

# **Hy24's STATEMENT ON PRINCIPAL ADVERSE IMPACTS OF INVESTMENT DECISIONS ON SUSTAINABILITY FACTORS**

June 2025

Hy24's statement on principal adverse impacts of investment decisions on sustainability factors pursuant to Commission Delegated Regulation (EU) 2022/1288 of 6 April 2022 supplementing Regulation (EU) 2019/2088 of the European Parliament and of the Council with regard to regulatory technical standards specifying the details of the content and presentation of the information in relation to the principle of 'do no significant harm', specifying the content, methodologies and presentation of information in relation to sustainability indicators and adverse sustainability impacts, and the content and presentation of the information in relation to the promotion of environmental or social characteristics and sustainable investment objectives in pre-contractual documents, on websites and in periodic reports.

## Statement on principal adverse impacts of investment decisions on sustainability factors

**Financial market participant:** Hy24 SAS

### **SUMMARY**

Hy24 SAS (LEI: 894500DKJMG8RK012S68), considers principal adverse impacts of its investment decisions on sustainability factors. The present statement is the consolidated statement on principal adverse impacts (PAI) on sustainability factors of Hy24. It covers both Hy24's Clean Hydrogen Infra Fund (CHIF) and Clean Hydrogen Equipment Fund (CHEF).

This statement on principal adverse impacts on sustainability factors covers the reference period from 1 January to 31 December 2024.

### **SUMMARY OF THE PRINCIPLE ADVERSE IMPACTS**

Both CHIF and CHEF are Article 9 funds and, as such all investments are sustainable investments. Based on data reported through PAI reporting and information obtained during its engagement campaign, Hy24 can conclude that no significant harm was done to any environmental and social objectives by the investments made by the funds.

Hy24 tracks all mandatory indicators for principle adverse impacts as well as the following relevant additional indicators ("optional" PAI indicators):

- Existence of a workplace accident prevention policy
- Rate of accidents
- Number of days lost to injuries, accidents, fatalities, or illness
- Share of investments in investee companies whose operations affect threatened species

These additional PAI indicators were selected because of their materiality to the infrastructure development sector, as well as based on reporting requirements from Limited Partners, to ensure that the management company can answer its own reporting obligations.

## RÉSUMÉ DES PRINCIPALES INCIDENCES NÉGATIVES

Les fonds CHIF et CHEF sont classés Article 9 et, de ce fait, tous les investissements sont donc des investissements durables. Sur la base des données reportées via le reporting PAI et des informations obtenues lors de sa campagne d'engagement auprès de ses participations, Hy24 peut conclure qu'aucun préjudice significatif n'a été causé à l'un des objectifs environnementaux et sociaux à travers les investissements réalisés par ces fonds.

Hy24 suit tous les indicateurs obligatoires pour calculer les principales incidences négatives ainsi que les indicateurs supplémentaires suivants (indicateurs PAI « optionnels ») :

- Existence d'une politique de prévention des accidents du travail
- Taux d'accidents
- Nombre de jours perdus en raison de blessures, d'accidents, de décès ou de maladies
- Part des investissements dans des entreprises dont les activités affectent des espèces menacées

Ces indicateurs PAI supplémentaires ont été sélectionnés en raison de leur matérialité pour le secteur du développement des infrastructures et en fonction des exigences de reporting des *Limited Partners*, afin que la société de gestion soit en mesure de répondre à ses propres obligations en matière de reporting.

