Stewardship Code Report 2026

Reporting period: 1 January to 31 December 2025

Gresham House Asset Management Limited (GHAM)

Stewardship Code
Report 2026

Reporting period: 1 January to 31 December 2025

Gresham House Asset Management Limited (GHAM)

Contents

Stewardship Code Report 2026: Reporting period: 1 January to 31 December 2025

1. Foreword from our Chief Executive

Good stewardship is central to how Gresham House invests on behalf of its clients. It reflects our approach to managing assets actively, responsibly and with a long-term perspective on value creation.

As a specialist alternative asset manager, we invest in asset classes where active ownership and capable responsible management directly influence financial performance. These include natural capital, energy transition, sustainable infrastructure, real estate and strategic equity. Across each of these strategies, stewardship is embedded in how we manage risk, engage stakeholders and deliver outcomes for our clients.

Our primary purpose remains to deliver long-term financial returns to achieve the fiduciary responsibilities of our clients while supporting the transition to a more sustainable and resilient economy. We believe appropriate stewardship is fundamental to achieving this and continue to evolve our approach in line with regulatory expectations and market best practice.

This report is our first submission under the UK Stewardship Code 2026. It reflects our commitment to outcome-focused, evidence-based stewardship across our investment platform.

Tony Dalwood
Chief Executive, Gresham House

2. About this report

This report has been prepared by Gresham House Asset Management Limited (GHAM), the FCA-regulated investment management entity. It satisfies the requirements of the UK Stewardship Code 2026 and covers the period from 1 January to 31 December 2025.

The report is structured as follows:

- **Part one: Policy & context disclosure**
- **Part two: Activities & outcomes**

This report has been reviewed and approved by the GHAM Board.

Our full suite of sustainable investment policies, including our Engagement and Voting Policy, is published at greshamhouse.com/sustainable-investing.

3. About Gresham House

Gresham House is a specialist alternative asset manager investing across natural capital, energy transition, sustainable infrastructure, real estate and strategic equity. Our strategies are aligned with long-term structural themes including decarbonisation, nature restoration, resilient infrastructure, and the growth of smaller companies. Sustainability considerations are embedded across our investment processes and are central to long-term value creation.

Assets under management by strategy (31 December 2025)

Strategy	AUM
Natural Capital (Forestry)	£3.7bn
Energy Transition	£2.7bn
Sustainable Infrastructure	£0.9bn
Real Estate	£1.0bn
Strategic Equity (Public & Private)	£2.4bn
Total	£10.7bn

Regulatory context

Gresham House Asset Management Limited is authorised and regulated by the Financial Conduct Authority. GHAM is classified as a Collective Portfolio Management Investment Firm regulated under AIFMD and as a MIFIDPRU Investment Firm. Regulated subsidiaries include Gresham House Investment Management (Guernsey) Limited, which acts as authorised AIFM for the BSIF funds, and Gresham House Asset Management Ireland Limited, authorised as an AIFM in Ireland.

Gresham House
Specialist investment

Part one

Policy & context

This section sets out our organisational context, investment beliefs, governance framework, policies and processes, approach to conflicts of interest, and how we communicate with clients on stewardship matters.

A. Organisation, investment beliefs and stewardship approach

Our investment beliefs

Our approach to investment is grounded in four core beliefs that shape how we design strategies, assess risk and manage assets on behalf of our clients.

Long-term capital creates long-term value

Alternative assets require patient capital and active ownership. We build investment strategies around structural, multi-decade themes because that is where we can generate durable, differentiated returns. Short-termism is not compatible with the asset classes in which we specialise.

Sustainability and financial performance are complementary

We do not treat sustainability as a constraint on returns. In the asset classes where we operate, sound environmental and social management is a direct driver of long-term investment value. A forest managed well for biodiversity is more resilient to physical climate risk. A company with strong governance is a lower-risk, higher-quality investment. We continue to believe and demonstrate that there is no need to compromise on target financial returns in our areas of sustainable investing.

Active ownership drives better outcomes

Across all our strategies, we invest to be involved, as board members, as engaged shareholders, as active forest managers, as long-term development partners. Stewardship is not oversight from a distance; it is embedded in how we manage assets throughout the investment lifecycle.

Evidence and accountability matter

We are committed to measuring what we do and reporting honestly on what we achieve. Our sustainability reporting is designed to be useful and defensible. Where outcomes fall short of objectives, we say so and explain what we are doing differently.

Our definition of stewardship

We adopt the UK Stewardship Code 2026 definition: stewardship is the responsible allocation, management and oversight of capital to create long-term sustainable value for clients and beneficiaries.

> *In practice, this means integrating ESG considerations systematically into investment decision-making; engaging actively with investee companies and counterparties; exercising ownership rights purposefully and on evidence; and reporting transparently on activities and outcomes.*

Our stewardship approach by asset class

Natural Capital - Forestry

As the largest commercial forestry manager in the UK, our stewardship of forestry assets is direct and operational. Gresham House manages 190,500 hectares of forestry across the UK, Ireland, Australia and New Zealand. Stewardship is embedded through the Gresham House Forest Charter, our publicly committed, verifiable standards covering climate, biodiversity, community engagement and forest certification, and through ongoing engagement with forest managers, landowners, communities, regulators and certification bodies. Gresham House has service level agreements and standard conditions with our forestry managers which set out expected standards of forest management ensuring all services and work activities are provided in line with the UK Forestry Standard, where this is relevant to the country, and industry good practice.

Energy Transition

Our Energy Transition strategy invests in wind, solar and battery energy storage systems. We work closely with developers, contractors, landowners and local authorities through the development and operational lifecycle, ensuring habitats are protected, communities benefit through structured engagement and community benefit funds, and supply chain sustainability risks, including those related to critical minerals, are actively managed.

Sustainable Infrastructure

Through our British Sustainable Infrastructure Fund (BSIF) strategies, we take majority or significant minority equity stakes in platform companies addressing key environmental and social challenges. We typically take a board seat and maintain intensive engagement with management throughout the holding period. Every new portfolio company is required to adopt a Sustainability Commitment Document, a Sustainability Policy and a DEI Policy as conditions of investment.

Real Estate

Our UK housing and Irish commercial property strategies focus on affordable, energy-efficient residential and commercial assets. Stewardship activities include engaging with residents, occupiers and housing associations, progressing EPC upgrade programmes, integrating green lease provisions and monitoring environmental performance through the investment lifecycle.

Strategic Equity - Public Equity

Our UK and Irish public equity strategies apply a private equity approach to public market investing, with deep fundamental research, concentrated portfolios and active engagement with management teams. We exercise voting rights across all holdings and use a structured six-stage engagement process to monitor, escalate and report on engagement outcomes.

Strategic Equity - Private Equity

Through our Gresham House Ventures and Baronsmead VCT platforms, we are active investors in early-stage and lower mid-market private companies. We conduct annual ESG surveys across the private equity portfolio, use outcomes to direct engagement, take board seats where possible, and implement 100-day post-investment plans to address material risks identified in due diligence.

B. Governance and resources

Board oversight

Sustainability oversight, including stewardship, is led by the Board, which retains ultimate accountability for sustainability-related risks, opportunities and long-term value creation. The Board integrates sustainability into its oversight of corporate strategy, investment planning, risk and performance management, and receives regular updates on sustainability matters including climate and nature-related risk assessments.

