

Consumer-facing disclosures

UK Sustainability disclosure and labelling regime

Investment	Gresham House Asset Management Limited
Manager	5 New Street Square
	London
Product name	Gresham House Energy Storage Fund plc
Date disclosure	07.05.2025
was last revised	
Product identifier	213800MSJXKH25C23D82
goal	Gresham House Energy Storage Fund plc (the "Company") invests in a portfolio of utility-scale Energy Storage Systems ("ESS"), which utilise batteries across Great Britain and the Overseas Jurisdictions. The Company's aim is to invest in ESS assets that facilitate the transition towards a more resilient and lower carbon energy system by storing excess energy that would otherwise be lost (the "Sustainability Objective"). There is no anticipated material effect on the financial risk and return of the Company as a result of the Manager applying the Sustainability Objective. The delivery of ESS has the potential to cause social and environmental impacts: Resource extraction for battery materials could result in habitat destruction, water pollution and high carbon emissions Fire risk causing environmental contamination and air quality issues Unsafe disposal of batteries as they reach the end of life Emissions generated from legacy assets including gas engine technology Human rights and supply chain concerns when sourcing materials Community impacts due to fires or leakage of toxic material for local residents
	 Community conflicts due to the size of ESS projects or due to assets being unsightly to local residents
Label descriptor	The Company is a UK Sustainability Focus fund: 'invests mainly in assets that focus on
	sustainability for people or the planet".
Sustainability approach	The Company will invest a minimum of 80% of the gross value of the Company's assets in line with the Sustainability Objective. The Company may also invest up to 20% in cash, other investments and instruments that will not be aligned with the Sustainability Objective but otherwise fall within the Investment Policy, provided that they do not conflict with the Sustainability Objective. Examples include:
	 Cash or cash equivalents as more particularly described in the Company's investment policy. A legacy asset that uses gas engine technology, primarily to ensure electricity supply security by providing reliable sources of capacity under a Capacity Market contract. This asset could help prevent a system blackout in case the electricity system experiences a shortage of generation. The Company is committed to not investing in equivalent assets going forward. The Manager's Investment Team employs a proprietary ESG Decision Tool (the "Tool") to evaluate each investment's contribution to the Sustainability Objective. This ensures that each investment: Demonstrates a clear contribution to the Sustainability Objective, measured by the capacity of energy storage in MW and MWh. Supports the transition to a low-carbon energy system, by enabling greater penetration of renewable energy sources and reducing curtailment.

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- Does not have fossil fuel generation capacity.
- Aligns with regulatory and industry best practices, including environmental permitting, responsible sourcing of battery materials, and end-of-life management.

For an asset to contribute to the Sustainability Objective, it must derive at least 80% of its revenue from activities directly related to ESS that support the transition to affordable, reliable, sustainable and modern energy systems, in alignment with UN Sustainable Development Goal (SDG) 7.

For ESS Projects that are under construction, construction phase risks are managed through consistent dialogue with and oversight of our chosen construction partners. The Manager will project manage the construction process and will monitor the Engineering, Procurement and Construction and Balance of Plant contractors at a minimum of a monthly basis. The Manager will be the client under Construction, Design and Management Regulations and so will be monitoring ESS Projects closely to ensure that all assets within the Company meet the Sustainability Objective.

For ESS Projects that have been constructed, once the Take Over Certificate is issued, the Manager's asset management team will then take on responsibility for monitoring the ESS Project for the rest of the asset's life. There will be an O&M contractor to perform day to day O&M activities and monthly reports will be issued by it to the Manager.

The energy stored in battery storage sites is managed by a specialist third-party company under an optimisation contract who continuously monitor the battery system in real time to ensure it operates safely and within its agreed limits. If they detect any issues or anything that could pose a risk to the site, they will immediately inform the Manager's asset management team. The management team will then work directly with the site's maintenance provider to resolve the issue as quickly as possible, ensuring the battery continues to operate smoothly and safely.

Sustainability metrics

The sustainability related key performance indicators ("KPIs") that the Company measures, monitors and reports on are:

- Percentage of gross asset value invested in assets aligned with the Sustainability Objective
- Operational ESS capacity (MW)
- Operational ESS capacity (MWh)
- ESS capacity under construction (MW)
- ESS capacity under construction (MWh)

Operational assets are those that have reached site energization and operational ESS capacity (MW) is the maximum power export of these assets at any one time to the National Grid (or equivalent). Operational ESS capacity (MWh) is the maximum volume of energy these assets have the capability to store.

ESS capacity under construction (MW) is the maximum power export of the assets under construction at any one time to the National Grid (or equivalent). This includes both the construction of new assets and upgrades to existing assets. This measurement indicates potential capacity once under construction assets are operational, meaning this metric will shows the pipeline of investment into ESS. ESS capacity under construction (MWh) is the maximum volume of energy the assets under construction have the capability to store. This includes both new assets and upgrades to existing assets.

Further details

The pre-contractual disclosure can be found in the Investor Disclosure Document: https://greshamhouse.com/real-assets/energy-transition-investment/gresham-house-energy-storage-fund-plc/

Gresham House Sustainable Investment Policy
Energy Transition Sustainable Investment Policy