apera asset management

2025 ESG Report

JUNE 2026

Welcome to Apera's 2025 ESG Report

We are pleased to present our 2025 Environmental, Social and Governance (ESG) report. As we mark our tenth anniversary in 2026, this report captures the progress of the past year and reflects the decade of momentum we have built toward responsible investing. 2025 was a pivotal year for Apera: we closed Fund III, our first Article 8 fund under SFDR, marking an important milestone in our responsible investing journey.

Against a backdrop of geopolitical tensions, regulatory uncertainty and a shifting ESG landscape, we have remained steadfast in progressing on our ESG priorities. Over the past year we further refined our sustainability approach, notably by systematising ESG-linked financing and deepening our dialogue with borrowers. We believe responsible investing is essential to both investment performance and long-term societal outcomes, and that conviction guides where we focus our energies. Three priorities, in particular, will shape the work ahead:

Francien Heckman
Head of ESG

Data quality as a foundation

Reliable, comparable ESG data is the starting point for credible borrower dialogue and for measuring real-world impact.

For our 2025 reporting cycle we onboarded a new data collection platform, refining how we gather, validate and analyse borrower disclosures across the portfolio. This investment in infrastructure enables us to track progress consistently and to measure ourselves and our borrowers against clearer benchmarks.

Climate action and resilience

We are deepening our focus on climate risk and decarbonisation, helping portfolio companies build resilience and capture the opportunities of the transition.

In 2025 we launched a dedicated workstream to enhance our pre- and post-investment climate risk assessment tools. Within this report we publish our inaugural TCFD disclosures, setting a baseline for how we govern, measure and manage climate-related risks and opportunities.

Collaborative engagement to effect change

Being a responsible investor means using our influence where it is most impactful.

ESG-linked financing is now systematically offered across our investment process, with margin ratchets and performance targets that translate intent into measurable accountability. This forms a part of our work with borrowers and sponsors to share and embed ESG best practice into portfolio company operations, and through ESG margin ratchets align financial incentives with enhancements in their ESG management as they progress with the execution of their business plans.

These developments strengthen our existing foundations, supporting the ongoing integration of ESG factors into our investment process. Looking to 2026 and beyond, decarbonisation will be a particular focus as we continue to advance our ESG efforts alongside the borrowers, sponsors and investors who make this work possible.

We extend our gratitude to our investors for their continued trust and engagement.

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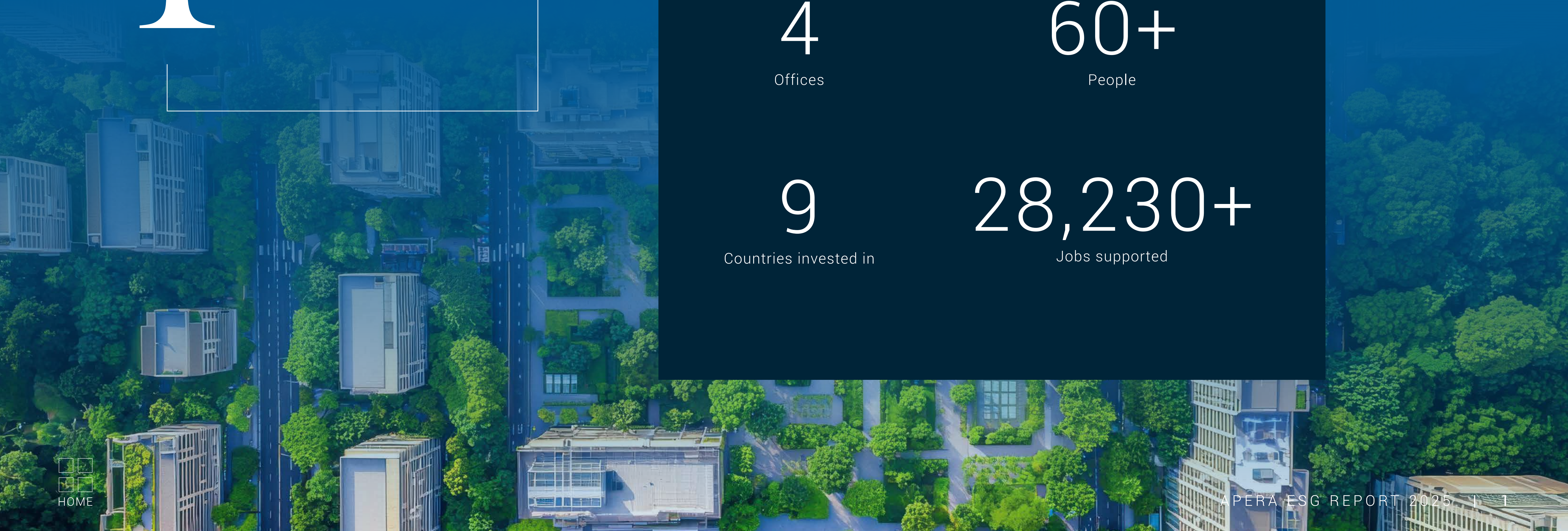


2025 Highlights

as at 31/12/2025

4
Offices

60+
People

9
Countries invested in

28,230+
Jobs supported

Apera at a Glance

Leading private debt manager providing senior financing solutions in the attractive European lower mid-market