The Group Management Committee (GMC), comprising the CEO, CFO, Managing Director, Chief Legal Officer and Chief Operating and Technology Officer, ensures that sustainability is operationalised across the business, working closely with the Investment Committees, which have a direct responsibility at strategy and portfolio level, and review investment proposals to ensure sustainability is embedded into investment decision-making.

Governance committees

Committee	Stewardship role
Board of Directors	Ultimate oversight of sustainability strategy, risk and stewardship reporting
Group Management Committee	Operational delivery of sustainability and stewardship commitments
Investment Committees (by division)	ESG integration in investment decisions; review of ESG findings in all investment proposals
AIFM Risk Committee	Quarterly review of ESG-related risks across the portfolio; chaired by Group CFO
Audit Committee	Oversight of risk management processes including ESG and climate
Remuneration Committee	Reviews sustainability objectives embedded in management performance targets
Net Zero & Nature Steering Committee	Strategic direction on net zero and nature strategy across the Group
Sustainability Executive Committee	Sustainability governance forum responsible for aligning and driving the delivery of the sustainability agenda across the Group

The Sustainable Investment team

The Sustainable Investment (SI) team serves as Gresham House's centre of excellence for stewardship and ESG integration, providing the tools, frameworks and subject-matter expertise needed to embed sustainability into decision-making, stewardship and reporting across all strategies.

Integration across investment teams

Sustainability is integrated across the investment lifecycle, from due diligence and asset selection to ongoing risk management and stewardship. Our approach ensures that investments are resilient, aligned with long-term sustainability goals, and contribute to real-world environmental and social outcomes.

We are committed to embedding sustainability across our investment approach, ensuring that our assets contribute to positive environmental and social outcomes. This includes advancing climate resilience, promoting biodiversity, and supporting nature-based solutions. Through proactive risk management and ESG integration, we aim to uphold high sustainability standards across our investment portfolio.

Each investment division has a responsibility to integrate and embed sustainability. The SI team provides frameworks, tools and challenge; the investment teams own day-to-day stewardship of their assets. As part of our commitment to sustainability, all employees are required to include sustainability objectives in their annual goal setting, reinforcing stewardship as a firm-wide commitment.

C. Policies, processes and review

Sustainable Investment Framework

Our Sustainable Investment Framework is built around ten ESG themes representing the most material sustainability factors across our asset classes: natural capital; climate change and pollution; governance and ethics; community care and engagement; waste management; marketplace responsibility; supply chain sustainability; employment, health, safety and wellbeing; commitment to sustainability; and risk and compliance.

The framework guides ESG analysis across all investment divisions, ensuring consistency in how we identify, monitor and report on ESG risks and opportunities. The ten themes also underpin our proprietary ESG Decision Tools, tailored by asset class, which structure ESG analysis at due diligence and provide the basis for ongoing monitoring post-investment.

Sustainable investment policies

Gresham House's sustainable investment policies outline our principles, expectations, and approach to managing ESG risks and opportunities. These policies apply at both Group and asset-class levels and provide consistent foundation across all investment strategies.

We adopt a structured process for policy development, review, and implementation to ensure alignment with evolving market standards, regulatory requirements, and stakeholder expectations. Regular reviews ensure our policies remain relevant and effective in guiding responsible investment practices.

Policies in place as at 31 December 2025 include:

- Group Sustainable Investment Policy
- Engagement and Voting Policy
- Asset-class-specific sustainable investment policies covering Forestry, Real Estate, Energy Transition, Private Equity, Public Equity and Sustainable Infrastructure
- Conflicts of Interest Policy
- Modern Slavery Statement (published annually under the UK Modern Slavery Act 2015)

Review and assurance

Sustainability data and performance indicators undergo regular internal review by investment teams and the SI function. We do not currently seek external third-party assurance of sustainability disclosures, though we continue to assess the feasibility and value of doing so as our reporting matures.

Risk management

Effective risk management is a core component of our business strategy and corporate culture.

At Gresham House, we maintain a comprehensive, structured risk management framework that ensures sustainability-related risks are integrated across all levels of decision-making and investment practices.

Governance of risk

The Group Board has ultimate responsibility for risk management, including setting the Group's risk appetite and strategic direction. Risk oversight is supported by the Group Audit Committee, which reviews risk management processes, challenges risk owners, and ensure appropriate mitigation actions are completed.

Sustainability-related risks, including climate and nature dependencies and impacts, are fully embedded in this framework. The Group Risk Register catalogues key risks and serves as a critical tool to evaluate materiality, likelihood, impact, and controls. "ESG and climate change" is designated a Level 1 strategic risk, ensuring Board-level visibility and accountability.

The First Line of Defence (1LOD), our investment teams, hold day-to-day responsibility for identifying and managing risks, including sustainability risks, throughout the investment lifecycle.

The Second Line of Defence (2LOD), including the central Risk and Compliance teams, provide oversight and challenge. This includes participation in executive level forums such as the AIFM Risk Committee, chaired by the Group CFO.

Quarterly risk reports from portfolio managers and risk owners are submitted to the Risk Management Function and reviewed by the AIFM Risk Committee.

ESG and climate-related risk oversight

The ESG and climate-related risk category encompasses both systemic transition risks, such as regulation, reputation, or market shifts, and physical risks arising from climate change, such as extreme weather events, biodiversity lost, or water stress. We formally assess ESG-related risks, including those linked to human rights, climate and nature, at four key stages:

1. **New product development** – ESG risks are considered during the product design process via the Group's due diligence checklist, which is reviewed and approved by the Group Management Committee.
2. **Investment decision-making** – ESG risks must be considered and documented in investment proposals, supported by tools such as the GH ESG Decision Tool and formally approved by the Investment Committee.
3. **Ongoing portfolio monitoring** – ESG risks are reviewed quarterly at portfolio meetings and by the AIFM Risk Committee. Where required, sustainability disclosures are integrated into quarterly portfolio and risk reports for SDR and SFDR-labelled funds.
4. **Annual stress testing** – Long-term scenario analyses are used to stress test climate and nature risks. Results inform portfolio reviews and are escalated to risk oversight bodies.

Mitigation and controls

Gresham House adopts tailored mitigation strategies based on the nature and materiality of the risks identified:

- Due diligence and monitoring: ESG risks, including those related to human rights and environmental impacts, are identified pre-investment and actively managed throughout the investment lifecycle.
- Modern slavery controls: Gresham House publishes an annual Modern Slavery Statement in accordance with the UK Modern Slavery Act 2015.
- Supply chain checks in Energy Transition: Technology providers complete annual questionnaires on labour rights and practices and responsible sourcing. New battery storage projects use lithium iron phosphate (LFP) to reduce reliance on cobalt from high-risk geographies.
- Active ESG risk dialogues: Portfolio managers engage with stakeholders to identify, monitor, and act on material ESG issues, including those affecting biodiversity, water resources, and climate change.

D. Conflicts of interest

Our approach

The effective identification and management of conflicts of interest is integral to our stewardship responsibilities and our obligations to clients. Our Conflicts of Interest Policy provides clear guidance on how conflicts are identified, recorded and addressed across the business.

