



Sustainable
Investment
Policy



ECP's mission is to deliver superior risk-adjusted returns for institutional investors by investing in the environmental commodity markets, while creating positive impact toward accelerating the zero-carbon economy.

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Message from the ECP Team

Environmental Commodity Partners was founded on the belief that climate change represents an urgent challenge requiring significant investment at scale and offers institutional-grade returns from investing in the global carbon markets.

ECP launched its inaugural fund in 2018, with a sole focus on investing in the environmental commodity markets (colloquially known as “carbon markets”).

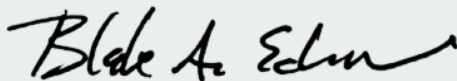
The firm’s founding partners have over 60 years of collective experience in this domain, fundamentally entrenching sustainability at the core of our professional endeavors.

ECP’s expanding investment platform mirrors our steadfast dedication to addressing the planet’s environmental exigencies. The portfolio of funds launched to date encapsulates a spectrum of investment strategies, ranging from those concentrating on a single environmental commodity to multi-strategy closed-end funds, culminating in our latest offering—a diversified portfolio of traded environmental commodities in markets around the globe.

This document sets out ECP’s approach to sustainable investment and our stewardship of sustainability, social, and governance (“SSG”) considerations. It elaborates on the firm’s aspirational guiding principles, and delineates the policies and procedures we have instituted to weave these principles into the fabric of the firm’s operations and investment activities.

We express our sincere gratitude for your interest in our initiatives. We look forward to chronicling our advancements and fostering meaningful engagement and collaboration with our investors and stakeholders along this journey.

Sincerely,



Blake Schaefer
Sustainable Investment Partner



Statement of Purpose

ECP's mission is to deliver superior risk-adjusted returns for institutional investors by investing in the global environmental commodity markets (also known as carbon markets), while creating positive impact toward accelerating the zero-carbon economy.

We are proud to be part of the global effort to achieve a more sustainable future and are dedicated to the capitalization of these highly specialized and dynamic markets.

ECP is committed to investing capital on behalf of its investor base in a responsible way by integrating relevant sustainability, social, and governance (“SSG”) factors alongside customary financial and commercial considerations when evaluating new investments and managing the firm’s investment portfolios.

ECP promotes the acceleration of progress toward a lower carbon economy at three different levels:

- 1) Through the firm’s recognized expertise and its team’s decades of investment experience in the environmental commodity markets
- 2) Via the raising of dedicated funds focused on the environmental commodity markets (thereby increasing awareness of the opportunity to invest in this area)
- 3) Through the impact of individual investments made by ECP-sponsored investment vehicles

Policy Scope

This policy covers all ECP investment vehicles and portfolio investments, as well as the firm’s own operations. All ECP staff are required to adhere to this policy.

Sustainability Objectives

ECP believes that sustainable impact is inextricably linked to investment performance and can be a material driver in delivering outsized absolute returns in the environmental commodity markets. The objectives for integrating

sustainability factors into the firm’s investment processes are to:

- 1) Ensure that all ECP investments further the firm’s mission of accelerating progress toward the zero-carbon economy
- 2) Augment and improve the capitalization of the environmental commodity markets, including “hard to finance” emission-reducing initiatives
- 3) Apply our extensive industry expertise to target positive environmental outcomes
- 4) Enhance risk-adjusted investment returns for ECP’s investors

ECP Investment Strategy

ECP addresses climate change via investment in environmental commodity markets around the globe, along with investments in specific environmental projects that promote direct climate solutions. We focus on two core investment categories:

Traded Environmental Commodities

This involves the buying and selling of environmental commodity instruments traded on open markets. Examples include carbon allowances or permits, carbon offsets, regional particulate emission reduction credits, renewable energy certificates, renewable and low-carbon fuel credits, and other similar commodities.

These carbon markets often involve fragmented regulatory regimes, mispricing, and limited liquidity. As policymakers address these challenges, ECP’s active investment in traded environmental commodities signals confidence in the price signals sent by those markets to the commercial actors that drive decarbonization.

Our participation in these markets also helps them perform as an effective regulatory tool to combat climate change. In fact, we are known to have actively shaped certain markets as recognized industry experts and participants.