~€6bn deployed since 2016

100+ transactions

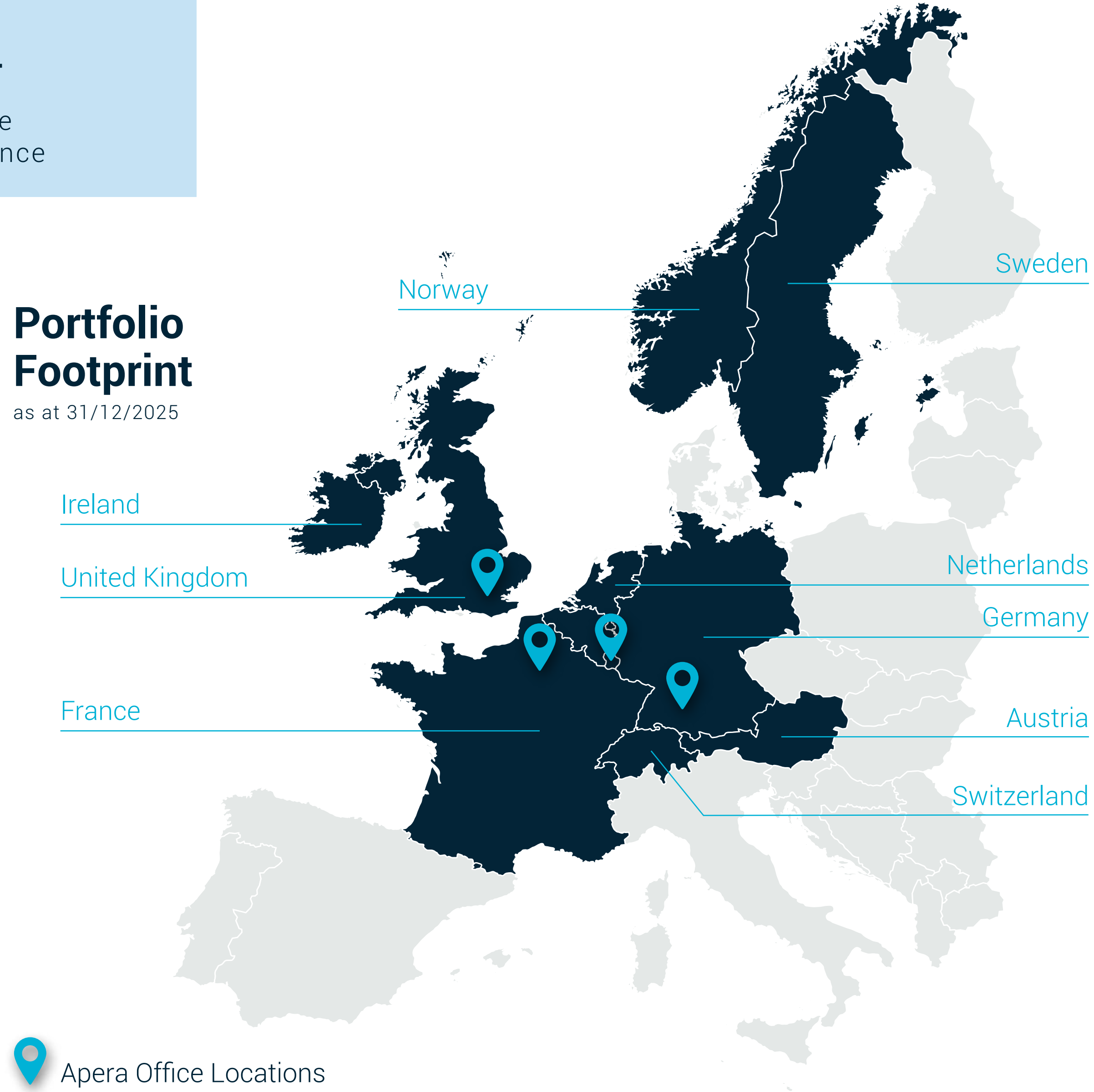
200+ years collective investing experience

Sustainability has always been a core value and strategic pillar of Apera's operations and investment activity. We integrate best-practice ESG principles into every stage of our investment and portfolio management process in support of businesses looking to improve performance through both acquisition-led and organic, CapEx-driven initiatives. We engage with portfolio companies in helping them to develop ESG roadmaps across climate targets, resource efficiency, employee well-being, diversity and inclusion, and responsible supply chain management. Through initiatives such as the implementation of ESG margin ratchets across several portfolio companies which enable savings upon the achievement of sustainability-linked KPIs, we are facilitating enhanced performance whilst reinforcing accountability at board levels. As we continue to roll out this and other initiatives and provide access to specialist ESG expertise, software tools and benchmarking, we help businesses build stronger governance frameworks, reduce costs, and protect their licence to operate. This partnership approach not only aims to improve ESG outcomes for portfolio companies, but also to enhance their long-term financial performance, thereby benefiting fund performance.

David Wilmot
Founding Partner

Portfolio Footprint

as at 31/12/2025



Continuing Our Sustainability Journey

ESG is integral to Apera's philosophy and investment process

"

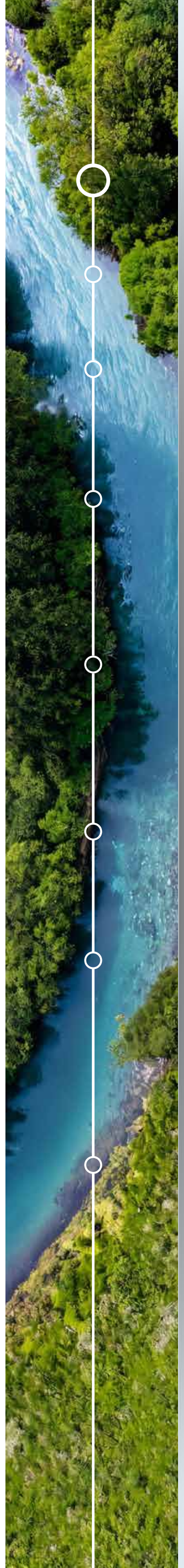
Sustainability has been one of the core pillars at Apera since inception. Since joining the UN PRI in 2018, we have steadily deepened the integration of its 6 Principles into our investment process.

2025: Strengthening the foundations

We have focused on refining our data collection and tools to prepare for deeper engagement with borrowers, and for our voluntary TCFD disclosures.

2026: Executing on engagement

Our focus shifts to active dialogue with borrowers, with climate at the centre. Systematising ESG margin ratchets in documentation enables these discussions. The focus is on the quality of KPIs and targets, calibrated to each borrower's ESG maturity.



2016
- Apera founded

2018
- Apera becomes a signatory of the UN Principles for Responsible Investment (UN PRI)

2020
- Apera becomes a supporting organisation of the Task Force on Climate-Related Financial Disclosures (TCFD)

2021
- ESG Committee established
- ESG Policy implemented
- Portfolio ESG reporting launched

2022
- First Article 8 Fund launched
- Inaugural ESG report published
- Corporate carbon footprint conducted

2024
- Dedicated ESG function created
- 100% portfolio carbon coverage (including estimates)

2025
- Apera joins the ESG Data Convergence Initiative (EDCI)
- Apera becomes an iCI member
- David Wilmot (Founding Partner) appointed ESG Committee Chair
- Pre-investment ESG Grid refined to further integrate climate considerations (roll out 2026)

2026
- Novata data collection platform implemented
- Inaugural ESG webinar on sustainability regulations
- ESG policy and exclusions refined
  - Climate exclusions *(p. 7)*
  - Defence framework *(p. 8)*
- Systematic ESG margin ratchet approach implemented
- Inaugural voluntary TCFD disclosures

2 Responsible Investing

ESG risk assessment is integrated into every step of our investment process.

I Screening

We believe that the activities of some businesses run counter to wider societal and environmental goals. Equally some are not compatible with Apera's responsible investment objectives because they entail sustainability risks or generate additional risks. Consequently, we exclude these borrowers from our investment activities. The exclusion and negative screening criteria are reflected in Apera's ESG policy, communicated to the investment teams, and reviewed periodically.

See p. 6 for more information.