A conflict of interest is defined as a situation where Gresham House, or a related party, is:

- Likely to make a financial gain, or avoid a financial loss, at the expense of a client.
- Has an interest in the outcome of a service provided to a client or a transaction carried out on behalf of a client, which differs from the client's interest in that outcome.
- Has a financial or other incentive to favour, or compete with the interests of, one Gresham House fund, investor, or group of investors over another.
- Carries on the same business as a client.
- Receives or will receive an inducement in relation to a service provided, beyond the standard commission or fee.
- In acting for one client, compromises its actions or creates a perception that its actions may be compromised in acting for another client.

Identifying and managing potential conflicts of interest

Conflicts of interest may arise in various aspects of our business, including but not limited to:

- Investment allocation – Ensuring the fair treatment of all investors when allocating investment opportunities across funds and mandates.
- Stewardship and engagement – Managing conflicts that may arise when engaging with investee companies where we have ownership interests, ensuring that engagement and voting decisions are made independently and in clients' best interests.
- Personal Account Dealing and Inside Information – Ensuring employees adhere to strict controls to prevent conflicts between personal interests and professional responsibilities.
- Service provider relationships – Managing potential conflicts arising from relationships with third-party service providers, ensuring objectivity in selection and oversight.
- Board and governance structures – Preventing undue influence in decision-making processes, ensuring that appropriate independence is maintained across governance functions.
- Outside business interests – Ensuring that employees' external business activities do not conflict with the interests of our clients.
- Gifts and entertainment – Managing the acceptance of gifts or entertainment to prevent any undue influence on decision-making.
- Inducements – Managing any benefits received from third parties to ensure they do not conflict with client interests.

Our Conflicts of Interest Policy, which is reviewed and updated regularly, provides clear guidance on how conflicts are identified, recorded, and addressed across these areas.

Governance of conflicts

Conflicts of interest are managed through structured oversight and control mechanisms to ensure transparency and compliance with regulatory obligations:

- Board and committee oversight – The Board and relevant committees, including compliance and risk functions, oversee conflict management processes, ensuring that policies are upheld.
- Conflicts Committee – A dedicated committee, comprising senior representatives from compliance, legal, finance, and operations, reviews conflict matters brought to its attention and ensures fair treatment of all clients.
- Conflicts Register – A formal register is maintained to document identified conflicts and the steps taken to mitigate or disclose them. The register is reviewed regularly by the Conflicts Committee.
- Employee training and awareness – Employees receive regular training to ensure awareness of conflicts and adherence to internal policies and regulatory expectations.
- Disclosure and transparency – Where conflicts cannot be fully mitigated, they are disclosed to relevant stakeholders, ensuring informed decision-making and maintaining trust.

We recognise that conflict management is an ongoing process, and we continually assess the effectiveness of our policies and controls. This ensures our approach remains aligned with industry best practices and evolving regulatory expectations.

- Regular policy reviews – Policies are reviewed periodically to ensure they remain effective and responsive to emerging risks.
- Independent compliance oversight – Our compliance function provides independent scrutiny and oversight to enhance conflict management procedures.
- Commitment to fairness and integrity – Above all, our approach prioritises fair outcomes for investors and stakeholders, reinforcing trust in our investment and stewardship processes.

Case study: Managing conflicts in a Gresham House fund-into-fund investment

During 2025, a Gresham House forestry fund under management considered making an investment into a Gresham House renewable energy fund that was open for subscription. The proposed allocation was assessed by the fund manager as value-accretive and consistent with the forestry fund's investment objectives, and the fund already held approved allocations to comparable Gresham House renewable energy entities.

The transaction represented an investment by one Gresham House fund into another Gresham House fund, giving rise to a potential conflict of interest. Three specific conflicts were identified and documented: price negotiation; acquisition and origination fees; and ongoing management fees.

Each conflict was addressed through a defined mitigant. On price, no conflict arose in practice, as the renewable energy fund was being offered at a fixed price via an Information Memorandum available to all eligible clients on equal terms; no information barriers were therefore required. On fees, the origination fee otherwise chargeable on the subscription was waived, with only the standard acquisition fee applied. On management fees, a rebate arrangement was put in place consistent with the forestry fund's existing investments in Gresham House renewables entities, ensuring limited partners were not subject to duplication of fees.

The transaction was subject to internal Investment Committee and compliance approval prior to proceeding. Under the terms of the limited partnership agreement, the limited partners' Advisory Committee was also required to consent to the investment. All approvals were obtained before the transaction completed.

The case illustrates how Gresham House identifies, documents and resolves conflicts arising from investments by one Gresham House fund into another, with mitigants structured to protect limited partner interests and ensure fair treatment across funds.

E. Dialogue with clients and beneficiaries

Client communication on stewardship

Effective client communication is a core component of our stewardship responsibilities. We provide regular, substantive updates on stewardship activities at both firm and strategy level, and seek alignment between our asset management practices and clients' own stewardship and investment policies.

Stewardship-related client communication takes place through:

- Regular fund reporting and annual strategy updates
- Investment update calls with fund managers and portfolio teams
- Annual stewardship meetings where invited by clients
- Site visits to bring assets to life
- Bespoke ESG metrics, engagement updates and stewardship case studies provided on request

Feedback and continuous improvement

We evaluate the effectiveness of our stewardship communication through direct engagement, group discussions and client feedback. Feedback informs improvements to our annual reporting standards and transparency. Our clients are increasingly active in developing their own ESG integration and stewardship practices, and we welcome this as an opportunity for genuine collaboration.

Case study: client stewardship engagement: site visit, South Scotland forestry assets

In March 2025, Gresham House hosted representatives from NGS Super, an Australian superannuation fund, on a structured site visit to forestry assets in South Scotland. The visit formed part of NGS Super's due diligence process in connection with a potential commitment to the Gresham House Sustainable International Forestry Fund, and was designed to provide direct, operational insight into how sustainable forestry is managed across different stages of the asset lifecycle.

The programme included two contrasting sites. At Tansy Hill, a newly planted site, discussions covered the afforestation process from public consultation and site design through to regulatory approval, natural capital integration and biodiversity enhancement. At Whitelyne, an established forest where live harvesting was under way, the visit illustrated how UK forestry practice has evolved from historic single-age, monoculture approaches towards multi-age, mixed-species design. The group observed harvesting operations directly and discussed the timber sales process, market-responsive deferral of harvesting, and Gresham House's approach to restocking.

The programme was completed with a tour of BSW Timber's sawmill in Carlisle, connecting forest management activity to the downstream timber value chain.

The visit provided a substantive forum for discussing sustainability, governance and operational practice at asset level. It is a clear example of how Gresham House supports clients in assessing stewardship quality through direct, evidence-based engagement rather than documentation alone.

Case study: client stewardship engagement: site visits, Shared Ownership housing, Chippenham

In March and November 2025, Gresham House hosted representatives from Wiltshire Pension Fund on two site visits to its Shared Ownership development in Chippenham, delivered through the Gresham House Thriving Investments housing platform. The visits were designed to give the client direct visibility of construction progress and the practical delivery of their investment at asset level.

