

### PUBLIC RI REPORT

**2021 PILOT** 

Altamar Capital Partners, S.L.

Generated 2022-11-21

# About this report

The PRI Reporting Framework helps to build a common language and industry standard for reporting responsible investment activities. **Public RI Reports** provide accountability and transparency on signatories' responsible investment activities and support dialogue within signatories' organisations, as well as with their clients, beneficiaries and other stakeholders.

This **Public RI Report** is an export of the signatory's responses to the PRI Reporting Framework during the 2021 reporting period. It includes the signatory's responses to mandatory indicators, as well as responses to voluntary indicators that the signatory has agreed to make public.

The information is presented exactly as it was reported. Where an indicator offered a multiple-choice response, all options that were available to select from are included for context. While presenting the information verbatim results in lengthy reports, the approach is informed by signatory feedback that signatories prefer that the PRI does not summarise the information.

# Context

In consultation with signatories, between 2018 and 2020 the PRI extensively reviewed the Reporting and Assessment processes and set the ambitious objective of launching in 2021 a completely new investor Reporting Framework, together with a new reporting tool.

We ran the new investor Reporting and Assessment process as a pilot in its first year, and such process included providing additional opportunities for signatories to provide feedback on the Reporting Framework, the online reporting tool and the resulting reports. The feedback from this pilot phase has been, and is continuing to be analysed, in order to identify any improvements that can be included in future reporting cycles.

## PRI disclaimer

This document presents information reported directly by signatories in the 2021 reporting cycle. This information has not been audited by the PRI or any other party acting on its behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented.

The PRI has taken reasonable action to ensure that data submitted by signatories in the reporting tool is reflected in their official PRI reports accurately. However, it is possible that small data inaccuracies and/or gaps remain, and the PRI shall not be responsible or liable for such inaccuracies and gaps.

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# Senior Leadership Statement (SLS)

# Senior leadership statement

#### Our commitment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SLS 1 S1	CORE	N/A	N/A	PUBLIC	Our commitment	GENERAL

- Why does your organisation engage in responsible investment?
- What is your organisation's overall approach to responsible investment?
- What are the main differences between your organisation's approach to responsible investment in its ESG practice and in other practices, across asset classes?
  - (1) Altamar strongly believes that investing the funds committed by its investors in a sustainable and responsible manner leads to better long-term returns and performance outcomes. For this reason, Altamar promotes ESG integration both through its engagement with the underlying funds in which it invests ("General Partners" or "GPs") and through the engagement with its investors ("Limited Partners" or "LPs") and other stakeholders.
  - (2) The Firm engages in responsible investment (RI) by integrating ESG criteria into all areas of the organisation, both within the Firm - implementing sustainability measures - and within the investment process - integrating ESG throughout the entire process, from the selection, Due Diligence and analysis phases, all the way to the reporting and monitoring of the life of the funds and the underlying investments. As part of the Due Diligence process, the investment team collects and analyses all information regarding the commitment to ESG of the GPs in question, both through the information provided by the GPs on this matter and by proactively asking for additional data. As part of this effort, Altamar requires the GPs under Due Diligence to answer an ESG Due Diligence Questionnaire ("ESG DD Questionnaire"), which includes 15 questions inquiring into the level of commitment to RI of the GP. Once the GPs have answered the ESG DD Questionnaire, the ESG Team applies an internal scoring model which classifies the GPs into four categories depending on their level of commitment to ESG. The investment team analyses these results and evaluates them in conjunction with the rest of the information on RI received, and requires any additional data deemed to be relevant, such as the GPs' level of commitment to the Sustainable Development Goals (SDGs), the use of KPIs to measure ESG evolution, or the PRI score in cases where the GP is a PRI member, in order to fully analyse the GP's positioning on RI. All of these analyses are presented during the Investment Committees and are always a key consideration in the final investment decision. The RI procedures and strategy carried out by Altamar are defined and set out in its ESG Policy, approved by the Board of Directors and aligned with the SDGs. As part of this alignment, the Altamar Team selected 7 SDGs on which the firm wishes to have a positive impact both through its main activity and through the Altamar Foundation. Additionally, as of 2020, Altamar has an Exclusion Policy (described in Section 2) which sets out a list of restricted sectors in which the Firm does not wish to invest. This list is requested in every Side Letter of the investments in all asset classes to avoid exposure to controversial sectors and industries.
  - (3) The ESG Policy includes the ESG criteria and guidelines followed by the Firm at all levels of its activity. Regarding the scope of the policy, the Group applies the same guidelines to all asset classes without distinction.

#### Annual overview

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SLS 1 S2	CORE	N/A	N/A	PUBLIC	Annual overview	GENERAL

- o Discuss your organisation's progress during the reporting year on the responsible investment issue you consider most relevant or material to your organisation or its assets.
- Reflect on your performance with respect to your organisation's responsible investment objectives and targets during the reporting year. This might involve e.g. outlining your single most important achievement, or describing your general progress, on topics such as the following:
  - $\circ$  refinement of ESG analysis and incorporation
  - stewardship activities with investees and/or with policy makers
  - o collaborative engagements
  - attainment of responsible investment certifications and/or awards

As part of Altamar's ESG Policy, the ESG Team elaborates an Annual ESG Action Plan which sets out the main objectives to be accomplished by the Firm. Last year's ESG Action Plan key achievements are outlined below:

(1) Strengthened ESG integration in the investment process:

Greater involvement of the Investment Team in the analysis and rationale behind the ESG practices reported by the GPs Altamar invests in. A more thorough analysis of the GPs' commitment to ESG is included in the Due Diligence (DD) materials. Additionally, as part of its ESG policy, Altamar has developed an Exclusion Policy and has included more demanding ESG clauses in Side Letters. The Exclusion Policy consists of a list of restricted investments ("Restricted Investment List") in which Altamar does not wish to participate, and which includes companies whose main activity involves sectors such as: the manufacture, sale or distribution of pornography products or the manufacture or trade of anti-personnel landmines, cluster weapons, or biological and chemical weapons. Further details on the Exclusion Policy are given in module ISP.

(2) Collaborative engagement with GPs, LPs and other stakeholders:

Engagement with LPs: since the beginning of the Covid-19 pandemic, Altamar has organised quarterly Webcasts to give LPs an update on the performance of the funds. In these events, Altamar has shared transparent and accurate information on the evolution of the funds' valuations throughout the pandemic. Additionally, throughout 2020, 25 contacts with LPs were made in order to share Altamar's ESG practices and policies answering specific investor requests and DDQs. Altamar has continued sharing ESG information with its LPs in its quarterly activity reports and Supervisory Committees, Annual General Meetings, the Annual Report, and on the ESG section of its official website.

Engagement with GPs: calls and webinars of existing and potential GPs in Altamar's portfolio were held/ attended frequently during 2020 and 100% ESG DD Questionnaires were sent.

Engagement with other stakeholders: (i) in October 2020, two members of the ESG Team participated as speakers in a webinar organised by UN PRI by sharing Altamar's keys for successful ESG corporate governance and the tools to succeed in the integration of ESG in the Firm. (ii) Altamar sponsors the Level 20 initiative which promotes gender diversity in the European Private Equity industry. Two senior members of the Investor Relations team have joined the organisation to become representatives of Altamar. (iii) Two members of the ESG Team discussed the implications of becoming a member of GRESB with representatives from the initiative. (iv) More than 4 ESG service providers were analysed during 2020 to increase the efficiency of Altamar's ESG processes. (v) Altamar's CRCO participated in two meetings of Inverco's ESG Working Group where she is an active member. (vi) 3 public consultations on regulation were answered.

(3) Impact investment market analysis and new products targeting sustainability:

During 2020, in light of the growing interest in impact investing across the market, the ESG Team led an Impact Task Force made up of representatives from different areas of the firm, to analyse the impact investment market. The analysis was carried out on the demand side (Altamar's LPs were contacted to learn about their knowledge and interest surrounding impact products) and the supply side (both national and international impact investment firms were analysed). Resulting conclusions were presented to the Board of Directors.

### Next steps

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SLS 1 S3	CORE	N/A	N/A	PUBLIC	Next steps	GENERAL

What specific steps has your organisation outlined to advance your commitment to responsible investment in the next two years?

(i) Measurement of the progress in the integration of ESG through the new structure of the Annual ESG Action Plan including a series of KPIs and goals linked to each of the actions defined. This way, the impact that each action has can be measured and monitored over the years, with a special focus on the contribution to the 7 SDGs selected (3,4,8,9,12,13,17). (ii) Stregthened reporting and transparency on ESG matters through webcasts, calls, documents for LPs and website. (iii) Development and launch of sustainable investment products after conducting an analysis of the sustainable and impact investing market. Conclusions were presented to the ESG Committee and the Board of Directors and Altamar made the decision to launch an ESG-plus Real Asset coinvestment fund during 2021.

#### Endorsement

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SLS 1 S4	CORE	N/A	N/A	PUBLIC	Endorsement	GENERAL

The Senior Leadership Statement has been prepared and/or reviewed by the undersigned and reflects our organisation-wide commitment and approach to responsible investment.

Name	Rocio Fernández
Position	CRCO
Organisation's name	Altamar Capital Partners

• This endorsement is for the Senior Leadership Statement only and is not an endorsement of the information reported by Altamar Capital Partners, S.L. in the various modules of the Reporting Framework. The Senior Leadership Statement is simply provided as a general overview of Altamar Capital Partners, S.L.'s responsible investment approach. The Senior Leadership Statement does not constitute advice and should not be relied upon as such, and is not a substitute for the skill, judgement and experience of any third parties, their management, employees, advisors and/or clients when making investment and other business decisions.

# Organisational Overview (OO)

# Organisational information

### Categorisation

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 1	CORE	Signatory category	Multiple, see guidance	PUBLIC	Categorisation	GENERAL

Select the type that best describes your organisation or the services you provide.

(O) Fund management	(2) This is an additional (secondary) type
(P) Fund of funds, manager of managers or sub-advised products	(1) This is our only (or primary) type
(Q) Execution and advisory	(2) This is an additional (secondary) type

## Subsidiary information

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 2	CORE	N/A	OO 2.1	PUBLIC	Subsidiary information	GENERAL

Does your organisation have subsidiaries that are also PRI signatories in their own right?

○ (A) Yes**⑥** (B) No

## Reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 3	CORE	N/A	N/A	PUBLIC	Reporting year	GENERAL

Indicate the year-end date for your reporting year.

	Month	Day	Year
Reporting year end date:	December	31	2020

# Assets under management

### All asset classes

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 4	CORE	OO 4.1, OO 4.2	N/A	PUBLIC	All asset classes	GENERAL

What were your total assets under management (AUM) at the end of the indicated reporting year? Provide the amount in USD.

(A) AUM of your organisation, including subsidiaries	US\$ 7,754,633,711.40
(C) AUM subject to execution, advisory, custody, or research advisory only	US\$ 476,617,489.90

## Asset breakdown

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5	CORE	Multiple, see guidance	Multiple, see guidance	PUBLIC	Asset breakdown	GENERAL

Provide a percentage breakdown of your total assets under management at the end of your indicated reporting year.

	Percentage of AUM
(A) Listed equity – internal	0.0%
(B) Listed equity – external	0.0%
(C) Fixed income – internal	0.0%
(D) Fixed income – external	4.7%
(E) Private equity – internal	1.3%

(F) Private equity – external	71.3%
(G) Real estate – internal	0.3%
(H) Real estate – external	10.3%
(I) Infrastructure – internal	0.4%
(J) Infrastructure – external	11.7%
(K) Hedge funds – internal	0.0%
(L) Hedge funds – external	0.0%
(M) Forestry – internal	0.0%
(N) Forestry – external	0.0%
(O) Farmland – internal	0.0%
(P) Farmland – external	0.0%
(Q) Other – internal, please specify:	0.0%
(R) Other – external, please specify:	0.0%
(S) Off-balance sheet – internal	0.0%
(T) Off-balance sheet – external	0.0%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.1	CORE	OO 5	Multiple, see guidance	PUBLIC	Asset breakdown	GENERAL

Provide a breakdown of your organisation's externally managed assets between segregated mandates and pooled funds or investments.

	(2) Fixed income	(3) Private equity	(4) Real estate	(5) Infrastructure
(A) Segregated mandate(s)	20.0%	3.0%	2.0%	2.0%
(B) Pooled fund(s) or pooled investment(s)	80.0%	97.0%	98.0%	98.0%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.2 FI	CORE	OO 5, OO 5.1	Multiple, see guidance	PUBLIC	Asset breakdown	GENERAL

Provide a further breakdown of your fixed income assets.

	(B) External allocation – segregated	(C) External allocation – pooled
(1) Passive – SSA	0.0%	0.0%
(2) Passive – corporate	0.0%	0.0%
(3) Passive – securitised	0.0%	0.0%
(4) Active – SSA	0.0%	0.0%
(5) Active – corporate	0.0%	0.0%
(6) Active – securitised	0.0%	0.0%
(7) Private debt	100.0%	100.0%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.2 PE	CORE	OO 5, OO 5.1	N/A	PUBLIC	Asset breakdown	GENERAL

### Provide a further breakdown of your private equity assets.

	(A) Internal allocation	(B) External allocation – segregated	$ \begin{array}{ll} {\rm (C)\ External\ allocation} - \\ {\rm pooled} \end{array} $
(1) Venture capital	100.0%	0.0%	21.0%
(2) Growth capital	0.0%	0.0%	0.0%
(3) (Leveraged) buyout	0.0%	100.0%	50.0%
(4) Distressed, turnaround or special situations	0.0%	0.0%	0.0%
(5) Secondaries	0.0%	0.0%	29.0%
(6) Other, please specify:	0.0%	0.0%	0.0%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.2 RE	CORE	OO 5, OO 5.1	N/A	PUBLIC	Asset breakdown	GENERAL

### Provide a further breakdown of your real estate assets.

	(A) Internal allocation	(B) External allocation – segregated	(C) External allocation — pooled
(1) Retail	0.0%	0.0%	9.87%
(2) Office	0.0%	0.0%	26.83%
(3) Industrial	0.0%	0.0%	16.76%
(4) Residential	100.0%	0.0%	22.16%

(5) Hotel	0.0%	0.0%	12.4%
(6) Lodging, leisure and recreation	0.0%	0.0%	2.21%
(7) Education	0.0%	0.0%	0.0%
(8) Technology/science	0.0%	0.0%	2.77%
(9) Healthcare	0.0%	0.0%	2.44%
(10) Mixed use	0.0%	0.0%	0.58%
<ul><li>(11) Other, please specify:</li><li>(C) Other operational and industrial portfolios (pooled funds)</li></ul>	0.0%	100.0%	3.98%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.2 INF	CORE	OO 5, OO 5.1	N/A	PUBLIC	Asset breakdown	GENERAL

### Provide a further breakdown of your infrastructure assets.

	(A) Internal allocation	(B) External allocation – segregated	(C) External allocation – pooled	
(1) Data infrastructure	0.0%	0.0%	2.61%	
(2) Energy and water resources	0.0%	0.0%	1.52%	
(3) Environmental services	0.0%	0.0%	2.78%	
(4) Network utilities	0.0%	0.0%	14.36%	
(5) Power generation (excl. renewables)	0.0%	0.0%	30.28%	
(6) Renewable power	0.0%	0.0%	4.15%	

(7) Social infrastructure	100.0%	0.0%	36.38%
(8) Transport	0.0%	0.0%	1.79%
<ul><li>(9) Other, please specify:</li><li>(C) Telecommunications and other social infrastructure (pooled funds)</li></ul>	0.0%	100.0%	6.13%

# Externally managed assets

## Captive relationships

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
00 7	CORE	OO 5	Multiple, see guidance	PUBLIC	Captive relationships	GENERAL

Does your organisation have a captive relationship with some or all of its external investment managers?

o (A) Yes

(B) No

### Investment consultants

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 8	CORE	OO 5	SAM 1	PUBLIC	Investment consultants	GENERAL

Does your organisation engage investment consultants in the selection, appointment or monitoring of your external investment managers?

o (A) Yes

(B) No

# Stewardship

## Fixed income

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 9 FI	CORE	OO 5, OO 5.2 FI	Multiple, see guidance	PUBLIC	Fixed income	2
Does your org	ganisation conduct stewar	rdship activities for	your fixed income assets?			
			(7) Pri	vate debt		
(A) Thro	ough service providers		Г	]		
(B) Throu	igh external managers		Ē	]		
(C) Th	(C) Through internal staff					
(D)	Collaboratively		Ē	]		
stewards	lid not conduct this ship activity for this stegy/asset type		С	]		

## Private equity, real estate and infrastructure

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 9 ALT	CORE	OO 5	Multiple, see guidance	PUBLIC	Private equity, real estate and infrastructure	2

Does your organisation conduct stewardship activities in the following asset classes?