**Description of the principal adverse impacts on sustainability factors**  
**Indicators applicable to investments in investee companies**  
**INDICATORS FOR CLIMATE AND OTHER ENVIRONMENT-RELATED MATTERS**

Adverse sustainability indicator (1/3)		2024 Impact	2023 <sup>1</sup> Impact	Unit	Explanation	Actions taken, and actions planned, and targets set for the next reference period
1. GHG emissions	Scope 1 GHG emissions	85	6	tCO2eq.	<u>Perimeter:</u> 100% of current value of Hy24 investment	<u>Ambitions and targets:</u> Hy24’s investment thesis is based on the belief that, by investing in projects which produce and/or consume clean hydrogen, Hy24 will directly contribute to the avoidance of carbon emissions with a view to support the long-term global warming objectives of the Paris agreements.  The focus of the assets is therefore to expand their activities that will contribute to the decarbonisation of the transport and energy sectors, while limiting the emissions related to their operations.  <u>Measures and expected evolutions:</u> Given that some of the assets are yet to start or just starting operations, the GHG footprint of the Fund will increase in future years, especially during the construction and deployment of new infrastructure. In addition, Hy24 encourages the expansion of the assessment of Scope 3 emissions.
	Scope 2 GHG emissions - MB <sup>2</sup>	1,216	304	tCO2eq.	<u>Results explanation:</u> The GHG emissions represent the share of emissions generated by portfolio companies and their projects attributable to the Funds. Hy24 has not used proxy data for the calculation of GHG emissions and relies on company data for all scopes.Hy24’s GHG emissions have increased compared to the year prior as <b>portfolio companies expand their activities</b> and <b>Hy24 makes new investments</b> (e.g., three new investments in 2024). <b>Scope 1 &amp; 2 GHG emissions are relatively</b> limited as Hy24 purposefully invests in portfolio companies that produce hydrogen or low carbon gases that meet the criteria to be considered “green” by the EU Taxonomy. Scope 2 market-based GHG emissions related to investments made by CHIF increased compared to the year prior primarily due to the pre-commissioning of hydrogen production tests by the Everfuel – Hy24 JV.	
	Scope 2 GHG emissions - LB <sup>3</sup>	1,040	624	tCO2eq.		
	Scope 3 GHG emissions	30,984	11,508 <sup>4</sup>	tCO2eq.		
	Total GHG emissions - MB <sup>2</sup>	32,286	11,819	tCO2eq.		
	Total GHG emissions – LB <sup>23</sup>	32,109	12,138	tCO2eq.		
2. Carbon footprint <sup>5</sup>		56	35	tCO2eq. / €M investment	<u>Perimeter:</u> 100% of current value of Hy24 investment <u>Results explanation:</u> The carbon footprint of Hy24’s investments increased compared to the year prior as portfolio companies’ GHG emissions have increased faster than investments with existing portfolio companies expanding their activities.	Finally, the alignment of portfolio companies’ activities with the substantial contribution criteria to climate change mitigation ensures that they support the energy transition and contribute to the reduction of GHG emissions.

<sup>1</sup> 2023 values only cover investments made by the CHIF. The CHEF only made its first two investments in 2024.

<sup>2</sup> Market-based

<sup>3</sup> Location-based

<sup>4</sup> Please note that 2023 Scope 3 GHG emissions have been corrected from 7 335 t CO2 eq. to 11 508 t CO2 eq. as one portfolio company has performed a refined version of its carbon footprint.

<sup>5</sup> Calculated using market-based total emissions

Adverse sustainability indicator (2/3)	2024 Impact	2023 <sup>6</sup> Impact	Unit	Explanation	Actions taken, and actions planned, and targets set for the next reference period
3. GHG intensity of investee companies <sup>57</sup>	562	513	tCO2eq. / €M revenues	<p><u>Perimeter:</u> 52% of current value of Hy24 investment</p> <p><u>Results explanation:</u> The GHG emission intensity has increased due to an increase in GHG emissions as described above. A number of portfolio companies are not included in this calculation as they do not generate revenues yet.</p>	See previous page.
4. Exposure to companies active in the fossil fuel sector	0%	0%	share of investment	<p><u>Perimeter:</u> 100% of current value of Hy24 investment</p> <p><u>Results explanation:</u> In alignment with the Fund investment strategy and Hy24 Responsible Investment Policy, <b>no investment was made in companies active in the fossil fuel sector.</b></p>	<u>Ambitions and targets:</u> Hy24 plans to continue following the investment strategy defined for the Fund.
5. Share of non-renewable energy consumption and production	27%	0%	share of non-renewable energy production	<p><u>Perimeter:</u> 100% of current value of Hy24 investment</p> <p><u>Results explanation:</u> In 2024, four portfolio companies produced energy (three in CHIF and one in CHEF). Within CHIF, <b>two portfolio companies produced renewable energy</b> (e.g., solar electricity, biomethane). <b>Another portfolio company produced hydrogen through electrolysis powered by the French low carbon electricity grid</b> (primarily nuclear). Within CHEF, Hexagon Purus has installed some solar PV panel to cover part of its energy consumption.</p>	<u>Ambitions and targets:</u> The goal of the Fund is to <b>continue producing renewable energy</b> . To that extent, the energy consumption should also be from renewable sources.
	56%	48%	share of non-renewable energy consumption		<u>Measures and expected evolutions:</u> With the support of Hy24, portfolio companies <b>develop electricity and hydrogen procurement</b> that will increase the share of renewable energy consumption over time.