The Chippenham scheme will deliver 167 homes across a mix of affordable and open-market tenures on a brownfield site near the town's railway station, with onward transport links to Bristol, Bath, Swindon and London. The two visits allowed Wiltshire Pension Fund to track the scheme's development across the year: in March, foundations had been laid for the initial homes; by November, the first phase was watertight and kitchens were being installed in more advanced plots. First handovers commenced in January 2026.

The visits also provided direct insight into the environmental and community measures in place during construction. These included site cabins powered by solar panels rather than petrol generators, water sprinklers to control dust dispersion, a safe corridor to support the relocation of a badger sett discovered on site, and the delivery of homes to high energy-efficiency standards through solar panels and wastewater heat recovery systems.

Taken together, the visits gave Wiltshire Pension Fund grounded evidence of how the investment is being managed in practice, from construction delivery to environmental stewardship on the ground.

Gresham House
Specialist investment

Part two

Activities & outcomes report

This section sets out our stewardship activities and outcomes for the period 1 January to 31 December 2025, structured around the Principles of the UK Stewardship Code 2026.

Principle 1

Integrating stewardship and investment

> **Principle 1**
> *Signatories integrate stewardship and investment to deliver long-term sustainable value for their clients and beneficiaries.*

Our approach

For Gresham House, stewardship and investment are inseparable. The assets we manage require active, engaged, long-term management to deliver the returns our clients expect. This is not a philosophy adopted in response to regulatory expectation; it is the practical reality of alternative asset management done well.

Our Sustainable Investment Framework and asset-class ESG Decision Tools provide the structure through which ESG considerations are integrated systematically from the earliest stages of sourcing and due diligence through to exit or end of investment lifecycle. Every investment proposal submitted to an Investment Committee includes a full ESG assessment, documenting material risks and opportunities, proposed mitigation actions, and an assessment against applicable UN Sustainable Development Goals.

Sustainability is embedded in our performance management framework. All employees are required to include sustainability objectives in their annual goal-setting, and management remuneration is reviewed by the Remuneration Committee with reference to sustainability objectives alongside financial targets.

Activities and outcomes in 2025

Natural Capital - Forestry

Metric	2024	2025
Trees planted (mn)	8.1	12.5
Carbon sequestered by forests (mn tCO_2e)	2.2	2.4

Case study: forestry engagement: Atlantic rainforest restoration feasibility assessment

In 2025, Gresham House undertook a ten-month feasibility assessment of Atlantic rainforest restoration across a non-discretionary UK forestry portfolio, following a client objective to explore opportunities to improve biodiversity and ecological function within its holdings. The portfolio includes a significant footprint in west Scotland, within a bioclimatic zone favourable to temperate rainforest, a globally rare habitat covering less than 1% of the world's land surface.

Gresham House assembled a project team comprising portfolio managers, natural capital practitioners, forestry managers and a specialist ecological restoration consultancy. The team reviewed the client's holdings against UK nature priorities, identified nationally important habitat types with restoration potential, and assessed the ecological, practical and financial dimensions of intervention across a range of candidate sites.

The output was a suite of intervention options providing the client with a structured basis for decision-making. Each option was assessed against the ecological and biodiversity outcomes achievable, the scope for improving landscape connectivity and reducing habitat fragmentation, and the financial implications of reducing or diversifying productive forestry areas. The client is currently evaluating the options and a decision on next steps is expected in 2026.

Energy Transition

Metric	2024	2025
Renewable energy generation (GWh)	680	601
Operational BESS capacity (MW)	845	1072

Sustainable Infrastructure

Metric	2024	2025
Total hectares supporting nature recovery	794	1,377
Premises passed with “ready for service” full fibre/gigabit-capable broadband	299,039	215,175

Case study: sustainable infrastructure: embedding ESG governance and operational efficiency at Aurem Care

Gresham House worked with Aurem Care, a portfolio of care homes providing residential, dementia and palliative care services across England and Scotland, to integrate sustainability into operational decision-making. The initial focus was on identifying practical efficiency gains in energy and waste management, with the objective of building a broader ESG governance framework across the platform.

To support this, Gresham House introduced a specialist sustainability consultant to conduct a targeted review of energy and waste procurement. An energy tender was run across all sites to align contract end dates, procure at scale and secure renewable electricity, resulting in 100% renewable electricity across the platform and annual gas and electricity savings of more than £200,000. In parallel, waste contracts were consolidated under a single management framework, introducing one point of contact, monthly site-level reporting, compliance oversight and KPI monitoring, delivering a 22% reduction in waste-related costs.

Following these operational improvements, engagement expanded to cover the preparation of a formal ESG strategy and further initiatives on water procurement, waste reduction and staff training. Taken together, the programme delivered annual savings of approximately £230,000, directly improving profitability across the platform. Beyond cost reduction, Aurem Care established a decarbonisation plan and embedded ESG governance within its operating model, strengthening its competitive position in Local Authority tenders where decarbonisation and social value are increasingly weighted criteria. The next phase is the formal rollout of the ESG strategy alongside continued optimisation of energy, water and waste use.

Real Estate

Metric	2024	2025
Operational UK housing EPC B or above (%)	52%	76%
Operational Irish commercial property BER B or above (%)	41%	45%

Strategic Equity - Public Equity

Metric	2024	2025
UK management teams met (%)	100%	100%
ESG engagements	95	98
Irish management teams met (%)	54%	55%

Case study: Public Equity

During its assessment of a manufacturer of natural ingredient extracts, the investment team identified a material physical climate risk linked to the pricing volatility and supply vulnerability of natural ingredients, particularly citrus. The team considered this exposure relevant in the context of increasing climate-related disruption to crop yields and the potential impact on input costs and earnings resilience. This factor was incorporated into the team's broader fundamental analysis and, alongside other considerations, contributed to the decision not to progress the investment opportunity.

Strategic Equity - Private Equity

Metric	2024	2025
Unquoted portfolio companies engaged with (%)	100%	100%
Portfolio company boards attended as member or observer (%)	81%	84%

Case study: Private Equity

Engagement on strategic M&A

Connect Earth is an early-stage data business backed by Gresham House Ventures since 2023. The company operates in the ESG data and analytics market, providing services that help financial institutions understand the sustainability profile of their customer activities. By 2025, the company had achieved material commercial progress, including positive revenue growth demonstrating early validation of its core technology.

Through ongoing monitoring, Gresham House identified a structural shift in the ESG data market: demand was consolidating around solutions directly linked to regulatory reporting requirements, while smaller, standalone providers faced increasing challenges in securing funding and achieving the scale required to compete. This created both a risk and an opportunity for the company. This assessment informed a structured engagement with management to explore strategic options and ensure the long-term sustainability of the business model.

When a proposed merger with a complementary ESG regulatory reporting platform was identified as the most credible path to scale, Gresham House played an active role in evaluating and progressing the transaction. This engagement included:

- Providing constructive challenge on the strategic rationale and testing assumptions against alternative scenarios
- Overseeing a comprehensive due diligence process across commercial, financial, legal, and technical workstreams
- Engaging with co-investors to assess transaction structure and funding requirements
- Supporting management in evaluating merger terms and post-merger integration planning

The merger was agreed in September 2025, structured as a share-for-share transaction. The combined entity has expanded its product offering to span both carbon data analytics and regulatory ESG reporting and has broadened its reach into asset and wealth management client segments.

