

ANNEX V, SFDR

Periodic Disclosure

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852 establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Template periodic disclosure for the financial products referred to in Article 9, paragraphs 1 to 4a, of Regulation (EU) 2019/2088 and Article 5, first paragraph, of Regulation (EU) 2020/852

Product name:
Selected Regenergy VSO A/S

Legal entity identifier:
636700O8VK1WLPWYYV64 (CVR: 43364731)

Sustainable investment objective

Did this financial product have a sustainable investment objective?

☒ ☒ ☒ **Yes**

☒ It made **sustainable investments with an environmental objective: 99.69%**

- ☒ in economic activities that qualify as environmentally sustainable under the EU Taxonomy
- ☒ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

☐ It made **sustainable investments with a social objective: ____%**

☒ ☐ ☐ **No**

☐ It **promoted Environmental/Social (E/S) characteristics** and while it did not have as its objective a sustainable investment, it had a proportion of ____% of sustainable investments

- ☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
- ☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- ☐ with a social objective

☐ It promoted E/S characteristics, but **did not make any sustainable investments**



Sustainability indicators measure how the sustainable objectives of this financial product are attained.

To what extent was the sustainable investment objective of this financial product met?

Selected Regenergy VSO A/S ultimately invests all of its equity in, Selected Waste-to-Life Fund I S.C.A. SICAV-RAIF, both directly and through WA3RM Regenergy Developer Fund I AB (the "Fund"). The Fund's financial product's sustainable investment objective was met by investing 99.69% of its funds in sustainable activities with 79% of this portion further qualifying as Taxonomy-aligned with a critical contribution to climate change mitigation. Specifically, the objective was met through investing in the construction of new buildings and the production of heat/cool using waste heat designed to effectively utilize industrial waste heat. Waste heat is excess energy from industrial processes and typically discharged into water bodies or the atmosphere. Utilizing this waste heat for value-added purposes gives access to an energy source without adding more energy to the industrial process the waste heat originates from. Hence, waste heat is considered neither a fossil nor a renewable energy source and it does not produce additional emissions, as the climate impact is already accounted for in the industrial process where this energy is a waste product. By using the energy that would otherwise be wasted, we can reduce the demand for primary energy sources, leading to lower overall energy consumption.

Improvements to data collection are an ongoing activity which includes for example mapping of relevant operational and reporting data and the improvement of data and analytics processes.

● How did the sustainability indicators perform?

Waste heat indicators are calculated on a demand-bounded basis, using the heating demand of the invested asset as the upper limit for waste heat availability. Primary energy consumption and avoided greenhouse gas emissions are calculated relative to location-specific district heating ('DH') as the most plausible counterfactual. As mentioned above, waste heat has zero operational emissions at the point of use. Calculations cover location-based Scope 1 and Scope 2 emissions only.

Indicator	Unit	2025
<i>Waste heat available for purchase</i>	<i>GWh</i>	51.72
<i>Waste heat used</i>	<i>GWh</i>	41.61
Waste heat utilization	%	80
<i>Primary energy consumed without use of waste heat</i>	<i>GWh</i>	8.32
<i>Primary energy consumed with use of waste heat</i>	<i>GWh</i>	2.44
Reduction of primary energy consumption	GWh	5.88
<i>Carbon emissions - primary energy consumed without waste heat usage</i>	<i>tCO2e</i>	1 023.09
<i>Carbon emissions - primary energy consumed with waste heat</i>	<i>tCO2e</i>	10.69
Carbon emissions avoided	tCO2e	1 012.40

● ...and compared to previous periods?