<sup>6</sup> 2023 values only cover investments made by the CHIF. The CHEF only made its first two investments in 2024.

<sup>7</sup> This indicator does not include Elyse, Everfuel – Hy24 JV and Stegra as these companies are not generating any revenue and therefore their carbon intensity cannot be calculated

Adverse sustainability indicator (3/3)	2024 Impact	2023 <sup>8</sup> Impact	Unit	Explanation	Actions taken, and actions planned, and targets set for the next reference period
<b>6. Energy consumption intensity per high impact climate sectors</b>	<b>0.22</b>	0.17	GWh / €M revenues	<p><u>Perimeter:</u> 100% of current value of Hy24 investment</p> <p><u>Results explanation:</u> All companies are classified in high impact climate sectors. In particular, portfolio companies have activities in the sectors of energy manufacture and transport, as well as manufacturing.</p> <p>The increase in energy intensity can be explained by <b>new projects of existing investee companies</b> and the <b>expansion of the portfolio</b>.</p>	<p><u>Measures and expected evolutions:</u> Hy24 will support the assets reducing their energy consumption intensity notably through the <b>limitation of hydrogen leaks</b> in distribution activities and by <b>using the most efficient technologies in hydrogen production</b>.</p>
<b>7. Activities negatively affecting bio-diversity sensitive areas</b>	<b>0%</b>	0%	share of investment	<p><u>Perimeter:</u> 100% of current value of Hy24 investment</p> <p><u>Results explanation:</u> The protection of biodiversity is <b>included in the action plans</b> developed by Hy24 for its portfolio companies. As the Fund targets the EU Taxonomy alignment of its activities, the <b>monitoring and mitigation of biodiversity impact is central</b> in the development of hydrogen production and distribution infrastructures. The fund supports its portfolio companies by reviewing documentation related to EIA and providing <b>adequate frameworks for biodiversity impact assessment</b>.</p>	<p><u>Measures:</u> Hy24 will continue monitoring biodiversity related metrics and supporting assets in the completion of biodiversity impact assessment in relation to the objective of EU Taxonomy alignment of the Fund.</p>
<b>8. Emissions to water</b>	<b>0</b>	0	tons / €M investment	<p><u>Perimeter:</u> 98% of current value of Hy24 investment<sup>9</sup></p> <p><u>Results explanation:</u> <b>No portfolio company reported having generated emissions</b> of phosphates, nitrates, pesticides, or any priority substances over the reporting period.</p>	<p><u>Measures:</u> Hy24 monitors portfolio companies' potential emissions to water through the ESG Monitoring &amp; Reporting Framework developed for the Fund. Hy24 will continue requesting portfolio companies to report on this indicator in the following years.</p>
<b>9. Hazardous waste</b>	<b>0.03</b>	0.01	tons / €M investment	<p><u>Perimeter:</u> 100% of current value of Hy24 investment</p> <p><u>Results explanation:</u> Seven portfolio companies reported having generated hazardous waste (waste from maintenance process, waste oil, contaminated soil, coolant, heat transfer medium, etc.).</p>	<p><u>Measures:</u> Hy24 monitors portfolio companies' hazardous waste through the ESG Monitoring Framework developed for the Fund. Hy24 will continue requesting portfolio companies to report on this indicator in the following years.</p>

<sup>8</sup> 2023 values only cover investments made by the CHIF. The CHEF only made its first two investments in 2024.