Key outcomes include:

- Combined annual recurring revenue approximately double that of the standalone business at the time of investment
- A broader, regulation-linked product suite better positioned for continued regulatory tailwinds
- Expanded customer base across institutional financial services sectors
- Strong post-merger client retention, supporting confidence in integration execution

Gresham House
Specialist investment

Principle 2

Market-wide and systemic risks

Principle 2
Signatories identify and respond to market-wide and systemic risks to promote a well-functioning financial system.

Our approach

Gresham House invests across real assets and equity strategies with investment horizons of up to 40 years. Long-duration, illiquid investments are acutely exposed to systemic risks, particularly those arising from climate change, nature loss, and regulatory and market transition. Identifying, assessing and responding to these risks is a core investment competency, not a reporting exercise.

We approach systemic risk management through two primary lenses: physical climate risk, assessed through scenario analysis across our real asset strategies; and nature risk, assessed using the Taskforce on Nature-related Financial Disclosures (TNFD)'s LEAP approach and the ENCORE tool.

Climate and Nature Risk

Our governance approach to climate and nature-related risks is structured around global frameworks including the Taskforce on Climate-related Financial Disclosures (TCFD) and TNFD which support our efforts to strengthen risk management and enhance transparency across our investment platform. In 2025, we launched our integrated Climate and Nature Strategy, committing to align our investment portfolios and corporate business with a net zero emissions future by 2050, consistent with the Paris Agreement.

As interim milestones to 2030, we aim for 75% of AUM to be contributing to real-economy decarbonisation, with 55% of AUM allocated to Climate Solutions.

We recognise that the future climate conditions will have a significant impact on both the risk profile and performance of our investments, as we all present opportunities aligned with the transition to a low-carbon economy. This is particularly relevant for our Real Assets strategies, which typically operate on investment horizons of over 10 years.

To better understand both the impacts and dependencies of our assets on nature, we developed our first TNFD-aligned report in 2025. This report was the first step in analysing across our real assets the range of impacts our assets have on nature. As part of our nature strategy, we plan to analyse this further to understand how we can best support nature through our investments. Gresham House is a member of Finance for Biodiversity, the global network of financial institutions committed to integrating nature into investment strategies.

Policy engagement and consultation

In 2025, we engaged directly with policymakers to help ensure the regulatory environment supports long term sustainable value:

- We responded to HM Treasury’s consultation on the UK Green Taxonomy, supporting the development of a practical, science based and globally interoperable framework. Our response emphasised the importance of alignment with international standards, inclusion of nature-based solutions and the need for a dynamic taxonomy that evolves with market practice and scientific developments.

- Our submission to the Scottish Parliament’s Net Zero, Energy and Transport Committee provided evidence on the implications of proposed lotting mechanisms under the Land Reform Bill for large scale forestry investment.
- We contributed to consultation responses on the integration of greenhouse gas removals into the UK Emissions Trading Scheme, advocating for the inclusion of productive forestry.

Gresham House
Specialist investment

Principle 3

Engagement

> **Principle 3**
> *Signatories engage to maintain or enhance the value of assets.*

Our approach

Engagement at Gresham House is purposeful, planned and evidence-based. It is a means of protecting and enhancing the long-term value of our clients' assets, and of driving the improvements in ESG performance that we believe contribute to that value over time. Our engagement model differs by asset class, reflecting the nature of our ownership and the type of counterparty involved.

Activities and outcomes in 2025

Natural Capital - Forestry

Our primary engagement relationships in Forestry are with forest managers, landowners, certification bodies, host communities, governments and carbon market participants. Engagement is a central feature of our asset management approach: we undertake public consultation for new woodlands involving a change of land use, keep communities informed of significant operational activities and seek to ensure all legitimate concerns are addressed.

Case study: Forestry engagement: advancing biodiversity monitoring in productive forestry

Following an initial trial in 2024 using the Wallacea Trust Methodology, which produced encouraging but preliminary findings, Gresham House undertook a further phase of biodiversity work in 2025 to test whether the observed patterns were robust enough to inform changes in management practice, and whether the approach could be scaled cost-effectively across the portfolio.

The Forestry fund management team worked with Renew Earth (formerly the consulting arm of rePLANET) on two parallel workstreams. First, in-depth statistical analysis of the original pilot datasets tested hypotheses on how biodiversity was distributed across habitat types within forest sites and between contrasting site types, including a mature forest undergoing felling and restructuring and farmland planned for afforestation. Second, a new biodiversity baseline survey was initiated at a mature forest in a different UK bioclimatic zone, both to broaden the evidence base and to trial lower-cost, technology-enabled surveying methods. These included bioacoustic monitors for birds, automated invertebrate trapping stations, and smartphone-based quadrat surveys for floristic diversity.

The evidence review produced substantive findings. Young, productive coniferous forestry was shown to support high levels of biodiversity across multiple taxonomic groups, in some circumstances comparable with or higher than non-forest habitats in south Scotland. The work also identified biodiversity value in previously unmapped habitats within managed forestry estates. The technology-enabled methods produced results comparable with traditional techniques at lower cost per unit area, though scaling across large portfolios remains a challenge.

The findings provide a stronger evidential basis for proactive biodiversity management in productive forests. Expanding the geographic range of sampling is the next step before translating these insights into portfolio-wide management practice.

Energy Transition

Our engagement across the Energy Transition strategy is multidimensional, reflecting the diverse stakeholders involved in the successful development and operation of renewable and energy storage infrastructure. We engage proactively with

- Developers, landowners, contracts to ensure timely delivery and responsible construction
- Equipment suppliers to improve supply chain sustainability and quality standards
- Local authorities and communities to ensure projects align with regional needs and minimise disruption
- Investors and policymakers to support the broader decarbonisation agenda

Sustainable Infrastructure

Engagement in Sustainable Infrastructure is intensive and board-level. We take a board seat in the majority of portfolio companies and maintain a close working relationship with management throughout the holding period, including weekly or fortnightly contact during early stages of ownership or periods of strategic transition.

Case study: Sustainable Infrastructure engagement: embedding workforce development and inclusion at N Family Club

Following investment in N Family Club, Gresham House worked closely with the business to strengthen its workforce strategy, recognising this as critical to long-term performance in the early-years sector. The focus was on improving retention, strengthening service quality and supporting growth in a sector facing low pay, high staff turnover and skills shortages.

This was driven through regular engagement with the Board and management team, focusing on career progression, retention, employee morale, inclusion and the long-term talent pipeline. Priorities were shaped through this ongoing dialogue and implemented across the business. In addition, as part of the initial investment, N Family Club launched the N Partnership, an employee share programme to align nursery managers and educators with the long-term success of the business.

Improving career progression was identified as a key priority. In response, the business introduced apprenticeship pathways from Levels 2 to 7, supported by mentoring and structured learning. More than 150 apprentices are currently in programme, with 94% progressing into permanent roles.

Employee support and inclusion were also strengthened. This included ADHD awareness training for managers, more accessible multi-format internal communications and the introduction of a Learning Experience Platform. N Family Club also maintained 100% Living Wage compliance and 58% Real Living Wage coverage as part of its broader retention strategy.

