

Statement on principal adverse
impacts of investment decisions
on sustainability factors

1 January - 31 December 2022

octopusinvestments

A brighter way

Statement on principal adverse impacts of investment decisions on sustainability factors

Financial market participant: Octopus Investment Limited (“OIL” or “we”) is authorised and regulated by the Financial Conduct Authority. Octopus Investments Limited is a wholly owned subsidiary of Octopus Capital Limited. LEI: 213800D8ZGDJZPOC9180.

Summary: OIL considers principal adverse impacts of its investment decisions on sustainability factors as part of its investment due diligence processes, ensuring that investments do no significant harm to any environmental or social objective.

The present statement is the consolidated statement on principal adverse impacts on sustainability factors of OIL, specifically for the financial products that are in scope for SFDR, namely

- Octopus Healthcare Fund (OHF)

This statement on principal adverse impacts on sustainability factors covers the reference period from 1 January 2022 to 31 December 2022.

OIL considers that for real estate investments, the following principle adverse impacts on sustainability factors are the most material (Table 1).

Table 1: Identification of principle adverse impacts.

Environmental Factors:

Carbon Emissions: Construction is a carbon intensive industry, and care homes can generate high operational emissions. Across all new and existing care homes we are exploring carbon reduction initiatives and, where possible, build these into ongoing site management strategies

- GHG Emissions
- Carbon footprint
- GHG intensity of portfolio

Biodiversity: Care homes are usually built within existing communities, however we consider the impact of new and existing care homes on the environment, mitigating potential adverse effects and enhancing biodiversity value where possible.

- Activities negatively affecting biodiversity-sensitive areas
- Natural species and protected areas

Social and employee matters, respect for human rights, anti-corruption and anti-bribery:

Health and Safety of Workforce: Construction can be hazardous and keeping people safe is a priority of across all OIL real estate investments. We make sure that all developers have appropriate health and safety policies in place.

We will encourage whistleblowing and maintain open communication channels between employees /contractors and management. We have put in place a whistleblowing policy. We will take action to remove counterparties who are not competent.

- Number of days lost to work related injuries, accidents, ill health and fatalities

Human Rights: The real estate sector (like every other sector) is subject to human rights abuse that needs to be mitigated. We promote fair treatment of all employees, irrespective of matters such as race, gender, nationality, disability, political or religious beliefs. We work with suppliers to align to

our supplier code of conduct. We will take action to exclude suppliers who do not meet our standards.

- Violations of OECD Guidelines for Multinational Enterprises or the UN Guiding Principles including the principles and rights set out in the eight fundamental conventions identified in the ILO Declaration and the International Bill of Human Rights
- Lack of a supplier code of conduct

Quality of care: The social objective of delivery quality care was measured through the Care Quality Commission reports and ratings together with the in-house Clinical Assurance Team's assessment and oversight strategies to provide clinical quality assurance.

- Clinical quality assurance

Table 2:

Adverse sustainability indicator Metric	Metric	Impact 2022	Impact 2021	Explanation	Actions taken, actions planned and targets set for the next reference period	
Climate and other environment-related indicators						
Greenhouse gas emissions	1. GHG emissions (of investee companies expressed in tonnes CO2 equivalent)	Scope 1 GHG emissions	N/A	N/A	GHG Scope 1 and 2 emissions are captured within Octopus Investments carbon footprinting Scope 3 GHG emissions were calculated in line with the GHG protocol.	The Fund is taking steps to reduce the Scope 3 carbon emissions through renewable energy solutions.
		Scope 2 GHG emissions	N/A	N/A		
		Scope 3 GHG emissions	9,196.99	N/A		
		Total GHG emissions	9,196.99	N/A		
	2. Carbon footprint	Total GHG emissions expressed as a ratio of all investments	0.0000079592	N/A		
3. GHG intensity of investee companies	GHG emissions expressed as a ratio of investee company's revenue	123.58	N/A			
4. Exposure to companies active in the fossil fuel sector	a) Share of investments in companies active in the fossil fuel sector	a) 0	N/A	The Fund has a no fossil fuel investments policy.	N/A	
	b) Share of investments in companies active in the coal sector	b) 0				