	(1) Private equity	(2) Real estate	(3) Infrastructure
(A) Through service providers			

(B) Through external managers	Z	<b></b>	$\square$
(C) Through internal staff			
(D) Collaboratively	Ø	Ø	V
(E) We did not conduct stewardship activities for this asset class			

# ESG incorporation

## Internally managed assets

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 10	CORE	Multiple, see guidance	Multiple, see guidance	PUBLIC	Internally managed assets	1

For each internally managed asset class, select whether or not you incorporate ESG into your investment decisions.

	(1) ESG incorporated into investment decisions	(2) ESG not incorporated into investment decisions
(J) Private equity	•	0
(K) Real estate	•	0
(L) Infrastructure	•	0

### External manager selection

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 11	CORE	Multiple, see guidance	Multiple, see guidance	PUBLIC	External manager selection	1

For each externally managed asset class, select whether or not you incorporate ESG into external manager selection. Your response should refer to the selection of the external managers who managed the relevant asset classes during the reporting year, regardless of when such selection took place.

	(1) ESG incorporated into external manager selection	(2) ESG not incorporated into external manager selection
(D) Fixed income – active	•	0
(E) Private equity	•	0
(F) Real estate	•	0
(G) Infrastructure	•	0

## External manager appointment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 12	CORE	Multiple, see guidance	Multiple, see guidance	PUBLIC	External manager appointment	1

For each externally managed asset class, select whether or not you incorporate ESG into external manager appointment. Your response should refer to the appointment of the external managers who managed the relevant asset classes during the reporting year, regardless of when their appointment took place.

	(1) ESG incorporated into external manager appointment	(2) ESG not incorporated into external manager appointment	
(D) Fixed income – active	•	0	
(E) Private equity	•	0	

(F) Real estate	•	0
(G) Infrastructure	•	0

# External manager monitoring

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 13	CORE	Multiple, see guidance	Multiple, see guidance	PUBLIC	External manager monitoring	1

For each externally managed asset class, select whether or not you incorporated ESG into external manager monitoring during the reporting year.

	(1) ESG incorporated into external manager monitoring	(2) ESG not incorporated into external manager monitoring
(D) Fixed income – active	•	0
(E) Private equity	•	0
(F) Real estate	•	0
(G) Infrastructure	•	0

# Voluntary reporting

### Voluntary modules

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 14	CORE	Multiple, see guidance	Multiple, see guidance	PUBLIC	Voluntary modules	GENERAL

The following modules are voluntary to report on in the separate PRI asset class modules as they account for less than 10% of your total AUM and are under USD 10 billion. Please select if you wish to voluntarily report on the module.

	(1) Yes, report on the module	(2) No, opt out of reporting on the module
(F) Private equity	0	•
(G) Real estate	0	•
(H) Infrastructure	0	•
(K) External manager selection, appointment and monitoring (SAM) – fixed income		0

The following modules are mandatory to report on as they account for 10% or more of your total AUM or are over USD 10 billion. The ISP (Investment and Stewardship Policy) module is always applicable for reporting.

	(1) Yes, report on the module		
ISP: Investment and Stewardship Policy	•		
(L) External manager selection, appointment and monitoring (SAM) – private equity	•		

(M) External manager selection, appointment and monitoring (SAM) – real estate		
(N) External manager selection, appointment and monitoring (SAM) – infrastructure	•	

# ESG/sustainability funds and products

## Labelling and marketing

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 16	CORE	Multiple, see guidance	Multiple, see guidance	PUBLIC	Labelling and marketing	GENERAL

What percentage of your assets under management in each asset class are ESG/sustainability marketed funds or products, and/or ESG/RI certified or labelled assets? Percentage figures can be rounded to the nearest 5% and should combine internally and externally managed assets.

	Percentage
(D) Fixed income – active	0.0%
(E) Private equity	0.0%
(F) Real estate	0.0%
(G) Infrastructure	0.0%

# Climate investments

### Asset breakdown

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 17	CORE	N/A	N/A	PUBLIC	Asset breakdown	GENERAL

What percentage of your assets under management is in targeted low-carbon or climate-resilient investments?

0.0%

# Other asset breakdowns

## Geographical breakdown

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18	CORE	Multiple, see guidance	N/A	PUBLIC	Geographical breakdown	GENERAL

What is the geographical breakdown of your organisation's assets under management by investment destination (i.e. where the investments are located)?

	<ul><li>(5) Fixed income</li><li>private debt</li></ul>	(6) Private equity	(7) Real estate	(8) Infrastructure
(A) Developed	100.0%	88.0%	84.0%	100.0%
(B) Emerging	0.0%	12.0%	16.0%	0.0%
(C) Frontier	0.0%	0.0%	0.0%	0.0%
(D) Other	0.0%	0.0%	0.0%	0.0%

### Management by PRI signatories

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 19	CORE	OO 5	N/A	PUBLIC	Management by PRI signatories	GENERAL

What approximate percentage (+/-5%) of your externally managed assets are managed by PRI signatories?

42.0%

### Fixed income constraints

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 20	CORE	OO 5.2 FI	OO 20.1	PUBLIC	Fixed income constraints	GENERAL

What percentage of your fixed income assets are subject to constraints? The constraints may be regulatory requirements, credit quality restrictions, currency constraints or similar.

#### Internal and external fixed income assets subject to constraints

(D) Fixed income – private debt 100.0%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 20.1	CORE	OO 20	N/A	PUBLIC	Fixed income constraints	GENERAL

Describe the constraints to your fixed income assets.

#### Fixed income constraints

(D) Fixed income – private debt

Our Private Debt Fund of Fund's legal documentation include a series of regulatory, liquidity, credit and asset type exposure restrictions. This document is available in Altamar's website:

https://www.altamarcapital.com/en/deuda-privada-2/

## Private equity: Sectors

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 21	CORE	OO 5	N/A	PUBLIC	Private equity: Sectors	GENERAL

What is the percentage breakdown of your organisation's internally managed private equity investments by sector?

#### Percentage of total internally managed private equity AUM

(A) Energy	0.0%
(B) Materials	0.0%
(C) Industrials	0.0%
(D) Consumer discretionary	0.0%
(E) Consumer staples	0.0%
(F) Health care	100.0%
(G) Financials	0.0%
(H) Information technology	0.0%
(I) Communication services	0.0%
(J) Utilities	0.0%
(K) Real estate	0.0%

## Private equity: Nature of ownership

Indicator	Type of indicator	$\begin{array}{c} {\rm Dependent} \\ {\rm on} \end{array}$	Gateway to	Disclosure	Subsection	PRI Principle
OO 22	CORE	OO 5	N/A	PUBLIC	Private equity: Nature of ownership	GENERAL

What is the percentage breakdown of your organisation's internally managed private equity investments by investment vehicle?

(A) Direct investment	(5)>75%
(B) Fund investment	(1) 0%
(C) Separate account	(1) 0%

## Private equity: Ownership level

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 23	CORE	OO 5	N/A	PUBLIC	Private equity: Ownership level	GENERAL

What is the percentage breakdown of your organisation's private equity investments by level of ownership?

(A) A majority stake (50% and above)	(1) 0%
(B) A significant minority stake (between $10-50\%$ )	(4) 51–75%
(C) A limited minority stake (less than $10\%$ )	(3) 11–50%

## Real estate: Building type

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 24	CORE	OO 5	$\begin{array}{c} \mathrm{RE}\ 1,\mathrm{RE}\ 9,\mathrm{RE} \\ 10 \end{array}$	PUBLIC	Real estate: Building type	GENERAL

What is the percentage breakdown of your direct physical real estate assets by strategy?

#### Percentage total of direct physical real estate AUM

(A) Standing investments	0.0%
(B) New construction	100.0%
(C) Major renovation	0.0%

## Real estate: Ownership level

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 25	CORE	OO 5	N/A	PUBLIC	Real estate: Ownership level	GENERAL

What is the percentage breakdown of your direct physical real estate assets by level of ownership?

(A) A majority stake (50% and above)	(1) 0%
(B) A significant minority stake (between 10–50%)	(5) > 75%
(C) A limited minority stake (less than $10\%$ )	(1) 0%

## Real estate: Management type

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 26	CORE	OO 5	Multiple, see guidance	PUBLIC	Real estate: Management type	GENERAL

#### What is the percentage breakdown of your direct physical real estate assets based on who manages these assets?

(A) Directly by our organisation	(1) 0%
(B) By external property managers that our organisation appoints	(5)>75%
(C) By other investors or their property managers	(1) 0%
(D) By a tenant(s) with operational control	(1) 0%

## Infrastructure: Fund strategy

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 27	CORE	OO 5	N/A	PUBLIC	Infrastructure: Fund strategy	GENERAL

#### What is the percentage breakdown of your organisation's infrastructure investments by fund type?

(A) Open-ended	(1) 0%
(B) Closed-ended	(5)>75%

## Infrastructure: Nature of ownership

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 28	CORE	OO 5	N/A	PUBLIC	Infrastructure: Nature of ownership	GENERAL

#### What is the percentage breakdown of your organisation's infrastructure assets by investment vehicle?

(A) Direct investment	(3) 11–50%		
(B) Limited liability company or partnership	$(5)>\!\!75\%$		
(C) Joint venture (JV) with a government entity	(1) 0%		
(D) Joint venture (JV) with a private entity	(1) 0%		
(E) Joint venture (JV) with a public entity	(1) 0%		
(F) Separate account	(1) 0%		
(G) Special purpose vehicle	(1) 0%		

## Infrastructure: Ownership level

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 29	CORE	OO 5	N/A	PUBLIC	Infrastructure: Ownership level	GENERAL

#### What is the percentage breakdown of your organisation's infrastructure assets by level of ownership?

(A) A majority stake (50% and above)	(1) 0%
(B) A significant minority stake (between 10–50%)	(5) >75%
(C) A limited minority stake (less than 10%)	(1) 0%

## Infrastructure: Strategy

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 30	CORE	OO 5	N/A	PUBLIC	Infrastructure: Strategy	GENERAL

What is the percentage breakdown of your organisation's internally managed infrastructure assets by investment strategy?

#### Percentage of total internally managed infrastructure AUM

(A) Core	0.0%
(B) Value added	100.0%
(C) Opportunistic	0.0%

## Infrastructure: Type of asset

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 31	CORE	OO 5	INF 1	PUBLIC	Infrastructure: Type of asset	GENERAL

What is the percentage breakdown of your infrastructure assets by strategy?

#### Percentage of total internally managed infrastructure AUM

(A) Standing investments/operating assets	100.0%
(B) New construction	0.0%
(C) Major renovation	0.0%

### Infrastructure: Management type

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 32	CORE	OO 5	Multiple, see guidance	PUBLIC	Infrastructure: Management type	GENERAL

What is the percentage breakdown of your direct infrastructure assets based on who manages these assets?

(A) Directly by our organisation	(1) 0%
(B) By third party infrastructure operators that we appoint	(5) >75%
(C) By other investors or their third party operators	(1) 0%
(D) By public or government entities or their third party operators	(1) 0%

# Investment and Stewardship Policy (ISP)

# Responsible investment policy & governance

### Responsible investment policy

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 1	CORE	N/A	ISP 1.1, ISP 1.2	PUBLIC	Responsible investment policy	1

Does your organisation have a formal policy or policies covering your approach to responsible investment? Your approach to responsible investment may be set out in a standalone guideline, covered in multiple standalone guidelines or be part of a broader investment policy. Your policy may cover various responsible investment elements such as stewardship, ESG guidelines, sustainability outcomes, specific climate-related guidelines, RI governance and similar.

- $\ \, igoplus \, (A)$  Yes, we do have a policy covering our approach to responsible investment
- o (B) No, we do not have a policy covering our approach to responsible investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 1.1	CORE	ISP 1	Multiple, see guidance	PUBLIC	Responsible investment policy	1

What elements does your responsible investment policy cover? The responsible investment elements may be set out in one or multiple standalone guidelines, or they may be part of a broader investment policy.

- (A) Overall approach to responsible investment
- ☑ (B) Guidelines on environmental factors
- (C) Guidelines on social factors
- (D) Guidelines on governance factors
- ☑ (E) Approach to stewardship
- ☑ (F) Approach to sustainability outcomes
- (G) Approach to exclusions
- □ (H) Asset class-specific guidelines that describe how ESG incorporation is implemented
- (I) Definition of responsible investment and how it relates to our fiduciary duty
- ☑ (J) Definition of responsible investment and how it relates to our investment objectives
- (K) Responsible investment governance structure
- ☑ (L) Internal reporting and verification related to responsible investment
- (M) External reporting related to responsible investment
- (N) Managing conflicts of interest related to responsible investment
- (O) Other responsible investment aspects not listed here, please specify:

Understanding and incorporating client / beneficiary sustainability preferences: as part of Altamar's fiduciary duty, a question regarding the sustainability and RI preferences of investors is included in the suitability test whenever investment advice is given.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 1.2	PLUS	ISP 1	N/A	PUBLIC	Responsible investment policy	1

What mechanisms do you have in place to ensure that your policies are implemented in an aligned and consistent way across the organisation?

Altamar has built a strong and robust ESG corporate governance structure through which the implementation of ESG policies is materialised and overseen. This governance structure reinforces the Firm's commitment to sustainability through the involvement and accountability of senior management members (C-Level staff) in the integration of ESG criteria within the organisation. It has been designed with the aim of carrying out an efficient execution of ESG activities that ensures compliance with the ESG policies established. A workflow has been designed in which the following levels are distinguished: ESG Committee, ESG Working Group and ESG Team.

- ESG Committee: Led by the founding partners, this forum's objective is to define the strategic lines and to promote Altamar's ESG activities at the highest level of the firm. This Committee is responsible for overseeing and following up on the Annual ESG Action Plan's evolution and implementation. The ESG Committee meets every 6 months (or more often if required) and amongst its duties it approves the Annual ESG Action Plan and carries out the dialogue and representation of Altamar ESG activities to the stakeholders of Altamar.
- ESG Working Group: It meets on a quarterly basis and its main objectives are to monitor and promote the achievement of the Annual ESG Action Plan and the integration of the ESG policies in all areas, strengthening employee awareness in order to continue building a culture that integrates ESG criteria both in the investment process and in the day-to-day work of the Firm. The ESG Working Group is also in charge of suggesting new initiatives by analysing the ESG best market practices in the industry. The conclusions of the ESG Working Group are reported to the ESG Committee.
- ESG Team: Responsible for the daily execution of activities in terms of sustainability and for providing the required support for the implementation of the Annual ESG Action Plan. The ESG Team is responsible for building and suggesting actions to be included in the Annual ESG Action Plan as well as any other new initiative that is deemed to be interesting to the ESG Working Group. It is also responsible for setting the deadlines for the actions, implementing the Annual ESG Action Plan, and reporting to the ESG Working Group. Additionally, this team promotes the importance of SRI through training and awareness programs.