<sup>9</sup> Hexagon Purus does not monitor this KPI yet. However, according to the company, there a limited risks of emissions to water.

## INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS

Adverse sustainability indicator	2024 Impact	2023 <sup>10</sup> Impact	Unit	Explanation	Actions taken, and actions planned, and targets set for the next reference period
<b>10. Investment in companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises</b>	0%	0%	share of investments	<p><u>Perimeter</u>: 100% of current value of Hy24 investment</p> <p><u>Results explanation</u>: Hy24 controls through its ESG Monitoring &amp; Reporting Framework that <b>no violation of the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights occurred during the reporting year</b>. This means that portfolio companies declared that the company or its top management were not convicted for a breach in human resources due diligence, anti-corruption, taxation or and fair competition laws.</p>	<p><u>Measures</u>: The verification of the absence of business ethics and human rights conviction and controversy is part of Hy24's <b>due diligence process</b>.</p> <p>Furthermore, during the holding period, Hy24's monitors through its action plan the <b>implementation of material measures that mitigates the risks of violation of human rights or business ethics principles</b> in line with the EU Taxonomy requirements regarding minimum social safeguards.</p>
<b>11. Investment in companies with a lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises</b>	8%	22%	share of investments	<p><u>Perimeter</u>: 99% of current value of Hy24 investment</p> <p><u>Results explanation</u>: <b>Two companies are still in the process of developing policies and procedures</b> to track their compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises. In practice, these companies present relatively low risks (e.g., no projects in operation). The two companies are expected to have developed such processes and policies in the near future as part of their ESG Action Plan developed by Hy24.</p>	<p><u>Ambitions and targets</u>: The alignment of portfolio companies' activities with the OECD guidelines for MNEs and the UN GC Principles is <b>an integral part of Hy24's engagement campaign</b> as it allows to confirm the compliance with minimum safeguards of the Regulation (EU) 2020/852.</p> <p><u>Measures</u>: Through its ESG Monitoring &amp; Reporting Framework, Hy24 supported portfolio companies in reinforcing their internal processes and compliance mechanisms. For instance, Hy24 provides technical assistance in the form of trainings. Hy24 also closely follows portfolio companies' commitment to introduce further safeguards before the start of operations.</p>

<sup>10</sup> 2023 values only cover investments made by the CHIF. The CHEF only made its first two investments in 2024.

Adverse sustainability indicator	2024 Impact	2023 <sup>11</sup> Impact	Unit	Explanation	Actions taken, and actions planned, and targets set for the next reference period
<b>12. Unadjusted gender pay gap</b>	<b>15%</b>	14%	average gender pay gap	<u>Perimeter:</u> 100% of current value of Hy24 investment <u>Results explanation:</u> The indicator ranges from 6% to 41% among companies.	<u>Measures and expected evolutions:</u> Hy24 has included portfolio companies' diversity indicators in the ESG Monitoring Framework developed for the Fund. Understanding the importance of increasing diversity in the hydrogen sector, Hy24 will continue requesting portfolio companies to report on this indicator in the following years as more of its portfolio companies become operational.
<b>13. Board gender diversity</b>	<b>21%</b>	10%	percentage of female members in governing bodies	<u>Perimeter:</u> 100% of current value of Hy24 investment <u>Results explanation:</u> The board gender diversity ranges from 0% to 45% in portfolio companies.	<u>Measures and expected evolutions:</u> Hy24 has included portfolio companies' diversity indicators in the ESG Monitoring Framework developed for the Fund. Understanding the importance of increasing diversity in the hydrogen sector, Hy24 will continue requesting portfolio companies to report on this indicator in the following years as more of its portfolio companies become operational.
<b>14. Exposure to controversial weapons (anti-personal mines, cluster munitions, chemical weapons, and biological weapons)</b>	<b>0%</b>	0%	share of investments	<u>Perimeter:</u> 100% of current value of Hy24 investment <u>Results explanation:</u> In alignment with the Clean H2 Infra Fund and Clean H2 Equipment Fund investment strategy and Hy24 Responsible Investment Policy, <b>no investment was made in companies active in the weapons industry.</b>	<u>Measures:</u> Hy24 does not invest in companies engaged in controversial weapons.