Table 2:

Adverse sustainability indicator Metric		Metric	Impact 2022	Impact 2021	Explanation	Actions taken, actions planned and targets set for the next reference period
	5. Share of non -renewable energy consumption and production	a) Share of non -renewable energy consumption of investee companies from non -renewable energy sources compared to renewable energy sources b) Share of non -renewable energy production of investee companies from non -renewable energy sources compared to renewable energy sources	a) 94% b) 0%	N/A	3 of the assets have photovoltaic panels installed on the roof and 15 assets have 'renewable energy electricity contracts'. The Fund does not produce energy from non-renewable energy sources.	The Fund is taking steps to increase the number of care homes that have photovoltaic panels installed and therefore increase the amount of renewable energy produced by the homes. In addition, the Fund is working with operators to switch to renewable energy tariffs.
	6. Energy consumption intensity per high impact climate sector	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector	Impact Sector L 0.000000555	N/A	N/A	The Manager will continue to track energy consumption and encourage operators to install renewable energy solutions and green energy tariffs
Biodiversity	7. Activities negatively affecting biodiversity sensitive areas	Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas	0	N/A	The Fund considers biodiversity metrics as part of planning consents.	The Fund will continue to review all new sites in or near to biodiversity sensitive areas.

Adverse sustainability indicator Metric		Metric	Impact 2022	Impact 2021	Explanation	Actions taken, actions planned and targets set for the next reference period
Water	8. Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested	0	N/A	Emissions to water are unlikely to occur as part of the Fund's normal activities.	N/A
Waste	9. Hazardous waste and radioactive waste ratio	Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested	123.6	N/A	The Fund encourages operators to have dedicated waste facilities to encourage segregation of hazardous waste. 29% of the assets gave data that was distinguished between hazardous and non-hazardous waste. Radioactive waste is not applicable to the Fund's activities.	The Fund will continue to improve the data coverage of operators hazardous and non-hazardous waste.

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters

Social and employee matters	10. Violations of OECD Guidelines for Multinational Enterprises or the UN Guiding Principles including the principles and rights set out in the eight fundamental conventions identified in the ILO Declaration and the International Bill of Human Rights	Share of investments in investee companies that have been involved in violations of OECD Guidelines for Multinational Enterprises or the UN Guiding Principles including the principles and rights set out in the eight fundamental conventions identified in the ILO Declaration and the International Bill of Human Rights	0	N/A	The Fund is regularly engaged with operators in a regulated industry and to the best of our knowledge none of our operators are engaged in any violations.	The Manager will continue to monitor Violations of OECD Guidelines for Multinational Enterprises or the UN Guiding Principles including the principles and rights set out in the eight fundamental conventions identified in the ILO Declaration and the International Bill of Human Rights.
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Adverse sustainability indicator Metric	Metric	Impact 2022	Impact 2021	Explanation	Actions taken, actions planned and targets set for the next reference period	
	11. Lack of processes and compliance mechanisms to monitor compliance with OECD Guidelines for Multinational Enterprises or the UN Guiding Principles including the principles and rights set out in the eight fundamental conventions identified in the ILO Declaration and the International Bill of Human Rights	Share of investments in investee companies without policies to monitor compliance with OECD Guidelines for Multinational Enterprises or the UN Guiding Principles including the principles and rights set out in the eight fundamental conventions identified in the ILO Declaration and the International Bill of Human Rights	0	N/A	The Adviser (instructed by the Manager) has carried out due diligence and in doing so ensured that human rights, equality and anti-bribery and corruption policies are in place alongside the Fund's own policies, so as to ensure that investments in the portfolio are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. As part of its ongoing assessment, the Manager will be seeking details of any processes and compliance mechanisms to monitor compliance with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.	The Manager will continue to adhere to the human rights, equality and anti-bribery and corruption policies that are in place alongside the Fund's own policies.
	12. Gender pay gap between female and male employees	Average gender pay gap between female and male employees of investee companies		N/A	The Fund engages with operators on their approach to the gender pay gap in the Engagement Tool. The Engagement tool is sent to operators and helps the Fund understand whether they consider the broader stakeholders (employees, communities, customers, shareholders and the environment). The tool provides guidance to help tenants operate more responsible and efficient homes.	The Manager will continue to engage with operators on their approach to gender diversity. In 2023 the Engagement Tool will also be sent to developers.

