

# 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 is a specialist impact investment manager focused on sustainability and the energy transition to a zero-carbon economy. Temporis has integrated a number of global sustainability initiatives into its investment processes: for example, it is a signatory of the UN’s Principles for Responsible Investment (“PRI”). A description of how Temporis has implemented each of the Principles is set out in its ESG Investment Policy, which is posted on the Temporis website.

This section summaries 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 Investment 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 will seek to follow ESG best practice (seeking specialist third party advice where necessary) in the following areas:- Environmental Standards, Social Standards, and Governance Standards.</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 <sub>2</sub> 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 <sub>2</sub> emission savings will be achieved for each kWh generated by the investments that are developed, constructed, and/or operated by the Fund. The CO <sub>2</sub> 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 CO<sub>2</sub> 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's sustainability due diligence policy is contained as an appendix to its ESG Investment Policy. Examples of the "green impacts" considered during investment due diligence are set out herein.</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</p>

	<p>investments, it includes asset management protocols and controls, monitoring, reporting and exit processes (as appropriate).</p>
<p>Engagement policies</p>	<p>Engagement in relation to the renewable assets held by the Fund will principally take the form of community involvement. Accordingly, Temporis will proactively involve the local community throughout the life of the assets and respond quickly and sympathetically to public enquiries.</p>
<p>Attainment of sustainable investment objective</p>	<p>An index has not been designated as a reference benchmark in respect of the Fund.</p>

### 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 integrated the DNSH test into its investment due diligence process.

The Manager assesses the DNSH test by reference to the principal adverse impact indicators.

Temporis is a signatory of the United Nations (UN) supported PRI and uses the PRI framework to benchmark ESG best practices. The PRI are implemented within Temporis’ investment processes for the Fund.

The Equator Principles apply to new projects globally and across all industry sectors. They are primarily intended to provide a minimum standard for due diligence and monitoring to support responsible risk decision making. Although Temporis is not a formal adoptee of the Equator Principles, it will review projects against the provisions where appropriate.

Examples of environmental issues that could manifest into adverse impacts for the sustainable investment objective are:

Environmental Issues	Temporis Actions
Planning	Temporis ensures that all projects are managed in accordance with planning laws and permissions and that land and access rights are respected.
Ecology	Temporis monitors its projects through the entire life cycle to ensure that there is no ecological damage. This often includes appointing suitably qualified third-party experts.
Noise, Shadow Flicker, TV and Radio Interference	Impact assessments are undertaken prior to construction to determine if any dwellings might be impacted. In certain cases, equipment may be installed at construction to have an immediate remedy available. All complaints are treated sympathetically and quickly with remedies implemented at the cost of the project.
Landscaping	Landscaping is implemented in accordance with planning with sympathy to the local environment. On decommissioning, the site will be restored to the agreed planning condition ordinarily back to its original status.
Hydrology	Hydrological factors are considered throughout the project lifecycle to ensure there is no damage to local watercourses or ground water supplies. Where necessary, third-party experts are utilised, and statutory authorities such as SEPA are engaged.
Archaeology	Working with third party experts (who are often local), Temporis ensures that site archaeology is monitored carefully throughout the project lifecycle.
Biodiversity	Temporis ensures the full implementation of any biodiversity monitoring or management planning conditions throughout the project lifecycle. Working with third party experts, all local species are sympathetically treated. Where necessary, this may include ongoing study, such as specific bird or bat species monitoring.

In addition, Temporis has in place a sustainability due diligence policy, which is contained as an appendix to its ESG Investment Policy, and carries out a due diligence process in respect of the

environmental impacts of its investments. Examples of the “green impacts” considered during investment due diligence are set out below:

Green Criteria	Green Impact Evaluation
Reduction of Greenhouse emissions	A positive contribution to resource sustainability, including (where appropriate) GHG savings.
Advancement of efficiency in the use of natural resources	A positive contribution to renewable energy generation, and active engagement to make renewable energy more efficient.
Protection or enhancement of the natural environment	<p>The presence of improvements to, or the avoidance or satisfactory mitigation of, any adverse impacts on the natural environment, including but not limited to:</p> <ul style="list-style-type: none"> <li>• adverse impact on visual amenity of the landscape, together with any other applicable loss of amenity (e.g. fishing);</li> <li>• noise pollution affecting populated areas together with any other loss of amenity; and</li> <li>• disturbance and long-term damage to the quality of the land or water environment, including adverse impact on the local surface water, ground water or soil environment, impacts to water flow or quality, including those arising directly or indirectly from hazardous waste and other forms of pollution.</li> </ul>
Protection or enhancement of biodiversity	<p>The presence of improvements to, or the avoidance or satisfactory mitigation of any adverse impacts on, biodiversity, including but not limited to:</p> <ul style="list-style-type: none"> <li>• impact on biodiversity resulting from the construction or operation of the plant and associated infrastructure, including where relevant the impact on natural species, including air-borne and water-borne life; and</li> <li>• any other effect that demonstrably reduces net loss and improves net gain to biodiversity arising from the project.</li> </ul>
Protection of environmental sustainability	<p>The presence of:</p> <ul style="list-style-type: none"> <li>• a commitment to continual improvement in environmental performance by applying prevailing good industry practice; and</li> <li>• additional benefits that may contribute to the transition to a green economy beyond the investment, including the potential for the future life-extension of the green infrastructure.</li> </ul>

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.

For DNSH 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”.

<b>Mandatory (from Table 1 of Annex I of the RTS)</b>	
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
<b>Additional (from Table 2 of Annex I of the RTS)</b>	
1	8. Exposure to areas of high-water stress.
2	14. Natural species and protected areas.
<b>Additional (from Table 3 of Annex I of the RTS)</b>	
1	4. Lack of a supplier code of conduct.
2	10. Lack of due diligence (on human rights impacts)

#### **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.

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 will seek to follow ESG best practice (seeking specialist third party advice where necessary) in the following areas:-

### Environmental Standards

Temporis will 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. It will also take appropriate steps to avoid or mitigate the environmental impacts on areas with regard to biodiversity, ecology, air quality, noise, waste management and archaeology, as applicable to the particular asset.

Temporis will also seek to ensure contractors and operators apply appropriate industry standards and will ensure that data provided to energy and other regulators complies with relevant quality assurance standards.

### Social Standards

Temporis will adhere to all applicable laws relating to employment, health & safety, human rights, and public safety. It will engage with local communities, ensuring that land and access rights are properly observed and that assets are managed in accordance with planning laws and permissions.

### Governance Standards

Temporis will seek to ensure that its corporate governance arrangements comply with mandatory statutory standards and operate in accordance with the regulatory body with jurisdiction over the relevant business / asset. It will also operate in accordance with internal policies relating to anti-financial crime and conflicts of interest.

Temporis has also ensured that its remuneration policy and organisational structures are consistent with its ESG Policy.

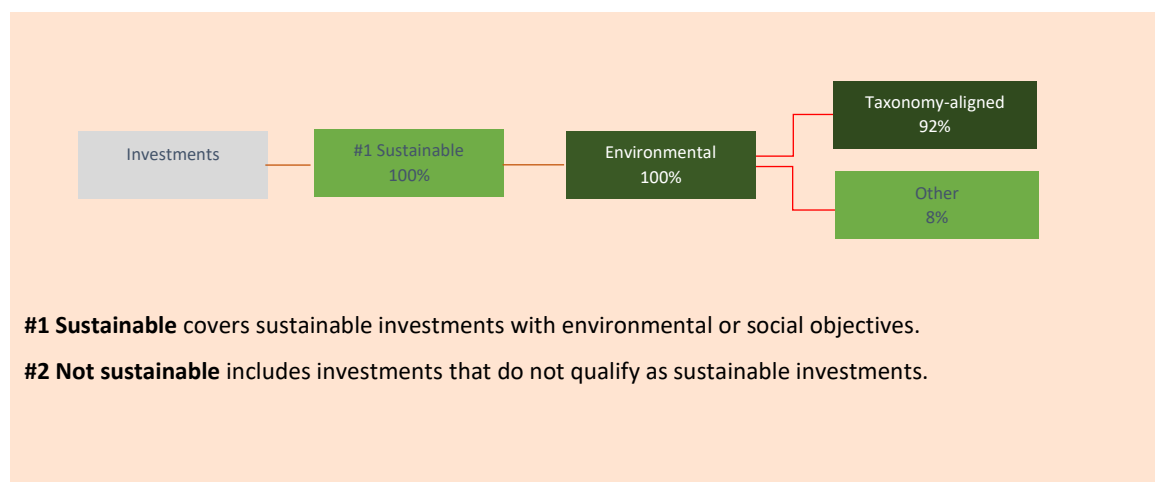
Temporis will ordinarily assume one or more Board appointments in the portfolio companies established to hold the assets of the Fund. Board representation enables Temporis to play a direct and active role in overseeing relevant governance matters, ensuring that ESG issues are considered in the context of corporate strategy, operational performance, and broader stakeholder relationships. Typically, the portfolio companies do not have any employees, but where the portfolio companies are operating entities with employees, Temporis will also oversee the specific provisions of the SFDR guidance such as employee relations, remuneration and tax compliance.