The sustainability indicators used to measure the attainment of the sustainable investment objective of the Fund's financial product were revised following an update to the pre-contractual disclosure (Annex III). As a consequence, certain indicators reported in the

current reference period are not directly comparable with those reported in previous periods. Therefore, the indicators reported on in the previous Periodic Disclosure only partially map onto the new indicators and only relevant data from the previous reporting period are stated in comparison in the following table:

Indicator	Unit	2024	2025
<i>Waste heat available for purchase</i>	<i>GWh</i>	51.72	51.72
<i>Waste heat used</i>	<i>GWh</i>	28.63	41.61
<i>Waste heat utilization</i>	%	55	80
<i>Primary energy consumed without use of waste</i>	<i>GWh</i>	5.73	8.32
<i>Primary energy consumed with use of waste</i>	<i>GWh</i>	2.44	2.44
<i>Reduction of primary energy consumption</i>	<i>GWh</i>	3.28	5.88
<i>Carbon emissions - primary energy consumed without waste heat</i>	<i>tCO2e</i>	703.94	1 023.09
<i>Carbon emissions - primary energy consumed with waste heat</i>	<i>tCO2e</i>	10.69	10.69
<i>Carbon emissions avoided</i>	<i>tCO2e</i>	693.25	1 012.40

How did the sustainable investments not cause significant harm to any sustainable investment objective?

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

ESG risks are systematically incorporated into investment decisions and are part of the Risk Profiling exercise. This involves disclosing the Fund's objectives and restrictions as outlined in its documentation, ensuring compliance with its environmental objective, and implementing both internal and external controls for monitoring ESG factors. Sustainability indicators are used throughout the Fund's lifecycle to incorporate ESG risks and to not cause significant harm.

During the reporting period, investments were made in the construction of new buildings and the production of heat/cool using waste heat. The construction of new buildings was previously assessed to align with the Taxonomy Regulation (TR), hence, these investments are automatically qualified as sustainable under the Sustainable Finance Disclosure Regulation (SFDR), as per the latest recommendations from the EU Commission.

Taxonomy alignment of CapEx related to Phase II with the production of heat/cool using waste heat is based on an interim technical assessment carried out at design and construction stage. While this assessment confirms that the project is expected to meet the applicable EU Taxonomy technical screening criteria upon completion, final alignment is subject to verification once construction is completed in 2026. As such, aligned CapEx reported for Phase II reflects a forward-looking assessment and may be updated in future reporting periods if material changes occur.

To account for embodied carbon from the construction of new buildings, a Life Cycle Assessment (LCA) in accordance with the EU Level(s) framework is being conducted with results becoming available during 2026. For operational energy consumption and related carbon emissions, a decarbonisation pathway assessment was conducted with preliminary results for the building acquired in Phase I. Note that the building type is to date beyond the set of property types included in the Carbon Risk Real Estate Monitor (CRREM), hence the developed alternate decarbonisation pathway assessment provides preliminary insights in emission alignment over time. LCA and the decarbonisation pathway assessment will serve as a baseline for the Fund's future investment decisions.

— — — *How were the indicators for adverse impacts on sustainability factors taken into account?*

The Fund considers Principal Adverse Impacts (PAIs) related to sustainability factors by integrating them into its policies, such as the Sustainable Investment Policy, and within its procedures. The approach includes a Sustainability Risk Assessment qualitative assessment of sustainability risks, with the investment strategy focused on ESG integration to mitigate significant negative impacts at the product level.

The Fund follows and reports a Principle Adverse Sustainability Impacts Statement (PAI Statement), according to Annex I of the Delegated Regulation. As described in the Private Placement Memorandum (PMM), the fund integrated in its investment decision making all indicators specified in Table 1 of Annex I of the Delegated Regulation regarding investments in “investee companies” and “real estate assets”, along with relevant indicators from Tables 2 and 3.

During the reporting period, all indicators were continuously monitored and reported through the Fund’s Periodic Disclosure and the PAI Statement at product level.

The Fund's procedures, in accordance with Chapter II on the *Transparency about adverse impacts on sustainability factors* and Annex I the *Template principal adverse sustainability impacts statement* of the Delegated Regulation, include the following steps:

Identification, Integration, and Monitoring: The Fund identifies and prioritizes PAIs by assessing material ESG risks for all investments. PAIs are integrated into the investment process through pre-investment screening, due diligence, and ongoing monitoring.