Moreover, the Altamar Internal Code of Conduct reinforces the compliance with the existing policies and procedures, including the ESG policy and sustainability guidelines applicable to all areas of the firm. Additionally, as part of the risk and compliance management mechanisms, Altamar has created an Investor Transparency Report including an exhaustive description of all the approved procedures and methodologies implemented in the firm. This report verifies the structure and existence of all operational processes, including ESG procedures.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 2	CORE	ISP 1.1	N/A	PUBLIC	Responsible investment policy	6

#### Indicate which of your responsible investment policy elements are publicly available and provide links.

- ☑ (A) Overall approach to responsible investment. Add link(s):
  - $https://www.altamarcapital.com/download/ESG\_Policy\_Altamar.pdf; \ https://www.altamarcapital.com/download/Altamar-ESG-Report.pdf$
- ☑ (B) Guidelines on environmental factors. Add link(s):
- https://www.altamarcapital.com/download/ESG Policy Altamar.pdf
- ☑ (C) Guidelines on social factors. Add link(s):
- $https://www.altamarcapital.com/download/ESG\_Policy\_Altamar.pdf$
- ☑ (D) Guidelines on governance factors. Add link(s):
- $https://www.altamarcapital.com/download/ESG\_Policy\_Altamar.pdf$
- ☑ (E) Approach to stewardship. Add link(s):
  - https://www.altamarcapital.com/download/ESG Policy Altamar.pdf
- ☑ (F) Approach to sustainability outcomes. Add link(s):
  - $https://www.altamarcapital.com/download/ESG\_Policy\_Altamar.pdf$
- ☑ (G) Approach to exclusions. Add link(s):

	$https://www.altamarcapital.com/download/ESG\_Policy\_Altamar.pdf$
<b>√</b>	(I) Definition of responsible investment and how it relates to our fiduciary duty. Add link(s): https://www.altamarcapital.com/download/ESG_Policy_Altamar.pdf
<b>√</b>	(J) Definition of responsible investment and how it relates to our investment objectives. Add link(s):
<b>V</b>	(K) Responsible investment governance structure. Add link(s): https://www.altamarcapital.com/download/ESG_Policy_Altamar.pdf
<b>√</b>	(L) Internal reporting and verification related to responsible investment. Add link(s): https://www.altamarcapital.com/download/ESG_Policy_Altamar.pdf
<b>√</b>	(M) External reporting related to responsible investment. Add link(s):
<b>V</b>	(N) Managing conflicts of interest related to responsible investment. Add link(s):
	<ul><li>(O) Other responsible investment aspects [as specified] Add link(s):</li><li>(P) Our responsible investment policy elements are not publicly available</li></ul>

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 3	CORE	ISP 1.1	N/A	PUBLIC	Responsible investment policy	1

What percentage of your total assets under management are covered by your policy elements on overall approach to responsible investment and/or guidelines on environmental, social and governance factors?

- o (A) Overall approach to responsible investment
- o (B) Guidelines on environmental factors
- o (C) Guidelines on social factors
- (D) Guidelines on governance factors

AUM coverage of all policy elements in total:

100.0%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 4	CORE	ISP 1.1	N/A	PUBLIC	Responsible investment policy	1

#### Which elements does your exclusion policy include?

- (A) Legally required exclusions (e.g. those required by domestic/international law, bans, treaties or embargoes)
- ☑ (B) Exclusions based on our organisation's values or beliefs (e.g. regarding weapons, alcohol, tobacco and/or avoiding other particular sectors, products, services or regions)
- ☑ (C) Exclusions based on screening against minimum standards of business practice based on international norms (e.g. OECD guidelines, the UN Human Rights Declaration, Security Council sanctions or the UN Global Compact)

#### Governance

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 6	CORE	N/A	ISP 8	PUBLIC	Governance	1

Do your organisation's board, chief-level staff, investment committee and/or head of department have formal oversight and accountability for responsible investment?

- ☑ (A) Board and/or trustees
- ☑ (B) Chief-level staff (e.g. Chief Executive Officer (CEO), Chief Investment Officer (CIO) or Chief Operating Officer (COO))
- (C) Investment committee
- $\ensuremath{\square}$  (D) Other chief-level staff, please specify:
- Chief Risk and Compliance Officer (CRCO)
- ☑ (E) Head of department, please specify department:
  - Private Equity Managing Director, Venture Capital Managing Partner, Talent Managing Director & Partner, IT Managing Director & Partner, Investor Relations Managing Director, Facilities Managing Director
- $\square$  (F) None of the above roles have oversight and accountability for responsible investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 7	CORE	N/A	ISP 8	PUBLIC	Governance	1

In your organisation, which internal or external roles have responsibility for implementing responsible investment?

- ☑ (A) Board and/or trustees
- ☑ (B) Chief-level staff (e.g. Chief Executive Officer (CEO), Chief Investment Officer (CIO) or Chief Operating Officer (COO))
- ☑ (C) Investment committee
- ☑ (D) Other chief-level staff [as specified]
- ☑ (E) Head of department [as specified]
- ☑ (F) Portfolio managers
- ☑ (G) Investment analysts
- $\square$  (H) Dedicated responsible investment staff
- ☑ (I) Investor relations
- ☐ (J) External managers or service providers
- $\square$  (K) Other role, please specify:
- $\square$  (L) Other role, please specify:
- $\square$  (M) We do not have roles with responsibility for implementing responsible investment.

### People and capabilities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 8	CORE	ISP 6, ISP 7	ISP 8.1, ISP 8.2	PUBLIC	People and capabilities	General

What formal objectives for responsible investment do the roles in your organisation have?

	$\begin{array}{c} \hbox{(1) Board} \\ \hbox{and/or trustees} \end{array}$	(2) Chief-level staff	(3) Investment committee	(4) Other chief-level staff [as specified]
(A) Objective for ESG incorporation in investment activities	Ø	Ø	Ø	☑
(B) Objective for contributing to the development of the organisation's ESG incorporation approach	Ø	Ø	Ø	☑

(C) Objective for contributing to the organisation's stewardship activities (e.g. through sharing findings from continuous ESG research or investment decisions)	Ø	Ø	Ø	Ø
(D) Objective for ESG performance	V	Ø	☑	Ø
(E) Other objective related to responsible investment [as specified]				
(F) Other objective related to responsible investment [as specified]				
(G) No formal objectives for responsible investment exist for this role				
	(5) Head of department [as specified]	(6) Portfolio managers	(7) Investment analysts	(9) Investor relations
(A) Objective for ESG incorporation in investment activities	☑	Ø	☑	Ø
(B) Objective for contributing to the development of the organisation's ESG incorporation approach	✓	Ø	✓	☑
(C) Objective for contributing to the organisation's stewardship activities (e.g. through sharing findings from continuous ESG research or investment decisions)	✓	Ø	☑	Ø
(D) Objective for ESG performance	V	Ø	☑	Ø
(E) Other objective related to responsible investment [as specified]				

ISP 8.1	PLUS	ISP 8	N/A	PUBLIC	People and capabilities	General
Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
responsible in	nal objectives for vestment exist for his role					
responsible	pjective related to e investment [as pecified]					

Describe the key responsible investment performance indicators (KPIs) or benchmarks that your organisation uses to compare and assess the performance of your professionals in relation to their responsible investment objectives.

All investment team members, Investment Committee members and ESG Team members, have individual objectives regarding ESG integration, depending on their professional category. At least twice a year, these individual ESG objectives are reviewed by each employee and their supervisors in order to ensure a successful accomplishment of the ESG commitments assigned. Depending on these ESG objectives, the KPIs that will be used to measure them will be different in order to correctly monitor the achievements by each professional.

Additionally, Altamar is in the process of defining a series of corporate KPIs that will measure several of the ESG actions that are being implemented and that will also serve as KPIs to measure the achievement of individual objectives (i.e. measuring the number of Annual General Meetings for which our investment team collects ESG information mentioned by the GPs, or the number of contacts made with our GPs asking them to update our ESG DD Questionnaire every year). These KPIs will strengthen our engagement with both GPs and LPs.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 8.2	CORE	ISP 8	N/A	PUBLIC	People and capabilities	General

Which responsible investment objectives are linked to variable compensation for roles in your organisation?

# RI objectives linked to variable compensation for roles in your organisation:

(1) Board and/or trustees		
(A) Objective for ESG incorporation in investment activities		
(B) Objective for contributing to the development of the organisation's ESG incorporation approach	<b></b>	
(C) Objective for contributing to the organisation's stewardship activities (e.g. through sharing findings from continuous ESG research or investment decisions)	<b></b> ✓	
(D) Objective on ESG performance	Ø	
(2) Chief-level staff (e.g. Chief Executive Officer (CEO), Chief Investment Officer (CEO)	IO) or Chief Operating Officer (COO))	
(A) Objective for ESG incorporation in investment activities	Ø	
(B) Objective for contributing to the development of the organisation's ESG incorporation approach	☑	
(C) Objective for contributing to the organisation's stewardship activities (e.g. through sharing findings from continuous ESG research or investment decisions)	Ø	
(D) Objective for ESG performance	Ø	
(3) Investment committee		
(A) Objective for ESG incorporation in investment activities	Ø	
(B) Objective for contributing to the development of the organisation's ESG incorporation approach	☑	
(C) Objective for contributing to the organisation's stewardship activities (e.g. through sharing findings from continuous ESG research or investment decisions)	Ø	
(D) Objective for ESG performance	<b>7</b>	

#### (4) Other chief-level staff

(A) Objective for ESG incorporation in investment activities	V	
(B) Objective for contributing to the development of the organisation's ESG incorporation approach		
(C) Objective for contributing to the organisation's stewardship activities (e.g. through sharing findings from continuous ESG research or investment decisions)		
(D) Objective for ESG performance	Ø	
(5) Head of department		
(A) Objective for ESG incorporation in investment activities	V	
(B) Objective for contributing to the development of the organisation's ESG incorporation approach		
(C) Objective for contributing to the organisation's stewardship activities (e.g. through sharing findings from continuous ESG research or investment decisions)	☑	
(D) Objective for ESG performance	V	
(6) Portfolio managers		
(A) Objective on ESG incorporation in investment activities	V	
(B) Objective for contributing to the development of the organisation's ESG incorporation approach		
(C) Objective for contributing to the organisation's stewardship activities (e.g. through sharing findings from continuous ESG research or investment decisions)		
(D) Objective for ESG performance		

#### (7) Investment analysts

(A) Objective for ESG incorporation in investment activities	<b>☑</b>
(B) Objective for contributing to the development of the organisation's ESG incorporation approach	☑
(C) Objective for contributing to the organisation's stewardship activities (e.g. through sharing findings from continuous ESG research or investment decisions)	✓
(D) Objective for ESG performance	<b>☑</b>
(9) Investor relations	
(A) Objective on ESG incorporation in investment activities	<b>☑</b>
(B) Objective for contributing to the development of the organisation's ESG incorporation approach	<b>☑</b>
(C) Objective for contributing to the organisation's stewardship activities (e.g. through sharing findings from continuous ESG research or investment decisions)	☑
(D) Objective for ESG performance	V
(G) We have not linked any RI objectives to variable compensation	

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 9	CORE	N/A	N/A	PUBLIC	People and capabilities	General

How frequently does your organisation assess the responsible investment capabilities and training needs among your investment professionals?

- (A) Quarterly or more frequently
- (B) Bi-annually
- o (C) Annually
- o (D) Less frequently than annually
- o (E) On an ad hoc basis
- $\circ$  (F) We do not have a process for assessing the responsible investment capabilities and training needs among our investment professionals

#### Strategic asset allocation

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 10	CORE	N/A	ISP 10.1	PUBLIC	Strategic asset allocation	1

#### Does your organisation incorporate ESG factors into your strategic asset allocation?

- □ (A) We incorporate ESG factors into calculations for expected risks and returns of asset classes
- $\square$  (B) We specifically incorporate physical, transition and regulatory changes related to climate change into calculations for expected risks and returns of asset classes
- (C) No, we do not incorporate ESG considerations into our strategic asset allocation
- □ (D) Not applicable, we do not have a strategic asset allocation process

# Stewardship

#### Stewardship policy

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 11	CORE	Multiple, see guidance	N/A	PUBLIC	Stewardship policy	2

What percentage of your assets under management does your stewardship policy cover?

(B) Fixed income	25.0%
(C) Private equity	25.0%
(D) Real estate	25.0%
(E) Infrastructure	25.0%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 12	CORE	ISP 1.1	ISP 12.1	PUBLIC	Stewardship policy	2

Which elements does your organisation's stewardship policy cover? The policy may be a standalone guideline or part of a wider RI policy.

- ☑ (A) Key stewardship objectives
- (B) Prioritisation approach of ESG factors and their link to engagement issues and targets
- □ (C) Prioritisation approach depending on entity (e.g. company or government)
- $\square$  (D) Specific approach to climate-related risks and opportunities
- ☑ (E) Stewardship tool usage across the organisation, including which, if any, tools are out of scope and when and how different tools are used and by whom (e.g. specialist teams, investment teams, service providers, external investment managers or similar)
- ☑ (F) Stewardship tool usage for specific internal teams (e.g. specialist teams, investment teams or similar)
- ☑ (G) Stewardship tool usage for specific external teams (e.g. service providers, external investment managers or similar)
- $\square$  (H) Approach to collaboration on stewardship
- ☑ (I) Escalation strategies
- ☑ (J) Conflicts of interest
- $\square$  (K) Details on how the stewardship policy is implemented and which elements are mandatory, including how and when the policy can be overruled

# ☑ (L) How stewardship efforts and results should be communicated across the organisation to feed into investment decision—making and vice versa

☐ (M) None of the above elements are captured in our stewardship policy

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 12.1	PLUS	ISP 12	N/A	PUBLIC	Stewardship policy	2

#### Describe any additional details related to your stewardship policy elements or your overall stewardship approach.

Altamar's main stewardship duties and priorities are included in its ESG Policy as it refers to the reinforcement of its engagement with GPs, LPs, employees and other stakeholders (e.g. entities with which we collaborate). In this sense, priorities are set as part of the Annual ESG Action Plans approved by the ESG Committee and a series of KPIs are in the process of being defined to measure the progress and evolution achieved.

Altamar's main tool to reinforce its engagement with GPs is the ESG DD Questionnaire through which the firm collects information from the managers' commitment with sustainability. Moreover, the results from the questionnaire are used to monitor the GPs' evolution and to identify the GPs who are less advanced in the intergration of ESG, to reinforce engagement with them.

Additionally, Altamar has procedures and controls for the identification, registration, and management of potentially harmful conflicts of interest. Specifically, Altamar has an express policy on conflicts of interest, set out in its Internal Code of Conduct, which establishes: I) a list of circumstances that may involve a risk of conflict of interest for its clients, and II) the necessary procedures and measures to be adopted to manage these conflicts. Altamar keeps an updated register of the operations carried out that have led to the appearance of a conflict of interest.

Likewise, a committee has been set up to monitor matters related to the Internal Code of Conduct, called the Internal Code of Conduct Monitoring Body (OSRIC), which meets on a quarterly basis and verifies that conflicts of interest have been managed in accordance with the established procedures.

In addition, the group has, within the aforementioned policy, a detailed procedure to resolve conflicts of interest arising in related-party transactions. The group has placed responsibility for such transactions in the hands of an independent director who ultimately authorises their execution.

#### Stewardship policy implementation

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 13	CORE	ISP 1.1	N/A	PUBLIC	Stewardship policy implementation	2

#### How is your stewardship policy primarily applied?

- (A) It requires our organisation to take certain actions
- o (B) It describes default actions that can be overridden (e.g. by investment teams for certain portfolios)
- o (C) It creates permission for taking certain measures that are otherwise exceptional
- o (D) We have not developed a uniform approach to applying our stewardship policy

#### Stewardship objectives

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 15	CORE	Multiple, see guidance	N/A	PUBLIC	Stewardship objectives	2

For the majority of assets within each asset class, which of the following best describes your primary stewardship objective?

