WEBSITE PRODUCT DISCLOSURE – ARTICLE 10 SFDR (FOR ARTICLE 9 PRODUCT)

Product name: Natural Capital Fund II

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1.0	21 August 2026	Initial Upload

Summary

Financial Product: Natural Capital Fund II A SCSp (the "**NC Fund Partnership**"), Natural Capital Fund II Agriculture SCSp (the "**Agriculture Partnership**") and, upon its establishment, Natural Capital Fund II Forestry SCSp (the "**Forestry Partnership**", together with the NC Fund Partnership and the Agriculture Partnership and any parallel or feeder vehicles thereto, the "**Fund**")

The Fund's investment objective is to offer investors access to natural capital projects, providing returns, impact, and the ability to invest at scale. The Fund will be structured as three or more Luxembourg special limited partnerships, which have been or will be established to either:

- invest in natural capital projects, including large-scale sustainable agriculture and forestry investments and opportunities ancillary or related thereto (e.g., the NC Fund Partnership);
- invest in large-scale sustainable agriculture investments and opportunities ancillary or related thereto only, alongside the NC Fund Partnership (e.g., the Agriculture Partnership); or
- invest in large-scale sustainable forestry investments and opportunities ancillary or related thereto only, alongside the NC Fund Partnership (e.g., the Forestry Partnership).

The Fund will seek to invest in natural capital assets that contribute to the following impact objectives:

- Climate: Support the transition to a low-carbon, climate-resilient economy by promoting carbon sequestration, reducing emissions, and strengthening resilience to climate risks;
- Biodiversity: Protect and restore ecosystems to safeguard biodiversity, maintain and enhance ecosystem services and strengthen connectivity across landscapes;
- Water: Promote the responsible use of water, protect riparian zones, support freshwater ecosystem services and implement efficient irrigation technology;
- Soil: Improve soil health by minimising disturbance, enhancing soil cover and maintaining living roots; and
- People: Promote fair employment and safe working conditions, while creating local jobs and contributing to broader community benefits through local procurement and partnerships,

together, the "**Impact Objectives**".

The Fund will measure the attainment of the Impact Objectives, whilst seeking to ensure that the Fund does not significantly harm any environmental or social

	sustainable investment objectives, in each case by reference to certain sustainability indicators. It is expected that 100% of investments made by the Fund will be considered sustainable investments under the criteria and procedures the Fund applies and as defined by Article 2(17) of Regulation (EU) 2019/2088 ("**SFDR**"). The Fund makes a 0% commitment to the alignment with Regulation (EU) 2020/852 (the "**EU Taxonomy**"). The Fund will apply Climate Asset Management Limited's ("**CAM**") ESG and Impact Management System framework ("**ESGI MS**"), established to: (i) identify and manage material sustainability risks; and (ii) select and manage investments to achieve sustainable objectives in accordance with the Fund's Impact Measurement and Management Framework ("**IMM Framework**"), part of the overall ESGI MS. The ESGI MS provides procedures and tools to identify, assess, and manage material risks and impacts throughout the investment lifecycle, from sourcing and due diligence to ongoing portfolio management and monitoring. Principal adverse impacts on sustainability factors are considered during the investment due diligence and selection process and subsequently monitored for the lifetime of the investment. The Fund actively monitors the achievement of its environmental objectives via regular reporting, remote monitoring, site visits and third-party assessments. The Fund regularly reviews the methodologies and data it uses to assess and monitor the attainment of the environmental objectives and continuously seeks to improve the way that these are applied. No reference benchmark has been designated for the purpose of attaining the sustainable investment objective.
No significant harm to the sustainable investment objective	Several processes are in place to ensure the Fund's potential investments do not significantly harm any environmental or social sustainable investment objectives, taking into account the principal adverse impact indicators, all in accordance with the ESGI MS. These include: • An exclusion list (norm based) outlining certain activities the Fund will not invest in; • environmental, social and governance ("**ESG**") due diligence carried out by investment teams for all investment opportunities, supported by internal ESG resources and third-party experts; • Implementation of mitigation and/or management plans covering sustainability objectives at the asset level; • Incorporating contractual clauses covering operating/delivery partners' ESG performance; • Monitoring of performance via regular reporting, remote monitoring, site visits and third-party assessments; • Prioritising sustainability topics at management meetings with delivery partners; and • Implementing corrective actions based on monitoring results, to rectify issues or identify opportunities to optimise ESG performance further. Indicators for potential adverse impacts, including those included in Annex 1 and a select number of those in Annexes 2 and 3 of the SFDR Regulatory Technical Standards, are taken into account through:

	1. Assessment of potential material ESG risks and impacts for all investments prior to final investment decision; 2. Developing management plans for relevant adverse impacts at the asset level; 3. Monitoring, reporting and verification ("**MRV**") of asset and delivery partners' performance via site visits, remote monitoring techniques, structured reporting and periodic independent third-party assessments; and 4. Implementing corrective actions in response to incidents or results from the MRV processes. The Fund's investments are expected to be aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. This will be achieved through screening of all investment opportunities for ESG and impact risks and impacts, including those outlined within the above guidelines, and subsequently monitoring throughout the lifetime of the investment. As outlined previously, the Fund will check if its delivery partners' policies and management procedures are consistent and align with these standards, and include these within contractual agreements.
Sustainable investment objective of the financial product	The Fund will seek to invest in natural capital assets that contribute to the Impact Objectives, as defined above in the "Summary" section. Each investment to be made by the Fund is expected to align with one or more of the Impact Objectives and therefore contribute to the Fund's sustainable investment objective. The Fund may also make investments made for certain specific purposes such as currency hedging, liquidity and cash management ("**Ancillary Investments**"). Although the Fund's objectives may support certain environmental objectives, the Fund does not commit to making a minimum proportion of investments which qualify as "environmentally sustainable" economic activities for the purposes of the EU Taxonomy. No reference benchmark has been designated for the purpose of attaining the sustainable investment objective.
Investment strategy	The Fund's objective is to offer investors access to natural capital projects, providing returns, impact, and the ability to invest at scale. The Fund is expected to have a real asset focus and will primarily seek to invest in regenerative agriculture and sustainable forestry, including both greenfield and brownfield opportunities. The Fund will target a portfolio that balances expected risk and return through exposure to farmland and timberland assets across Europe, North America, and Australia and New Zealand. Impact performance will be defined by a proprietary framework, which seeks to measure and quantify impact benefits to habitats, biodiversity, carbon, water and landscapes across a set of standardised metrics. The Fund's strategy is to acquire assets capable of delivering both financial returns and positive environmental and social outcomes. Recognising that for many assets, their condition and operating procedures may not initially meet all requirements of CAM's ESGI MS, the investment process begins with a focused screening phase. This prioritises the exclusion of opportunities that fall under the Fund's excluded activities list, lack a credible pathway to

reaching the requisite standards, present material ESG and impact issues that are too complex or costly to mitigate, or pose significant reputational implications.

The Fund assesses good governance practices through the integration of ESGI risks, opportunities and impacts throughout the Fund's investment process, from initial screening, and due diligence through to implementation, monitoring and reporting. A more detailed description of how good governance practices are assessed is provided below in the due diligence section.

The Fund makes a 0% commitment to the alignment with the EU Taxonomy.

Proportion of investments

The Fund has a 100% sustainable investment objective and will only target potential investments which are aligned with the sustainable investment strategy.. The Fund is expected to obtain exposure principally through direct equity investments.

The Fund may make ancillary investments, i.e. derivatives and/or temporary liquid assets such as bank deposits, in furtherance of and consistent with the Fund's sustainable investment objective. The Fund does not consider such instruments to be investments of the Fund and accordingly excludes them from the Fund's asset allocation disclosures.

The Fund makes a 0% commitment to the alignment with the EU Taxonomy.

Monitoring of the sustainable investment objective

The Fund's proprietary IMM Framework provides the basis for monitoring of the attainment of the sustainable investment objective. For each potential investment, once a comprehensive due diligence process has been completed, a baseline will be established across the five impact categories underpinning the IMM Framework: (i) biodiversity; (ii) climate; (iii) soil; (iv) water; and (v) people.

Each investment opportunity will be (i) screened against minimum investment level criteria in each of these categories; and (ii) scored against the overall Fund's objectives in each impact category to ensure that selected investments help achieve the overall investment strategy. Investments need to meet the IMM Framework requirements to be considered by the Investment Committee.

The measurement of the Fund's attainment of its sustainable investment objective is tracked via indicators that are relevant to the impact goals of the .Indicators used to measure the attainment of the sustainable objectives are outlined in the table below. Note that natural capital investments often require a number of years to achieve the sustainable outcomes and as such, improvements on an annual basis are not necessarily discernible.

Indicator	Fund Impact Objective
Hectares of land managed for nature	Biodiversity
% of assets under third-party sustainability certification	All
Total carbon sequestered or avoided (tCO2e)	Climate
Km of water courses protected	Water
Hectares of productive area with soil improvement strategies in place	Soil
Number of FTE jobs supported	People

Implementation is monitored through a combination of operating partner self-reporting, remote sensing techniques and periodic third-party on-the-ground surveys, which are particularly relevant to monitoring biodiversity regeneration. In addition, any crediting, offsetting, or certification processes pursued by the asset are expected to serve as a further source of MRV. The data collected through these channels will generally inform ongoing asset management, support adaptive decision-making, and contribute to fund-level reporting and stakeholder disclosures.

Methodologies

The Fund's ESGI Management System is underpinned by certain leading international natural capital methodologies, measuring impact via sustainability indicators across five impact categories: (i) biodiversity; (ii) climate; (iii) water; (iv) soil; and (v) people.

To qualify an investment for the consideration of the Fund's Investment Committee, the following binding elements need to be met:

- None of the investment activities trigger the Fund's Excluded Investment Activities List in line with CAM's Responsible Investment Policy, available here;
- All investments have undergone the ESG screening and assessment in accordance with the requirements and standards outlined in CAM's Responsible Investment Policy, implemented through the ESGI MS; and
- All investments have met the minimum individual investment criteria and passed the fund objectives scorecard in line with the Impact Measurement and Management Framework to qualify as attaining the sustainable investment objectives.