II ESG Committee Consultation

If the investment falls into a 'grey area' (e.g. due to sector exposure or customer base) or if the pre-investment ESG assessment yields controversial results, the deal team consults the ESG Committee for review and guidance as to acceptability. The ESG Committee has the discretion to escalate ESG concerns and the authority to decline an opportunity on ESG grounds.

See p. 6 for more information.

III Due Diligence

The investment team carries out ESG due diligence using the pre-investment grid, which evaluates the ESG materiality, exposure and management of a prospective borrower. Key findings are included in the Investment Memorandum for consideration by the Investment Committee.

See p. 9 for more information.

ESG risk assessment is integrated into every step of our investment process

Documentation IV

For most transactions, Apera will include a commitment in the credit agreement for the portfolio company to complete an annual ESG questionnaire and provide additional information on ESG topics. Going forward all loan documentation will include provisions for the agreement of ESG margin ratchets, whereby adjustments to the interest margin will be tied to the annual achievement of targets on ESG KPIs.

V **Investment**

As part of our ESG monitoring and reporting, an annual ESG questionnaire is sent to each borrower. Agreements with portfolio companies to conduct a minimum number of borrower meetings annually are built in to our loan documentation. Meeting agendas will incorporate relevant ESG items. The collected data is analysed to assess positive and negative ESG impacts and consolidated at portfolio-level. Apera reports annually to our investors and industry initiatives (e.g. UN PRI and EDCI).

See p. 10 for more information.

Holding Period VI

Where an ESG margin ratchet is included in loan documentation, Apera will work with the company management and the sponsor to define ESG KPIs and annual Sustainability Performance Targets (SPTs). Performance against these targets may result in a margin adjustment.

ESG Selection During the Screening Process

Apera excludes activities that are incompatible with our responsible investment objectives

Apera's exclusion policy

- Fossil fuels[1]
- Gambling
- Illegal activity
- Munitions / military
- Tobacco
- Pornography
- Alcohol
- Nuclear

20% revenues materiality threshold — Complete exclusion

During the pre-investment stage we will apply strict ESG criteria in the evaluation process and seek to influence businesses' sustainability policy post-completion. In addition to ensuring that the firm complies with all applicable laws, regulations, and economic sanctions, Apera applies negative ESG screening across all Funds. This process excludes certain businesses from our investment universe based on sector, products or services, or behaviours deemed undesirable for moral or ethical reasons. Sectors considered to have unmanageable risk(s) are outlined in our exclusion policy, communicated to the Investment Team and reviewed on a periodic basis.

In addition to the excluded activities, Apera applies a norms-based approach, considering the 10 Principles of the UN Global Compact across its 4 Pillars:

Human Rights | **Labour** | **Environment** | **Anti-Corruption**

If an opportunity falls into a "grey area" (e.g. due to sector exposure, customer base, supply chain), the ESG Committee is consulted to form a view and has the authority to decline it on ESG grounds.

The ESG Policy is reviewed annually as part of Apera's ESG Governance framework to ensure continued alignment with:

- Evolving regulatory requirements
- Investor dialogues and expectations
- Responsible investment principles

The March 2026 policy further strengthened exclusions around fossil fuels *(see p. 7)*.

2025 ESG Committee consultations

25	11
Deals reviewed	Deals declined

1. Transportation of fossil fuels has a 10% revenue threshold. See *p. 7* for a deep dive on Apera's climate exclusions.

ESG Policy Developments

Apera's refined climate-related exclusions capture the complete value chain

In 2024, global average temperatures exceeded 1.5°C above pre-industrial levels for the first time, a signal of the accelerating warming that drives physical climate risk. Against this backdrop, national commitments are increasingly shaping our operating environment and that of the companies we finance. As of September 2025, 137 of 198 governments have set Net Zero targets, with the EU pledging a 55% reduction and the UK a 68% reduction in emissions from 1990 levels by 2030[1]. In the past year, Apera has built on its existing policy to integrate TCFD recommendations, and refine climate exclusions and selection criteria.

Apera's Climate exclusions

The following activities are excluded from Apera's investable universe due to climate considerations:

1. Exploration, mining, extraction, production, processing, storage, refining and trade of fossil fuels
2. Production of coal-based energy
3. Transportation of fossil fuels (10% revenue threshold)

Climate considerations

Supporting the transition to Net Zero is one of the key considerations of our responsible investment approach. Before we invest, we focus on identifying assets that are well positioned to retain their licence to operate in a low-carbon economy. Once invested, we work together with our portfolio companies to advance their decarbonisation journey through data collection, knowledge sharing and the setting of credible targets along a decarbonisation pathway.

As a debt provider, we cannot compel companies to measure and reduce their emissions, but we can exert meaningful influence. In doing so, we help manage risk, create long-term value and generate positive spillover effects for society more broadly.

Climate ESG Policy developments

In March 2026, we revisited our climate due diligence framework and aligned our exclusions with the fossil fuel exposure definition under SFDR (PAI 4). The result is a more comprehensive policy that spans the full value chain (upstream, midstream and downstream). Our thermal coal position has been strengthened to a complete exclusion, and a 10% revenue threshold transportation exclusion has been introduced.

Pre-investment physical and transition climate risk assessments

Over the past year, Apera has continued to embed the TCFD recommendations into our investment process. The pre-investment ESG Grid now incorporates a dedicated assessment of physical risk, drawing on company locations and the Global Facility for Disaster Reduction and Recovery (GFDRR) database, alongside transition risk informed by sector exposure. These findings are included in the Investment Memorandum for review by the Investment Committee. Where climate risk is judged to be unmanageable, the opportunity is declined; several activities likely to fall into this category are captured in our exclusion policy.

1. Net Zero Stocktake 2025.

ESG Policy Developments

Apera's refined Responsible Defence Investment approach maintains its core exclusions

Geopolitical tensions have led several governments to prioritise the expansion of their defence capabilities. This has prompted a reassessment by both GPs and LPs of the compatibility of responsible investment with these wider governmental imperatives. Global military spending is increasing, with the EU's ReArm Europe plan targeting €800bn. The European Commission clarified the compatibility of the SFDR with the defence sector following the call to action to invest. As a response, a group of investors and subject matter experts published a concept note on the *Principles for Responsible Defence Investment*.

