

Atrato Onsite Energy Plc

Introduction

Atrato Onsite Energy plc (“the Company” or “ROOF”) is an investment company focused on onsite clean energy generation. The Company focuses on UK commercial rooftop and onsite solar, helping its corporate clients achieve net zero and reduce their energy bills. As long term investors the Company is fully committed to integrating sustainable practices into its operations and expects that its business partners should do the same.

The Company’s activities align with the UN Sustainable Development Goals (SDG) Agenda 2030, and we have identified the following SDGs as the most relevant to us:

- SDG 7 (Affordable & Clean Energy)
- SDG 12 (Responsible Consumption & Production)
- SDG 13 (Climate Action).

The Company’s environmental objectives are further strengthened by the commitments of our Investment Adviser. The Investment Adviser has adopted the United Nations Principles for Responsible Investment (“UN PRI”) which defines responsible investment as a strategy and practice to incorporate Environmental, Social and Governance factors in investment decisions and active ownership. The integration of all six principles into the Investment Adviser’s operations and investment decision process impacts the Company’s performance.

Responsibility

This policy forms part of the Company’s operational policies, and falls under the overall responsibility of the Company’s Board of Directors (“Board”).

The Company requires that the Investment Adviser takes direct responsibility for ensuring effective implementation of this policy throughout all its investment processes, subsequent asset management and any relevant supply chain considerations.

The Company requires that quarterly progress reports are provided to the Board, outlining progress against the agreed Sustainability strategy. This is led by the Managing Director, ESG, with contributions from the wider Investment Adviser team.

The Company requires that the Investment Adviser's Managing Director, ESG, supported by the wider Investment Advisory team, take responsibility for the preparation and provision of relevant ESG data and information relating to the performance of the Company against the agreed Objectives, ESG Metrics and Targets, the quarterly reports and public disclosures as well as responding to other information requests.

Scope

This policy covers all of our operations and applies to all the Company directors and the managers and employees (whether permanent, fixed term or temporary) of the Investment Adviser.

Policy

The Environmental Policy (the "Policy") sets out the Company's belief in making a positive impact on the communities and industries in which we operate. The Company is committed to developing, acquiring, operating and owning assets that produce renewable energy, and protecting the environment through minimising the impact of its operations as well as the activities of the Investment Adviser. The Company recognises that its investments have the potential to impact their surroundings including the environment and biodiversity. Therefore, the Company seeks to ensure that environmental and biodiversity considerations are reflected in our investment process. We consider the environmental performance of our assets and the protection of the natural environment as key elements of our sustainability strategy.

The Company is committed to strong environmental governance and will ensure that it is always in compliance with relevant environmental legislation.

Aims and Objectives:

Climate Change & Emissions

- The Company recognises the threat posed by climate change and the critical role business has in tackling this crisis. We acknowledge the potential impact climate may have on our business and operating environment, as well other stakeholders.
- The Company recognises the Paris Agreement 2015 and the need for companies and businesses to achieve Net Zero for their operational activities.
- The Company is committed to going beyond compliance and to take the lead in reducing the direct and indirect greenhouse gas ("GHG") emissions associated with our operations, to minimise their impacts both on our business and society as a whole.
- The Company will annually report against the Taskforce for Climate related Financial Disclosures ("TCFD") reporting requirements as well as disclosing the emissions of its own operations and its advisors.

- The Investment Adviser has signed the Net Zero Asset Manager (“NZAM”) initiative. NZAM’s commitments support a goal of net zero Green House Gas (GHG) emissions by 2050, specifically to:
 - Work towards decarbonisation of all assets under management (AUM), net zero emissions by 2050 or sooner
 - Establish interim targets for a proportion of the AUM to reach net zero emissions by 2050 or sooner and
 - Review each interim target at least every 5 years with a view to increasing the proportion of AUM covered until 100% of the assets are included.

Energy

- The Company is committed to improving the energy efficiency of the installation and management of its solar panels as well as the solar panels themselves.

Waste Materials

- Waste is minimal in the Company’s direct operations, and we are committed to minimising waste within our portfolio. In addition, the Investment Adviser is committed to recycling office waste and ensuring that office equipment, at end of life, is recycled or repurposed to minimise waste going to landfill.

Training

- Water usage is minimal in the direct operations of the Company and the Investment Adviser and we are committed to eliminating unnecessary consumption. We are committed to reducing water consumption within our portfolio.

Biodiversity

- The Company is committed to reducing the portfolio’s impact on the local environment. Please see our “Biodiversity Policy” for further information on this topic.

Environmental Performance

- The Company is committed to measuring and evaluating the environmental performance of the portfolio and will report our progress annually. The company is committed to engage with customers and other key stakeholders on environmental issues and improving performance.

Compliance and training

The Company is committed to ensure that all members of the Scope of this policy (see above) are made aware of their responsibilities and of the standards that fall within the Environmental Policy. All Investment Adviser staff will be provided ESG training to improve their understanding of the Policy and each employee's individual responsibilities across the Company.

Compliance and training

The Company is committed to continuous monitoring and improving of the Company's environmental performance and to report regularly on any environmental issues. We will use this information to support our engagement with customers and other key stakeholders on environmental issues and improving performance. As part of the monitoring process, we will update the Policy on a regular basis to ensure that it remains up to date with the latest approaches to environmental protection.

Signed by:

Juliet davenport
Chair

11th December 2023