Atrato has also appointed external ESG consultants to provide additional support for the delivery of Atrato's responsible investment and broader ESG activities, as and when needed. Atrato welcomes the appointment of ESG specialists to its Funds' Boards along with the additional oversight and challenge it offers.

Reporting

We have committed to publish an annual Responsible Investment Report on the Atrato website which provides details of the activities that underpin our responsible investment commitments. Our Responsible Investment report is accompanied by Atrato Partners' and Atrato Capital's annual PRI reports, the first of which will be published publicly at the end of the 2024 PRI reporting cycle. Each of our Funds also make sustainability disclosures either through standalone Sustainability Reports or sustainability updates included within the Annual Reports.

Policies

In addition to this Responsible Investment Policy, we have developed and apply a number of corporate policies to support good governance, including:

- Conflicts of Interest Policy
- Anti-Bribery and Corruption Policy
- Equal Opportunities Policy
- Human Rights Policy

- Whistleblowing Policy
- Privacy Policy
- Stakeholder Policy
- Community Engagement Policy
- Labour Standards Policy
- ESG Policy

Review

This Policy will be reviewed periodically and updated if required. More frequent updates may be made in response to best practice and regulatory changes.

Appendix A – PRI Principles

Principles for Responsible Investment: Six Principles

Principle 1: We will incorporate ESG issues into investment analysis and decision-making processes.

Principle 2: We will be active owners and incorporate ESG issues into our ownership policies and practices.

Principle 3: We will seek appropriate disclosure on ESG issues by the entities in which we invest.

Principle 4: We will promote acceptance and implementation of the Principles within the investment industry.

Principle 5: We will work together to enhance our effectiveness in implementing the Principles.

Principle 6: We will each report on our activities and progress towards implementing the Principles.