Apera's Defence exclusions

The following Defence-related activities are excluded from Apera's investable universe:

1. Production and trade of antipersonnel landmines, cluster munitions, nuclear and biological weapons (controversial weapons)
2. Any products only used for cruel, inhuman or degrading punishment
3. Conventional weapons deemed excessively injurious or have indiscriminate effects

Responsible Defence considerations

The definition of Defence is broadening, illustrated by AI and dual-use companies. Key considerations remain Human Rights and downstream sale and use of products and services (end-user risk). To form a considered view on the Defence sector activities from an ESG perspective, we engaged both internal and external stakeholders:

Internally, we held discussions with our Partner and Principal group to examine ethical and risk dimensions of Defence investing. These conversations were complemented by dedicated sessions with our ESG committee, to develop a framework for evaluating the sector against our existing responsible investment principles and identifying the nuances that distinguish Defence investments. Activities are assessed on two axes: defensive / offensive technologies, and dual-use / military-first. Additional flagged activities are kinetic applications, with controversial weapons remaining excluded from the Apera investment universe.

Externally we engaged with seven of our LPs in a series of discussions on their stance towards Defence investment against the changing geopolitical backdrop. These conversations were instrumental in understanding the views among our investor base, including evolving attitudes toward Defence, distinctions between different subsegments of the sector, and expectations around exclusions, due diligence, and transparency.

Implementing Responsible Defence Considerations

This engagement provided a foundation to consider internal conviction and LP expectations in our investment process. The developed framework has been implemented applied to opportunities where there is a Defence exposure, to inform decision making by the Investment Team and ESG Committee.

Assessing ESG Risks and Opportunities During Due Diligence

Our pre-investment ESG grid provides a systematic approach to assessing ESG risks and opportunities

Each opportunity is assessed through two ESG lenses:

- **strategic proposition:** alignment with long-term sustainability trends and the company's role in a more sustainable future; and
- **operational ESG performance:** how effectively the company manages material ESG risks and embeds responsible business practices.

The Investment Team assesses the opportunity using Apera's proprietary Pre-Investment ESG Grid. This sector-agnostic systematic framework covers material ESG topics, awarding up to 360 points for ESG risk management and 40 points for ESG-related opportunities, and is applied consistently across every opportunity regardless of size or sector.

Where due diligence materials do not sufficiently cover relevant ESG areas, the Investment Team engages directly with management or sponsors to request additional information. Sponsor ESG due diligence reports, where available, complement our internal analysis and support a fuller understanding of the company's ESG exposure.

The key ESG findings from the due diligence process are summarised in the Investment Memorandum, which is submitted to the Investment Committee for consideration. These findings include the overall ESG score, as well as a climate exposure and management deepdive.

The grid covers ESG factors material across industries:

General Company size | Geography | Exclusion Policy

Environmental	Social	Governance
Climate exposure	Net job creation	Litigation history
Carbon footprint	Diversity & inclusion	Anti-Bribery & Corruption
Pollution	Employee well-being	Cybersecurity
Biodiversity		

To strengthen the robustness of our ESG analysis, we draw on several external tools:

SASB	ESG topics financially material to each industry
Transparency International CPI	Country-level governance and corruption risk
Human Rights Map	Social and human rights risks by geography
ND-GAIN Country Index	Country-level climate vulnerability and readiness
MSCI Materiality Map	Sector-specific ESG priorities
Protected Planet	Biodiversity risk via protected-area exposure
GFDRR	Physical climate risk

The Portfolio Reporting and Engagement Process

Data forms the foundation of engagement with portfolio companies, allowing us to track and quantify progress

I Data collection

- Data on ~75 questions is collected across PAIs, pre-contractual KPIs, EDCI KPIs and ESG developments.
- Companies invested in during Q4 are granted leniency for reporting in the following year.

novata

Data collection platform used to engage with companies during the annual ESG monitoring and reporting cycle

II Data validation

- ***Novata*** performs an automated robustness check, including comparisons versus previous reporting years.
- Apera performs a robustness review based on industry, country, company size, and expected response.

III Performance assessment

- Borrowers gain insight into performance against relevant benchmarks once data collection is complete.
- Apera's proprietary ESG maturity score combines qualitative and quantitative factors, rating firms from compliance-driven (1) to leader (5).

IV PAI modelling

- Where portfolio companies do not monitor performance on PAIs, the ***Upright Project*** may be used to model and estimate these impacts.
- The PAIs are modelled based on (i) granular sector of activity, (ii) geography, and (iii) revenue, to provide an indicative impact.

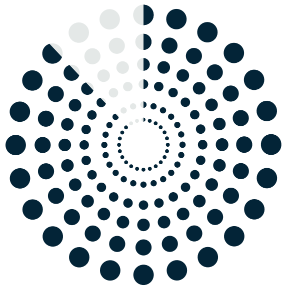
UPRIGHT PROJECT

Data modelling platform to estimate company impacts, used to assess PAIs where the company does not monitor these.

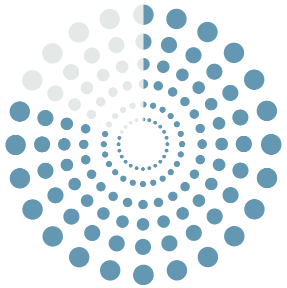
V Engagement

- Data collection, assessment, and benchmarking inform our engagement priorities, guided by materiality.
- Insights gathered during the investment due diligence and data collection process will help in identifying material KPIs and setting appropriate targets for the implementation of an ESG margin ratchet.

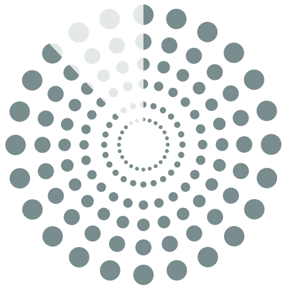
2025 Response Rate[1]



Fund I 86%



Fund II 82%



Fund III[2] 86%

1. Response rate by number of portfolio companies, including partial and complete responses. 2. Including Fund III – EUR and Fund III – USD.

Partnerships and Industry Collaboration

Promoting transparency across the industry and keeping abreast of best practice

Collaboration and best practice sharing are catalysts for advancing responsible investing. Joining the UN PRI in January 2018 marked the formal start of our sustainability journey and our commitment to integrating its 6 Principles. Since then, we have built on this foundation by joining additional initiatives that strengthen our sustainability approach.

Signatory of:

PRI Principles for Responsible Investment

Apera has been a signatory of the UN Principles for Responsible Investment (UN PRI) since 2018 and is committed to integrating its 6 Principles:

1. We will incorporate ESG issues into investment analysis and decision-making processes.
2. We will be active owners and incorporate ESG issues into our ownership policies and practices.
3. We will seek appropriate disclosure on ESG issues by the entities in which we invest.
4. We will promote acceptance and implementation of the Principles within the investment industry.
5. We will work together to enhance our effectiveness in implementing the Principles.
6. We will each report on our activities and progress towards implementing the Principles.