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).

With respect to the assessment of good governance practices of investee companies, Temporis is actively involved in the management and oversight of the portfolio companies formed to hold the physical assets of the Fund and for each company, Temporis employees ordinarily assume one or more Board positions. Temporis will play a direct and active role in overseeing relevant governance matters, ensuring that ESG issues are considered in the context of corporate strategy, operational performance, and broader stakeholder relationships. Typically, the portfolio companies will not have any employees, but where the portfolio companies are operating entities with employees, Temporis will also oversee the specific provisions of the SFDR guidance such as employee relations, remuneration and tax compliance. Temporis will, through its involvement in, and review of the portfolio companies, satisfy itself that such companies following good governance practices.

## 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 and landfill gas, do seek to 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 CO<sub>2</sub> 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. CO<sub>2</sub> emission savings will be achieved for each kWh generated by the investments that are operated by the Fund. The CO<sub>2</sub> 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 CO<sub>2</sub> 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 CO<sub>2</sub> 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 CO<sub>2</sub>. The net CO<sub>2</sub> 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 CO<sub>2</sub> emissions that would have previously been incurred during construction.

The CO<sub>2</sub> 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 CO<sub>2</sub> 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

Temporis’s sustainability due diligence policy is contained as an appendix to its ESG Investment Policy. Examples of the “green impacts” considered during investment due diligence are set out below.

Green Criteria	Green Impact Evaluation
Reduction of Greenhouse emissions	A positive contribution to resource sustainability, including (where appropriate) GHG savings.
Advancement of efficiency in the use of natural resources	A positive contribution to renewable energy generation, and active engagement to make renewable energy more efficient.
Protection or enhancement of the natural environment	<p>The presence of improvements to, or the avoidance or satisfactory mitigation of, any adverse impacts on the natural environment, including but not limited to:</p> <ul style="list-style-type: none"> <li>• adverse impact on visual amenity of the landscape, together with any other applicable loss of amenity (e.g. fishing);</li> <li>• noise pollution affecting populated areas together with any other loss of amenity; and</li> <li>• disturbance and long-term damage to the quality of the land or water environment, including adverse impact on the local surface water,</li> </ul>

	ground water or soil environment, impacts to water flow or quality, including those arising directly or indirectly from hazardous waste and other forms of pollution.
Protection or enhancement of biodiversity	<p>The presence of improvements to, or the avoidance or satisfactory mitigation of any adverse impacts on, biodiversity, including but not limited to:</p> <ul style="list-style-type: none"> <li>• impact on biodiversity resulting from the construction or operation of the plant and associated infrastructure, including where relevant the impact on natural species, including air-borne and water-borne life; and</li> <li>• any other effect that demonstrably reduces net loss and improves net gain to biodiversity arising from the project.</li> </ul>
Protection of environmental sustainability	<p>The presence of:</p> <ul style="list-style-type: none"> <li>• a commitment to continual improvement in environmental performance by applying prevailing good industry practice; and</li> <li>• additional benefits that may contribute to the transition to a green economy beyond the investment, including the potential for the future life-extension of the green infrastructure.</li> </ul>

As set out in Section 3 above, Temporis considers the mandatory and relevant additional principal adverse impact indicators as part of the investment due diligence process.

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).

Following the satisfactory completion of due diligence, an Investment Committee meeting of the Fund will be held to discuss the findings of due diligence and to determine whether to proceed with the investment, and on what terms.

Once Investment Committee approval has been obtained, the investment will proceed towards financial close, with the Investment team responsible for ensuring that ESG criteria are considered in the drafting of deal documentation, particularly with respect to the incorporation of representations, covenants and default events into financing documentation. Specialist external legal support may assist in the drafting process.

## **12. Engagement Policies**

Engagement in relation to the renewable assets held by the Fund principally takes the form of community involvement. Accordingly, Temporis proactively involves the local community throughout the life of the assets and respond quickly and sympathetically to public enquiries.

Community benefit schemes, which will vary from site to site, are often a critical part of sharing economic benefit locally by supporting local, community-based schemes.

## **13. Attainment of Sustainable Investment Objective**

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

**1st July 2023**