	(2) Fixed income	(3) Private equity	(4) Real estate	(5) Infrastructure
(A) Maximise the risk–return profile of individual investments	o	0	0	0
(B) Maximise overall returns across the portfolio	O	0	0	0
(C) Maximise overall value to beneficiaries/clients	•	•	•	•
(D) Contribute to shaping specific sustainability outcomes (i.e. deliver impact)	0	0	0	0

#### Stewardship prioritisation

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 16	CORE	Multiple, see guidance	N/A	PUBLIC	Stewardship prioritisation	2

What key criteria does your organisation use to prioritise your engagement targets? For asset classes such as real estate, private equity and infrastructure, you may consider this as key criteria to prioritise actions taken on ESG factors for assets, portfolio companies and/or properties in your portfolio. Select up to 3 options per asset class from the list.

	(2) Fixed income	(3) Private equity	(4) Real estate	(5) Infrastructure
(A) The size of our holdings in the entity or the size of the asset, portfolio company and/or property				
(B) The materiality of ESG factors on financial and/or operational performance	☑	Ø	Ø	
(C) Specific ESG factors with systemic influence (e.g. climate or human rights)				
(D) The ESG rating of the entity	<b>V</b>	<b>√</b>	Ø	<b>7</b>
(E) The adequacy of public disclosure on ESG factors/performance	☑	Ø	Ø	Ø
(F) Specific ESG factors based on input from clients				
(G) Specific ESG factors based on input from beneficiaries				
(H) Other criteria to prioritise engagement targets, please specify:				
(I) We do not prioritise our engagement targets				

#### Stewardship methods

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 17	PLUS	Multiple, see guidance	N/A	PUBLIC	Stewardship methods	2

Please rank the methods that are most important for your organisation in achieving its stewardship objectives. Ranking options: 1 = most important, 5 = least important.

(A) Internal resources (e.g. stewardship team, investment team, ESG team or staff)	1
(B) External investment managers, third-party operators and/or external property managers (if applicable)	2
(C) External paid services or initiatives other than investment managers, third-party operators and/or external property managers (paid beyond a membership fee)	We do not use this method
(D) Informal or unstructured collaborations with peers	4
(E) Formal collaborative engagements (e.g. PRI-coordinated collaborative engagements, Climate Action 100+, the Initiative Climat International (iCI) or similar)	3

#### Collaborative stewardship

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 18	CORE	Multiple, see guidance	ISP 18.1	PUBLIC	Collaborative stewardship	2

Which of the following best describes your organisation's default position, or the position of the service providers/external managers acting on your behalf, with regards to collaborative stewardship efforts such as collaborative engagements?

 $<sup>\</sup>circ$  (A) We recognise that stewardship suffers from a collective action problem, and, as a result, we actively prefer collaborative efforts

 $<sup>\</sup>circ$  (B) We collaborate when our individual stewardship efforts have been unsuccessful or are likely to be unsuccessful, i.e. as an escalation tool

o (C) We collaborate in situations where doing so would minimise resource cost to our organisation

- (D) We do not have a default position but collaborate on a case-by-case basis
- (E) We generally do not join collaborative stewardship efforts

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 18.1	PLUS	ISP 18	N/A	PUBLIC	Collaborative stewardship	2

#### Describe your position on collaborating for stewardship.

Altamar channels its strong commitment to sustainability through its active engagement strategies with GPs, LPs, employees and stakeholders by implementing a series of actions:

Engagement with GPs: as part of the GP selection, the ESG DD Questionnaire is sent to every GP under DD and the data retrieved from their answers is included as a fundamental part of the DD materials. As part of the monitoring of the existing GPs, the questionnaire is updated on an annual or biannual basis depending on the score of each GP. Engagement is reinforced through calls and emails to make sure the vast majority of the GPs (if not all) answer the questionnaire. Additional calls or meetings are held to do follow up on ESG integration progress and relevant changes made to the GP's policy.

Engagement with LPs: Altamar shares its experience and procedures regarding ESG criteria integration (including PRI membership implications) with investors who are beginning to implement sustainability measures and request information on ESG best practices. During 2020, we had 19 requests from investors which we addressed either by DDQ answering or by engaging in calls with them.

Engagement with other stakeholders: Altamar promotes ESG best practices across the industry by collaboratively engaging with entities such as Inverco (our CRCO is a member of the ESG Working Group), Spanish Association of Capital, Growth and Investment (ASCRI), Invest Europe, and UN PRI. In October 2020, two members of our ESG team participated as speakers in a webinar organised by PRI to share Altamar's approach to ESG integration. Additionally, the member of our Venture Capital (VC) team designated as the VC ESG leader, participated as speaker in a webinar organised by ASCRI about ESG, VC and impact.

Altamar believes that by engaging and collaborating with other players in the industry, ESG stewardship policies and strategies are aligned towards a common goal: to promote sustainable development across the industry.

#### Escalation strategies

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 19	PLUS	Multiple, see guidance	N/A	PUBLIC	Escalation strategies	2

Which of these measures did your organisation, or the service providers/external managers acting on your behalf, use most frequently when escalating initial stewardship approaches that were deemed unsuccessful?

	(2) Fixed income	
(A) Collaboratively engaging the entity with other investors		

snaren	co-filing/submitting a older resolution or proposal	a				
	ely engaging the entity.g. open letter)	y				
	ting against the re- of one or more board directors					
	g against the chair of poard of directors					
	ng against the annual nancial report					
	ting or implementing a exit strategy					
	We did not use any measures during the			Ø		
	g year. Please explain why below			<u> </u>		
reporting  You have s  During 202  year were	why below  selected "(H) We did a  20, Altamar did not has successful.  Type of	not use any escalation me ve to use any escalation me Dependent on	easure given that t	e reporting yea		throughout the
You have s During 202 year were s	why below  selected "(H) We did not have successful.	ve to use any escalation me	easure given that t	<b>e reporting yea</b> he stewardship s	trategies implemented	l throughout the
You have s During 202 year were s cator	why below  selected "(H) We did not have successful.  Type of indicator  CORE  ardship approaches we	ve to use any escalation mediate Dependent on Multiple, see	easure given that the Gateway to $N/A$	e reporting year he stewardship s  Disclosure  PUBLIC  owing measures	Subsection  Escalation strategies  are excluded from	PRI Principle  2 the potential
You have s  During 202 year were s  cator  20	why below  selected "(H) We did not have successful.  Type of indicator  CORE  ardship approaches we	Dependent on  Multiple, see guidance	easure given that the Gateway to $N/A$	e reporting year he stewardship s  Disclosure  PUBLIC  owing measures	Subsection  Escalation strategies s are excluded from acting on your beha	PRI Principle  2 the potential

(B) Filing/co-filing/submitting a shareholder resolution or proposal	
(C) Publicly engaging the entity (e.g. open letter)	
(D) Voting against the re- election of one or more board directors	
(E) Voting against the chair of the board of directors	
(F) Voting against the annual financial report	
(G) Divesting or implementing an exit strategy	
(H) We do not have any restrictions on the escalation measures we can use	✓

#### Alignment and effectiveness

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 21	PLUS	Multiple, see guidance	N/A	PUBLIC	Alignment and effectiveness	2

Describe how you coordinate stewardship across your organisation to ensure that stewardship progress and results feed into investment decision-making and vice versa.

Altamar tracks the progress of ESG integration, both at a firm level and in the investment process, by monitoring the implementation of the Annual ESG Action Plan. KPIs are in the process of being defined in order to measure the evolution and results of the stewardship policies, and they will be tracked on an annual basis. Additionally, Altamar's solid ESG governance structure allows having thorough control over the workflow and the implementation of engagement strategies with stakeholders. Supervisory and control mechanisms are in place to ensure material ESG incidents and breaches / non-compliance are identified and mitigated.

- Investment Committees (IC): As mentioned before, the Investment Teams present ESG analyses as part of the Due Diligence materials. The results of the ESG DD Questionnaire, together with an analysis of the scoring obtained for each GP under DD, and the relevant reporting issued in terms of ESG are discussed during the ICs. This information is an important part of the final investment decision.

- Side Letter and Exclusion Policy: Altamar seeks to obtain, through the side letter negotiation, a commitment from all GPs in order to be informed on any material ESG-related incidents that may occur and to exclude certain sectors from its investments. Specifically, the side letter provision that we try to negotiate with the GPs states that they will make an effort to provide us with "a summary of any ESG-related incidents that have occurred with respect to a portfolio company of which the GP is aware and which the GP reasonably determines will have a material negative impact on the business of the Partnership, and any corrective actions that have been taken in respect thereof". In case this happens, Altamar would engage in a dialogue with the GP to monitor how these incidents are taken care of and ensure the required ESG standards are met. Moreover, any material ESG incident will be communicated to Altamar's Investment Committee if necessary and if needed, further actions will be considered. To the date, the funds' GPs and portfolio companies have not disclosed with Altamar any material ESG-related incidents.
- Monitoring and Compliance: Altamar monitors the ESG compliance of the fund-of-funds during their entire life by periodically updating the ESG DD Questionnaire as well as by monitoring any relevant information received from the GP by any means (emails, calls, ESG reports etc). Limited Partners can monitor and, where necessary, ensure that the funds-of-funds are operating consistently with the Altamar ESG-related policies through the ESG information released by Altamar.

#### Stewardship examples

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 22	PLUS	Multiple, see guidance	N/A	PUBLIC	Stewardship examples	2

Describe stewardship activities that you participated in during the reporting year that led to desired changes in the entity you interacted with. Include what ESG factor(s) you engaged on and whether your stewardship activities were primarily focused on managing ESG risks and opportunities or delivering sustainability outcomes.

	(1) Engagement type	(2) Primary goal of stewardship activity
(A) Example 1	b) Collaborative	c) Both managing ESG risks and delivering outcomes
(B) Example 2	b) Collaborative	c) Both managing ESG risks and delivering outcomes
(C) Example 3	b) Collaborative	b) Delivering sustainability outcomes
	(3) The ESG factors you focused on in the stewardship activity	(4) Description of stewardship activity and the desired change(s) you achieved

(A) Example 1	Governance (ESG governance model, ESG policies and procedures)	Altamar has entered into a Joint Venture with another Asset Management firm for its Private Debt division. During 2020, Altamar teams and the other Asset Manager teams held meetings and calls to discuss the ESG procedures, methodologies and policies. Finally, a Joint ESG policy has been elaborated and agreed upon, sharing ESG best practices from both entities.
(B) Example 2	Measuring engagement with GPs on ESG	A new procedure was established in 2020 to ensure that every GP submitted their response to the ESG DD Questionnaire following the defined updating criteria in terms of the scoring of each GP. For the period ending on December 31st 2020, 100% of the GPs for which the questionnaire had to be updated were contacted by Altamar and also 100% of them answered the questionnaire
(C) Example 3	Transparency on ESG matters and Contribution to SDG 17	Altamar has had several meetings with LPs who requested information on ESG best practices and the implications of becoming a PRI member. The ESG team has shared with them Altamar's ESG strategy and experience in the integration and reporting of sustainability matters, emphasising the importance of the PRI's support and resources. (response continued in row below)
		This way, Altamar contributes to SDG 17 by promoting alliances to achieve the goals, and also raises awareness of ESG and the importance of becoming member of initiatives that encourage sustainability, like the PRI. It is worth noting that LPs from the Latam region are becoming increasingly interested in joining the PRI and they are starting to develop sustainability policies progressively.

#### Engaging policymakers

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 23	CORE	N/A	Multiple, see guidance	PUBLIC	Engaging policymakers	2

How does your organisation, or the external investment managers or service providers acting on your behalf, engage with policymakers for a more sustainable financial system?

- ☑ (A) We engage with policymakers directly
- ☑ (B) We provide financial support, are members of and/or are in another way affiliated with third-party organisations, including trade associations and non-profit organisations, that engage with policymakers
- $\square$  (C) We do not engage with policymakers directly or indirectly

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 23.1	CORE	ISP 23	N/A	PUBLIC	Engaging policymakers	2

What methods do you, or the external investment managers or service providers acting on your behalf, use to engage with policymakers for a more sustainable financial system?

- $\square$  (A) We participate in "sign-on" letters on ESG policy topics. Describe:
- ☑ (B) We respond to policy consultations on ESG policy topics. Describe:

As part of the active engagement with external stakeholders carried out by Altamar, the ESG team responds to public consultations on ESG matters and regulation. During 2020, Altamar participated in the following public ESG policy consultations: April 15th, 2020: European Commission consultation on the new ESG strategy May 27th, 2020: Climate change action plan public consultation (national, Spain) June 25th, 2020: Joint consultation paper concerning ESG disclosures and requirements

- $\square$  (C) We provide technical input on ESG policy change. Describe:
- $\Box$  (D) We proactively engage financial regulators on financial regulatory topics regarding ESG integration, stewardship, disclosure or similar. Describe:
- $\square$  (E) We proactively engage regulators and policymakers on other policy topics. Describe:
- $\square$  (F) Other methods used to engage with policy makers. Describe:

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 23.2	CORE	ISP 23	N/A	PUBLIC	Engaging policymakers	2

Do you have governance processes in place (e.g. board accountability and oversight, regular monitoring and review of relationships) that ensure your policy activities, including those through third parties, are aligned with your position on sustainable finance and your commitment to the 6 Principles of the PRI?

● (A) Yes, we have governance processes in place to ensure that our policy activities are aligned with our position on sustainable finance and our commitment to the 6 Principles of the PRI. Describe your governance processes:

Altamar engages in policy activities by responding to regulatory public consultations, including those related to ESG. The responses submitted are included in the reports presented to the quarterly Control and Supervision Commission (CCS), standing Commission of the Board of Directors, and also presented to the ESG Committee. This way the alignment of the responses given to the consultations with the firm's policies and strategy is ensured.

o (B) No, we do not have these governance processes in place. Please explain why not:

#### Engaging policymakers – Policies

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 24	CORE	ISP 23	ISP 24.1	PUBLIC	Engaging policymakers – Policies	2

Do you have policies in place that ensure that your political influence as an organisation is aligned with your position on sustainable finance and your commitment to the 6 Principles of the PRI?

As part of the ESG Policy, Altamar has defined a set of engagement activities and actions with external stakeholders in line with the strategy of the Firm. These actions include participation in public policy consultations, calls with GPs and other entities regarding regulatory changes and ESG requirements, etc. KPIs are in the process of being defined to measure the implementation of these actions of active engagement in line with the firm's contribution to SDG 17 selected by the team.

 $\circ$  (B) No, we do not a policy (ies) in place. Please explain why not:

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 24.1	CORE	ISP 24	N/A	PUBLIC	Engaging policymakers – Policies	2

Is your policy that ensures alignment between your political influence and your position on sustainable finance publicly disclosed?

- https://www.altamarcapital.com/en/esg-principles-2/
- o (B) No, we do not publicly disclose this policy(ies)

#### Engaging policymakers – Transparency

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 25	CORE	ISP 23	N/A	PUBLIC	Engaging policymakers – Transparency	2

During the reporting year, did your organisation publicly disclose your policy engagement activities or those conducted on your behalf by external investment managers/service providers?

- ☑ (A) We publicly disclosed details of our policy engagement activities. Add link(s):
- https://www.altamarcapital.com/memoria 2020/en/
- $\square$  (B) We publicly disclosed a list of our third-party memberships in or support for trade associations, think-tanks or similar that conduct policy engagement activities with our support or endorsement. Add link(s):
- □ (C) No, we did not publicly disclose our policy engagements activities during the reporting year. Explain why:
- $\square$  (D) Not applicable, we did not conduct policy engagement activities

# Climate change

#### Public support

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 26	CORE	N/A	N/A	PUBLIC	Public support	General

#### Does your organisation publicly support the Paris Agreement?

Altamar's Board of Directors made the decision to align the Altamar Group's ESG strategy and policies with the 2030 Agenda and the Sustainable Development Goals (SDGs) following the SDGs Compass methodology. https://www.altamarcapital.com/en/esg-principles-2/ Additionally, Altamar signed the Briefing Paper on the Global Investor Statement to Governments on Climate Change. By signing this statement, Altamar shows its support for the Paris Agreement and the TCFD recommendations, and urges all governments to implement the actions that are needed to achieve the goals of the Agreement, with the utmost urgency. https://theinvestoragenda.org/wp-content/uploads/2020/03/200309-Policy-Advocacy-list-for-IA-website.pdf

o (B) No, we currently do not publicly support the Paris Agreement

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 27	CORE	N/A	N/A	PUBLIC	Public support	General

#### Does your organisation publicly support the Task Force on Climate-Related Financial Disclosures (TCFD)?

- https://theinvestoragenda.org/wp-content/uploads/2020/03/200309-Policy-Advocacy-list-for-IA-website.pdf
- (B) No, we currently do not publicly support the TCFD

#### Governance

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 28	CORE	N/A	N/A	PUBLIC	Governance	General

How does the board or the equivalent function exercise oversight over climate-related risks and opportunities?