The investment process will be governed by the Fund's Investment Committee who review investment opportunities.

Post-acquisition, the Fund's Investment Committee will be kept updated via the Fund's MRV processes.

Data sources and processing

Data is obtained through a combination of operating partner self-reporting, remote sensing techniques and periodic third-party on-the-ground surveys, which are particularly relevant to monitoring biodiversity regeneration.

Data is then aggregated, quality-checked and analysed at both asset and portfolio level to assess performance against relevant sustainability and impact indicators All data is verified by internal ESG resources with the support of technical experts as necessary.

The majority of data acquired is measured and as such only a small proportion of data obtained is expected to be estimated. The principal example of this is the use of remote sensing to monitor activities in between periods of on-site surveys.

Limitations to methodologies and data

No material limitations to the methodologies and data are expected, save that by virtue of its investment strategy the Fund relies on timely delivery of suitable and accurate data from other parties, notably delivery partners. It should also be noted that natural capital and nature-based solutions assessment methodologies are an emerging topic; whilst the Fund's approach is underpinned by leading methodologies, developments and wider formalisation of the sector are likely to occur as the market matures, including in emerging certification and credit schemes. Finally, natural capital projects are long-lived and some of the sustainable investment objectives are achieved over a long-

	time horizon (10+ years). As such, annual reporting for certain indicators will not show significant annual variation. As mentioned above, the Fund does not anticipate such limitations to have a material impact on the attainment of the Fund's sustainability objective.
Due diligence	Consideration of environmental, social, governance and impact ("**ESGI**") risks, opportunities and impacts are integrated throughout the Fund investment process. The two core ESGI objectives in the investment process are: • To sufficiently de-risk opportunities and establish confidence in their potential to deliver meaningful impact before committing to an investment; and • Upon satisfying the first objective, to implement tailored ESGI plans and monitor progress against defined KPIs, reporting regularly to the Fund stakeholders through to exit. The Fund's strategy is to acquire assets capable of delivering both financial returns and positive environmental and social outcomes. Recognising that for many assets, their condition and operating procedures may not initially meet all requirements of CAM's ESGI MS, the investment process begins with a focused screening phase. This prioritises the exclusion of opportunities that fall under the Fund's excluded activities list, lack a credible pathway to reaching the requisite standards, present material ESGI issues that are too complex or costly to mitigate, or pose significant reputational implications. Once an opportunity passes the initial screening, it proceeds to a detailed due diligence stage to assess material ESGI risks and the potential for positive impact. Material ESGI risks may include those that could significantly affect the asset's financial performance, operating conditions or long-term sustainability. Where such risks are identified, CAM aims to develop and implement appropriate mitigation measures or corrective actions - typically within a 2-year timeframe. For example, this may include establishing an environmental and social management system tailored to the asset. In parallel, the timeline for achieving positive impacts is addressed through the development of a strategic plan. Given the nature-based focus of many investments (such as enhancing soil carbon or restoring biodiversity), impact delivery is inherently long-term. The plan seeks to outline the required actions, assign responsibilities, and set a timeline for implementation, alongside a MRV regime. These elements are designed to inform the investment's implementation budget and are incorporated into the financial due diligence process. Principal adverse impacts on sustainability factors are considered during the investment due diligence and selection process by the Funds investment committee and subsequently monitored for the lifetime of the investment by CAM's Asset Management Committee.
Engagement policies	The Fund does not invest in shares that are admitted to trading on a regulated market, hence the manager is not required to have an engagement policy. The Fund adopts an active stewardship approach to all its investments, which it considers critical to managing risks, realising positive environmental and social impacts and seeking to create returns for its investors. Through regular engagement, support and monitoring, sustainability risks and impacts are tracked throughout the investment holding period and corrective actions implemented where these fall short or where there are opportunities to optimise

	these further. Results are reported at regular intervals to investors and external stakeholders as required. Information on principal adverse impacts on sustainability factors will be included in the Fund's annual reporting to investors.
Attainment of the sustainable investment objective	The measurement of the Fund's attainment of its sustainable investment objective is tracked via indicators that are relevant to the impact goals of the Fund's portfolio. As no benchmarks exist to measure attainment of sustainable investment objectives for natural capital, no index has been designated as a reference benchmark for the Fund's investments or portfolio. No EU Climate Transition Benchmark or an EU Paris-aligned Benchmark under Title III, Chapter 3a, of Regulation (EU) 2016/1011 has been designated by the Fund as CAM have not identified an appropriate one. As such, the Fund does not seek to align with the methodological requirements set out in Delegated Regulation (EU) 2020/1818. The Fund supports the objectives of the Paris Agreement by investing in natural capital assets that sequester and avoid carbon through growing natural carbon sinks including soil and biomass and through implementing climate-smart initiatives including efficiency improvements in energy, water and agrochemicals. These initiatives ensure that the Fund achieves an overall net-negative carbon balance during its life.