2025 UN PRI Summary Scorecard

Policy Governance and Strategy	65	★★★☆☆
Direct – Fixed income – Private debt	76	★★★★☆
Confidence building measures	80	★★★★☆

TCFD TASK FORCE ON CLIMATE-RELATED FINANCIAL DISCLOSURES

Apera has been a supporting organisation of the Task Force on Climate-Related Financial Disclosures (TCFD) since 2020, with our first voluntary disclosures published in 2026 (*see section 3. Climate & Decarbonisation*).

ESG Data Convergence Initiative

The ESG Data Convergence Initiative (EDCI) is a private markets initiative committed to developing standardised ESG KPIs and a meaningful benchmark. Apera joined in 2025, the inaugural year for private credit participation.

initiative climat international
Private equity action on climate change

The Initiative Climat International (iCI) is a global investor-led community supporting private market managers in measuring, managing and reducing the carbon emissions of their portfolio companies in line with the Paris Agreement.

Other industry body memberships

British Business Investments

UK PRIVATE CAPITAL

BAI Diversifikation zählt.

3 *Climate &* **Decarbonisation**

Climate change can be a material driver of long-term risk and value for the businesses we finance, and this section sets out Apera's inaugural, voluntary climate disclosures in response. As a private debt provider in the lower mid-market, we exert influence through credit selection and active engagement rather than ownership. Where physical or transition risks could impact credit quality, we assess them as we would any other driver of credit risk.

Prepared in line with the 4 Pillars of the TCFD recommendations, the pages that follow describe how the Board and ESG Committee govern climate-related risks and opportunities (Governance); how we assess them across relevant time horizons (Strategy); how we identify and manage them throughout the investment lifecycle (Risk Management); and the data we use to measure exposure and progress (Metrics & Targets).

Governance

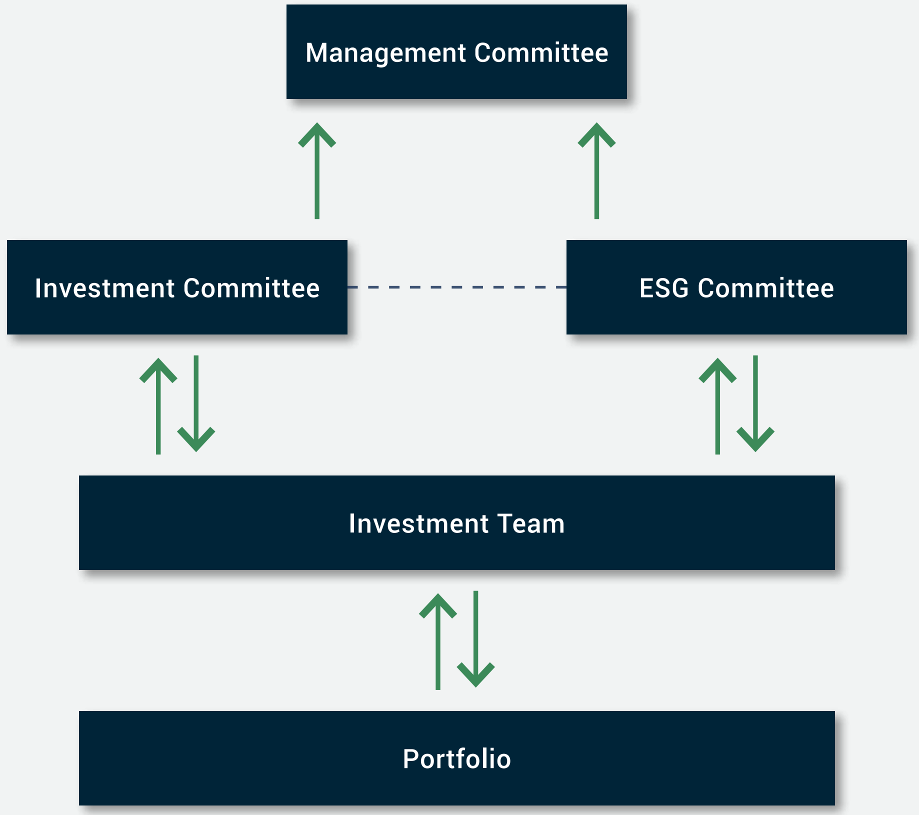
Board Oversight

The Apera Board holds ultimate responsibility for the firm's strategic direction and risk management framework, including the integration of ESG and climate-related considerations. The Board has formally approved the firm's approach to climate-related risks and opportunities and has delegated day-to-day oversight of climate matters to the ESG Committee. The Board and ESG Committee convene quarterly to review: (i) the firm's ESG strategy and alignment with evolving regulatory and market developments, (ii) material climate-related risks that may affect investments, funds and the portfolio, and (iii) Apera's approach to managing these risks.

Management Oversight

David Wilmot (Founding Partner) has been designated as the senior leader responsible for overseeing the management of climate-related risks and opportunities. As a member of the Board, Management and Investment Committees, and Chair of the ESG Committee, he provides a direct link between strategic oversight and investment decision-making on climate matters. He is kept informed through regular ESG Committee meetings and can escalate climate-related issues to the Board where necessary.

The ESG Committee comprises five members: David Wilmot, Francien Heckman (Head of ESG), and three ESG champions drawn from the investment team, each representing one of Apera's investment offices. The ESG Committee is responsible for developing and maintaining tools and frameworks to assess climate-related risks and opportunities throughout the investment lifecycle, as well as building internal capacity through training. The ESG Committee meets on a weekly basis to operationalise the ESG policy and form a view on potential investments when consulted by the Investment Team.



Governance

Pre-Investment Oversight

The Investment Team assesses climate risks pre-investment; the ESG Committee can decline non-compliant deals; the Investment Committee reviews the summary of the pre-investment ESG Grid included in the Investment Memorandum.

Holding-Period Monitoring

Borrowers complete an annual ESG questionnaire (a loan-documentation requirement). The team monitors risks throughout, engaging borrowers via knowledge-sharing or an ESG margin ratchet.

Training & Capability

Annual ESG training for the Investment Team. In Q1 2026, climate-specific training introduced the enhanced ESG tool and the identification of physical and transition risks.

Industry Initiatives

In 2025, Apera joined the Initiative Climat International (iCI) and adopted the Private Markets Decarbonisation Roadmap (PMDR) to track portfolio decarbonisation maturity.

Strategy

Climate-related risks and opportunities

Climate change can have negative impacts on the companies we finance through the effects of physical or transition climate risk. The impacts may influence the borrower's capacity to service its debt. As such, we assess climate alongside other drivers of credit risk to inform our credit underwriting.

The time horizons to assess climate risks and opportunities are aligned with the typical lifecycle of our funds and tenor of loans:

Short-term: 0 - 2 years
This relates to the current ESG monitoring cycle of the funds' underlying investments, and aligns with the typical fundraising period.