In 2025, N Family Club was ranked 30th in the UK's Best Workplaces by Great Place to Work, with 80% of employees stating it is a great place to work, well above the UK benchmark. This improved to 14th place in 2026.

Case study: Sustainable Infrastructure engagement: developing carbon governance and a decarbonisation pathway at Elevate

Following investment in Elevate, a full-fibre broadband network providing coverage to >100,000 businesses across the UK via its 700km of fibre network. Gresham House engaged with the company's leadership team to formalise carbon measurement and governance. The objective was to move from limited emissions visibility to a complete carbon management framework covering Scopes 1, 2 and 3, with decarbonisation oversight embedded at Board level.

Through direct engagement with the Board and senior management, Gresham House supported Elevate in completing a full carbon footprint assessment aligned with the GHG Protocol. Carbon measurement was embedded within governance processes and supported by detailed physical data collection across fleet fuel use, electricity consumption and supplier spend. Board-level discussions identified priority decarbonisation levers including fleet electrification, increased renewable electricity procurement (targeting 80% by 2031) and structured supplier engagement to strengthen Scope 3 data quality. Scope 1 and 2 targets align with a reduction pathway of approximately 47% by 2031.

As a result, Elevate established a full Scope 1 to 3 carbon footprint and a clear decarbonisation roadmap. Total emissions in FY25 were 21% lower than FY24, including a 43% reduction in Scope 1 emissions driven by reduced diesel consumption across the fleet. The work also improved transparency for investors and customers and supported updates to internal company policies. The next phase includes continued progress on fleet electrification, expanded supplier engagement, increased renewable electricity procurement and refinement of Scope 3 measurement, with the company progressing toward formal validation of its net zero trajectory.

Case study: Sustainable Infrastructure engagement: strengthening education and community engagement at Environment Bank

Through ongoing engagement with Environment Bank, which creates from scratch and then operates a national network of Habitat Banks across England delivering Biodiversity Net Gain units while supporting rural landowners, Gresham House supported the development of a broader approach to nature restoration extending beyond habitat creation alone. The objective was to strengthen the long-term sustainability of the UK biodiversity market by embedding education, community engagement and green skills development alongside ecological delivery.

Through Board-level dialogue, Environment Bank expanded its community and education activity. The business introduced regular "BNG Breakfast" events bringing together landowners, developers, planning professionals and community representatives to explain how Biodiversity Net Gain works and respond directly to questions. Public access to Habitat Banks was actively managed, with rights of way maintained and monitored to balance ecological protection with community use. To support broader stakeholder engagement, Environment Bank founded the BNG Federation in December 2025, a trade body representing private sector BNG providers.

Structured education outreach was also developed, including school visits near Habitat Banks with interactive sessions on biodiversity and habitat creation. This extended to a partnership with Mount Kelly School in Devon to deliver one of the UK's first large-scale events focused on embedding nature connection within education, alongside research collaborations with students from Lancaster University and Leeds University. As a result, education and community engagement became more embedded within the business's operating model, awareness of BNG increased in local communities, and stronger links were established with schools and universities to support green career pathways. The next phase will focus on strengthening measurement of social value and access outcomes to demonstrate the wider benefits of biodiversity investment to stakeholders.

Real Estate

Across our real estate strategies, stewardship is delivered through active asset management, with a focus on improving environmental performance, enhancing social outcomes for tenants and communities, and maintaining strong governance over assets and partners.

During the reporting period, we have prioritised engagement with managing agents, developers and operational partners to drive improvements aligned with our sustainability objectives. We have continued to strengthen data collection and performance monitoring across the portfolio, supporting more consistent measurement of outcomes.

Case study: Real Estate engagement: solar PV installation at Beaver House, Beach Hill office campus

At Beaver House within the Beach Hill Office Campus in Clonskeagh, Dublin, Gresham House identified an opportunity to improve energy efficiency and reduce grid electricity reliance through rooftop solar PV installation. The project formed part of the fund's broader renewable energy objectives for the Irish commercial property portfolio.

The asset management and property management teams worked with an external installer to design and deliver a 54.60kWp photovoltaic system on the roof of Beaver House. The installation marked the first solar project within the business park, establishing a replicable model for similar upgrades across the wider campus.

The system is now generating renewable electricity on site, reducing operational grid demand and directly benefiting occupiers through lower energy costs. Based on verified export data, the installation delivers an estimated minimum annual saving of approximately 13,600 kWh in grid electricity demand, equating to around 3.2 tonnes of avoided CO_2 emissions per annum. Actual savings are expected to be higher once on-site consumption is accounted for. Performance monitoring is ongoing, with a full operating cycle of data to be used to assess the case for further installations across the campus.

Case study: Real Estate engagement: HVRF system upgrade at No.1 Tuansgate

At No.1 Tuansgate, Gresham House identified an opportunity to improve the building's environmental performance and address a future regulatory risk. The existing VRF air conditioning system relied on higher Global Warming Potential refrigerants, was energy inefficient, and had contributed to a BER rating of D1. Evolving F-Gas regulations presented a further compliance risk if the system remained in place.

The asset management and property management teams worked alongside mechanical and electrical consultants, specialist HVAC contractors and building occupiers to deliver a full upgrade, replacing the existing installation with a lower-carbon Hybrid VRF system. The project was completed as part of the fund's operational asset improvement programme.

The upgrade delivered a significant improvement in the building's energy performance rating, moving from D1 to B3. The new system uses R32 refrigerant, aligned with lower Global Warming Potential requirements, and is expected to deliver more than 80% reduction in CO2 equivalent compared with traditional systems and up to 40% reduction in refrigerant usage relative to the R410A VRF systems it replaced. Long-term operational performance and energy savings data are being collected, with tenant feedback on system performance also being monitored.

Case study: Real Estate: Achieving Fitwel 3 Star certification at The Ironworks, Sheffield

At The Ironworks, a multifamily residential building in Sheffield, Gresham House and BSI Housing portfolio company Rise Homes pursued Fitwel certification for the first time under the Fitwel v2.1 Multifamily Residential Built scorecard. As an as-built assessment, all required measures needed to be fully in place and evidenced at the point of submission. An initial review identified that further targeted action would be needed within a tight delivery window to achieve a 3 Star rating.

Gresham House appointed RLB to undertake the assessment, including an initial review and gap analysis against the scorecard. This identified specific opportunities to strengthen resident health and wellbeing outcomes and improve the overall score. In response, a series of enhancements were implemented: additional drinking water points, water quality and indoor air quality testing, improved lighting to external terrace areas, amenity displays highlighting local services available to residents, provision of defibrillators, and the development of a resident health and wellbeing programme. Existing building policies and procedures were also reviewed and mapped against Fitwel requirements, identifying measures with potential application to other assets in the portfolio.

The Ironworks achieved Fitwel 3 Star certification with a final score of 126, exceeding the 3 Star threshold of 125. The project received a Fitwel award for the highest-scoring Multifamily Residential Built v2.1 assessment of the year. The measures and documentation developed through the process provide a framework for replication across other residential assets.

Strategic Equity – Public Equity

Our Public Equity teams follow a structured six-step engagement process: materialising key engagement topics; planning a strategy tailored to the company; engaging with management with a clear objective; monitoring and responding as progress develops; prioritising the activities with greatest potential impact; and reporting outcomes in annual disclosures.