<sup>11</sup> 2023 values only cover investments made by the CHIF. The CHEF only made its first two investments in 2024.



Other indicators for principal adverse impacts on sustainability factors

ADDITIONAL CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS

Adverse sustainability indicator		2024 Impact	2023 <sup>12</sup> Impact	Unit	Explanation	Actions taken, and actions planned, and targets set for the next reference period
14. Natural species and protected areas	1. Operations affecting threatened species	0%	0%	share of investments	<p><u>Perimeter</u>: 100% of current value of Hy24 investment</p> <p><u>Results explanation</u>: The protection of biodiversity is <b>included in the action plans</b> developed by Hy24 for its portfolio companies. As the Fund targets the EU Taxonomy alignment of its activities, the <b>monitoring and mitigation of biodiversity impact is central</b> in the development of hydrogen production and distribution infrastructures. The fund supports its portfolio companies by reviewing documentation related to EIA and EIA screening and providing <b>adequate frameworks for biodiversity impact assessment</b>.</p>	<p><u>Measures</u>: Hy24 will continue monitoring biodiversity related metrics and supporting assets in the completion of biodiversity impact assessment in relation to the objective of EU Taxonomy alignment of the Fund.</p>

<sup>12</sup> 2023 values only cover investments made by the CHIF. The CHEF only made its first two investments in 2024.

## ADDITIONAL INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS

Adverse sustainability indicator	2024 Impact	2023 <sup>13</sup> Impact	Unit	Explanation	Actions taken, and actions planned, and targets set for the next reference period
<b>1. Investments in companies without workplace accident prevention policies</b>	6%	8%	share of investments	<p><u>Perimeter</u>: 100% of current value of Hy24 investment</p> <p><u>Results explanation</u>: One portfolio company, at an early development stage has yet to <b>implement a workplace accident prevention policy</b>. All the companies with operational infrastructure or activities have workplace accident prevention policies. For companies operating infrastructure projects on which they do not have operational controls, equivalent policies are applied at the project level.</p>	<p><u>Measures</u>: Through its action plan, Hy24 <b>supported portfolio companies in implementing workplace accident prevention policies and monitoring safety-incidents</b>.</p> <p>The existence of policies and management systems to reduce safety risks is an integral part of Hy24's engagement campaign as it allowed to confirm the compliance with Minimum Safeguards.</p>
<b>2. Rate of accidents</b>	13	0	accidents per millions of hours worked	<p><u>Perimeter</u>: 100% of current value of Hy24 investment</p> <p><u>Results explanation</u>: In 2024, accidents were reported by only two portfolio companies. Hysetco, for instance, reported non-lethal accidents primarily linked to maintenance activities at its garage.</p> <p>Due to the nature of Hexagon Purus' activities, employees are exposed to several hazards (e.g., work carried out in height, metal processing), which can lead to accidents. Hexagon Purus has recently formalised Global Safety Rules and implemented a global safety alert mechanism to enhance H&amp;S across its activities. Associated progress should be observed in the coming years.</p>	
<b>3. Number of days lost to injuries, accidents, fatalities, or illness</b>	64	0	days lost	<p><u>Perimeter</u>: 100% of current value of Hy24 investment</p> <p><u>Results explanation</u>: In 2024, two portfolio companies reported days lost following accidents occurring in the work place as detailed above.</p>	

<sup>13</sup> 2023 values only cover investments made by the CHIF. The CHEF only made its first two investments in 2024.