Engagement and Reporting: The Fund actively engages with investee companies to mitigate adverse impacts and regularly report on these impacts.

— — — *Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?*

The Fund ensures that its sustainable investments comply with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. This compliance includes adherence to the principles and rights outlined in the eight fundamental conventions identified in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, as well as the International Bill of Human Rights.

The Fund’s operational procedures include applying Minimum Safeguards (MS) in accordance with Articles 3 and 18 of the Taxonomy Regulation (TR). Additionally, during the screening and selection of investments, the Fund follows the social Principal Adverse Impact (PAI) criteria outlined in the Sustainable Finance Disclosure Regulation (SFDR). Close cooperation with the investee companies will continually improve our operational procedures, uphold our commitments, and integrate lessons learned.



How did this financial product consider principal adverse impacts on sustainability factors?

The Fund takes into account Principal Adverse Impacts (PAIs) related to sustainability factors by incorporating them into its policies and operational procedures. The Fund's procedures include the application of Minimum Safeguards (MS) as per Articles 3 and 18 of the Taxonomy Regulation (TR), along with the social PAIs of the Sustainable Finance Disclosure Regulation (SFDR), during the screening and selection of investments. This approach embeds a qualitative assessment of sustainability risks, with an investment strategy focused on integrating Environmental, Social, and Governance (ESG) factors to mitigate significant negative impacts at the product level. Relevant indicators are disclosed in the annual PAI statement of the Fund.

The list includes the investments constituting **the greatest proportion of investments** of the financial product during the reference period which is: 2025

What were the top investments of this financial product?

The Fund's top investments during the reporting period was the construction of new buildings as detailed below:

Largest investments	Sector	% Assets	Country
RegEnergy Frövi	Industry	99.69%	Sweden

RegEnergy Frövi comprises the construction of a new greenhouse facility forming part of the renewable energy and circular economy infrastructure underlying the Fund's sustainable investment objective. The construction of the building constitutes the primary investment activity during the reference period.



What was the proportion of sustainability-related investments?

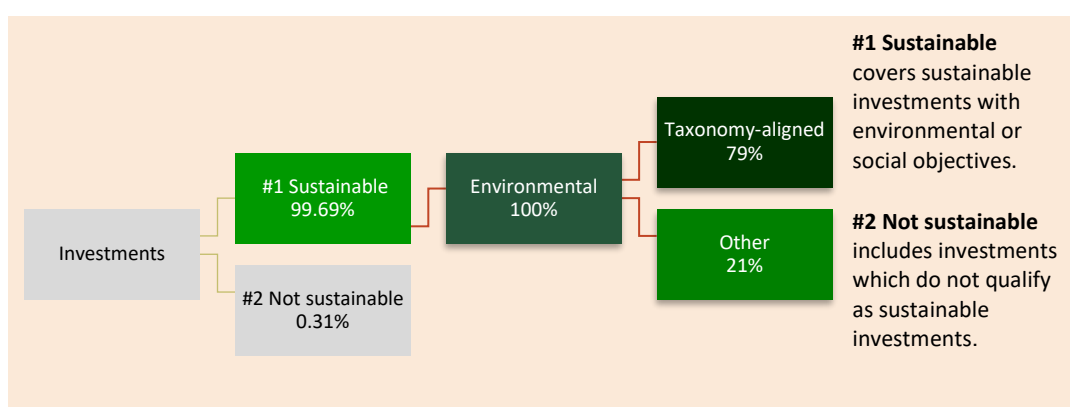
The proportion of sustainability-related investments contributed to the sustainable investment objective during the reporting period is 99.69%.

Asset allocation describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of

What was the asset allocation?



