SEQUOIA ECONOMIC INFRASTRUCTURE INCOME FUND LIMITED

Summary

The Company promotes environmental and social characteristics, but it does not have sustainable investment as its objective sustainable investment.

The environmental characteristics promoted by the Company are focussed around the Company's three ESG investment themes, which are set out in full in the Company's ESG Policy and explained in the "investment strategy" section below:

- renewable energy
- enabling the transition to a lower carbon world
- infrastructure with societal benefits

The investment strategy used to attain the environmental and social characteristics promoted by the Company is detailed in the Company's ESG Policy. ESG principles are applied in three ways to the Company's portfolio, as further explained in the "Investment Strategy" section below:

- negative screening
- thematic investing (positive screening)
- ESG scoring

The Company uses an ESG scoring methodology, as further explained below, which is used to measure particular sustainability metrics for each investment, including:

- environment indicators and modifiers such as: exposure to particular sectors and sub-sectors such as solar, wind, hydro, energy transition assets, biofuels, aircrafts, nuclear energy generation, air pollution and water pollution;
- social indicators such as: job creation in socially deprived areas and engagement with local communities; and
- governance indicators such as: independent board members, effective diversity policies, independent oversight.

These indicators are used to score investments and are monitored with a view to improving the overall ESG score of the Company.

The negative screening element of the strategy is binding on the Company. In addition, ESG scores must be taken into account in the investment process. When evaluating potential investments, ceteris paribus, the Investment Adviser will prioritise transactions with higher ESG scores, and when considering the potential disposal of investments, the Investment Adviser will prioritise transactions with lower ESG scores.

The Company's approach to ESG is carried out on a continuous basis from pre-acquisition stage, through engagement with borrowers to assess their continued performance and, where relevant including particular ESG KPI's in the loan documentation requiring borrowers to meet particular ESG targets and to report on these on an ongoing basis.

Additional information on how the Investment Adviser integrates sustainability into its investment process to ensure that it is applied on a continuous basis, and in particular its approach to due diligence and ongoing monitoring of investments, can be found at www.seqifund.com.

No sustainable investment objective

The Company promotes environmental and social characteristics, but it does not have sustainable investment as its objective sustainable investment. Detailed disclosure on the Company's sustainability credentials are set out further below.

Environmental or social characteristics of the financial product

The environmental characteristics promoted by the Company are focussed around the Company's three ESG investment themes, which are set out in full in the Company's ESG Policy and explained in the "investment strategy" section below:

- renewable energy
- enabling the transition to a lower carbon world
- infrastructure with societal benefits

There are significant number of sustainability indicators which may be used in respect of any particular investment and full details of the measures the Investment Adviser may use are set out in the Company's ESG policy. In particular, the Company uses an ESG scorecard (the **ESG Scorecard**) which is used to measure particular sustainability metrics for each investment, including:

- environment indicators and modifiers such as: exposure to particular sectors and sub-sectors such as solar, wind, hydro, energy transition assets, biofuels, aircrafts, nuclear energy generation, air pollution and water pollution;
- social indicators such as: job creation in socially deprived areas and engagement with local communities; and
- governance indicators such as: independent board members, effective diversity policies, independent oversight.

These indicators are used to score investments and are monitored with a view to improving the overall ESG score of the Company.

Investment Strategy

The full investment strategy of the Company is set out in the Company's prospectus.

The investment strategy used to attain the environmental and social characteristics promoted by the Company is detailed in the Company's ESG Policy. ESG principles are applied in three ways to the Company's portfolio:

- Negative screening
  The following subsectors or asset types are excluded:
    - Infrastructure related to the exploration and production of oil and gas, such as oil rigs and platforms, fracking facilities and facilities involved in tar sands. Note that midstream assets such as pipelines are not necessarily excluded but are subject to ESG scoring as set out below.
    - Infrastructure related to mining thermal coal.
    - Electricity generation from coal.
    - Military infrastructure, such as military housing.
    - Alcohol, gambling and pornography.