Adverse sustainability indicator Metric	Metric	Impact 2022	Impact 2021	Explanation	Actions taken, actions planned and targets set for the next reference period
13. Management and supervisory board gender diversity	Average ratio of female to male management and supervisory board members in investee companies, expressed as a percentage of all board members	0	N/A	The Fund engages with operators on their approach to diversity in the Engagement Tool.	The Manager will continue to engage with operators on their approach to gender diversity. In 2023 the Engagement Tool will also be sent to developers.
14. Amount of accumulated earnings in non - cooperative tax jurisdictions	Amount of accumulated earnings at the end of the relevant financial year from investee companies where the total consolidated revenue on their balance sheet date for each of the last two consecutive financial years exceeds total of EUR 750M in jurisdictions that appear on the revised EU list of non-cooperative jurisdictions for tax purposes	0	N/A	The Company does not have any investments in non-cooperative tax jurisdictions	N/A
15. Exposure to controversial weapons	Share of investments in investee companies involved in the manufacture or selling of controversial weapons	0	N/A	There is no involvement in controversial weapons.	N/A
16. Exposure to companies involved in the cultivation and production of tobacco	Share of investments in investee companies involved in the cultivation and production of tobacco	0	N/A	There is no exposure to companies involved in the cultivation and production of tobacco	N/A

Adverse sustainability indicator Metric		Metric	Impact 2022	Impact 2021	Explanation	Actions taken, actions planned and targets set for the next reference period
	17. Interference in the formation of trade unions or elections of worker representatives	Share of investments in investee companies without commitments on their non-interference in the formation of trade unions or election of worker representatives		N/A	Given this is a new indicator, information on trade unions or election of worker representatives was not available for this reporting period.	The Fund will build in a question to the Engagement Tool that will ask operators and developers if they have commitments on their trade unions or election of worker representatives
	18. Share of employees of investee companies earning less than the adequate wage	Average percentage of employees in investee companies earning less than the adequate wage	0	N/A	Given this is a new indicator, information on pay was not available for this reporting period.	Minimum wage is a legal requirement and the care home operators are in a regulated industry. The Fund will build in a question to the Engagement Tool to ask operators and developers about the share of employees earning less than the adequate wage

The Fund will build in a question about the share of employees earning less than the adequate wage

Indicators applicable to investments in real estate assets

Fossil fuels	17. Exposure to fossil fuels through real estate assets	Share of investments in real estate assets involved in the extraction, storage, transport or manufacture of fossil fuels	N/A	N/A	The Company does not have any investments in the extraction, storage, transport or manufacture of fossil fuels.	N/A
Energy efficiency	18. Exposure to energy-inefficient real estate assets	Share of investments in energy-inefficient real estate assets	23%	N/A	To complete the calculation, all assets that didn't have full 12 months of data in 2022 were removed. Resulting in the value of real estate assets required to abide by EPC and NZEB rules being smaller.	The Fund is taking steps to reduce energy intensity through renewable energy solutions.

Adverse sustainability indicator Metric	Metric	Impact 2022	Impact 2021	Explanation	Actions taken, actions planned and targets set for the next reference period
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Indicators applicable to investments in real estate assets