## DESCRIPTION OF POLICIES TO IDENTIFY AND PRIORITISE PRINCIPAL ADVERSE IMPACTS ON SUSTAINABILITY FACTORS

To achieve its sustainable investment objective and avoid significant harm to any sustainability factors, Hy24 integrates sustainability risks and opportunities into all phases of its investment process. To that end, Hy24 has developed a specific approach and resources to ensure ESG objectives are successfully met, including the identification and prioritisation of principle adverse impacts. **This approach is outlined in Hy24's Responsible Investment Policy**, which latest version was revised in June 2023.

The responsibilities for the operational implementation of the Responsible Investment Policy are allocated as such:

- The Investement team: the Responsible Invesment Policy is directly implemented by Hy24's investment teams, who are responsible for deal flow screening, due diligences and engagement with portfolio companies.
- The ESG team: Composed of Hy24's General Counsel and ESG and Public Affairs Officer, with the support of a team of dedicated analysts, the ESG team supports investment teams in the implementation of the Responsible Investment Policy through sustainability-specific expertise. The team is also in charge of implementing portfolio-level aspects of the Policy, including LP reporting and overall portfolio performance review.
- The ESG working group: Composed of Hy24's ESG team, some members of Hy24's investment team as well as representatives of Ardian's ESG team, the ESG working group is in charge of defining the ESG initial framework, including the Responsible Investment Policy and of overseeing the implementation of the Fund's ESG Policy.
- The Sustainability Committee: On a strategic level, a Sustainability Committee has been formed to review the Responsible Investment Policy and the Fund's level of alignment with its sustainability objectives.

Hy24 tracks all mandatory indicators for principle adverse impacts as well the following relevant additional indicators ("optional" PAI indicators):

- Existence of a workplace accident prevention policy
- Rate of accidents
- Number of days lost to injuries, accidents, fatalities, or illness
- Share of investments in investee companies whose operations affect threatened species

These additional PAI indicators as referred to in Article 6(1), points (a), (b) and (c) were selected because of their materiality to the infrastructure development sector, as well as based on reporting requirements from Limited Partners, to ensure that the management company can answer its own reporting obligations. Though the additionnal PAI indicators were selected based on the perceived materiality to the infrastructure development sector, it does not mean that other optional PAI indicators are never material to Hy24's investments.

Principal adverse impacts on sustainability factors are **considered from pre-investment and throughout the holding period**. To track these indicators, Hy24 undertakes an **engagement campaign with its portfolio companies, through which an important emphasis is given to ESG data monitoring**.

Hy24 has consolidated these PAI indicators at the portfolio company level following a proportional approach, which means that indicators have been weighted according to the level of ownership of portfolio companies within their own projects. Hy24 believes that this approach better reflects the principal adverse impact of its portfolio companies, and thus of its Fund. The disclosure of PAI indicators consolidated at the Fund and Hy24 levels follows the consolidation methodology provided by the considerations laid out in Annex 1 of the Delegated Regulation 2022/1288.

Hy24 strives to respect some principles and key steps to **ensure the quality of data and therefore the accuracy of its reporting**. These include for instance:

- **Supporting portfolio companies throughout the reporting campaign.** Before the start of the campaign, all portfolio companies were invited to a **technical training session** to introduce the ESG Reporting Campaign. During this session, Hy24 presented its Reporting and Monitoring framework and the campaign calendar. The training session was the opportunity to focus on several key and challenging indicators such as the calculation of Taxonomy alignment, the carbon footprint and avoided emissions. During the campaign, Hy24 supported the portfolio companies in particular regarding the most complex indicators. Finally, at the end of the campaign, Hy24 reviewed all reported data to ensure consistency with historic values and Hy24's understanding of the companies' operations.
- Revising Hy24's Reporting and Monitoring framework to provide more clarity on the requested data points. The framework now includes detailed definitions for each indicator based on reference standards (e.g., ESRS and GHG protocol).
- Agreeing with portfolio companies on the completion of an action plan resulting from the due diligence conducted (see more detailed in the "Engagement policies" section below) within a reasonable timeframe following the investment (e.g., 18 months). This action plan supports the investee companies in the definition of a robust reporting methodology.
- Verifying the completeness and accuracy of reported data and following up with portfolio companies on every data point that need further explanations.
- Being transparent with portfolio companies and stakeholders, including LPs, on the limitations of the methodologies and data reported.

