

G10 Capital Limited

30th June 2024

Task Force on Climate-related Financial Disclosures ("TCFD") Entity Disclosure

TCFD was established by the Financial Stability Board to help identify the information needed by market participants to appropriately assess and price climate-related risks and opportunities. The FCA's ESG Handbook implemented a number of the requirements linked to TCFD as part of the UK Government's roadmap towards mandatory climate-related disclosures.

Under the FCA's rules there is an Assets Under Management ("AUM") based threshold associated with this obligation of £5bn of AUM, which must be calculated on a rolling three year average. Exceeding this threshold brings FCA authorised and regulated firms performing certain activities into scope of TCFD based Disclosure requirements. In conjunction with the assessment of AUM, the activities which bring firms into scope include that of being a portfolio manager, sub-threshold Alternative Investment Fund Manager ("AIFM") or a full scope AIFM.

Firms which are in-scope based on the above analysis, must prepare and publish **TCFD Entity Reports** and make **TCFD Product Reports** available by the 30th of June, of each calendar year.

TCFD Product Reports are required with respect to products, such as the following:

- Closed-Ended Investment Funds whose primary objective is investing and managing assets in property of any description with a view to spreading risk; and
- Unauthorised Alternative Investment Funds ("AIF") which are listed on recognised investment exchanges.

In this context, G10 Capital Limited ("G10" or the "Firm") is a full scope Alternative Investment Fund Manager ("AIFM") with MiFID 'top up' permissions, authorised and regulated by the Financial Conduct Authority ("FCA") (Firm Reference Number, "FRN", 648953).

TCFD based Disclosures for FCA authorised and regulated firms can take the form of public website-based disclosures as well as on-demand disclosures for AIFs which are not listed. The Firm must take all reasonable steps to publish its TCFD Entity Report and its public TCFD Product Reports in a way that makes it easy for prospective readers to locate and access, including, as a minimum, by making the most recent of these reports available in a prominent place on the main website for the business of the Firm. In the FCA's view prominence may be achieved by adding hyperlinks to the reports which are accessible via the landing page of the main website for the business of the Firm. ***This report is located alongside the Firm's other regulatory disclosures on its website.***

Assessment of G10 with respect to the scope of the Disclosure requirements

In the course of its business and its FCA authorisation, G10 provides:

- A regulatory hosting platform, as a Principal Firm, for a number of Appointed Representatives ("ARs");
- Discretionary investment management on behalf of clients ("Clients"), where the Firm is appointed as portfolio manager or delegated portfolio manager to funds; and
- Alternative Investment Fund Manager ("AIFM") services to Alternative Investment Funds ("AIFs").

G10's business model can be characterised as follows in the context of the Disclosure requirements under TCFD:

- The Firm is an AIFM or a discretionary manager to portfolios managed by small investment management teams ("Investment Teams") acting under its authorisation and working independently of each other. These Investment Teams are at an early stage of their growth towards forming separately authorised firms in their own right;
- Portfolios are often managed for short periods for the above reason. It is generally not appropriate to impose a standardised approach to data collection to such Investment Teams; and
- The investment strategies managed by the Investment Teams are also diverse, such that it is not possible to have a single approach that covers all situations or approaches.

G10 is in-scope of the Disclosure requirements above based on the AUM threshold. Therefore, G10 needs to complete periodic reports regarding itself (i.e. this Disclosure) and Product Reports are also required for all listed funds along with on demand reports for any closed ended funds (also referred to as "Private Funds").

The TCFD Entity Report and G10's Obligations

The TCFD Entity Report (i.e. this Disclosure) in respect of the Firm's investment management activities is required to explain how the Firm takes into account climate-related risks when managing investments. The following areas need to be covered: Governance; Strategy; Risk Management; Targets and Metrics.

As noted above, the diversity of the investment strategies, the stage of growth of the Investment Teams, the independence of the Investment Teams from each other and the duration over which many of the Investment Teams operate within the Firm's infrastructure make a harmonised approach to TCFD impractical. Each Investment Team, therefore, articulates its approach separately, where appropriate, in Product Reports.

TCFD Product Reports

TCFD Product Reports in respect of the investment products managed by the Firm need to disclose the core mandatory carbon emissions and carbon intensity metrics, along with scenario analysis.

As noted, the Product Reports must be made for all listed funds where G10 is AIFM and be made available on demand for any Private Funds, to investors who demand product level reports and underlying data, provided the requesting investors themselves have a related financial disclosure obligation, with respect to TCFD or as a result of other legal or regulatory requirements. Private Funds do not need to publish this information publicly.

TCFD Product Reports must include a number of core metrics and a set of additional metrics, which are set out below. The Firm must ensure the TCFD Product Report clearly explains the methodology used in providing such metrics and ensure that the mandatory metrics are at least as prominently presented.

Core metrics:

- Scope 1 and 2 greenhouse gas emissions;
- Scope 3 greenhouse gas emissions;
- Total carbon emissions;
- Total carbon footprint; and
- Weighted average carbon intensity.

G10 is required to calculate the metrics using the calculations contained in the TCFD Annex and take into account the TCFD Guidance on Metrics, Targets and Transition Plans as relevant.

The Product Reports must be supported by:

- Contextualised information such as explaining how the metrics should be interpreted and their associated limitations (for example, if the Firm has used assumptions or proxies in order to generate this information);
- Historical time series for comparison (in subsequent years in which the Product Report is prepared); and
- A narrative of any material deviations from the Firm-level approach.

Additional metrics: G10 must “as far as it is reasonably practicable” include the following calculations in each TCFD product report:

- Climate Value-at-Risk; and
- Metrics that show the climate warning scenario with which a product or portfolio is aligned, such as an implied temperature rise metric.

Scenario analysis: G10 is additionally required to include a scenario analysis in the Product Reports. This includes:

- A qualitative summary of how climate change is likely to impact the relevant products’ assets, under orderly, disorderly and hothouse world scenarios and a discussion of the most significant drivers of impact; and
- Where financial products have concentrated exposure or higher exposure to carbon-intensive sectors, the TCFD Product Report must also include a quantitative analysis of the three transition scenarios.

Links to the Product Reports published by the five listed investment companies to which G10 was AIFM to as of 31st December 2023, and in the interests of completeness as of 30th June 2023, can be found below:

- **The PRS REIT plc:** Please refer to the “ESG Report 2023” dated 31st December 2023 and the “Environmental, Social and Governance” section of the Annual Report & Account dated 30th June 2023, both of which can be found on the following link [2023 Reports - The PRS REIT](#)
- **Urban Logistics REIT plc:** Please refer to the “Sustainability Report” which can be found in the REIT’s Annual Reports & Accounts to 31st March 2024 on the following link [Results, Reports & Presentations | Urban Logistics \(urbanlogisticsreit.com\)](#)
- **Life Science REIT plc:** Please refer to the “Sustainability Report” in the REIT’s Annual Report & Account to 31st December 2023 [Investors – Life Science REIT](#)
- **Warehouse REIT plc:** Please refer to the “Environmental, Social and Governance- TCFD Disclosure” section of the Annual Report & Accounts to 31st March 2024, can be found on the following link [Investors - Warehouse REIT](#)
- **Chrysalis Investments Limited:** Please refer to the “Environmental, Social and Corporate Governance Report” in the Annual Reports and Accounts to 30th September 2023 on the following link [Chrysalis-Investments-Limited-Annual-Report-2023.pdf \(chrysalisinvestments.co.uk\)](#)