# $\square$ (A) By establishing internal processes through which the board or the equivalent function are informed about climate-related risks and opportunities. Specify:

Altamar has implemented a comprehensive risk management system (Enterprise Risk Management System (ERM) or ERM System) consisting of a set of structured, consistent and continuous processes for the identification, assessment and management of opportunities and threats affecting the Group's defined objectives. The system was developed ad hoc by Marsh Risk Consulting, while its periodic maintenance is carried out by Altamar. It is based on principles aligned with the Group's model and strategy, which take into account the requirements of regulators and supervisors, as well as best market practices: - Lines of defense to manage risks including sustainability / ESG risks, and their origin, their control and monitoring, as well as independent risk assessment. - A risk culture that integrates throughout the organisation a set of attitudes, values, skills and guidelines for action against risks. - Risk management by the risk generating units. Within the ERM system, a risk taxonomy has been created that includes all relevant risks to which the organisation is exposed. Risks are defined and prioritised according to likelihood and impact. It is a continuously evolving inventory. Concretely, risks associated with ESG and sustainabilty are considered. The risk assessment is carried out on a quarterly basis and is based on a two-stage process: (i) Qualitative analysis: this consists of assessing each risk on the basis of a scale, and (ii) Quantitative analysis: considers different key risk indicators for each of the risk categories and subcategories in order to avoid subjectivity throughout the quantification of likelihood and impact. On a quarterly basis, a global regulatory compliance and risk management report is prepared and submitted for approval to the Boards of Directors, as well as to the Altamar Group's Control and Supervision Committee. This report includes information on risks including those related to sustainability.

- □ (B) By articulating internal/external roles and responsibilities related to climate. Specify:
- ☑ (C) By engaging with beneficiaries to understand how their preferences are evolving with regard to climate change. Specify:

  Altamar incorporates a question regarding the RI and sustainability preferences of LPs in the Suitability Test whenever investment advice services are provided by Altamar. Here, investor preferences regarding action against climate change is considered.

In addition, support and additional information is provided to LPs in adhoc meetigs and calls in order to fulfill their investment preferences and ensure their understanding of the investment products. Also, training sessions are organised for this same purpose, both adhoc and under request.

(D) By incorporating climate change into investment beliefs and policies. Specify:

Altamar establishes various courses of action aimed at maximising the integration of ESG criteria both in the life of the organisation and in its Sustainable and Responsible Investment (SRI) processes.

As part of this integration, Altamar's Board of Directors took the decision to align the Altamar Group's ESG strategy and policies with the 2030 Agenda and the Sustainable Development Goals (SDGs) following the SDGs Compass methodology, and with the collaboration of Baker & McKenzie. As part of this process, awareness-raising and training sessions were held for employees on the importance of the SDGs.

Altamar is committed to achieving the SDGs. Specifically, 7 SDGs have been selected based on the impact Altamar can have on them through its core business and through the Altamar Foundation: SDG 3, 4, 8, 9, 12, 13 and 17. The group is currently in the process of defining a series of measurement indicators (KPIs) to monitor progress in achieving these SDGs.

Regarding the engagement with GPs, the ESG clauses requested in Side Letters include a section dedicated to the GP's commitment with the global SDGs. In this section, Altamar expresses its strong commitment to contribute towards 7 SDGs selected by the Firm, among which SDG number 13 (Climate Action) is included, and shares its strategy with the managers.

#### ☑ (E) By monitoring progress on climate-related metrics and targets. Specify:

As part of Altamar's Annual ESG Action Plan and strategy, actions and targets to ensure the Firm's contribution to the 7 selected SDGs including climate action objectives are being established. A series of KPIs are being defined for every action to be achieved and they will be monitored and measured throughout the year. Climate-related metrics are being discussed given Altamar's wish to contribute to SDG 13 both at a corporate level - targets related with CO2 emission reduction and energy saving measures - and within the investment process - number of analyses carried out about our GP's commitment to SDG 13, or number of conversations held with GPs in terms of how they are fighting climate change.

#### ☑ (F) By defining the link between fiduciary duty and climate risks and opportunities. Specify:

Altamar recognises its fiduciary duty regarding its responsibility with the environment and with society and, in the following reporting periods, the results from monitoring the defined KPIs and any material ESG risks encountered including climate-related risks, will be publicly disclosed and shared with LPs.

- $\square$  (G) Other measures to exercise oversight, please specify:
- ☐ (H) The board or the equivalent function does not exercise oversight over climate-related risks and opportunities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 29	CORE	N/A	N/A	PUBLIC	Governance	General

#### What is the role of management in assessing and managing climate-related risks and opportunities?

☑ (A) Management is responsible for identifying climate-related risks/opportunities and reporting them back to the board or the equivalent function. Specify:

Management has identified three main trends / challenges to be considered during the investment decision process across the different asset classes Altamar invests in:

- Climate change-related risks: Infrastructure and Real Estate (Real Assets) GPs invest in assets which, due to their nature and activity, may entail greater environmental risks. We have seen that most of our underlying Real Asset GPs carry out demographics and climate change impact scenario analyses to ensure they do not cause damage to the environment while achieving long-term returns. For instance, Altamar invests in managers who implement action plans to reduce plastic pollution and waste. Several of these GPs publish annual reports on the results of the measurement of their KPIs to track their impact on SDGs 6, 9, 11, 12 and 13.
- Resource Scarcity: Altamar invests in GPs who invest in Real Assets with specific energy saving and waste reduction policies. These asset classes have shown greater engagement with the environmental factors within the ESG framework.
- Exposure to disruptive technologies: Altamar has gained exposure to disruptive technologies through investing in Venture Capital assets, since VC assets are prone to investing in companies that are active in R&D to consolidate new technologies which usually generate a positive impact both on the environment and society.
- $\Box$  (B) Management implements the agreed-upon risk management measures. Specify:
- □ (C) Management monitors and reports on climate-related risks and opportunities. Specify:
- □ (D) Management ensures adequate resources, including staff, training and budget, are available to assess, implement and monitor climate-related risks/opportunities and measures. Specify:
- □ (E) Other roles management takes on to assess and manage climate-related risks/opportunities, please specify:
- □ (F) Our management does not have responsibility for assessing and managing climate-related risks and opportunities

#### Strategy

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 30	CORE	N/A	Multiple, see guidance	PUBLIC	Strategy	General

#### Which climate-related risks and opportunities has your organisation identified within its investment time horizon(s)?

#### ☑ (A) Specific financial risks in different asset classes. Specify:

In the case of direct investments on: - Real Estate assets: Even though we don't require specific or ad hoc environmental studies, so far, we have obtained all the required environmental permits in all the direct Real Estate investment opportunities we have executed. In case of detecting any type of material risk in the Due Diligence process the investment would be discarded. - Infrastructure assets: For co-investments opportunities, environmental impact studies are part of the Due Diligence of the asset. - Private Equity: In co-investments, environmental Due Diligence is performed when applicable as part of the DD process run by the GP. In case of detecting any type of material risk, the investment would be discarded either directly by the GP or by Altamar. Additionally, Altamar is also taking into account the investment opportunities that rise as a result of climate change, especially in the Real Assets category in sectors such as renewable energy or sustainable real estate. Altamar is closely following these trends and inquires GPs on these matters as part of our commercial due diligence when evaluating an investment opportunity.

#### ☑ (B) Specific sectors and/or assets that are at risk of being stranded. Specify:

Altamar takes a proactive approach in the identification and management of potential ESG-risks. In order to do so, Altamar has developed an Exclusion Policy, as explained in previous questions, to avoid investing in certain sectors or activities which have high ESG-related risks. On the other hand, Altamar also asks fund managers via side letter to be informed on any material ESG-incidents that may occur in the portfolio companies, and in case this happens, Altamar will take the appropriate steps to monitor the situation and support the fund manager in order to solve the issue.

(C)	Assets with	exposure t	o direct	physical	climate	risk.	Specif	iv:

 $\square$  (D) Assets with exposure to indirect physical climate risk. Specify:

√	(E) Specific sectors and/or assets that are likely to benefit under a range of climate scenarios. Specify:
	When evaluating Real Estate and Infrastructure investments, an ESG impact-related scenario analysis is carried out in order to
	understand the climate-related risks associated with the investment projects in terms of the GPs' reporting on these matters.
	Additionally, other more general scenario analyses are carried out in order to consider stress situations and general incidents (including

ESG risks).

#### ☑ (F) Specific sectors and/or assets that contribute significantly to achieving our climate goals. Specify:

As mentioned before, our investment teams are noticing a strong trend towards sustainability and the contribution to the SDGs in the Real Assets market and among the GPs we invest in. Given the alignment of Altamar's strategies and policies with the SDG framework, Real Assets tend to show investment strategies which are very aligned with the environmental goals set by Altamar.

Additionally, given their nature, the Venture Capital assets provide exposure to sectors dedicated to developing the latest technological solutions to improve efficiency and processes, among other solutions, therefore, contributing to the improvement of businesses. These type of investments can have a positive impact both on society and the environment.

- $\square$  (G) Other climate-related risks and opportunities identified. Specify:
- □ (H) We have not identified specific climate-related risks and opportunities within our organisation's investment time horizon

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 30.1	CORE	ISP 30	N/A	PUBLIC	Strategy	General

For each of the identified climate-related risks and opportunities, indicate within which investment time-horizon they were identified.

	(1) 3–5 months	(2) 6 months to 2 years	(3) 2–4 years	(4) 5–10 years
(A) Specific financial risks in different asset classes [as specified]				☑
(B) Specific sectors and/or assets that are at risk of being stranded [as specified]				Ø
(E) Specific sectors and/or assets that are likely to benefit under a range of climate scenarios [as specified]				☑
(F) Specific sectors and/or assets that contribute significantly to achieving our climate goals [as specified]				☑

	(5) 11–20 years	(6) 21–30 years	(7) > 30  years
(A) Specific financial risks in different asset classes [as specified]			
(B) Specific sectors and/or assets that are at risk of being stranded [as specified]			
(E) Specific sectors and/or assets that are likely to benefit under a range of climate scenarios [as specified]			
(F) Specific sectors and/or assets that contribute significantly to achieving our climate goals [as specified]			

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 31	CORE	N/A	N/A	PUBLIC	Strategy	General

	opportunities					

	l (A) Specific financial risks in different asset classes. Specify:
	(B) Specific sectors and/or assets that are at risk of being stranded. Specify:
	(C) Assets with exposure to direct physical climate risk. Specify:
	(D) Assets with exposure to indirect physical climate risk. Specify:
	(E) Specific sectors and/or assets that are likely to benefit under a range of climate scenarios. Specify:
$\checkmark$	(F) Specific sectors and/or assets that contribute significantly to achieving our climate goals. Specify:
	In line with our answers to the previous module, Altamar expects the Real Assets industry to continue to evolve and further engage in the contribution to the SDGs and sustainable investing. The relevance and impact of investing in a responsible way is growing, and, as discussed with one of our European Infrastructures GPs, it seems that it will continue to increase especially after the global Covid pandemic.
	Althouth the Real Asset sectors show more advanced trends towards integrating sustainability in their investments, all of the Altamar Funds invest with a long term objective of value creation, prioritising managers who show a clear alignment with our ESG integration strategy.

 $\Box$  (G) Other climate-related risks and opportunities identified, please specify:

 $\square$  (H) We have not identified specific climate-related risks and opportunities beyond our organisation's investment time horizon

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 32	PLUS	N/A	N/A	PUBLIC	Strategy	General

# Describe the impact of climate-related risks and opportunities on your organization's investment strategy, products (where relevant) and financial planning.

In 2020, Altamar began to evaluate the possibility of launching sustainable products. The firm made the decision to take a step further in its commitment to ESG by deciding to launch a coinvestments Real Asset Fund focused on the following megatrends: digital transformation, science and health, energy transition, logistical revolution and sustainable cities.

The investment policy and strategy of the Fund will target investments which directly contribute to the SDGs and will be launched in 2Q21.

#### Strategy: Scenario analysis

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 33	CORE	N/A	ISP 33.1	PUBLIC	Strategy: Scenario analysis	General

Does your organisation use scenario analysis to assess climate-related investment risks and opportunities? Select the range of scenarios used.

- $\square$  (A) An orderly transition to a 2°C or lower scenario
- (B) An abrupt transition consistent with the Inevitable Policy Response
- □ (C) A failure to transition, based on a 4°C or higher scenario
- ☑ (D) Other climate scenario, specify:

Altamar carries out several scenario analyses considering the best and the worst-case scenarios of every investment opportunity. In terms of the negative scenarios, all kinds of risks are considered including natural disasters and other material ESG-related risks, as well as their future impact.

□ (E) We do not use scenario analysis to assess climate-related investment risks and opportunities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 33.1	PLUS	ISP 33	N/A	PUBLIC	Strategy: Scenario analysis	General

Describe how climate scenario analysis is used to test the resilience of your organisation's investment strategy and inform investments in specific asset classes.

#### (B) An abrupt transition consistent with the Inevitable Policy Response

In order to meet the objectives related with regulatory compliance given the constant increase of disclosure requirements and policies related to sustainability, Altamar is constantly following up with the most recent regulatory developments, publications and news. The firm is well informed at all times in order to face any new regulatory requirement which might affect a specific sector or company in its portfolio, and act accordingly.

#### ☑ (D) Other climate scenario

Please, see answer to ISP 33.

#### Risk management

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 34	PLUS	ISP 30	N/A	PUBLIC	Risk management	General

#### Which risk management processes do you have in place to identify and assess climate-related risks?

- ☐ (A) Internal carbon pricing. Describe:
- ☐ (B) Hot spot analysis. Describe:
- $\square$  (C) Sensitivity analysis. Describe:
- □ (D) TCFD reporting requirements on external investment managers where we have externally managed assets. Describe:
- ☐ (E) TCFD reporting requirements on companies. Describe:
- (F) Other risk management processes in place, please describe:

As mentioned previously, Altamar has implemented a risk management system (ERM system) to identify, assess and manage opportunities and risks affecting the Group's strategy and objectives. Among the different risks being analysed, environmental and climate-related threats are taken into account.

As part of the ERM system, Altamar has created a risk taxonomy that includes all the relevant risks to which the organisation is exposed. Risks are defined and prioritised according to probability and impact. It is an inventory in continuous evolution.

This process is accompanied by a series of controls and KPIs included in the risk assessment process to have more objective data to evaluate the risks. The objective of the ERM is not the elimination of all risks but to assume a prudent level of risks that allows the organisation to maintain acceptable levels of capital and financing and to generate benefits on a recurring basis. Compliance with the Risk Appetite limits is subject to continuous monitoring

□ (G) We do not have any risk management processes in place to identify and assess climate-related risks

Indicator	Type of indicator	Dependent on				PRI Principle
ISP 35	PLUS	Multiple, see guidance	N/A	PUBLIC	Risk management	General

#### In which investment processes do you track and manage climate-related risks?

# ☑ (A) In our engagements with investee entities, and/or in engagements conducted on our behalf by service providers and/or external managers. Describe:

Altamar takes a proactive approach in the identification and management of potential ESG-risks. In order to do so, Altamar has reinforced the ESG clauses requested in Side Letters by highlighting the firm's ESG policy and strategy, incorporating a specific clause dedicated to the contribution to the 7 SDGs selected, including SDG 13. Additionally, a clause where the restricted activity list is outlined has been added in line with the Exclusion Policy mentioned in previous modules.