The non sustainable portion of 0.31% (#2) covers costs like financing costs and cash.

In which economic sectors were the investments made?

During the reporting period, investments were made in the construction and real estate sector with the activity of the construction of new buildings (sector classification selection

according to EU Taxonomy Navigator). Investing in this sector aligns with the Fund's sustainable investment objectives, as the building constructed is designed to effectively produce and utilize waste heat for heating or cooling within or between industrial facilities.



To what extent were sustainable investments with an environmental objective aligned with the EU Taxonomy?

The Fund's sustainable investments with an environmental objective are aligned with the EU Taxonomy by investing in the construction of new buildings.

The economic activities of construction of new buildings and the acquisition and ownership of buildings are deemed sustainable under Article 3 of Regulation (EU) 2020/852 and have been evaluated for compliance with the EU Taxonomy, meaning they do not cause significant harm to any other environmental objectives, comply with the MS, and adhere to the Technical Screening Criteria (TSC). Compliance of investments with the EU Taxonomy was subject to a third-part assessment conducted by WSP with information directly obtained from investee companies.

The total percentage of capital expenditures (CapEx) aligned with the EU Taxonomy is 79%, while the percentage of turnover is 48% and operational expenditures (OpEx) is 17%.

● Did the financial product invest in fossil gas and/or nuclear energy related activities complying with the EU Taxonomy¹?

☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

The graphs below show in green the percentage of investments that were aligned with the EU Taxonomy. As there is no appropriate methodology to determine the taxonomy-alignment of sovereign bonds, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.*

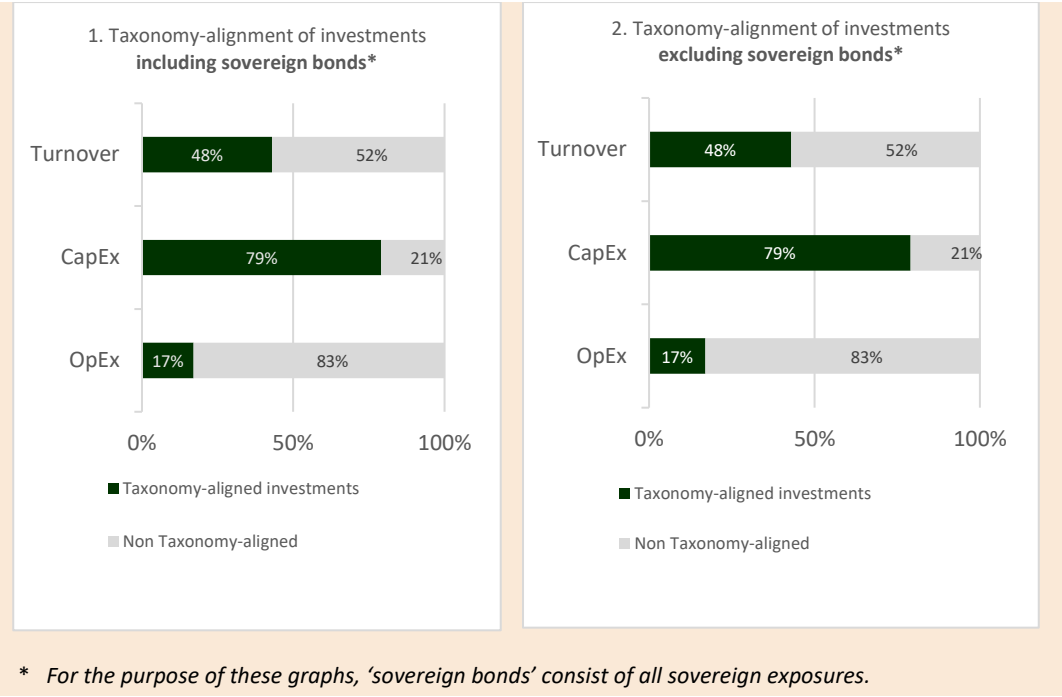
To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective

Transitional activities are economic activities for which low-carbon alternatives are not yet available and that have greenhouse gas emission levels corresponding to the best performance.