Medium-term: 2 - 7 years
This corresponds to the 2-4 years typical holding period of Apera's loans, with the legal maturity of the loan in a typical range of 6-7 years, as well as the fund's maturity.

Long-term: 7+ years
This extends beyond the maturity of the investments towards the widely recognised global ambition of net zero emissions by 2050, consistent with the Paris Agreement.

Transition risks are expected to be the most relevant drivers of credit risk over the short and medium term due to tightening policy, shifting demand and changing perceptions.

Physical risks are expected to grow in importance over the life of the fund and beyond, as acute weather events become more frequent and chronic impacts compound.

In line with the TCFD framework, we assess our portfolio across three dimensions:

- i the risks arising from the **transition** to a lower-carbon economy,
- ii the risks arising from the **physical** impacts of climate change, and
- iii the **opportunities** the transition creates:

i Transition Risk

Policy and Legal
Evolving policy, adaptation requirements, litigation and liability from failure to mitigate, adapt or disclose

Technology
Low-carbon innovation disrupting incumbent products and processes

Market
Shifts in supply and demand as a result of climate change considerations

Reputation
Changing investor, customer and/or community perceptions of climate change

ii Physical Risk

Acute
Event-driven impacts of extreme weather *e.g. flooding, drought and wildfire*

Chronic
Longer-term shifts in climate patterns *e.g. temperature, precipitation and sea-level rise*

iii Opportunities

Resource Efficiency & Energy Source
Resource efficiency, cost savings and low-emission energy adoption

Products/Services & Markets
New climate-aligned products, services, and markets

Resilience
Strengthened resilience across operations, portfolios and supply chains

Strategy

Identified climate-related risks and mitigation actions

Risk	Materiality: Apera	Materiality: Portfolio	Example Identified Potential Impact[1]	Horizon	Mitigation Actions
TRANSITION RISK					
Policy & Legal	H	H	• Increased compliance and/or operational costs from evolving climate-related regulation, applicable to Apera, our funds and borrowers. • Exposure to climate-related litigation and claims at Apera and/or our borrowers.	S M L	***Implemented*** • Compliance monitoring and regulatory watch. ***Roadmap*** • Readiness assessment for revised SFDR regime. • Board/ESG Committee regulatory tracker.
Technology	L	L	• Borrowers' assets, technologies, or business models become obsolete or uncompetitive as low-carbon alternatives scale and mature.	S M L	***Implemented*** • Carbon-intensive end-market assessment pre-investment; transition potential assessed where fossil-fuel exposure exists. • Annual ESG questionnaire monitoring.
Market	M	H	• Changing investor and/or customer preferences favouring products and services with a stronger climate focus. • Rising costs to meet market expectations for demonstrable performance against climate metrics applicable to Apera, our funds and borrowers.	S M L	***Implemented*** • Credit selection (pre-investment ESG grid). • Monitoring & engagement (annual questionnaire, PMDR). • ESG margin ratchet. ***Roadmap*** • Early engagement on exposed credits.
Reputation	H	M	• Stewardship commitments are not matched by demonstrable progress, resulting in increased scrutiny. • Reputational exposure from the polarised climate-investing debate.	S M L	***Implemented*** • Climate governance structure (Board/ESG Committee); ESG Committee veto. • Credit selection, exclusion list, monitoring and engagement, PMDR. • Annual TCFD-aligned reporting with stated improvement roadmap.
PHYSICAL RISK					
Acute	L	M	• Increased frequency and/or severity of extreme weather disrupts borrower operations and supply chains, resulting in a deterioration of credit quality.	S M L	***Implemented*** • Credit selection (including acute risk assessment). • Annual monitoring.
Chronic	L	M	• Increased operating or adaptation costs to mitigate or insure chronic climate impacts.	S M L	***Implemented*** • Annual monitoring.
Opportunities					
	M	M	• Improved management of portfolio climate risk through integrating climate considerations into the investment process. • Enhance current and/or develop new credit strategies to meet client demand for transition or low-carbon investments.	S M L	

Materiality: L Low · M Medium · H High

S Short-term · M Medium-term · L Long-term

1. Potential impacts are non-exhaustive.

Strategy

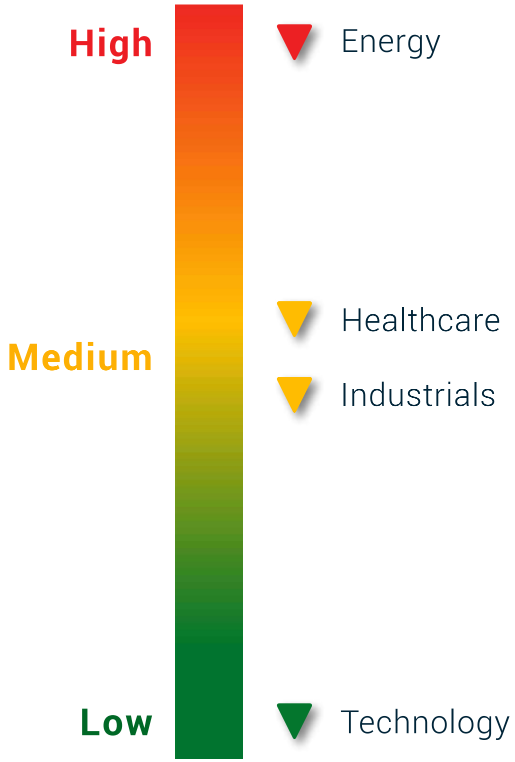
Our Approach

We have assessed the climate-risk exposure of the current portfolio. As private-market data is difficult to obtain, a listed-market proxy is used to indicate exposure. Using a forward-looking climate scenario model, each industry is classified as a low, medium or high climate-risk industry based on its structural physical and transition risk. Holdings are then mapped to these industries to derive a portfolio-level view. Across all seven NGFS scenarios, the portfolio's overall climate-risk exposure is assessed as medium.

Illustrative Sector Risk Spectrum

The sectors shown are illustrative reference points rather than Apera holdings, positioned by their structural climate risk to integrate both physical and transition exposure; in practice the portfolio is concentrated in lower-risk industries such as software and business services. This approach has its limitations, as it relies on a listed-market proxy whereas Apera invests in lower-mid-market, unlisted companies that the proxy does not adjust for, meaning the ratings reflect industry-level climate risk rather than the profile of individual borrowers. Furthermore, whilst there may be some correlation to the sector, physical risk is closely tied to the physical footprint of a company.

On this basis, Apera's funds are skewed towards low to medium-risk sectors, with a few limited exposures to higher risk sectors following a highly selective investment due diligence process.