Greenhouse gas emissions	18. GHG emissions	Scope 1 GHG emissions generated by real estate assets	N/A	N/A	GHG Scope 1 and 2 emissions are captured within Octopus Investments carbon footprinting, Scope 3 GHG emissions were calculated in line with the GHG protocol.	The Fund is taking steps to reduce the Scope 3 carbon emissions through renewable energy solutions.
		Scope 2 GHG emissions generated by real estate assets	N/A	N/A		
		Scope 3 GHG emissions generated by real estate assets	9,196.99	N/A		
		Total GHG emissions generated by real estate assets	9,196.99	N/A		
Energy consumption	19. Energy consumption intensity	Energy consumption in GWh of owned real estate assets per square meter	6022.454363	N/A	The Fund measures the electricity and gas consumption of the care homes.	
Waste	20. Waste production in operations	Share of real estate assets not equipped with facilities for waste sorting and not covered by a waste recovery or recycling contract	3%	N/A	The Fund uses the BREEAM In-Use assessment waste score to measure waste production for each care home. Out of the 79 assets, 2 don't have the facilities.	The Fund will work with the 2 assets to encourage them to add waste sorting facilities.

Adverse sustainability indicator Metric		Metric	Impact 2022	Impact 2021	Explanation	Actions taken, actions planned and targets set for the next reference period
Resource consumption	21. Raw materials consumption for new construction and major renovations	Share of raw building materials (excluding recovered, recycled and biosourced) compared to the total weight of building materials used in new construction and major renovations	0	N/A	The Fund doesn't currently measure the share of raw building materials compared to the total weight of materials. The Fund encourages new developments to have a Site Waste Management Plan with 85% reduction of construction and demolition wastes.	
Biodiversity	22. Land artificialisation	Share of non-vegetated surface area (surfaces that have not been vegetated in ground, as well as on roofs, terraces and walls) compared to the total surface area of the plots of all assets	0	N/A	The Fund considers this as part of the planning process.	The Fund will continue to work with the planning process.

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters

Adverse sustainability impact	Adverse impact on sustainability factors (qualitative or quantitative)	Metric
Human Rights	9. Lack of a human rights policy	<p>The real estate sector (like every other sector) is subject to human rights abuse that needs to be mitigated. We promote fair treatment of all employees, irrespective of matters such as race, gender, nationality, disability, political or religious beliefs. We work with suppliers to align to our supplier code of conduct. We will take action to exclude suppliers who do not meet our standards.</p> <ul style="list-style-type: none"> ● Lack of a supplier code of conduct

Description of policies to identify and prioritise principal adverse impacts on sustainability factors

OIL has a Responsible Investment Policy and each managed fund has an Responsible Investment policy that sets out the approach to identifying and managing environmental, social and governance (“ESG”) matters and the principles that we adopt.

These principles are in line with the UN Principles for Responsible Investment (UN PRI) to which OIL is a signatory. These policies outline risks and mitigations aligned to potential adverse impacts on sustainability factors.

OIL seeks to embed the principles set out in firm and fund level Responsible Investment Policies into investment decisions and ongoing management of investments to actively manage sustainability risks. A three-step approach to responsible investment considers an investments alignment with sustainability outcomes, the financial materiality of sustainability issues and the impact of an investment on its wider stakeholders (planet, people, community, and employees).

It is the responsibility of the Investment Committee to ensure that principle adverse

impacts on sustainability factors are considered in the investment process and mitigated before that investment is approved. The methodology of assessment includes two tools. One which is completed by the investment manager to identify key information that needs to be considered within the investment process and one which is completed by the care home developer and care home operator to identify how sustainability issues are being mitigated. These tools incorporate guidance from:

- The Impact Reporting and Investment Standards (IRIS) which provides a framework to identify and manage alignment with sustainable outcomes.
- The Sustainability Accounting Standards Board (SASB) framework which identifies financially material ESG risks by asset class.
- EU Taxonomy which identifies taxonomy aligned investments and the DNSH criteria that should be considered.

During the investment cycle, the outputs from these tools indicate presence or absence of a principal adverse impact. These indicators include those relating to:

1. Environmental damage (carbon, biodiversity, water and waste) and are mitigated through environmental impact assessment, habitat management plans, resource minimisation strategies, carbon reduction and measuring, alongside assessing counterparty; and
2. Investee company policies (or the counterparties managing the renewable assets) for social and employee matters (anti-bribery, corruption, human slavery, equality, diversity and opportunity), unfair advantage and community relations (engagement and community benefit initiatives).