ECP’s traded environmental commodity market investments are thematically aligned with our sustainability objectives.

We target markets that are demonstrably combatting climate change and other pressing environmental challenges.

We invest in environmental commodity markets with credible, experienced regulators that have proven execution and enforcement capabilities and experience in administering compliance markets. We execute transactions via robust exchanges/clearinghouses, such as the Intercontinental Exchange® (“ICE”) and Over the Counter (“OTC”) transactions only with experienced counterparties. Though these traded commodity investments have less direct and measurable impact outcomes, our specialized knowledge contributes to the enhanced integrity of these markets and their efficacy in reducing emissions.

Our market participation results in:

- 1) Increased efficiency of pricing externalities resulting from our informed, (typically) long-duration investments
- 2) Improved effectiveness of emissions regulations by driving appropriate pricing
- 3) Increased government revenue for environmental uses resulting from increased demand for environmental commodities in public auctions

Structured Commodity Finance Projects

In most environmental commodity markets, the demand for capital to fund emission-reduction projects vastly outstrips supply. End users of emissions certificates (e.g., energy producers and other “emitters”) usually buy these certificates “on demand” for their compliance (and sometimes voluntary) needs. As a result, they are “price takers” and are unwilling to advance the capital needed to develop projects that focus on reducing emissions. End users also typically avoid entering into long-term advance purchase agreements due to price risk and/or hedging costs. This results in limited capital investment for promising projects.

To address this challenge, ECP provides differentiated capital to emission-reduction projects through commodity

prepayments, long-term purchase agreements, and other innovative offtake agreements. By using such risk transfer mechanisms, project developers and clean energy producers can access the financing necessary to advance their programs.

Our unique capital base and innovative structuring bolsters undersupplied decarbonization markets and accelerates project development. ECP’s understanding of the environmental commodity markets positions us to identify projects and structure innovative financing terms that benefit ECP’s investors as well as serve as blueprints for future transactions in the industry.

We invest only in high quality projects with top-tier developers and focus on proven project types and technologies.

We source deal opportunities through our extensive network of renewable energy and clean fuel project developers, financing partners and technology providers, as well as broader counterparty relationships with energy and industrial emitters in our target markets. Each investment is subjected to extensive technical, legal, policy, and financial due diligence, using both internal and trusted external resources. These structured commodity finance investments have direct sustainability impact via reductions in greenhouse gas (“GHG”) emissions and the accelerated deployment and economic viability of emission-reducing projects and technologies. There is a clear link between ECP’s investments and measurable environmental outcomes. Our investments produce quantifiable impacts, including:

- 1) Reduced emissions resulting directly from the projects
- 2) Accelerated financing for decarbonization and environmental protection projects, enabled through ECP’s role in absorbing risk and potentially catalyzing further investment capital
- 3) Increased creation, adoption, and integration of sustainable projects and initiatives

Integration of Sustainability Factors

ECP is committed to responsible investing by integrating relevant sustainability factors alongside other customary financial and commercial considerations when evaluating new investments and managing our fund portfolios.

We focus solely on the environmental commodity markets. Environmental sustainability therefore forms part of *each and every* investment decision. ECP's efforts to integrate sustainability into the firm's investment process include:

- 1) Responsible sourcing of deals through our extensive networks and independent research
- 2) Responsible screening and due diligence of potential investments by utilizing appropriate resources to

monitor regulatory, judicial, and legislative developments

- 3) A commitment to classifying investments that promote environmental commodity financing innovations as "catalytic," elevating ECP's impact intentionality for selected transactions
- 4) Ongoing risk monitoring and management throughout the firm's investment and operational practices
- 5) A commitment to measurement of impact outputs (where they are quantifiable—e.g., GHG emissions mitigated, capital invested in environmental projects, etc.)