- Thematic investing (positive screening)
  Currently, the Company has three ESG investment themes. Positive screening will be employed to increase the Company's exposure to these investment themes, subject to existing concentration limits:

  - Renewable energy, such as solar, wind and geothermal generation, and directly-related businesses including companies that supply renewable energy.
  - Enabling the transition to a lower carbon world, such as grid stabilization, electric vehicles, traffic congestion reduction and the substitution of coal by gas.
  - Infrastructure with social benefits, such as healthcare, clean water and education.

- ESG scoring

  An ESG scoring framework helps the Investment Adviser to allocate capital between projects and to measure its progress over time in a quantitative way. The Investment Adviser's proprietary ESG scoring methodology has been designed to be as objective as possible. The score primarily reflects the current ESG performance of the investment but also reflects, to a limited extent, the "direction of travel". For example, a business that currently contributes to climate change will receive some credit if it is investing meaningfully to reduce its contribution.

  The methodology blends the "E", "S" and "G" components without allowing strength in one area to offset entirely weakness in another. For example, a polluting company will always get a poor score, even if it has excellent social and governance policies. Moreover, the Company's policy is not to lend to companies with a very low E score, of less than one, regardless of the overall ESG score.

The negative screening element of the strategy is binding on the Company. In addition, ESG scores must be taken into account in the investment process. When evaluating potential investments, ceteris paribus, the Investment Adviser will prioritise transactions with higher ESG scores, and when considering the potential disposal of investments, the Investment Adviser will prioritise transactions with lower ESG scores. By aiming to invest in higher-scoring opportunities, and aiming to dispose of lower-scoring opportunities, the aim of the ESG Policy is to improve the ESG score of the Company's loan book over time.

The Company is not, however, bound to invest only in accordance with the positive screening criteria and, subject to the application of the negative screens and the Scorecard, may invest more widely than the types of asset listed in the positive screening criteria.

The Company's approach to ESG is carried out on a continuous basis from pre-acquisition stage, through engagement with borrowers to assess their continued performance and, where relevant including particular ESG KPI's in the loan documentation requiring borrowers to meet particular ESG targets and to report on these on an ongoing basis. As part of the investment process, and in line with the ESG Scorecard, the Investment Adviser puts an emphasis on the demonstration of strong governance during the due diligence process.

Additional information on how the Investment Adviser integrates sustainability into its investment process to ensure that it is applied on a continuous basis, and in particular its approach to due diligence and ongoing monitoring of investments, can be found at www.seqifund.com

Proportion of investments

As explained in the investment policy of the Company, the Company invests in a diversified portfolio of senior and subordinated economic infrastructure debt investments. The detailed asset allocation limits to which the Company adheres are set out in its investment objective and policy in the Company's prospectus. The Company's objective is to maintain its portfolio so that not more than 10 per cent. by value of the Company's investments (at the time of the investment) consists of securities or loans relating to any one individual infrastructure asset.

As a result of its approach to thematic investing, it is likely that the Company will provide capital to sustainable investments, as that terms is defined in SFDR. However, the Company is not currently committed or bound to do so and there is no minimum proportion of sustainable investments that will or may be held by the Company. However, the positive screening will be employed to increase the Company's exposure to these investment themes over time, subject to existing concentration limits. As such, the Company's approach to committing to investing in sustainable investments may change over time and this disclosure will be updated accordingly.

In any event, the Company broadly takes into consideration the principle of "do no significant harm" through its approach to negative screening and the ESG Scorecard. As noted above, the methodology blends the "E", "S" and "G" components without allowing strength in one area to offset entirely weakness in another. For example, a polluting company will always get a poor score, even if it has excellent social and governance policies. Moreover, the Company's policy is not to lend to companies with a very low E score, of less than one, regardless of the overall ESG score.

To the extent that the Company is not fully invested in senior and subordinated economic infrastructure debt investments, it may hold cash with well rated institutions for liquidity purposes and not for the attainment of the environmental characteristics of the Company.

In addition, the Company does not intend to use hedging or derivatives for investment purposes but it does intend to engage in currency hedging with a view to protecting the level of Sterling dividends and other distributions to be paid by the Company.