The principle adverse impacts, those that in our experience are most likely to be material to real estate investments, are outlined in Table 1. No PAI indicators were available within the SFDR RTS for ‘quality care’, therefore our own metric has been included on a voluntary basis as the definition of a quality care bed is important to care home developments.

Ongoing data collection in line with the PAI Indicators in Table 2 is requested either directly from care home developers and operators. Ongoing management and oversight of principle adverse impacts is the responsibility of the

investment manager. Any issues are escalated to the Responsible Investment Committee whom the OIL board have delegated accountability over responsible investment.

To ensure the reliability and accuracy of the data, OIL works closely with specialised external advisors. These advisors thoroughly review OIL methodologies in regard to GHG emissions, PAIs and offer valuable insights based on industry best practices.

The data collection process:

- KPI data is primarily sourced directly from care home developers or operators. This information is then complemented, as needed and where relevant, by the expertise of OIL's own investment managers, the Impact and Sustainability team, and by external consultants. This information consists of a standardised set of KPIs, as well as qualitative factors like health and safety, adherence to applicable laws and regulations, engagement with local communities, and biodiversity metrics, whenever relevant.

- Carbon footprint indicators are measured in adherence to the industry standard Greenhouse Gas (GHG) Protocol, utilising an operational control approach. The calculations of emissions are verified by third-party consultants.
- OIL may need to resort to estimates or proxy data where data is unavailable. The proportion of estimates and proxies used varies depending on investee company but overall, use of estimates and proxies are infrequent and constitute only a minority of the data used. Estimate and proxies are still relied on for the funds' carbon emissions, especially when calculating Scope 3 emissions. A breakdown of the percentage of estimates and proxies used for carbon footprint is provided in the annual report for each managed fund. When estimated data is used, it is based on reasonable assumptions and appropriate comparators.

Engagement policies

OIL recognises the importance of active stewardship in responsible investment and is dedicated to engaging with stakeholders relevant to its portfolio of assets under management, ensuring each fund continues to contribute to its sustainability objectives. OIL seeks to establish long-term value for its funds and its portfolio of relevant stakeholders through active management of its assets.

OIL's care home investments provide capital to fund the development of quality care homes which mean that more traditional engagement or voting policies associated with holding publicly listed shares are not relevant. While the Manager does not follow a traditional engagement policy, the nature of investment means that the team is involved in setting the strategy, financial and non-financial performance and risk, capital structures, social and environmental impact and corporate governance as well as appointment of developers and the care home operators of the assets who are actively engaged with to ensure appropriate decision-making oversight.

OIL work with a range of external service providers to manage the portfolio of investments, for example construction managers, operations and maintenance providers, and external asset managers. To address any adverse impacts on a continuous basis, OIL actively engage with service providers, provide decision making oversight and carry out an annual review of care home operators and this includes reviewing policies in relation to human rights, anti-corruption and anti-bribery. This seeks to ensure that strategies to reduce any new adverse impacts are put in place in a timely manner.

Adverse impacts associated with health and safety are assessed and monitored continuously by the investment team and 93rd party consultants who provide additional oversight and support. Where developers fail to meet the standards set, OIL will use its contractual rights to first look to improve the service provision, and if that is unsuccessful, terminate the service provider.

All investors are provided comprehensive reports on the performance of their funds. Every investor report includes related ESG information and KPIs.

References to international standards

OIL is investing in the people, ideas, and industries that can change the world. Broadly these investments target three themes, building a sustainable planet, empowering people, and revitalising healthcare. We are currently in the process of setting targets in line with the Science Based Targets Initiative (SBTi).

OIL maintains a list of relevant responsible investment partner organisations and memberships which create potential synergies and provide valuable insights and benefits. OIL is currently a member or supporter of the following organisations:

- United Nations Principles for Responsible Investment ("UN PRI")
- Operating Principles for Impact Management (Impact Principles)
- Global Real Estate Sustainability Benchmark (GRESB)
- B Corporation

We also utilise the following data sources:

- EU Taxonomy
- IRIS+
- Sustainability Accounting Standards Board (SASB)

Historical comparison

This is the first reporting period. No historical data is available.