On the other hand, Altamar also asks fund managers via side letter to be informed on any material ESG-incidents that may occur in the portfolio companies, and in case this happens, Altamar will take the appropriate steps to monitor the situation and support the fund manager in order to solve the issue. At this point, climate-related risks would be monitored if reported by our underlying funds.

(C)	In our	external	investment	manager	selection	process.	Describe:

- $\square$  (D) In our external investment manager monitoring process. Describe:
- $\square$  (E) In the asset class benchmark selection process. Describe:
- $\square$  (F) In our financial analysis process. Describe:
- $\square$  (G) Other investment process(es). Describe:
- $\square$  (H) We are not tracking and managing climate-related risks in specific investment processes

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 36	PLUS	N/A	N/A	PUBLIC	Risk management	General

# How are the processes for identifying, assessing and managing climate-related risks incorporated into your organisation's overall risk management?

$\square$ (A)	The risk	committee	or the equivalent	function is	s formally	responsible for	r identifying,	assessing and	d managing	climate risks.
Decemil										

- $\square$  (B) Climate risks are incorporated into traditional risks (e.g. credit risk, market risk, liquidity risk or operational risk).
- $\square$  (C) Climate risks are prioritised based on their relative materiality, as defined by our organisation's materiality analysis. Describe:
- □ (D) Executive remuneration is linked to climate-related KPIs. Describe:
- $\square$  (E) Management remuneration is linked to climate-related KPIs. Describe:
- (F) Climate risks are included in the enterprise risk management system. Describe:

As we already explained previously, Altamar uses an ERM system to identify, assess and manage risks and opportunities including those related with ESG and sustainability. It is based on principles aligned with the Group's model and strategy, which take into account the requirements of regulators and supervisors, as well as best market practices.

Please, refer to question ISP 35 for more details on the risk management system.

$\square$ (G)	Other	methods	for	incorporating	; climate	risks	into	overall	risk	management,	please	describe:
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#### Metrics and targets

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 37	PLUS	N/A	ISP 37.1	PUBLIC	Metrics and targets	General

#### Have you set any organisation-wide targets on climate change?

] (	(A)	Reducing	carbon	intensity	of	portfolios

- $\square$  (B) Reducing exposure to assets with significant climate transition risks
- □ (C) Investing in low-carbon, energy-efficient climate adaptation opportunities in different asset classes
- □ (D) Aligning entire group-wide portfolio with net zero
- $\square$  (E) Other target, please specify:
- (F) No, we have not set any climate-related targets

#### Metrics and targets: Transition risk

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 38	PLUS	N/A	ISP 38.1	PUBLIC	Metrics and targets: Transition risk	General

#### What climate-related metric(s) has your organisation identified for transition risk monitoring and management?

$\square$ (	(A)	) Total	carbon	emissions

- $\square$  (B) Carbon footprint
- □ (C) Carbon intensity
- □ (D) Weighted average carbon intensity
- ☐ (E) Implied temperature warming
- ☐ (F) Percentage of assets aligned with the EU Taxonomy (or similar taxonomy)
- ☐ (G) Avoided emissions metrics (real assets)
- $\square$  (H) Other metrics, please specify:
- (I) No, we have not identified any climate-related metrics for transition risk monitoring

<sup>□ (</sup>H) Processes for identifying, assessing and managing climate-related risks are not integrated into our overall risk management

#### Metrics and targets: Physical risk

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 39	PLUS	N/A	ISP 39.1	PUBLIC	Metrics and targets: Physical risk	General

#### What climate-related metric(s) has your organisation identified for physical risk monitoring and management?

- $\square$  (A) Weather-related operational losses for real assets or the insurance business unit
- $\square$  (B) Proportion of our property, infrastructure or other alternative asset portfolios in an area subject to flooding, heat stress or water stress
- $\square$  (C) Other metrics, please specify:
- $\square$  (D) Other metrics, please specify:
- (E) We have not identified any metrics for physical risk monitoring

# Sustainability outcomes

#### Set policies on sustainability outcomes

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 40	CORE	ISP 1.1	N/A	PUBLIC	Set policies on sustainability outcomes	1, 2

Where is your approach to sustainability outcomes set out? Your policy/guideline may be a standalone document or part of a wider responsible investment policy.

- (A) Our approach to sustainability outcomes is set out in our responsible investment policy
- (B) Our approach to sustainability outcomes is set out in our exclusion policy
- □ (C) Our approach to sustainability outcomes is set out in our stewardship policy
- □ (D) Our approach to sustainability outcomes is set out in asset class–specific investment guidelines
- $\square$  (E) Our approach to sustainability outcomes is set out in separate guidelines on specific outcomes (e.g. the SDGs, climate or human rights)

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 41	CORE	ISP 1.1	N/A	PUBLIC	Set policies on sustainability outcomes	1, 2

Which global or regionally recognised frameworks do your policies and guidelines on sustainability outcomes refer to?

- ☑ (A) The SDG goals and targets
- ☑ (B) The Paris Agreement
- (C) The UN Guiding Principles on Business and Human Rights
- $\square$  (D) The OECD Guidelines for Multinational Enterprises, including guidance on Responsible Business Conduct for Institutional Investors
- $\square$  (E) Other frameworks, please specify:
- $\square$  (F) Other frameworks, please specify:

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 42	PLUS	ISP 1.1	N/A	PUBLIC	Set policies on sustainability outcomes	1, 2

What are the main reasons that your organisation has established policies or guidelines on sustainability outcomes? Select a maximum of three options.

- $\square$  (A) Because we understand which potential financial risks and opportunities are likely to exist in (and during the transition to) an SDG-aligned world
- $\square$  (B) Because we see it as a way to identify opportunities, such as through changes to business models, across supply chains and through new and expanded products and services
- $\square$  (C) Because we want to prepare for and respond to legal and regulatory developments, including those that may lead to stranded assets
- □ (D) Because we want to protect our reputation and licence-to-operate (i.e. the trust of beneficiaries, clients and other stakeholders), particularly in the event of negative sustainability outcomes from investments
- ☑ (E) Because we want to meet institutional commitments on global goals (including those based on client or beneficiaries' preferences), and communicate on progress towards meeting those objectives
- $\square$  (F) Because we consider materiality over longer time horizons to include transition risks, tail risks, financial system risks and similar
- $\square$  (G) Because we want to minimise negative sustainability outcomes and increase positive sustainability outcomes of investments

#### Identify sustainability outcomes

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 43	CORE	N/A	Multiple, see guidance	PUBLIC	Identify sustainability outcomes	1

Has your organisation identified the intended and unintended sustainability outcomes from any of its activities?

- (A) No, we have not identified the sustainability outcomes from our activities
- (B) Yes, we have identified one or more sustainability outcomes from some or all of our activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 44	CORE	ISP 43	ISP 44.1	PUBLIC	Identify sustainability outcomes	1

What frameworks/tools did your organisation use to identify the sustainability outcomes from its activities? Indicate the tools or frameworks you have used to identify and map some or all of your sustainability outcomes.

oxtimes (A) The UN Sustainable Development Goals (SDGs) and ta
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- ☐ (B) The Paris Agreement
- (C) The UN Guiding Principles on Business and Human Rights (UNGPs)
- $\square$  (D) The OECD Guidelines for Multinational Enterprises, including guidance on Responsible Business Conduct for Institutional Investors
- ☐ (E) The EU Taxonomy
- ☐ (F) Other taxonomies (e.g. similar to the EU Taxonomy), please specify:
- $\square$  (G) Other framework/tool, please specify:
- ☐ (H) Other framework/tool, please specify:
- $\square$  (I) Other framework/tool, please specify:

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 44.1	CORE	ISP 44	N/A	PUBLIC	Identify sustainability outcomes	1

#### At what level(s) did your organisation identify the sustainability outcomes from its activities?

$\square$ (A) At the asset level
$\Box$ (B) At the economic activity level
$\square$ (C) At the company level
$\square$ (D) At the sector level
$\square$ (E) At the country/region level
$\square$ (F) At the global level
$\square$ (G) Other level(s), please specify:

The Board of Directors endorses the alignment of the group's ESG strategy and policies with the 2030 Agenda and the SDGs. All of the employees at the Firm took part in selecting the SDGs on which Altamar wishes to have a greater impact. A series of KPIs are being defined for the measurement of each of the selected SDGs, and a follow-up process established to monitor the Firm's contribution to

☐ (H) We do not track at what level(s) our sustainability outcomes were identified

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 45	CORE	ISP 43	SO 1	PUBLIC	Identify sustainability outcomes	1

#### How has your organisation determined your most important sustainability outcome objectives?

□ (A)	Identifying sustainability outcomes that are closely linked to our core investment activities
□ (B)	Consulting with key clients and/or beneficiaries to align with their priorities
$\square$ (C)	Assessing the potential severity (e.g. probability and amplitude) of specific negative outcomes over different timeframes
$\square$ (D)	Focusing on the potential for systemic impacts (e.g. due to high level of interconnectedness with other global challenges)
$\square$ (E)	Evaluating the potential for certain outcome objectives to act as a catalyst/enabler to achieve a broad range of goals (e.g.
gender	or education)
<b>☑</b> (F)	Analysing the input from different stakeholders (e.g. affected communities, civil society or similar)
$\square$ (G)	Understanding the geographical relevance of specific sustainability outcome objectives
□ (H)	Other method, please specify:
$\square$ (I)	We have not yet determined our most important sustainability outcome objectives

# Transparency & Confidence-Building Measures

#### Information disclosed – All assets

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 49	CORE	N/A	N/A	PUBLIC	Information disclosed – All assets	6

For the majority of your total assets under management, what information about your ESG approach do you (or the external managers/service providers acting on your behalf) include in material shared with clients, beneficiaries and/or the public? The material may be marketing material, information targeted towards existing or prospective clients or information for beneficiaries.

- ☑ (A) A commitment to responsible investment (e.g. that we are a PRI signatory)
- $\square$  (B) Industry-specific and asset class–specific standards that we align with (e.g. TCFD, or GRESB for property and infrastructure)
- (C) Our responsible investment policy (at minimum a summary of our high-level approach)
- (D) A description of our investment process and how ESG is considered
- ☐ (E) ESG objectives of individual funds
- ☐ (F) Information about the ESG benchmark(s) that we use to measure fund performance
- (G) Our stewardship approach
- (H) A description of the ESG criteria applied (e.g. sectors, products, activities, ratings and similar)
- □ (I) The thresholds for the ESG criteria applied in our investment decisions or universe construction
- □ (J) A list of our main investments and holdings
- $\square$  (K) ESG case study/example from existing fund(s)
- $\square$  (L) We do not include our approach to ESG in material shared with clients/beneficiaries/the public for the majority of our assets under management

## Client reporting – All assets

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 50	CORE	Multiple, see guidance	N/A	PUBLIC	Client reporting – All assets	6

#### What ESG information is included in your client reporting for the majority of your assets under management?

- ☑ (A) Qualitative ESG analysis, descriptive examples or case studies
- ☑ (B) Quantitative analysis or key performance indicators (KPIs) related to ESG performance
- ☑ (C) Progress on our sustainability outcome objectives
- □ (D) Stewardship results
- $\square$  (E) Information on ESG incidents where applicable
- $\square$  (F) Analysis of ESG contribution to portfolio financial performance
- □ (G) We do not include ESG information in client reporting for the majority of our assets under management

### Frequency of client reporting – All assets

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 51	CORE	Multiple, see guidance	N/A	PUBLIC	Frequency of client reporting – All assets	6

#### For the majority of each asset class, how frequently do you report ESG-related information to your clients?

(C) Private equity	(1) Quarterly
(D) Real estate	(1) Quarterly
(E) Infrastructure	(1) Quarterly

#### Confidence-building measures

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 52	CORE	OO 16.1	Multiple, see guidance	PUBLIC	Confidence-building measures	6

# What verification has your organisation had regarding the information you have provided in your PRI Transparency Report this year?

- $\square$  (A) We received third-party independent assurance of selected processes and/or data related to our responsible investment processes, which resulted in a formal assurance conclusion
- $\square$  (B) We conducted a third-party readiness review and are making changes to our internal controls/governance or processes to be able to conduct an external assurance next year
- $\square$  (C) The internal audit function team performed an independent audit of selected processes/and or data related to our responsible investment processes reported in this PRI report
- ☑ (D) Our board, CEO, other C-level equivalent and/or investment committee has signed off on our PRI report
- $\square$  (F) We conducted an external ESG audit of our ESG/sustainability marketed funds or products (excluding ESG/RI certified or labelled assets)
- $\square$  (G) We conducted an external ESG audit of our holdings to check that our funds comply with our RI policy (e.g. exclusion list or investee companies in portfolio above certain ESG rating)
- $\square$  (H) We conducted an external ESG audit of our holdings as part of risk management, engagement identification or investment decision-making
- $\square$  (I) Responses related to our RI practices documented in this report have been internally reviewed before submission to the PRI
- $\Box$  (J) None of the above

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ISP 58	CORE	ISP 52	N/A	PUBLIC	Confidence-building measures	6

#### Who has reviewed/verified the entirety of or selected data from your PRI report?

(A) Board and/or trustees	(4) report not reviewed
(B) Chief-level staff (e.g. Chief Executive Officer (CEO), Chief Investment Officer (CIO) or Chief Operating Officer (COO))	(3) parts of the report
(C) Investment committee	(4) report not reviewed

I	(D) Other chief-level staff, please specify: Chief Risk and Compliance Officer (CRCO)	(1) the entire report
ı	(E) Head of department, please specify: Private Equity Managing Director, 2 Investor Relations Managing Directors	(1) the entire report
	(F) Compliance/risk management team	(1) the entire report
	(G) Legal team	(4) report not reviewed
	(H) RI/ ESG team	(1) the entire report
	(I) Investment teams	(1) the entire report

# Manager Selection, Appointment and Monitoring (SAM)

# Selection

#### Responsible investment policy

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 2	CORE	OO 11	SAM 2.1	PUBLIC	Responsible investment policy	1, 4

During the reporting year, did your organisation include compliance with your responsible investment policy as a pre-requisite when selecting external managers? (If you did not select any external managers during the reporting year, refer to the last reporting year in which you did select external managers.)

	(1) Yes, only when selecting external managers of ESG/sustainability funds	(2) Yes, when selecting external managers of ESG/sustainability funds and mainstream funds (This option also applies to signatories who may not hold ESG/sustainability funds)	(3) We did not include compliance with our responsible investment policy as a pre-requisite when selecting external managers
(C) Fixed income (active)	0	•	0
(E) Private equity	0	•	0
(F) Real estate	0	•	0
(G) Infrastructure	0	•	0

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 2.1	CORE	SAM 2	N/A	PUBLIC	Responsible investment policy	1,4

In what proportion of cases did your organisation include compliance with your responsible investment policy as a pre-requisite when selecting external managers?

(3) Fixed income (active)

# (B) When selecting external managers of ESG/sustainability funds and mainstream funds (5) Private equity (B) When selecting external managers of ESG/sustainability funds and mainstream funds (1) in all cases (6) Real estate (B) When selecting external managers of ESG/sustainability funds and mainstream funds (1) in all cases (7) Infrastructure

(1) in all cases

## Research and screening

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 3	CORE	OO 11	N/A	PUBLIC	Research and screening	1

When selecting external managers, which aspects of their organisation do you, or the investment consultant acting on your behalf, assess against responsible investment criteria? (Per asset class, indicate the proportion of your AUM to which each of these selection practices applies, regardless of when you selected your different external managers.)