Case study: Active ownership: Engagement during a hostile takeover approach at Inspired plc

When Inspired plc received a hostile takeover approach from a shareholder holding approximately 30% of the company, Gresham House responded promptly. The investment team considered the offer unattractive and believed it materially undervalued the business. As a substantial shareholder of approximately 30%, and having been engaged with the company on value creation strategy prior to the approach, Gresham House was well positioned to act.

Gresham House objected to the initial hostile bid and publicly supported the Board's rejection, as publicly announced by the company, with the intention of providing a clear signal to other shareholders. The team engaged directly with the Board and its M&A adviser, working to create the conditions for an alternative transaction at a better price.

This engagement helped provide the Board with additional time and leverage in responding to the approach. A competing bid at a significantly higher price was subsequently secured, delivering a materially better outcome for investors. The vote against the initial offer is a matter of public record, and Gresham House's position as a supportive major shareholder was formally acknowledged by the company.

Strategic Equity - Private Equity

Our Private Equity ESG process is built around an annual ESG Survey across all portfolio companies, used both to support companies' own sustainability ambitions and to identify areas where we believe improvements are needed. A 100-day post-investment plan is developed for each new investment to address material ESG risks identified in due diligence.

Case study: Private Equity engagement: strengthening governance over site selection at Spinners

Following Gresham House Ventures' investment in Spinners in June 2025, the team turned its attention to the company's site rollout strategy. Spinners operates three competitive socialising venues outside London and was planning to deploy the investment capital to open additional sites. At the point of investment, there was no formal board structure in place, and an incoming Non-executive Chair was due to join the business shortly after completion.

Given the strategic and commercial significance of site selection decisions, Gresham House Ventures and management agreed to pause any commitments on future locations until the new Chair and board were in a position to establish a formal decision-making framework. This resulted in the introduction of a site report template and a structured presentation and sign-off process, creating clearer accountability and board-level challenge for expansion decisions.

The process involved management, the incoming Non-executive Chair, the wider board and Gresham House Ventures as investor. The strengthened governance framework led to a revised site target profile that differed materially from the pipeline under consideration before investment. The first site selected and progressed under this new process opened in March 2026 and has been the strongest performer in the portfolio to date.

Escalation

Where engagement does not result in desired changes, we have a clear escalation pathway:

- Further engagement with management and non-executive directors
- Formal shareholder letters setting out our position and expectations
- Voting action to influence governance decisions
- Collaboration with other shareholders for coordinated action

- Public statements or AGM interventions
- Exit from the investment where risks remain unresolved and engagement has been exhausted

Collaboration and industry engagement

Where direct engagement offers limited leverage, we undertake collaborative engagement with other investors, industry bodies and policymakers to address systemic risks, influence market standards and support the development of sustainable investment practices. This is particularly relevant in areas such as climate transition, nature-related risks and emerging regulatory frameworks, where outcomes are dependent on coordinated action across the financial system.

Our approach to collaboration is selective and outcome focused. We prioritise initiatives where we can contribute relevant expertise, influence practical implementation, and support the development of standards that are applicable to our asset classes.

During 2025, our collaboration and industry engagement contributed to outcomes in key areas such as shaping market standards and methodologies or advancing industry knowledge and investor understanding. We played an active role in developing practical methodologies and frameworks that support consistent measurement and reporting of sustainability outcomes:

- Through the Energy Storage Network, we led an industry working group to develop a standardised avoided emissions methodology for battery energy storage systems, supporting more consistent reporting across the sector.
- Through our involvement with the International Sustainable Forestry Coalition (ISFC), we contributed to the development of a standardised natural capital reporting framework, in collaboration with the Capitals Coalition and supported by the TNFD.
- Through our participation in Finance for Biodiversity, we contributed to a global investor initiative focused on integrating nature-related risks and opportunities into investment decision-making frameworks.

Case study: Industry engagement: contributing to third-party research on natural capital and sustainability integration

During 2025, Gresham House contributed to two pieces of third-party research designed to support investor understanding of sustainability-related investment themes.

The first was A Guide to Natural Capital Investing, authored by Kana Earth in collaboration with market participants including Aberdeen (formerly abrdn) and Rebalance Earth. Gresham House was a key contributor to the report, which set out the three pillars of natural capital investment, examined the portfolio characteristics of an allocation to the theme, and outlined the structural drivers supporting growth in the asset class. The report was intended to make natural capital more accessible to investors approaching the theme for the first time.

Gresham House also co-commissioned, alongside Federated Hermes, Fidelity International, Mercer, SAIL Investments and Solas Capital, a report by Pensions for Purpose examining sustainability integration across the UK insurance sector. The report considered how sustainability strategies vary by asset class, assessed the practical challenges insurers face in implementation, and reviewed the role of regulatory guidance in supporting progress. It concluded that the UK insurance industry is making meaningful advances in embedding sustainability, while identifying areas where greater regulatory clarity would unlock further impact.

Contributing to research of this kind is part of Gresham House's broader approach to market-wide stewardship: improving the quality of investor understanding of sustainability themes that remain in active development.

Case study: Industry engagement: contributing to the ISFC Natural Capital project

The ISFC natural capital project is one example of how Gresham House contributes to market-wide initiatives. The project, developed jointly with the Capitals Coalition and supported by the TNFD, aims to establish a standardised approach for measuring and reporting on natural capital across productive forestry. In September 2025, Gresham House participated in a three-day conference in Helsinki where ISFC members finalised a shortlist of seven ecosystem services and natural capital stocks for standardised reporting: sustainable timber and fibre supply, carbon sequestration and emissions, water quantity, water quality, biodiversity, air quality, and recreational and cultural services. The outputs were released publicly at COP 30, with phase two of the project, covering common methodologies and an illustrative natural capital account, due for completion in 2026.

Gresham House
Specialist investment

Principle 4

Rights and responsibilities

> **Principle 4**
> *Signatories actively exercise their rights and responsibilities.*

Our approach

Active ownership is fundamental to how we invest. We exercise the rights available to us, board representation, voting, escalation and engagement, with the intention of protecting and enhancing long-term value for clients. We do not engage in stock lending, ensuring we retain full voting rights across all listed holdings at all times.

Voting

Voting is a fundamental stewardship responsibility for our Public Equity investments. We believe that effective voting enhances corporate governance, strengthens accountability, and supports long-term shareholder value creation. Our approach is guided by our Engagement and Voting Policy, ensuring that our decisions reflect the best interests of our clients and the integrity of our investment principles. We do not rely on proxy advisor recommendations to determine how we vote, but use proxy platforms for vote execution.

Our voting decisions are informed by a combination of sources including:

- Internal research and investment team discussions
- Company engagements and dialogue with management
- Analysis of governance structures and voting proposals
- Consultation with other stakeholders, advisers, and industry bodies
- Consideration of broader ESG and sustainability issues

While we adhere to the principles outlined in our policy, portfolio managers retain discretion to vote differently if there is a compelling investment rationale. Any such deviation is reviewed by the team to ensure consistency and accountability.