Below are examples of various sustainability, social, and governance factors that *may* be considered as part of ECP's investment process:

Sustainability Factors	Social Factors	Governance Factors
Air quality/pollution Biodiversity Greenhouse gas emissions Renewable energy Sustainable agriculture Sustainable land use Water quality/sustainability Wilderness conservation	Climate justice Diversity, equity, and inclusion Economic benefits/livelihoods in disadvantaged communities Health and safety Human rights Microfinance	Anti-money laundering Business ethics Corruption Counterparty risk Cybersecurity Project governance Regulatory compliance Risk management

Sustainability Considerations in the Investment Process

ECP’s sustainability considerations for both our investment portfolios *and* our firm reflect our dedication to supporting the transition to a zero-carbon economy. We limit our investible universe to opportunities supported by regulatory frameworks and/or policies that aim to achieve positive environmental results.

As stated previously, environmental factors underpin ECP’s entire investment strategy. As a result, there are no components of the ECP investment process where an environmental focus does not play a primary role.

There are also significant social components in certain segments of our investment strategy because positive community impact is often associated with the structured commodity finance projects in which we invest. Lastly, governance factors are critical to investing in environmental commodities, due to the direct influence of governmental policies, legal and regulatory frameworks, and compliance requirements that govern these programs.

This holistic focus on sustainability is woven throughout the firm’s investment process; the tables below describe the integration of responsible investment factors into key components of that process:

TRADED ENVIRONMENTAL COMMODITY INVESTMENTS	STRUCTURED COMMODITY FINANCE PROJECTS
Deal Origination	
<ul style="list-style-type: none"> ▪ Continuous monitoring and analysis of global traded commodity markets to understand key developments and emerging investment opportunities ▪ Positive screening to identify investments that maximize contributions to a zero-carbon economy ▪ Evaluation of specific commodity markets to identify those with credible regulators that have proven execution and enforcement capabilities and experience in administering compliance markets ▪ Underwriting of compliance programs designed to reduce emissions or increase volumes of clean fuels and power (typically evidenced by steeply declining caps or strengthening of clean energy production/other targets that demonstrate increasing ambition for meaningful environmental benefits) 	<ul style="list-style-type: none"> ▪ Continuous monitoring and analysis of global environmental commodity markets to understand key developments and emerging investment opportunities ▪ Positive screening to identify investments that maximize contributions to a zero-carbon economy ▪ Proactive origination through ECP’s extensive network of best-in-class renewable energy and clean fuel project developers, financing partners, and technology providers ▪ Screening of available/proposed projects for opportunities to partner with the highest quality developers and focus on proven project types and technologies ▪ Completion of background checks on agents and other parties involved with evaluation of potential project investments ▪ Additional screening to identify projects that may offer co-benefits ▪ Site visits (where appropriate) to further assess market/project parameters and assess the level of cohesion with ECP’s investment return/environmental criteria

**TRADED ENVIRONMENTAL
 COMMODITY INVESTMENTS**
**STRUCTURED COMMODITY
 FINANCE PROJECTS**
Investment Evaluation & Due Diligence

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| <ul style="list-style-type: none"> ▪ Analysis of current/historical political, regulatory, and environmental policy factors ▪ Assessment of the environmental/emissions targets being required or proposed, including their duration ▪ Identification of the entities required by law or regulation to participate in the subject market ▪ Analysis of what market-specific regulations or rules exist that may impact pricing, supply, and/or demand ▪ Evaluation of the compliance enforcement mechanism(s) and the penalties for non-compliance ▪ Analysis of existing supply/demand imbalances ▪ Assessment of the monitoring, reporting and verification ("MRV") mechanisms in place ▪ Evaluation of trade execution and what standardized processes and mechanisms can be utilized to buy and sell the environmental commodity ▪ Retention of subject matter experts and other consultants/advisors (as needed) to assist in evaluation of the target market(s) and current/projected market conditions | <ul style="list-style-type: none"> ▪ Extensive technical, legal, policy, and financial due diligence, using both internal and trusted external resources, which supports ECP decision-making and also promotes improved project structuring and operation ▪ Extensive reference-checking with other stakeholders who have prior experience with the potential counterparty or familiarity with the project (or portfolio of projects) ▪ Review of projects to confirm the requisite approvals from authorizing governmental/other institutions (e.g., the United Nations, U.S. federal and state government agencies, etc.) ▪ Assessment of existing/proposed monitoring, reporting and verification ("MRV") mechanisms that meet ECP's internal investment standards ▪ Evaluation of the scalability of existing/proposed project(s) to assess the possibility of creating additional environmental impact or other co-benefits ▪ Site visits (where appropriate) to further assess project characteristics and evaluate prospects for meeting ECP investment return/environmental impact criteria |
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**TRADED ENVIRONMENTAL
COMMODITY INVESTMENTS**
**STRUCTURED COMMODITY
FINANCE PROJECTS**
Investment Negotiation/Closing