	(3) Fixed income (active)	(5) Private equity
(A) Firm culture	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(B) Investment approach, objectives and philosophy	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(C) Investment policy or guidelines	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(D) Governance structure and management oversight, including diversity	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(E) Investment strategy and fund structure	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(F) Investment team competencies	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(G) Other, please specify:	- (4) for none of our externally managed AUM	(4) for none of our externally managed AUM

	(6) Real estate	(7) Infrastructure
(A) Firm culture	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(B) Investment approach, objectives and philosophy	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(C) Investment policy or guidelines	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(D) Governance structure and management oversight, including diversity	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(E) Investment strategy and fund structure	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(F) Investment team competencies	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(G) Other, please specify:	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM

## Investment practices

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 4	CORE	OO 11	N/A	PUBLIC	Investment practices	1

Which responsible investment practices does your organisation, or the investment consultants acting on your behalf, require as part of your external manager selection criteria? (Per asset class, indicate the proportion of your AUM to which each of these selection practices applies, regardless of when you selected your different external managers.) As part of the selection criteria, we require that external managers:

	(3) Fixed income (active)	(5) Private equity
(A) Incorporate material ESG factors in all of their investment analyses and decisions	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(B) Incorporate their own responsible investment policy into their asset allocation decisions	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
(C) Have adequate resources and processes to analyse ESG factors	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(D) Incorporate material ESG factors throughout their portfolio construction	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
(E) Engage with underlying portfolio assets to address ESG risks and opportunities	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(F) Comply with their own exclusions policy	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(G) Embed ESG considerations in contractual documentation	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(H) Implement adequate disclosure and accountability mechanisms	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM

(I) Are willing to work in partnership with our organisation to develop their responsible investment approach	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
(J) Track the positive and negative sustainability outcomes of their activities	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(K) Other, please specify:	During the formalisation phase of the Due Diligence, GPs are required to use their best efforts to provide Altamar with a report with (i) any material changes to the GP's ESG policies, (ii) a summary of ESG-related incidents, (iii) the implementation of their policy with regard to their portfolio companies, (iv) investments that could be classifed as 'sustainable development investments'.	During the formalisation phase of the Due Diligence, GPs are required to use their best efforts to provide Altamar with a report with (i) any material changes to the GP's ESG policies, (ii) a summary of ESG-related incidents, (iii) the implementation of their policy with regard to their portfolio companies, (iv) investments that could be classifed as 'sustainable development investments'.
	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
	(6) Real estate	(7) Infrastructure
(A) Incorporate material ESG factors in all of their investment analyses and decisions	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(B) Incorporate their own responsible investment policy into their asset allocation decisions	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
(C) Have adequate resources and processes to analyse ESG factors	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(D) Incorporate material ESG	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM

(E) Engage with underlying portfolio assets to address ESG risks and opportunities	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(F) Comply with their own exclusions policy	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(G) Embed ESG considerations in contractual documentation	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(H) Implement adequate disclosure and accountability mechanisms	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(I) Are willing to work in partnership with our organisation to develop their responsible investment approach	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
(J) Track the positive and negative sustainability outcomes of their activities	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(K) Other, please specify:	During the formalisation phase of the Due Diligence, GPs are required to use their best efforts to provide Altamar with a report with (i) any material changes to the GP's ESG policies, (ii) a summary of ESG-related incidents, (iii) the implementation of their policy with regard to their portfolio companies, (iv) investments that could be classifed as 'sustainable development investments'.  (1) for all of our externally managed AUM	During the formalisation phase of the Due Diligence, GPs are required to use their best efforts to provide Altamar with a report with (i) any material changes to the GP's ESG policies, (ii) a summary of ESG-related incidents, (iii) the implementation of their policy with regard to their portfolio companies, (iv) investments that could be classifed as 'sustainable development investments'.  (1) for all of our externally managed AUM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 5	PLUS	OO 11	N/A	PUBLIC	Investment practices	1

Does your organisation, or the investment consultants acting on your behalf, expressly assess the following practices regarding derivatives and short positions as part of your manager selection process? (Indicate the proportion of your AUM to which each of these selection practices applies, regardless of when you selected your different external managers.)

(A) We assess whether they apply ESG incorporation into derivatives, insurance instruments (such as CDS) and other synthetic exposures or positions	(5) for none of our externally managed AUM
(B) We assess how they apply their exclusion policies to short and derivative exposures	(5) for none of our externally managed AUM
(C) We assess whether their use of leverage is aligned with their responsible investment policy	(5) for none of our externally managed AUM

## Stewardship

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 6	CORE	00	N/A	PUBLIC	Stewardship	2

How does your organisation, or the investment consultants acting on your behalf, assess the stewardship policies of investment managers during the selection process? (Per asset class, indicate the proportion of your AUM to which each of these selection practices applies, regardless of when you selected your different external managers.)

	(3) Fixed income (active)	(5) Private equity
(A) We assess the degree to which their stewardship policy aligns with ours	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(B) We require that their stewardship policy prioritises systemic issues	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM

(C) We require that their stewardship policy prioritises ESG factors beyond corporate governance	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(D) We require that their stewardship policy allows for and encourages the use of a variety of stewardship tools	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
(E) We require that their stewardship policy allows for and encourages participation in collaborative initiatives	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(F) We require that their stewardship policy includes adequate escalation strategies for instances where initial efforts are unsuccessful	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
(G) Other, please specify:	x (4) for none of our externally managed AUM	x (4) for none of our externally managed AUM
	(6) Real estate	(7) Infrastructure
(A) We assess the degree to which their stewardship policy aligns with ours	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(B) We require that their stewardship policy prioritises systemic issues	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM

(C) We require that their stewardship policy prioritises ESG factors beyond corporate governance	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(D) We require that their stewardship policy allows for and encourages the use of a variety of stewardship tools	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
(E) We require that their stewardship policy allows for and encourages participation in collaborative initiatives	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(F) We require that their stewardship policy includes adequate escalation strategies for instances where initial efforts are unsuccessful	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
(G) Other, please specify:	x (4) for none of our externally managed AUM	x (4) for none of our externally managed AUM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 7	CORE	00	N/A	PUBLIC	Stewardship	2

How does your organisation, or the investment consultants acting on your behalf, assess the stewardship practices of external managers as part of the selection process? (Per asset class, indicate the proportion of your AUM to which each of these selection practices applies, regardless of when you selected your different external managers.)

	(3) Fixed income (active)	(5) Private equity
(A) We assess whether they allocate sufficient resources to stewardship overall	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(B) We assess whether they allocate sufficient resources for systemic stewardship	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
(C) We assess the degree of implementation of their stewardship policy	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(D) We assess whether their investment team is involved in stewardship activities	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
(E) We assess whether stewardship actions and results are fed back into the investment process and decisions	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM

(F) We assess whether they make full use of a variety of tools to advance their stewardship priorities	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
(G) We assess whether they deploy their escalation process to advance their stewardship priorities where initial efforts are unsuccessful	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
(H) We assess whether they participate in collaborative stewardship initiatives	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(I) We assess whether they take an active role in their participation in collaborative stewardship initiatives	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
(J) Other, please specify:	$\mathbb{I}$ (4) for none of our externally managed AUM	$\mathbb{I}$ (4) for none of our externally managed AUM
	(6) Real estate	(7) Infrastructure
(A) We assess whether they allocate sufficient resources to stewardship overall	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(B) We assess whether they allocate sufficient resources for systemic stewardship	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM

(C) We assess the degree of implementation of their stewardship policy	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(D) We assess whether their investment team is involved in stewardship activities	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
(E) We assess whether stewardship actions and results are fed back into the investment process and decisions	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(F) We assess whether they make full use of a variety of tools to advance their stewardship priorities	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
(G) We assess whether they deploy their escalation process to advance their stewardship priorities where initial efforts are unsuccessful	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
(H) We assess whether they participate in collaborative stewardship initiatives	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(I) We assess whether they take an active role in their participation in collaborative stewardship initiatives	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM

(J) Other, please specify:

(4) for none of our externally managed AUM

(4) for none of our externally managed AUM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 9	CORE	OO 11 and OO 9 FI	N/A	PUBLIC	Stewardship	2

Which stewardship practices does your organisation, or the investment consultants acting on your behalf, assess when selecting external managers that invest in fixed income? (Per strategy, indicate the proportion of your AUM to which each of these selection practices applies, regardless of when you selected your different external managers.)

#### (1) Fixed income (active)

(A) We assess whether they	(4) for none of our externally managed AUM
engage with issuers	
in the context of	
refinancing	
operations to	
advance ESG	
factors beyond	
governance	
(B) We assess	(4) for none of our externally managed AUM
whether they	
engage with issuers	
in the context of	
refinancing	
operations to	
advance systemic	
issues	
(C) We assess	(4) for none of our externally managed AUM
whether they	(1) for none of our externally managed from
prioritise ESG	
factors beyond	
governance in case	
of credit events	
(D) We assess	(4) for none of our externally managed AUM
whether they	(2) for none of our occurring managed from
01101	
prioritise systemic	
prioritise systemic issues in case of	

## Sustainability outcomes

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 10	PLUS	OO 11	N/A	PUBLIC	Sustainability outcomes	1

How does your organisation, or the investment consultant acting on your behalf, assess external managers' approaches to their sustainability outcomes as part of your selection process? (Indicate the proportion of your AUM to which each of these selection practices applies, regardless of when you selected your different external managers.)

(A) We assess their track records on advancing sustainability outcomes across their assets	(1) for all of our externally managed AUM
(B) We assess whether they have set targets for the sustainability outcomes of their activities or are willing to incorporate our own targets	(1) for all of our externally managed AUM
(C) We assess how they use key levers including asset allocation, engagement and stewardship activities to advance sustainability outcomes	(1) for all of our externally managed AUM
(D) We assess how well they report on their progress on sustainability outcomes across their assets	(1) for all of our externally managed AUM
(E) Other, please specify:	(4) for none of our externally
na	managed AUM

## Documentation and track record

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 11	CORE	OO 11	N/A	PUBLIC	Documentation and track record	1

As part of your selection process, which documents does your organisation, or the investment consultants acting on your behalf, review to gain confidence in external managers' responsible investment practices? (Indicate the proportion of your AUM to which each of these selection practices applies, regardless of when you selected your different external managers.)

(A) Standard client reporting, responsible investment reports or impact reports	(1) for all of our externally managed AUM
(B) Responsible investment methodology and its influence on past investment decisions	(4) for none of our externally managed AUM
(C) Historical voting and engagement activities with investees	(1) for all of our externally managed AUM
(D) Historical engagement activities with policymakers	(4) for none of our externally managed AUM
(E) Compliance manuals and portfolios to ensure universal construction rules are applied (e.g. exclusions, thematic, best-in-class definitions and thresholds)	(1) for all of our externally managed AUM
(F) Controversies and incidence reports	(1) for all of our externally managed AUM
(G) Code of conduct or codes of ethics	(1) for all of our externally managed AUM
(H) Other, please specify:	(1) for all of our externally
Track record and performance summary	managed AUM

# Appointment

#### Pooled funds

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 12	CORE	OO 12, OO 5.1, OO 15	N/A	PUBLIC	Pooled funds	4

How did your organisation, or the investment consultants acting on your behalf, include responsible investment requirements for pooled funds in your current contracts with external managers? (Indicate the proportion of your AUM invested in pooled funds to which each of these requirements applies, regardless of when you appointed your different external managers.)

- (A) We amended or instituted side letters or equivalent legal documentation to include responsible investment requirements
- (1) for all of our AUM invested in pooled funds
- (B) We encouraged the external manager to include responsible investment requirements into the investment mandate, the investment management agreement or equivalent legal documentation
- (1) for all of our AUM invested in pooled funds

## Segregated mandates

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 13	CORE	OO 12, OO 5.1	N/A	PUBLIC	Segregated mandates	4

When setting up segregated mandates with external managers, which responsible investment clauses did your organisation, or the investment consultants acting on your behalf, include in your current contractual agreements? (Indicate the proportion of your AUM invested in segregated funds to which each of these requirements applies, regardless of when you appointed your different external managers.)

- (A) The manager's commitment to follow our responsible investment strategy in the management of our assets
- (1) for all of our AUM invested in segregated mandates
- (B) The manager's commitment to incorporate material ESG factors into its investment and stewardship activities
- (1) for all of our AUM invested in segregated mandates

(C) Exclusion list(s)

(1) for all of our AUM invested in segregated mandates

(D) Responsible investment communication and reporting obligations, including on stewardship activities and results	(1) for all of our AUM invested in segregated mandates
(E) Stewardship commitments in line with the PRI's guidance and focused on seeking sustainability outcomes and prioritising common goals and collaborative action	(4) for none of our AUM invested in segregated mandate
(F) Where applicable, commitment to fulfil a clear policy on security lending aligned with our own security lending policy or with the ICGN Securities Lending Code of Best Practice	(4) for none of our AUM invested in segregated mandate
(G) Incentives and controls to ensure alignment of interests	(4) for none of our AUM invested in segregated mandate
(H) Commitments on climate-related disclosure in line with internationally recognised frameworks such as the TCFD	(4) for none of our AUM invested in segregated mandate
(I) If applicable, commitment to disclose against the EU Taxonomy	(4) for none of our AUM invested in segregated mandate
(J) Commitment to respect human rights as defined in the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights	(1) for all of our AUM invested in segregated mandates
(K) The manager's acknowledgement that their appointment was conditional on their fulfilment of their responsible investment obligations	(1) for all of our AUM invested in segregated mandates
(L) Other, please specify:	(4) for none of our AUM invested in segregated mandate

# Monitoring

## Investment practices

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 14	CORE	OO 13	N/A	PUBLIC	Investment practices	1

During the reporting year, which aspects of your external manager's responsible investment practices did you, or your investment consultant acting on your behalf, monitor?

	(3) Fixed income (active)	(5) Private equity
(A) We monitored their alignment with our organisation's responsible investment strategy	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(B) We monitored any changes in their responsible investment–related policies, resourcing, oversight and responsibilities or investment processes	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(C) We monitored their use of ESG data, benchmarks, tools and certifications	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(D) We monitored how ESG incorporation affected investment decisions	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(E) We monitored how ESG incorporation affected the fund's financial and ESG	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM

(F) We monitored any changes in ESG risk management processes	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(G) We monitored their response to material ESG incidents	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(H) Other, please specify:	na (4) for none of our externally managed AUM	na (4) for none of our externally managed AUM
	(6) Real estate	(7) Infrastructure
(A) We monitored their alignment with our organisation's responsible investment strategy	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(B) We monitored any changes in their responsible investment-related policies, resourcing, oversight and responsibilities or investment processes	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(C) We monitored their use of ESG data, benchmarks, tools and certifications	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(D) We monitored how ESG incorporation affected investment decisions	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(E) We monitored how ESG incorporation affected the fund's financial and ESG	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM

(F) We monitored any changes in ESG risk management processes	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(G) We monitored their response to material ESG incidents	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(H) Other, please specify:	na (4) for none of our externally managed AUM	na (4) for none of our externally managed AUM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 16	PLUS	OO 13	N/A	PUBLIC	Investment practices	1

Provide an example of a leading practice you adopted as part of your monitoring of your external managers' responsible investment practices in private equity, real estate and/or infrastructure during the reporting year.

#### Please provide examples below:

(A) Private equity

As part of Altamar's 2020 ESG Action Plan, the ESG clauses requested in Side Letter agreements for all asset classes and investments were reviewed and strengthened. As part of this effort a new clause is being requested that would allow Altamar to get periodic information on ESG data in order to monitor the underlying fund's evolution.

The information requested includes (i) any material changes to the GP's policies with respect to ESG, (ii) data on ESG-related incidents that have occurred with respect to portfolio companies that will have a material negative impact on the business and corrective actions that have been taken, (iii) the implementation of the GP's ESG policy with respect to portfolio companies or prospective portfolio companies and (iv) any portfolio investments that could be characterised as "sustainable development investments".

(B) Real estate

As part of Altamar's 2020 ESG Action Plan, the ESG clauses requested in Side Letter agreements for all asset classes and investments were reviewed and strengthened. As part of this effort a new clause is being requested that would allow Altamar to get periodic information on ESG data in order to monitor the underlying fund's evolution.

The information requested includes (i) any material changes to the GP's policies with respect to ESG, (ii) data on ESG-related incidents that have occurred with respect to portfolio companies that will have a material negative impact on the business and corrective actions that have been taken, (iii) the implementation of the GP's ESG policy with respect to portfolio companies or prospective portfolio companies and (iv) any portfolio investments that could be characterised as "sustainable development investments".