## ENGAGEMENT POLICIES

Hy24's investment procedures ensures that **ESG considerations are raised and answered throughout the entire lifecycle** of its financial product, which implies that principal adverse impacts of investments on sustainability factors are fully considered. The key features of this approach applied in 2024 are the following:

- I. **Preliminary screening:** As Hy24 refrains from investing in activities that are not in line with its sustainability objectives during the pre-investment stage, it conducts a preliminary screening to **ensure that the opportunity is aligned with the Fund's sectoral targets and strategic purpose.**
- II. **Sustainability (ESG) due diligence:** Hy24 engaged in the **development of its own approach** to sustainability due diligence, with the goal **of integrating sustainability and policy aspects in its analysis of investment opportunities.** The approach of the sustainability due diligences selected by Hy24 is one that **merges sustainable finance requirements**, specifically those of the SFDR and EU Taxonomy, with **ESG materiality analysis.** The sustainability due diligences performed in 2024 **revealed no concerns for Hy24 with regards to significant negative impacts on the sustainable factors.**
- III. **Investment decisions and Action plans:** A summary of the sustainability due diligence analysis was **included in investment memoranda submitted to the Investment Committee.** The investment decisions included an **agreement with the investee companies on the completion of the Action Plan** resulting from the due diligence within a reasonable timeframe following the investment (e.g., 18 months).
- IV. **Engagement campaign throughout the holding period:** Since the inception of the Fund, Hy24 has undertaken an engagement campaign with its portfolio companies, **with the goal of improving their maturity on ESG priorities, building internal capacity within each asset** and, if it was not yet the case, **assisting them to comply with the requirements of the SFDR and the EU Taxonomy.** In doing so, Hy24 ensures that portfolio companies are **committed to maximising their positive impact and minimising their potential negative impact on their stakeholders and the environment.** This engagement campaign was carried on during this new reporting period, supporting Hy24 in meeting its ambitions of fostering the hydrogen infrastructure in a sustainable way. The key features of this year's campaign included the following:
  - i. **Revision of the ESG Monitoring & Reporting Framework:** Hy24's ESG team updated its ESG Monitoring & Reporting Framework to include information requests from co-investors, **streamlining data collection for portfolio companies** whenever possible. The ESG Monitoring & Reporting Framework was **instrumental in managing potential negative impacts of portfolio companies.** In particular, it allowed the tracking of PAI indicators and the alignment with the UNGP Principles and OECD Guidelines for Multinational Enterprises.
  - ii. **Technical training on the ESG Monitoring & Reporting Framework:** All portfolio companies were provided with a 2 hour-long Technical Training at the end of 2024 to support them in answering the reporting requirements. **Continuous dialogue with portfolio companies:** Hy24 pursued its proactive approach of fostering dialogue with portfolio companies to strengthen their ESG management practices and facilitate the completion of their Action plans. This materialised through regular meetings with each portfolio company to delve into their progress and identify any potential support required. For some of the portfolio companies, Hy24 provided direct feedback and guidance on ESG matters. This supports covers for example the development of methodologies to estimate avoided emissions or guidance on how to assess whether sites are located in or near biodiversity sensitive areas. Hy24's engagement approach also involves its co-investors, with whom the Fund closely collaborates to align expectations on ESG matters. Most often, this collaboration takes the form of joined meetings with portfolio companies or bi-lateral meetings between Hy24 and its co-investors.