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|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> ▪ Execution of exchange-traded transactions using robust exchanges and clearinghouses, such as ICE ▪ Execution of OTC transactions only with robust, experienced counterparties | <ul style="list-style-type: none"> ▪ Thorough evaluation of the overall transparency of the relevant counterparty/counterparties ▪ Negotiation of appropriate monitoring, reporting, and verification ("MRV") mechanisms that allow for proper ECP governance and oversight, plus verification that the desired impact is being achieved ▪ Structuring designed to reinforce incentives to build and operate projects for maximum climate impact |
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**TRADED ENVIRONMENTAL
COMMODITY INVESTMENTS**
**STRUCTURED COMMODITY
FINANCE PROJECTS**
Portfolio Management

- | | |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> ▪ Daily monitoring of investment positions, margin requirements, and portfolio risk ▪ Continuous assessment of regulatory and environmental policy changes that could impact market conditions and threaten the integrity of the environmental program governing each investment | <ul style="list-style-type: none"> ▪ Regular calls and project updates with project developers/sponsors ▪ Active oversight of periodic volumetric forecasts, project milestones and key technical performance metrics, production goals, and risk/scenario analyses ▪ Assessment of project status via ECP's Risk Management Committee review process ▪ Continuous evaluation of each project's performance ▪ Identification of opportunities to optimize the investment returns/environmental benefits from existing projects via active management, follow-on investments, and/or exploration of additional prospects in parallel project types or other environmental commodity markets |
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ECP Sustainability Thesis

ECP takes a thematic approach to sustainability through its exclusive focus on the environmental commodity markets. In addition to self-classifying as a manager of “thematic investments” (as highlighted by the dotted lines in the diagram below), ECP has assessed its intentional environmental outcomes against the “avoid-benefit-contribute” (“ABC”) classification framework developed by the Impact Management Project.