(C) Infrastructure

As part of Altamar's 2020 ESG Action Plan, the ESG clauses requested in Side Letter agreements for all asset classes and investments were reviewed and strengthened. As part of this effort a new clause is being requested that would allow Altamar to get periodic information on ESG data in order to monitor the underlying fund's evolution.

The information requested includes (i) any material changes to the GP's policies with respect to ESG, (ii) data on ESG-related incidents that have occurred with respect to portfolio companies that will have a material negative impact on the business and corrective actions that have been taken, (iii) the implementation of the GP's ESG policy with respect to portfolio companies or prospective portfolio companies and (iv) any portfolio investments that could be characterised as "sustainable development investments".

## ${\bf Stewardship}$

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 17	CORE	Multiple, see guidance	N/A	PUBLIC	Stewardship	1, 2

During the reporting year, how did your organisation, or the investment consultants acting on your behalf, monitor your external managers' stewardship activities?

	(3) Fixed income (active)	(5) Private equity
(A) We monitored any changes in stewardship policies and processes	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(B) We monitored the degree of implementation of their stewardship policy	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(C) We monitored their prioritisation of systemic issues	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
(D) We monitored their prioritisation of ESG factors beyond corporate governance	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(E) We monitored their investment team's level of involvement in stewardship activities	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
(F) We monitored whether stewardship actions and results were fed back into the investment process and investment decisions	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM

(G) We monitored whether they had made full use of a variety of stewardship tools to advance their stewardship priorities	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
(H) We monitored the deployment of their escalation process in cases where initial stewardship efforts were unsuccessful	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
(I) We monitored whether they had participated in collaborative stewardship initiatives	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(J) We monitored the degree to which they had taken an active role in their participation in collaborative stewardship initiatives	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(K) Other, please	na	na
specify:	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
	(6) Real estate	(7) Infrastructure
(A) We monitored any changes in stewardship policies and processes	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(B) We monitored the degree of implementation of their stewardship policy	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM

(C) We monitored their prioritisation of systemic issues	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
(D) We monitored their prioritisation of ESG factors beyond corporate governance	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(E) We monitored their investment team's level of involvement in stewardship activities	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
(F) We monitored whether stewardship actions and results were fed back into the investment process and investment decisions	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
(G) We monitored whether they had made full use of a variety of stewardship tools to advance their stewardship priorities	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
(H) We monitored the deployment of their escalation process in cases where initial stewardship efforts were unsuccessful	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
(I) We monitored whether they had participated in collaborative stewardship initiatives	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM

(J) We monitored the degree to which they had taken an active role in their participation in collaborative stewardship initiatives	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(K) Other, please specify:	na (4) for none of our externally managed AUM	na (4) for none of our externally managed AUM

## Sustainability outcomes

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 19	PLUS	OO 13	N/A	PUBLIC	Sustainability outcomes	1

During the reporting year, how did your organisation, or the investment consultants acting on your behalf, monitor your external managers' progress on sustainability outcomes?

$\square$ (A	We reviewed progress on the sustainability outcomes of their activities
$\square$ (B	We reviewed how they used asset allocation individually or in partnership with others to make progress on sustainability

- $\square$  (C) We reviewed how they used individual or collaborative investee engagement, including voting, to make progress on sustainability outcomes
- $\Box$  (D) We reviewed how they used individual or collaborative systemic stewardship, including policy engagement, to make progress on sustainability outcomes
- $\square$  (E) We reviewed how they contributed to public goods (such as research) or public discourse (such as media) or collaborated with other actors to track and communicate progress against global sustainability goals
- $\square$  (F) Other, please specify:

outcomes

The main tools we use to monitor the evolution of our GPs' sustainability outcomes are (i) the update of the ESG DD Questionnaire and (ii) keeping in touch with our GPs to learn about their progress and about any changes made to their policies.

As mentioned, the checklist is updated with a different frequency depending on the score of each GP in order to reinforce our engagement with the least advanced GPs in terms of ESG integration.

 $\square$  (G) We did not review their progress on sustainability outcomes

## Review

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 20	CORE	OO 13	N/A	PUBLIC	Review	1

During the reporting year, how often did your organisation, or the investment consultants acting on your behalf, require your external managers to report to you on their responsible investment practices?

	(3) Fixed income (active)	(5) Private equity
(A) Quarterly or more often	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
(B) Every six months	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
(C) Annually	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
(D) Less than once a year	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
(E) On an ad hoc basis (e.g. whenever significant changes, incidents or ESG- linked events occur)	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM
	(6) Real estate	(7) Infrastructure
(A) Quarterly or more often	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
(B) Every six months	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
(C) Annually	(1) for all of our externally managed AUM	(1) for all of our externally managed AUM

(E) On an ad hoc
basis (e.g. whenever
significant changes,
incidents or ESG-
linked events occur)

(1) for all of our externally managed AUM

(1) for all of our externally managed AUM

## Verification

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 21	PLUS	OO 13	N/A	PUBLIC	Verification	1

During the reporting year, how did your organisation, or the investment consultants acting on your behalf, verify the information reported by external managers on their responsible investment practices?

	(3) Fixed income (active)	(5) Private equity
(A) We required evidence of internal monitoring or compliance	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
(B) We required evidence of external monitoring or compliance	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
(C) We required that they had an independent ESG advisory board or committee	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
(D) We required verification by an external, independent auditor	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
(E) Other, please specify:	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM

	(6) Real estate	(7) Infrastructure
(A) We required evidence of internal monitoring or compliance	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
(B) We required evidence of external monitoring or compliance	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
(C) We required that they had an independent ESG advisory board or committee	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
(D) We required verification by an external, independent auditor	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM
(E) Other, please specify:	(4) for none of our externally managed AUM	(4) for none of our externally managed AUM

## Engagement and escalation

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SAM 22	CORE	OO 13	N/A	PUBLIC	Engagement and escalation	1

Which actions does your organisation, or the investment consultants acting on your behalf, include in its formal escalation process to address concerns raised during monitoring?

	(3) Fixed income (active)	(5) Private equity	(6) Real estate	(7) Infrastructure
(A) We notify the external manager about their placement on a watch list				

(B) We engage the external manager's board or investment committee			
(C) We reduce exposure with the external manager until any non-conformances have been rectified			
(D) We terminate the contract with the external manager if failings persist over a (notified) period of time and explain the reasons for the termination			
(E) Other, please specify	V	<b>✓</b>	Ø
(F) Our organisation does not have a formal escalation process to address concerns raised by monitoring			

#### Please specify for "(E) Other" above.

Should ESG issues arise during the monitoring phase of the investment process, Altamar would, first, thoroughly analyse the issue in search for consequences and implications, evaluating any material risks that it may generate. In case further information is required, Altamar would contact the GP to seek for the rationale behind the issue identified. If Altamar is not satisfied with the evidence requested, the issue would be escalated to the Investment Committee and the ESG Committee.

# Sustainability Outcomes (SO)

# Set targets on sustainability outcomes

## Outcome objectives

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 1	PLUS	ISP 45	SO 1.1, SO 2	PUBLIC	Outcome objectives	1

Has your organisation chosen to shape any specific sustainability outcomes?

(A) Yes

∘ (B) No

Indicator						PRI Principle
SO 2	PLUS	SO 1	SO 3	PUBLIC	Outcome objectives	1

Please list up to 10 of the specific sustainability outcomes that your organisation has chosen to shape.

#### Sustainability outcomes

(A) Sustainability Outcome $\#1$	SDG 3: Good health and well-being
(B) Sustainability Outcome $\#2$	SDG 4: Quality education
(C) Sustainability Outcome $\#3$	SDG 8: Decent work and economic growth
(D) Sustainability Outcome $\#4$	SDG 9: Industry, innovation and infrastructure
(E) Sustainability Outcome $\#5$	SDG 12: Responsible consumption and production
(F) Sustainability Outcome #6	SDG 13: Climate action
(G) Sustainability Outcome $\#7$	SDG 17: Partnerships for the goals

## Target-setting process

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 3	PLUS	SO 2	SO 3.1	PUBLIC	Target-setting process	1

Have you set any targets for your sustainability outcomes? Indicate how many targets you have set for each sustainability outcome.

(A) Sustainability Outcome $#1$ :	(2) One target
(B) Sustainability Outcome #2:	(2) One target
(C) Sustainability Outcome $#3$ :	(1) No target
(D) Sustainability Outcome #4:	(2) One target
(E) Sustainability Outcome #5:	(2) One target
(F) Sustainability Outcome #6:	(1) No target
(G) Sustainability Outcome #7:	(3) Two or more targets

Indicator						PRI Principle
SO 3.1	PLUS	SO 3	Multiple, see guidance	PUBLIC	Target-setting process	1

For each sustainability outcome, name and provide a brief description of up to two of your targets and list the metrics or key performance indicators (KPIs) associated with them, the targets' deadlines and the percentage of your assets under management to which the targets apply.

	Target name	Target description
(A1) Sustainability Outcome #1: (Target 1)	Engagement with employees through the Altamar Foundation	Increase of employee participation in Altamar Foundation projects related to health

(B1) Sustainability Outcome #2: (Target 1)	Engagement with employees through the Altamar Foundation	Increase of employee participation in Altamar Foundation projects related to education
(D1) Sustainability Outcome #4: (Target 1)	Internal sustainability measures (governance)	Increase in efficiency of ESG processes
(E1) Sustainability Outcome #5: (Target 1)	Internal sustainability measures (ESG)	Promotion of sustainable transport and employee awareness
(G2) Sustainability Outcome #7: (Target 2)	Engagement with GPs	Achievement of 100% of the ESG DD Checklists sent to all GPs per year
	KPIs/metrics	Target deadline: Year
(A1) Sustainability Outcome #1: (Target 1)	Number of volunteering employees in projects to improve access to quality health care	2021
(B1) Sustainability Outcome #2: (Target 1)		
(D1) Sustainability Outcome #4: (Target 1)	Number of IT improvement projects implemented per year	2021
(E1) Sustainability Outcome #5: (Target 1)	Number of quarterly ESG newsletters shared with the Altamar Team	2021
(G2) Sustainability Outcome #7: (Target 2)	Number of ESG DD checklists sent to GPs per year	2021
	Coverage: % of ass	sets under management
(A1) Sustainability Outcome #1:	(Target 1)	100
(B1) Sustainability Outcome #2:	(Target 1)	100
(D1) Sustainability Outcome #4:	(Target 1)	100
(E1) Sustainability Outcome #5:	(Target 1)	100
(G2) Sustainability Outcome #7:	(Target 2)	100

Indicator						PRI Principle
SO 4	PLUS	SO 3.1	N/A	PUBLIC	Target-setting process	1

Which global goals (or other references) did your organisation use to determine your sustainability outcomes targets? Explain whether you have derived your target from global goals, e.g. by translating a global goal into a target at the national, regional, sub-national, sectoral or sub-sectoral level. Alternatively, explain why you have set your target independently from global goals.

#### Global goals/references

(A1) Sustainability Outcome #1: (Target 1)	Global Sustainable Development Goals
(B1) Sustainability Outcome #2: (Target 1)	Global Sustainable Development Goals
(D1) Sustainability Outcome #4: (Target 1)	Global Sustainable Development Goals
(E1) Sustainability Outcome #5: (Target 1)	Global Sustainable Development Goals
(G2) Sustainability Outcome #7: (Target 2)	Global Sustainable Development Goals

## Tracking progress

Indicator						PRI Principle
SO 5	PLUS	SO 3.1	SO 5.1, SO 5.2	PUBLIC	Tracking progress	1

#### Does your organisation track intermediate performance and progress against your sustainability outcomes targets?

(A1) Sustainability Outcome #1: (Target 1)	(2) No
(B1) Sustainability Outcome #2: (Target 1)	(2) No
(D1) Sustainability Outcome #4: (Target 1)	(2) No
(E1) Sustainability Outcome #5: (Target 1)	(2) No
(G2) Sustainability Outcome #7: (Target 2)	(2) No

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 6	PLUS	SO 3.1	SO 6.1	PUBLIC	Tracking progress	2

Despite your organisation's efforts to make progress on your sustainability outcomes, there may be stakeholders who have been negatively affected by your organisation's activities. For each of your sustainability outcomes, indicate whether your organisation ensures that stakeholders who have been negatively affected are able to seek an effective remedy.

(A) Sustainability Outcome #1:	(1) Yes
(B) Sustainability Outcome #2:	(1) Yes
(D) Sustainability Outcome #4:	(1) Yes
(E) Sustainability Outcome #5:	(1) Yes
(G) Sustainability Outcome #7:	(1) Yes

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 6.1	PLUS	SO 6	N/A	PUBLIC	Tracking progress	2

How does your organisation ensure that stakeholders negatively affected by your activities are able to seek an effective remedy?

# In the event that any of Altamar's stakeholders were negatively affected by the firm's activity, the situation would be analysed and evaluated by the Risk & Compliance team and escalated to the ESG Committee, if necessary. In the event that any of Altamar's stakeholders were negatively affected by the firm's activity, the situation would be analysed and evaluated by the Risk & example of the state of the event that any of Altamar's stakeholders were negatively affected by the firm's activity, the situation would be analysed and evaluated by the Risk &

Please describe below:

Compliance team and escalated to the ESG Committee, if necessary.

(D) Sustainability Outcome #4:	In the event that any of Altamar's stakeholders were negatively affected by the firm's activity, the situation would be analysed and evaluated by the Risk & Compliance team and escalated to the ESG Committee, if necessary.			
(E) Sustainability Outcome #5:	In the event that any of Altamar's stakeholders were negatively affected by the firm's activity, the situation would be analysed and evaluated by the Risk & Compliance team and escalated to the ESG Committee, if necessary.			
(G) Sustainability Outcome #7:	In the event that any of Altamar's stakeholders were negatively affected by the firm's activity, the situation would be analysed and evaluated by the Risk & Compliance team and escalated to the ESG Committee, if necessary.			

# Global stakeholders collaborate to achieve outcomes

## Tracking progress against global goals

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 23	PLUS	SO 3.1	N/A	PUBLIC	Tracking progress against global goals	4

Does your organisation engage with standard setters, reporting bodies or similar organisations to help track and communicate progress against global sustainability goals?

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As mentioned before, Altamar has collaborated with Baker & McKenzie in order to define the alignment strategy of the firm's policies with the SDG framework following the SDG Compass methodology. Once aligned, several training sessions were implemented to increase employee awareness of the relevance of the SDGs and seven SDGs were selected. As part of the collaboration with Baker & McKenzie, a communication campaign was designed to share Altamar's commitment to the SDGs through social networks and its official website.

o (B) No. Please describe why not:

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 24	PLUS	SO 3.1	N/A	PUBLIC	Tracking progress against global goals	4

Does your organisation contribute to public goods (such as research) or public discourse (such as media coverage) to make progress on global sustainability goals?

#### 

'- Altamar's CRCO participated in Invest Europe's initiative, through ASCRI, to start up the collection of ESG-related information from management companies. A series of KPIs defined by ASCRI and Invest Europe were analyzed - Altamar's CRCO is an active member of the ESG Working Group organised by Inverco (May 13th, 2020) - A member from the Venture Capital investments team participated as speaker in a webinar organised by ASCRI to discuss 'A new path to sustainability'. The main ESG trends observed in the Venture Capital market were discussed and Altamar's ESG strategy was shared with the audience (October 2020) - As mentioned previously, two members of the ESG team participated as speakers in a webinar organised by PRI in order to communicate and share Altamar's ESG policies and plans to contribute to the SDGs - A member of the ESG Team is part of the CFA Society Spain ESG Committee and, during 2020, she carried out extensive analysis of the existing ESG certificates - Two senior members of the team collaborate in the Level 20 initiative representing Altamar to promote female presence in senior positions in the Private Equity industry. They participated in several meetings during 2020. - The ESG and Risk & Compliance Team members participated in 3 public consultations on ESG regulatory requirements and European legislation on sustainability matters

#### o (B) No. Please describe why not: