

2024

Axium Infrastructure

SFDR Principal Adverse Impact Statement - AxInfra US III
for the year ended December 31, 2024



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1. Summary

Axium Infrastructure Inc. considers principal adverse impacts of its investment decisions on sustainability factors. The present disclosure is the consolidated statement on principal adverse impacts on sustainability factors of Axium Infrastructure Inc. This statement on principal adverse impacts on sustainability factors covers the reference period from 1 January 2024 to 31 December 2024. The subsequent disclosure material relates AxInfra US III Limited Partnership (AxInfra US III) which is registered in targeted countries in Europe under the Alternative Investment Fund Managers Directive (AIFMD).

PRINCIPAL ADVERSE IMPACTS INDICATOR OVERVIEW

Each of Axium’s funds marketed in Europe are based on investments in Country Funds with underlying assets located in North America, which are subject to the regional laws, standards, and regulations. While Axium is dedicated to applying the prescribed mandatory indicators to align with SFDR, some proxy factors were required and have been identified where applicable. The information presented in this statement is based on the data provided by Axium’s operating partners, along with data available internally to Axium. Although regular reporting on the principal adverse indicators will provide the most up to date information, data is subject to availability and Axium will continue working with our partners to improve the breadth of information disclosed.

REPORTING APPROACH

As prescribed by the SFDR, the reporting reference period was held between 1 January 2024 to 31 December 2024 to produce the results on the principal adverse impact indicators. The volume and level of detail involved in reporting on the PAIs requires time to evaluate and interpret to ensure provided data is accurate and relevant. Due to the inherent lag associated with GHG reporting and the detailed validation timeframe required for quality assurance by third parties, Axium will be disclosing GHG and energy related metrics with a one-year lag. This means that for the 2024 reporting period all emission and energy indicators will be disclosed based on 2023 data, calculated using the NAV at the end of December for that year. All other indicators will use information made available in the prescribed reference period, along with the NAV as of December 2024. Disclosing real data that has been validated continues to be a priority to ensure accuracy in GHG accounting. Axium is dedicated to working towards aligning all data with the fiscal year when this becomes feasible to do so. The below illustrates a summary view of assets included in all three reporting requirements as they relate to the SFDR disclosures.

Disclosure Document	Principal Adverse Impact Statement	SFDR Website Disclosure	Periodic Disclosure	Pre-Contractual Disclosure
Section	<i>Indicators applicable to investments in investee companies</i>	<i>Proportion of investments for financial products that promote E&S characteristics</i>	<i>What was the proportion of sustainability-related investments?</i>	<i>What is the asset allocation planned for this financial product?</i>
NAV	December 31, 2023 - All GHG & energy indicators December 31, 2024 - All other indicators	December 31, 2024		

INVESTMENT DETAIL

Where applicable to the indicator methodology and Axium’s portfolio detail, the share of investments is calculated based on the Net Asset Value (“NAV”) of the relative year. This is the best indicator that depicts the market value of the underlying investments, and this approach is used in financial reporting activities that are audited annually.

Article 17 of the Regulation (EU) 2022/1288 of 6 April 2022 supplementing Regulation (EU) 2019/2088 outlines the formula for calculating the market value of investments and their relative environmental and social contributions to the portfolio. This formula has been listed below.

$$\frac{\text{market value of all investments of the financial product in environmentally sustainable economic activities}}{\text{market value of all investments of the financial product}}$$

Using the same approach, Axiom’s calculations depict the market value through the use of the NAV listed below.

$$\frac{\text{NAV of all investments of the financial product in environmentally sustainable economic activities}}{\text{NAV market value of all investments of the financial product}}$$

This approach has been used to depict all metrics associated with illustrating the share of investments for the relevant indicators. It is important to note that the total NAV may differ between indicators and detailed information on the scope of assets included for each indicator is outlined *Principal Adverse Impacts – AIUS*.

COVERAGE RATIO

The coverage ratio has been calculated for each of the mandatory and voluntary principal adverse indicators disclosed. This coverage ratio is a metric intended to measure the percent of the portfolio reporting on a given indicator based on the NAV of the underlying assets. Additional information on the scope of the coverage ratio, reporting year data, and indicator nuances is outlined in *Appendix I: Methodology*. The coverage ratio is abbreviated to “CR” in *Summary Table 1: Mandatory Social and Environmental Indicators & Summary Table 2: Voluntary Social and Environmental Indicators*.