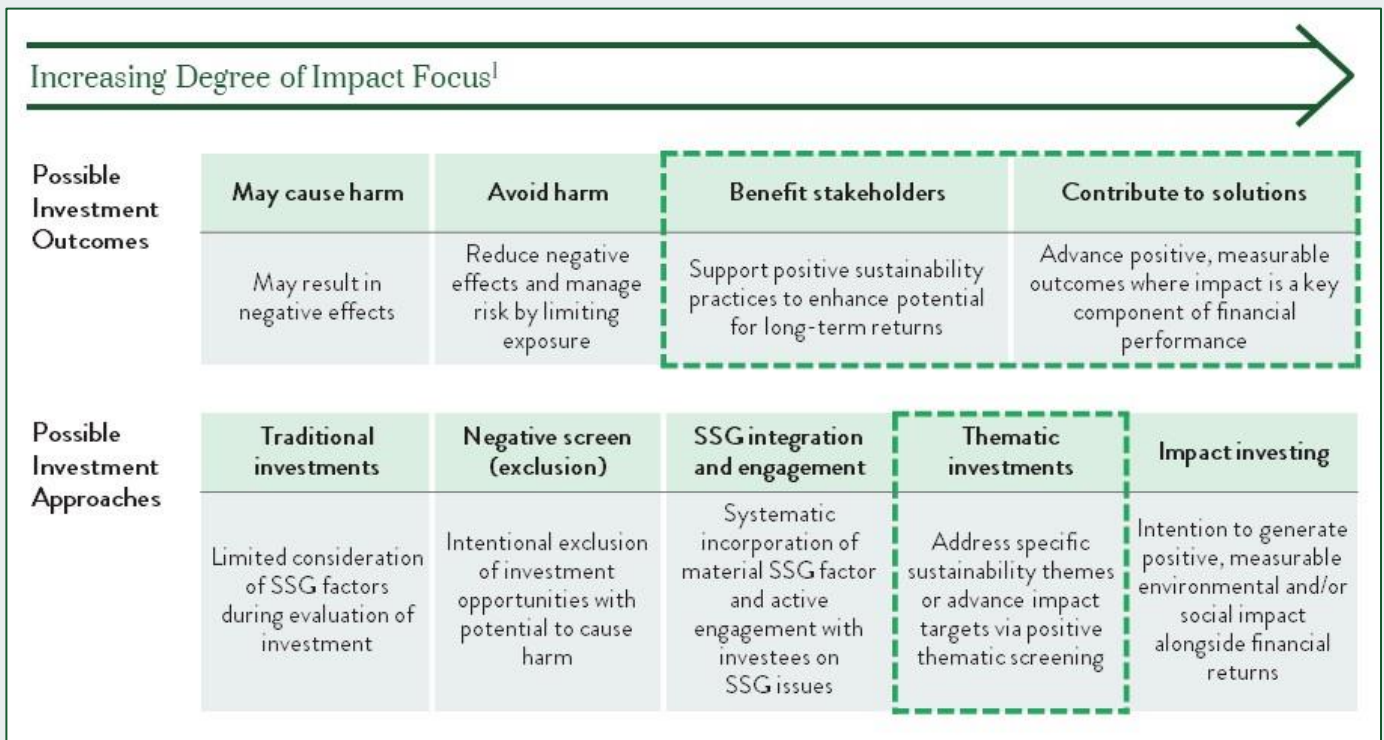
ECP Sustainability Thesis

Our investment activity benefits the environment as a key stakeholder. As shown in the above diagram, the outcomes of our investments primarily *benefit stakeholders* by accelerating the creation, adoption, and integration of

emission reduction, clean fuel, and/or clean power projects in the global financial markets and increasing the efficiency of pricing environmental externalities. In selected cases, our investments also directly contribute to solutions by reducing emissions and by accelerating the financing and development of these types of projects.



Our focus on the environmental commodity markets, where financial and sustainability performance are inherently linked, is intended to deliver positive (and, wherever possible) measurable environmental outcomes. The table below illustrates some of the key performance metrics that are tracked and incorporated in ECP’s investor reporting process.

ECP commits to providing sustainability reporting to its investors and other stakeholders at least annually.



¹The Impact Management Project has built consensus among 2,000 impact investing practitioners on best practices for measuring and managing impact along a spectrum of increasing sustainability and classifying outcomes as “Avoiding harm.” “Benefitting stakeholders” or “Contributing to solutions.”

ECP Sustainability Framework

Investment Types	TRADED ENVIRONMENTAL COMMODITY INVESTMENTS	STRUCTURED COMMODITY FINANCE PROJECTS
<p>Sustainability Outcomes</p> <p>Core/Ancillary</p>	<p>Increased efficiency of environmental externalities pricing</p> <p>Improved effectiveness of emissions regulations</p> <p>Increased public auction revenues for environmental uses</p>	<p>Reduced emissions and pollution</p> <p>Accelerated financing for emission reducing businesses and technologies</p> <p>Accelerated growth, adoption, and integration into markets</p> <p>Social co-benefits</p>
<p>Key Performance/ Portfolio Metrics</p>	<p>Amount cumulatively invested in traded commodity markets</p> <p>Tons of avoided emissions cumulatively purchased</p> <p>Number of traded commodity markets represented in ECP fund portfolios</p>	<p>GHG emissions avoided</p> <p>Amount invested in emission-reduction projects</p> <p>Number of catalytic transactions structured</p> <p>Amount of follow-on capital attracted</p> <p>Other metrics based on project type</p>
<p>Aligned UN SDGs</p> <p>Selection of UN SDGs represented in current ECP fund portfolios</p>		

ECP's Commitment to the United Nations Sustainable Development Goals

Due to our commitment to environmental investing across the entire ECP platform, every ECP investment reflects a commitment to certain United Nations Sustainable Development Goals (“UN SDGs” or “SDGs”—a set of 17 goals adopted by the UN in 2015 to end poverty, protect the planet, and improve the lives of everyone, everywhere by 2030).