Key voting principles

While we do not set a prescriptive policy on all voting items, we apply the following key principles:

- Authority to allot shares: We vote against proposals exceeding 33%.
- Disapplication of pre-emption rights: We vote against proposals exceeding 20%.
- Authorisation to purchase own shares: We vote against proposals exceeding 10%.
- Political donations: We vote against all political donations.
- Executive remuneration: We assess these on a case-by-case to ensure alignment with long-term shareholder value creation.

Voting statistics 2025

We are committed to transparency in our voting activity, ensuring our decisions reflect our stewardship responsibilities. In 2025, we exercised our voting rights across all eligible holdings.

UK Equities

Metric	2024	2025
Resolutions voted on (%)	100%	100%
Votes supporting management (%)	95%	94%
Votes against management (%)	4%	2.7%
Abstentions (%)	1%	2.5%

Irish Equities

Metric	2024	2025
Resolutions voted on (%)	100%	100%
Votes supporting management (%)	94%	91%
Votes against management (%)	6%	9%
Abstentions (%)	0%	<1%

Our full voting records for 2025 are published at greshamhouse.com/sustainable-investing/

Voting against management and escalation process

When we decide to vote against management, we seek to engage with the company in advance to communicate our concerns and explore potential resolutions. We aim to resolve governance concerns privately, wherever possible, before escalation to a formal vote.

Key reasons for votes against management in 2025 include:

- Resolutions that did not meet our voting policy requirements, such as non-pre-emptive share issuance thresholds.
- The proposal of transactions we did not support, where we believed they were not in the best interest of shareholders or long-term company value creation.
- Resolutions allowing political donations

Where engagement is unsuccessful, we may escalate concerns through:

- Further engagement with boards.
- Collaboration with other shareholders where appropriate.
- Using our voting rights to drive change.
- Public statements or AGM interventions, if deemed necessary.
- Divesting our position, if governance risks remain unresolved.

Case study: Active ownership: voting against management at Anexo plc

In September 2025, Gresham House voted against a management resolution at Anexo plc to cancel its admission to trading on AIM and re-register the company as a private limited company, in connection with a proposed take private transaction.

The proposed delisting raised immediate governance concerns. Taking a company private removes the protections associated with a public listing, reduces reporting transparency and materially limits liquidity for minority shareholders. The investment team considered these factors significant: in its assessment, the transaction was not structured in a manner that adequately protected the interests of minority shareholders, and the governance standards available to public market investors would be weakened as a result.

Gresham House used its voting rights to formally oppose the resolution, providing a transparent and documented means of registering its dissent. The vote was supported by voting records from September 2025.

While the transaction proceeded, the case demonstrates how Gresham House deploys voting as a stewardship tool where a proposed corporate action raises material governance concerns. It reflects a clear and consistent position: that minority shareholder rights warrant active defence, and that take-private transactions which erode public market protections warrant formal opposition regardless of outcome.

Active ownership in Real Assets

In our Real Assets strategies, ownership rights are exercised through operational management, contractual frameworks, certification requirements and direct engagement rather than through voting or board representation.

In Forestry, this is underpinned by the Gresham House Forest Charter, our publicly committed, independently verifiable standards covering climate, biodiversity, community engagement and forest certification, enforced through ongoing engagement with forest managers, certification bodies and regulators. All forestry assets held in discretionary managed funds are certified under FSC, PEFC equivalent local standards at the earliest opportunity, with independent audit by accredited certification bodies.

In Energy Transition, ownership rights are exercised through planning conditions, habitat management plans and community benefit arrangements embedded in development and operational agreements, alongside supply chain sustainability requirements covering critical minerals and contractor conduct.

In Sustainable Infrastructure, to align with regulatory commitments, each British Sustainable Infrastructure Fund III (BSIF III) investment must demonstrate adherence to the fund's sustainability commitments. Portfolio companies are encouraged to embed sustainability into their business models by committing to the BSIF Sustainability Commitment Document (a document listing out initiatives the business has committed to and will be monitored against). Portfolio companies are also encouraged to adopt their own Sustainability Policy and DEI Policy to further expand the integration of good sustainability governance. The investment team monitor and engage with portfolio companies on their sustainability commitments throughout the holding period.

In Real Estate, stewardship rights are exercised through lease provisions, EPC upgrade programmes, green lease clauses and direct engagement with residents, occupiers and housing associations, with environmental performance monitored throughout the investment lifecycle.

Principle 5

External managers

> **Principle 6**
> *Signatories integrate stewardship considerations into their selection and oversight of external managers.*

Statement of Non-Applicability:

Gresham House is a specialist investment manager that manages its assets under management (AUM) through internal, dedicated investment teams. Consequently, the requirements related to the selection and oversight of external managers under Principle 5 are not applicable to our business model for this reporting period. Our stewardship activities are managed directly by our internal investment teams, supported by our central Sustainable Investment function. Gresham House uses a range of external service providers to support the delivery of stewardship activities. We seek to ensure that providers operate to standards consistent with our own stewardship commitments, and we monitor their performance and outputs actively.

Principle 6

Stewardship service providers

Principle 6
Signatories monitor and hold to account stewardship service providers.

Our approach

Gresham House uses a range of external service providers to support the delivery of stewardship activities. We seek to ensure that providers operate to standards consistent with our own stewardship commitments, and we monitor their performance and outputs actively.

Key service providers

Proxy voting platforms

We do not rely on proxy voting advisory services to inform decisions, but we utilise proxy voting platforms for vote execution. Votes are delivered by our middle office to an execution platform, ensuring decisions align with our internal voting policies and investment principles. In some cases, the depositary executes the vote in line with our instructions.

While we adhere to the principles outlined in our policy, portfolio managers retain discretion to vote differently if there is a compelling investment rationale. Any such deviation is reviewed by the team to ensure consistency and accountability.

Carbon accounting - Watershed

In 2024, Gresham House adopted Watershed as its carbon footprinting platform for both corporate operations and investment activities. Watershed's methodology is aligned with the PCAF Global GHG Accounting & Reporting Standard and provides asset, fund and strategy-level visibility of emissions across the Group. In 2025, we continued to improve data quality and coverage within the platform, enhancing our ability to transparently report our carbon emissions across both our operations and investments.

ESG data - Addidat

Our Public Equity team uses the Addidat platform for ESG data coverage across AIM and UK small-cap companies, providing over 110 ESG metrics, peer benchmarking capabilities and integrated engagement tools. The use of the Addidat platform has transformed the investment team’s ability to monitor and assess ESG risks and opportunities. During 2025, the investment and sustainable investment teams worked with Addidat to integrate an ESG scoring mechanism into the platform, supporting both pre-investment due diligence and ongoing engagement activity.

Certification bodies

All forestry assets held within discretionary managed funds are certified under FSC, PEFC or equivalent local standards, with independent audit by accredited bodies providing an external validation layer on our forest management practices. The majority of our forestry managers also hold ISO 14001 environmental management certification, subject to external audit by UKAS-accredited assessors.

Oversight and accountability

We hold service providers to account through service level agreements, ongoing performance monitoring and periodic review. All forestry managers operate under standard conditions setting out expected standards of management in line with the UK Forestry Standard. Investment team members who hold ICF or RICS membership are subject to professional standards that reinforce our expectations of conduct and competence.