Proxied exposure

Public-market data stands in for scarce private-market data

Risk ranking

Industries classified low, medium or high on structural physical and transition risk

Portfolio mapping

Holdings mapped to derive overall portfolio exposure

Managing High-Risk Exposure

A number of industries categorised as high risk are excluded from Apera's investable universe, including a range of fossil-fuel-related activities. Other high-risk industries remain in the investable universe, examples include environmental facilities & services and food distributors. A climate-risk assessment is conducted for every new opportunity, with results reviewed by the Investment Committee, and the ESG Committee consulted if a high-risk exposure is identified.

Risk Management

Identifying, assessing and managing climate-related risks

Apera's approach to integrating climate risks within our risk management structure is evolving as our understanding deepens. Starting Q4 2025, Apera has updated its pre-investment ESG Grid to further reflect the recommendations of the TCFD, updated the Investment Memorandum to standardise the inclusion of a section on climate risks and conducted investment team training regarding the consideration of climate risk throughout the investment process. Climate risk analysis is integrated across the lifecycle, including:

Exclusion policy screening
Alignment of the transaction with our sustainability policies, and exclusions which screen out sectors with unmanageable climate risk.

Pre-investment ESG grid
Assessment of the borrower's physical and transition climate risk and opportunity exposure. Climate risk exposure is categorised as low, medium or high, where a designation as high requires consultation with the ESG Committee.

ESG Committee consultation
Where a potential climate exposure has been flagged by the pre-investment ESG Grid, the committee is consulted and has the authority to decline an investment opportunity.

Climate risk assessment in the Investment Memorandum
Summary of the climate risk and opportunity assessment integrated in every Investment Memorandum for review by the Investment Committee.

Investment

Annual ESG questionnaire
Ongoing annual monitoring of climate indicators across the portfolio, including questions across five themes: carbon footprint, decarbonisation, governance, risk assessment and risk mitigation.

Engagement on climate matters
Decarbonisation is a core engagement topic as part of the implementation of ESG margin ratchets.

Each positive investment decision is informed by the processes of four internal stakeholders, creating a robust decision-making process:

- **Investment team**
  Performs the initial climate screen on every transaction and declines immediately where it identifies a significant exposure.
- **ESG Committee**
  Develops ESG Policy and is consulted where the investment team has flagged a potential climate exposure and requires a recommendation.
- **Compliance**
  Conducts an adverse media screen to assess compliance with the UN Global Compact and good governance considerations, which could flag climate controversies.
- **Investment Committee**
  Reviews the summary of the investment team's climate risk assessment included in every Investment Memorandum to inform decision-making.

Integration with overall risk management
Climate risks are identified, assessed and managed through the same processes that govern all other credit risks, embedded in IC materials, and reinforced through investment team training.

Risk Management

Pre-investment climate risk assessment

Every transaction is scored for climate risk before investment. This assessment is two-pronged, looking at each investment bottom-up and top-down. Data availability can be challenging given the lower mid-market focus, as such the physical risk and transition risk exposure based on sector and location forms a useful starting point. Generation of a credible climate risk management score requires adequate company information, where missing data points are conservatively scored as high vulnerability.

1a TRANSITION RISK EXPOSURE

Each assessed opportunity receives a transition risk exposure score based on its sector of activity.

Sectors with a significant climate footprint most exposed to tightening policy, technological change and shifting demand in the transition to a lower-carbon economy carry a higher baseline score.

1b PHYSICAL RISK EXPOSURE

Each assessed opportunity receives a physical risk exposure score based on the company's physical footprint (countries and regions). The locations are assessed on their exposure to six acute risks based on the GFDRR database.

Over the investment horizon (short and medium term) acute physical risks represent the main channel through which climate change can impair credit quality and therefore is the core consideration in asset selection.

Chronic risks, which evolve over decades, are considered more holistically in the quarterly meetings between the Board and ESG Committee and inform investment strategy.

2 CLIMATE RISK MANAGEMENT SCORE

Management scores are determined on the governance of climate risks and processes, including whether the company:

- operates in a sector with a significant physical footprint
- operates in a High-Impact Climate Sector (NACE classification under the SFDR)
- has conducted a climate risk assessment
- experienced (physical or transition) climate incidents

3a CLIMATE RISK SCORECARD

Physical risk and transition risk are assessed separately on

(i) exposure score,

(ii) management score and

(iii) (low / medium / high) vulnerability assessment

The findings are summarised in the Investment Memorandum, alongside an assessment of climate opportunities.

3b MANAGING IDENTIFIED RISKS

High-risk exposures are referred to the ESG Committee[1]. The deal team is supported in collecting additional data to assess the risk, and discussions with the sponsor on managing it may be initiated and formalised through an ESG margin ratchet. Opportunities with risks deemed unmanageable, or unlikely to be managed, are declined.

1. For more information on the ESG Committee review process and 2025 ESG Committee Consultations, see *p. 6*.

Metrics & Targets

Monitoring greenhouse gas emissions

Operational emissions

Apera has calculated the 2025 operational carbon footprint in accordance with the GHG Protocol, covering Scope 1, 2 and 3 (categories 1 – 14) emissions.

To manage its emissions, Apera has introduced several internal initiatives. These include the implementation of "Go Green" initiatives:

Business travel emissions reduction

Cycle-to-work schemes in select offices

(International) train travel encouraged, where possible

Financed emissions

Apera's most significant climate impacts come from the investments we finance (Scope 3, category 15). We assess our financed emissions using data gathered through our annual ESG questionnaire and evaluate the portfolio's decarbonisation maturity using the Private Markets Decarbonisation Roadmap (PMDR) framework.

As Apera's focus is on the lower mid-market, many borrowers are still formalising their ESG strategies and have not assessed their 2025 emissions. Where that is the case, we estimate emissions using the Upright Project. Through our stewardship and engagement activities, our aim is to work with borrowers to help them measure and manage emissions, thereby reducing our reliance on estimations. Where appropriate, an ESG margin ratchet linked to decarbonisation targets may be implemented.

With modelled data included, our disclosure covers 100% of total invested capital.