The *primary* SDGs aligned with most ECP investments are:

	<p>SDG 7: Affordable and Clean Energy</p> <p>Ensure access to affordable, reliable, sustainable and modern energy for all</p>
	<p>SDG 11: Sustainable Cities and Communities</p> <p>Make cities and human settlements inclusive, safe, resilient and sustainable</p>
	<p>SDG 13: Climate Action</p> <p>Take urgent action to combat climate change and its impacts</p>

ECP's investments in structured commodity finance projects typically produce incremental benefits that may align with additional SDGs, including the following (partial list):

	<p>SDG 1: No Poverty</p> <p>End poverty in all its forms everywhere</p>
	<p>SDG 3: Good Health and Well-Being</p> <p>Ensure healthy lives and promote well-being for all at all ages</p>
	<p>SDG 6: Clean Water and Sanitation</p> <p>Ensure availability and sustainable management of water and sanitation for all</p>
	<p>SDG 8: Decent Work and Economic Growth</p> <p>Promote Sustained, Inclusive and Sustainable Economic Growth, Full And Productive Employment And Decent Work For All</p>
	<p>SDG 9: Industry, Innovation and Infrastructure</p> <p>Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation</p>
	<p>SDG 15: Life on Land</p> <p>Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss</p>

ECP Carbon Footprint

As an investment firm with a small office and team, ECP's carbon footprint is relatively small. It is our policy to purchase carbon offsets that more than cover our calculated CO₂e emissions.

Each year, we calculate our Scope 1 and 2 emissions and purchase the requisite number of carbon offsets; we also compensate for possible Scope 3 emissions related to IT equipment and office furnishings acquired during the year. The largest source of emissions is long-distance travel for investment due diligence and project monitoring, as well as some fundraising.

As ECP's business continues to grow, we will continue to refine/expand the calculations of our carbon footprint and the offsetting methodologies that we employ.

Sustainability Practices at ECP

Sustainability practices are also embedded at the firm level within our own operations. We actively monitor major initiatives in responsible investment and environmental finance, like the United Nations Principles for Responsible Investment ("UNPRI") and the Financial Stability Board's Task Force on Climate-Related Financial Disclosures ("TCFD"). We will continue to monitor these and incorporate best practices relevant to our environmental investment strategies.

The ECP team is dedicated to driving environmental change both inside and outside the firm. Our three founding partners have decades of collective experience in the environmental commodity markets and have made lifelong commitments to environmental impact.

We have an extensive track record of engaging with the environmental commodity industry and lending our expertise to champion market and regulatory progress in the field. ECP's partners have variously served in consulting, advisory, and/or pro bono capacities for such roles as:

- 1) Advisor to the Chief Investment Officer of the **California Public Employees' Retirement System (CalPERS)** on carbon risk exposure and carbon-related investment opportunities
- 2) Advisor to the **California State Treasurer** on green bonds and the development of California's municipal green bond market
- 3) Senior advisor to the **Climate Bonds Initiative**, an international not-for-profit that promotes investment in projects and assets necessary for a rapid transition to a low carbon and climate resilient economy
- 4) Founding member of the **Clean Cooking Alliance** (formerly the Global Alliance for Clean Cookstoves), a public-private initiative to save lives, improve livelihoods, empower women, and combat climate change by creating a thriving market for clean and efficient household cooking solutions
- 5) Co-Founder of the **Climate Resilience Impact Fund**, a non-profit foundation that supports high-impact charities focused on education and empowerment of women and girls in low-income countries who are disproportionately impacted by the effects of climate change
- 6) Western Working Group Co-Chair of **IETA** (International Emissions Trading Association)
- 7) Co-Founder, seed investor, and board member of **UpEnergy**, a leading global carbon finance company that has distributed more than 1,000,000 efficient biomass cookstoves and other products

Policy Governance

ECP partner, Blake Schaefer, is the person responsible for sustainable investing at ECP. In that capacity, he ensures that appropriate considerations are taken into account, particularly by the firm's Investment Committee (of which he is a member), during each step of the investment process, from due diligence through realization.

He also oversees our sustainability reporting and other activities related to our responsible investing program. Please contact Blake with any questions/comments about this report at blake.schaefer@envcp.com.

Policy Review

This policy will be reviewed annually and revised as needed. The date of the most recent update is **April 2024**.

Environmental Commodity Partners

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