2. Description of the principal adverse impacts on sustainability factors

Sustainability risks, including climate-related concerns must be embedded in the decision-making processes during the ownership and management of infrastructure projects. Axiom’s Investment Restrictions and Guidelines include exclusions of non-environmentally friendly projects and investments where management does not demonstrate strong and healthy labor relations while also embedding the UN Principles for Responsible Investment. ESG and, more specifically, principal adverse impacts on sustainability factors are considered at every phase of the investment process and policies and guidelines are in place to mitigate sustainability risks. These include:

Policies	Date of Approval	Responsibility /Governance	Relevant SFDR Indicator
ESG Policy/ ESG Charter	2020	ESG of Axiom Infrastructure Inc.	Mandatory Indicator #1-9, 18 Voluntary Indicator # 19
Responsible Contractor Policy	2018	ESG of Axiom Infrastructure Inc.	Voluntary Indicator # 1
Human Rights Statement	2022	Legal & Compliance of Axiom Infrastructure Inc.	Mandatory Indicator # 10-11
Diversity & Inclusion Policy	2021	Talent & Culture of Axiom Infrastructure Inc.	Mandatory Indicator # 12 -13 Voluntary Indicator # 12
Investment Restrictions and Guidelines	2009	Axiom Infrastructure Inc. acting as manager of General Partners of the AIFs	Mandatory Indicator # 14 & 17 Voluntary Indicator # 1

METHODOLOGIES USED TO SELECT VOLUNTARY INDICATORS

Voluntary Indicator #1: Social and Employee Matters - Investments in companies without workplace accident prevention policies

As per our Investment Restrictions and Guidelines, Axiom invests only in projects whose management demonstrates strong and healthy labour relations. Safety continues to be a priority for Axiom, and we closely monitor the labour and health and safety practices of our contractors. Health and safety concerns are monitored on a regular basis through monthly and quarterly reporting from our O&M providers. With this, we collect statistics on occupational health and safety and training provided for many of our portfolio projects under management. In addition, Axiom has a Responsible Contractor Policy to ensure our contractors share our values and confirm that they will follow best in class workplace practices.

Voluntary Indicator #19: Energy consumption intensity - Energy consumption in GWh of owned real estate assets per square meter

Although Axium does not invest in real estate, indicator 19 is applicable to our social sector assets. Asset performance through innovation and energy efficiency is a central element to investment decisions which create value to our Limited Partners, all the while supporting the growth of Axium's portfolio. This focus also aligns with our objective to be Net Zero by 2050. Data presents asset electricity consumption, gathered through quarterly GHG inventory reporting and is sourced directly from our operating partners.

3. Indicators applicable to investments in investee companies

The following section refers to Table 1, Table 2, and Table 3 of Annex I of the SFDR regulation. Indicators applicable to investments in investee companies present in AxInfra US III are in a separate file. Refer to the below document:

- › Principal Adverse Impacts – [AIUS](#)

AxInfra US III: 100% of AIUS III LP capital is invested in the US Country Funds (AIUS LP), holding indirectly 78.5% of AIUS LP as of December 31, 2024.

Each of Axium's funds marketed in Europe are based on investments in Country Funds with underlying assets located in North America. With 29 transactions as of December 31, 2024, Axium has invested or committed to invest in a diversified portfolio of 74 US infrastructure assets. Subsectors and asset profiles are detailed [here](#).

4. Description of policies to identify and prioritize principal adverse impacts on sustainability factors

Detail listed in the "Transparency of sustainability risk policies", "Transparency of remuneration policies in relation to the integration of sustainability risks", "Investment strategy", "Monitoring of environmental and social characteristics", and "Data sourcing and processing" sections of the [SFDR Website Disclosure](#).

5. Engagement policies

Detail listed in the "Engagement policies" sections of the [SFDR Website Disclosure](#).

6. References to international standards

Axium's alignment with international standards include:

- International Labour Organisation's
- OECD Guidelines for Multinational Enterprises
- Partnership for Carbon Accounting Financials
- United Nations Guiding Principles on Business and Human Rights
- United Nations Principles for Responsible Investment
- United Nations Declaration on the Rights of Indigenous Peoples

Furthermore, alignment with the Paris Agreement is applied through Axium's ambition to be Net Zero by 2050. Our decarbonization roadmap leveraged target setting guidelines to align emission reduction targets with the latest science.

7. Historical comparison

Information on historical comparison for each indicator is outlined in *Principal Adverse Impacts – AIUS*.