## REFERENCES TO INTERNATIONAL STANDARDS

### Alignement with international climate objectives

The CHIF and CHEF have a sustainable investment objective in the meaning of Article 9 of the Regulation (EU) 2019/2088 of 27 November 2019 on sustainability-related disclosures in the financial sector ("SFDR"). This sustainable investment objective is to contribute to climate change mitigation, through the funding of low-carbon hydrogen projects and the broader clean hydrogen supply chain (e.g., equipment to produce or store hydrogen). As such, **Hy24 has aimed to align its assets with the EU Taxonomy criteria for contributing to climate change mitigation**. By investing in low-carbon hydrogen production, storage and distribution, as well as the broader clean hydrogen supply chain (e.g., equipment manufacturers), the **Fund is thus directly contributing to reducing carbon emissions with a view to support the long-term global warming objectives of the Paris agreements**.

The attainment of the sustainable investment objective of climate change mitigation is monitored throughout the lifecycle of the financial product through the reporting by portfolio companies of their **Taxonomy alignment** towards this objective and of **sustainability indicators**. As all investments are directly contributing to and enabling climate change mitigation, the use of a forward-looking decarbonisation scenario is not relevant.

The **following sustainability indicators** are used to measure the attainment of the abovementioned objective for CHIF investments:

- GhG emissions intensity for the manufacture of hydrogen (tCO<sub>2</sub>e/tH<sub>2</sub>)
- Avoided CO<sub>2</sub> emissions (tCO<sub>2</sub>e)
- Share of renewable energy consumed (%)
- Share of renewable energy produced (%)

The following sustainability indicators are used to measure the attainment of the abovementioned objective for CHEF investments:

- Electrolysis capacity produced or installed (MW)
- Hydrogen storage, transport and/or distribution capacity enabled (MW or MWh)
- Hydrogen consumption capacity enabled (MW)

The data covers all investments in operational projects and is directly reported by portfolio companies of financial products. Hy24 relies as much as possible on national, European or internationally recognised standards for the reporting of climate-related indicators. As such, it mainly relies on recommendations of the GHG Protocol and the ESRS of the EFRAG as reporting guidance.

### Alignement with international standards on business ethics

The alignment of the portfolio companies with the **OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights** is also monitored by Hy24 at several steps of the investment process, including as early as the due diligence phase, and throughout the engagement campaign.

An initial assessment of the alignment of portfolio companies with the OECD guidelines for MNEs and the UNGP on Business and Human Rights is performed during the sustainability due diligence. This includes an appraisal of the materiality of social and governance risks, as well as the maturity of potential portfolio companies on these topics. Hy24 also requests all necessary information to confirm that the portfolio companies' governance practices are sufficiently robust. Where Hy24 identifies a lack of procedures or documentation, corrective measures are included in portfolio companies' individual Action Plans. Such measures include for instance the formalisation of codes of conducts, the expansion of alert systems to different stakeholder groups, or the update of internal policies regarding anti-corruption or taxation.

During its engagement campaign, Hy24 then looks specifically at the way portfolio companies manage four key topics: human rights (including labour and consumer rights), corruption and bribery, taxation, and fair competition. Hy24's ESG Monitoring Framework allows not only to identify and improve procedures in place on these topics through the individual Action Plans, but also to track the outcomes of these procedures thanks to the ESG Data Monitoring Sheet.

**HISTORICAL COMPARISON**

Hy24 publishes its statement on PAI indicators for the third year and can therefore provide an historical comparison between 2023 and 2024 results. The evolution is presented for each indicator as part of PAI indicators tables with accompanying explanation for significant variations.

When interpreting these evolutions, it should be noted that the investment portfolio has significantly evolved compared to last year, with new investments in the Clean Hydrogen Infrastructure Fund and the first two investments in the Clean Hydrogen Equipment Fund. Furthermore, as Hy24 is investing in the emerging clean hydrogen infrastructure, a majority of the investments have been made in greenfield assets, whose impacts evolve rapidly year over year, transitionning from the project phase to construction, and ultimately to operation. Both the evolution of the portfolio composition and the portfolio companies themselves might limit the relevance of year-over-year analysis.