Fund	Financed Emissions	Carbon Footprint	GHG Intensity
	tCO_2e	*tCO_2e / M€*	*tCO_2e / M€*
Fund I	24,124	124.7	125.2
Fund II	52,524	54.6	71.2
Fund III EUR	49,672	47.8	72.4
Fund III USD	17,366	50.5	76.4

Metrics & Targets

Tracking the Decarbonisation Maturity of Our Portfolio

Apera tracks the decarbonisation maturity of our portfolio using the Private Markets Decarbonisation Roadmap (PMDR). The roadmap categorises companies into five stages:

Not Started
No emissions measurement or reduction plan

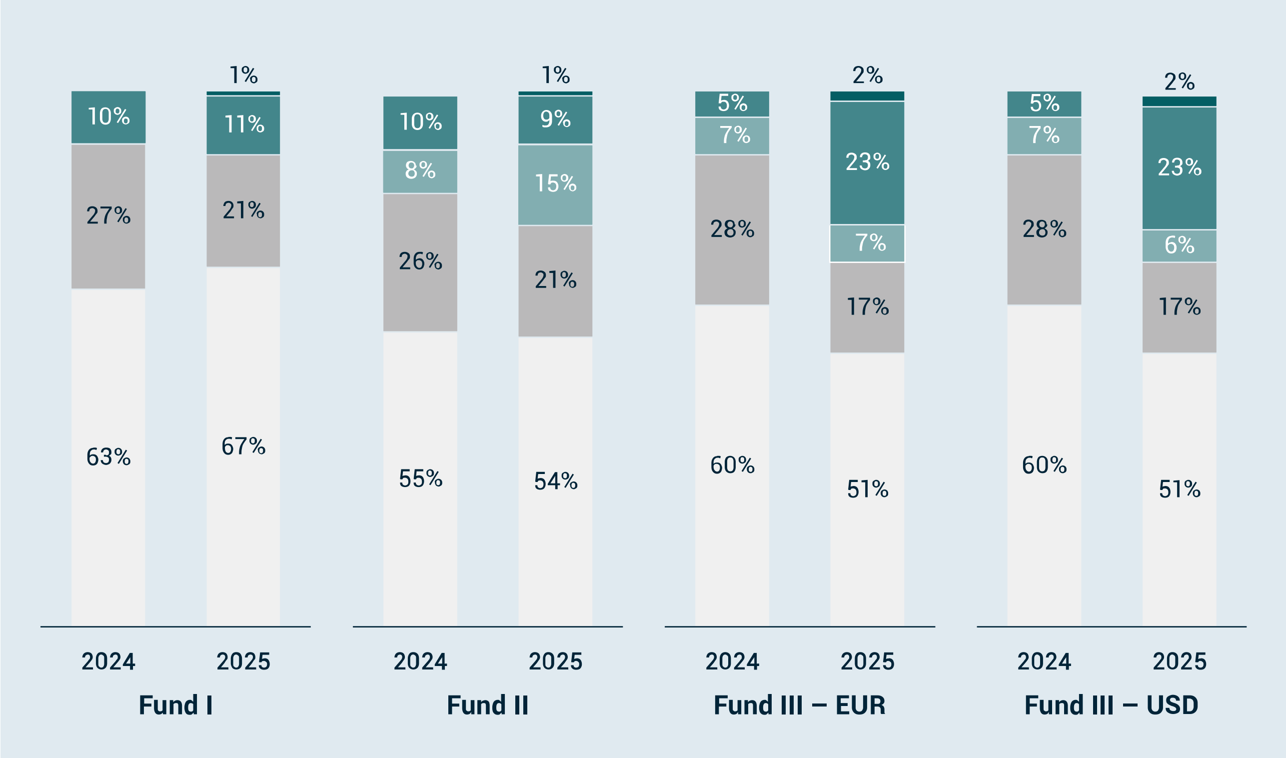
Capturing Data[1]
Reporting emissions but no plan to reduce

Preparing to Decarbonise
Planning to reduce emissions

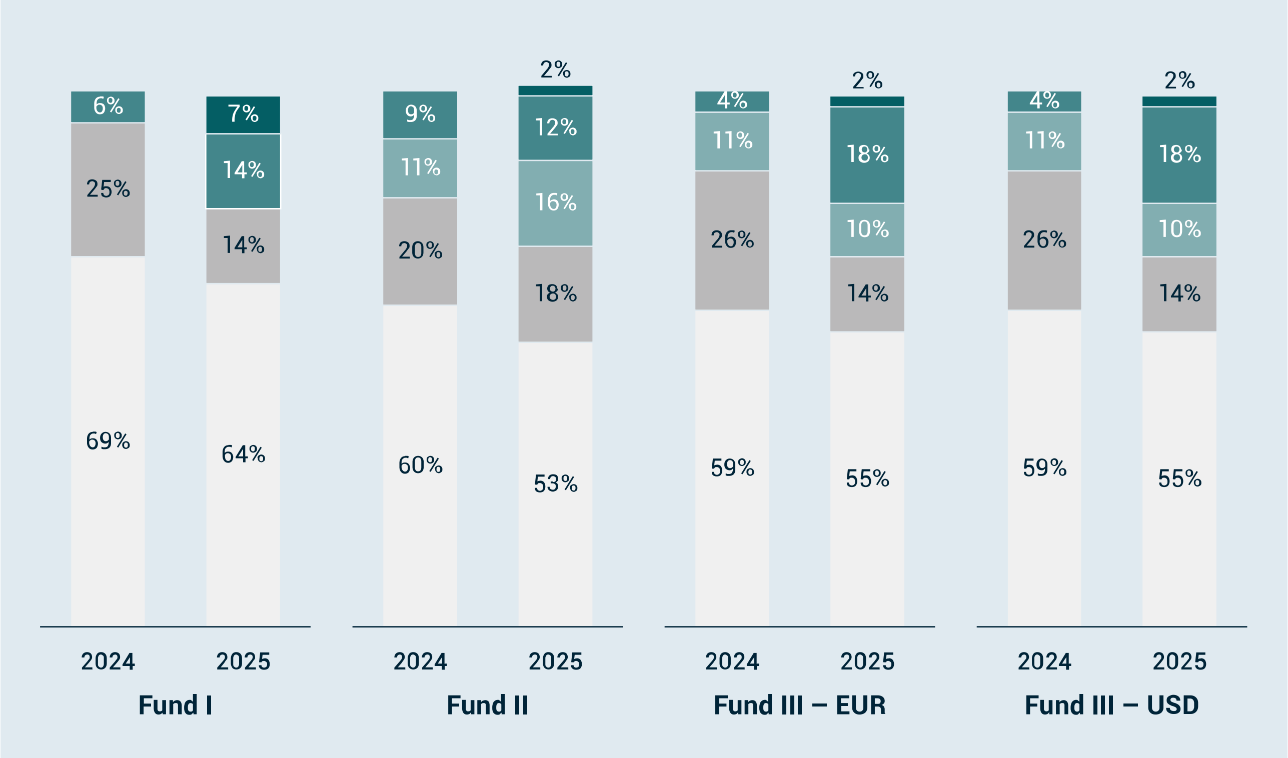
Aligning
Committed plan aligned to a transition pathway

Aligned
Delivering against a net zero plan

Invested Capital[2]



Companies[2]



1. Covering Scope 1, Scope 2 and material Scope 3. 2. The assessment covers all borrowers, including those who have not responded to the ESG questionnaire. A hypothesis has been formulated using available or public information. If no information is available, the company is marked as Not Started.

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