Monitoring of environmental or social characteristics

Where appropriate, loan terms will include an obligation on the borrower to report suitable ESG metrics. These could include:

- Carbon emissions (broken down by scope 1, 2 and 3), carbon footprint and weighted average carbon intensity.
- Energy performance including the total energy consumption from non-renewable sources, energy consumption intensity.
- Water emissions.
- Hazardous waste ratio and non-recycled waste ratio.
- Gender pay gap, board gender diversity, ethnic diversity, excessive CEO pay ratio.

Borrowers will also be asked to complete annual post-investment ESG questionnaires. These will cover quantifiable ESG metrics/KPIs when appropriate, such as CO2 emissions, Health and Safety records, CQC ratings, etc, as well as confirmation of the borrower's overall ESG policies and procedures.

ESG performance and credentials will be monitored regularly for each investment in the semi-annual monitoring process. If a borrower's ESG scores deteriorate, Sequoia will contact the management of the borrower to determine a strategy to improve performance. If the borrower is unwilling or unable to do this, the Investment Adviser may look to dispose of the loan.

Methodologies

The methodologies to measure the attainment of the social or environmental characteristics promoted by the Company are also described in the "monitoring of environmental or social characteristics" and "due diligence" sections of this disclosure.

The main methodology used by the Company to measure the attainment of the social or environmental characteristics is its ESG Scorecard.

In addition, and where appropriate, loan terms may include covenants or repeated representations to ensure that the borrower complies with its stated ESG objectives and to encourage it to improve its standards over time. These could include:

- Obligations to comply with environmental standards and regulations.
- Obligations to adopt net zero policies.
- Obligations to reduce pollution over and above statutory minimums, including light and noise pollution.
- Obligations to adopt or continue social policies such as living wages, non-discrimination, employee diversification and minority board representation.

Obligations to adopt or continue good governance policies such as independent directors, whistleblowing, complaints procedures and internal audit functions.

The Investment Adviser can also consider adopting financial terms in a loan where (for example) the interest rate might fluctuate depending upon the borrower's performance on an environmental metric such as carbon emissions.

Data sources and processing

The Investment Adviser uses only internal data, collated through its detailed due diligence exercise and ongoing monitoring of all investments.

Limitations to methodologies and data

Available ESG and sustainability data has its limitations, particularly in the asset classes in which the Company invests. The Investment Adviser regularly reviews its metrics and the application of its ESG Scorecard, and continuously seeks to improve transparency, disclosure and data provision in relation to the Company, using where relevant international benchmarking standards.

Due diligence

The Investment Adviser evaluates all project risks it believes are material to making an investment decision and will assess how those risks are mitigated. Where appropriate, it will complement its analysis through the use of professional third party advisers, including technical consultants, financial and legal advisers and valuation and insurance experts. These advisers will be engaged to conduct due diligence that is intended to provide an additional and independent review of key aspects and risks of a project, providing comfort as to the level of risk mitigation and the project's ongoing performance. In addition, the Investment Adviser will, where appropriate, conduct site visits and meetings with the management of the Borrower and/or its advisers.

The particular sustainability due diligence is carried out by way of the use of the ESG Scorecard, which must be taken into account during the investment process. In addition, as part of its investment analysis, the Investment Adviser will, where possible, assess the consequences for its investments of three climate change scenarios: a 1.5-2°C case where the physical risks of climate change are modest but the transitional risks (e.g. stranded assets) are high; a 2-3°C case where emissions stabilize at current levels; and the "business as usual" case where temperatures rise at 3-6°C resulting in increased physical risks (e.g. rising sea levels).

Engagement policies

The Company takes a pro-active approach to managing its loan book and engages with borrowers (in relation to ESG topics) in a number of important ways, as set out in more detail in the ESG Policy. In summary, these include:

- Incorporating environmental considerations into loan terms, such as covenants to comply with environmental regulations, manage pollution, reduce carbon emissions and adopt water and waste water management strategies.
- Reporting requirements on environmental metrics such as carbon footprint, energy intensity and recycling ratios.
- Exercising voting rights in loan agreements responsibly and taking account of the environmental consequences of voting.
- Engaging with the management of its borrowers to encourage them to adopt policies that would be beneficial for the environmental and reduce their impact on climate change.
- Considering disposing of investments where adequate progress towards climate goals is not being made.

Designated reference benchmark

Currently (as of March 2021), no index is designated as a benchmark for determining the sustainability of the Company.