¹ Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do no significant harm to any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.



- **What was the share of investments made in transitional and enabling activities?**
No investments were made in transitional or enabling activities during the reporting period.
- **How did the percentage of investments aligned with the EU Taxonomy compare with previous reference periods?**
Comparison of the percentage of investments aligned with the EU Taxonomy to the previous and first reporting period 2024.

Following a review in 2023 of the pre-contractual documents and reporting made available to potential and current investors pursuant to SFDR and its delegated regulations, the Fund Manager decided to adjust the presented minimum share of investments aligned with the EU Taxonomy Regulation from 100% to 55%. This means that the Manager's going-forward target is for a minimum of 55% of investments to meet the criteria for sustainable activities under the EU Taxonomy. This adjustment does not imply that any changes have been made or will be made to the Funds' underlying investments as a result of this revision.

The decision to revise the minimum share is based on the fact that the original 100% figure was defined by the master fund, which supplies the Manager with the underlying data basis for the preparation of sustainability-related disclosures. However, following a thorough validation of this data, the Manager concluded that this level is, in the Manager's assessment, neither realistic nor appropriate to achieve. The Manager's own analysis of data from the master fund indicated that certain investments do not fully meet the requirements of the Taxonomy Regulation, as the Manager considers that technical screening criteria have not necessarily yet been established for these types of investment activities. On this basis, the Manager has made this adjustment and reduced the minimum share from 100% to 55% in order to ensure alignment with the actual taxonomy assessments.

		2024	2025
1. Taxonomy-alignment of investments including sovereign bonds			
Turnover	Taxonomy-aligned	0%	48%
	Non Taxonomy-aligned	100%	52%
CapEx	Taxonomy-aligned	85%	79%

	Non Taxonomy-aligned	14.73%	21%
OpEx	Taxonomy-aligned	0%	17%
	Non Taxonomy-aligned	100%	83%
2. Taxonomy-alignment of investments excluding sovereign bonds			
Turnover	Taxonomy-aligned	0%	48%
	Non Taxonomy-aligned	100%	52%
CapEx	Taxonomy-aligned	85%	79%
	Non Taxonomy-aligned	14.73%	21%
OpEx	Taxonomy-aligned	0%	17%
	Non Taxonomy-aligned	100%	83%



What was the share of sustainable investments with an environmental objective that were not aligned with the EU Taxonomy?

The Fund's share of investments with an environmental objective that were not aligned with EU Taxonomy was 21% during the reporting period. That share is the remaining portion of the construction of new buildings not yet verified as aligned as documentation is pending (due to the construction phase).

What was the share of socially sustainable investments?

N/A



What investments were included under “not sustainable”, what was their purpose and were there any minimum environmental or social safeguards?

Investments included categorized as “not sustainable” make up 0.31% of the investments made during the reporting period, and is cash held for ancillary purposes. While these investments are not classified as sustainable, they are managed to ensure that they do not compromise the Fund's sustainable investment objective and are still subject to specific safeguards detailed in the Private Placement Memorandum (PPM) and the Sustainability Policy (SP). These safeguards include:

Exclusion Lists and Norm-Based Screening: Ensuring that investments avoid activities that are excluded based on ethical, environmental, or social norms.

General Screening Criteria: Applied prior to making an investment, these criteria minimize the risk of investing in projects that negatively impact sustainability factors and ensure good governance.

Do No Significant Harm (DNSH): Identifying, managing, and mitigating principal adverse impacts by incorporating considerations of these impacts into all investment decision-making processes.



What actions have been taken to attain the sustainable investment objective during the reference period?

During the reporting period, we took the following actions to achieve our sustainable investment objective:

As part of stakeholder engagement and to further the usage of waste heat and subsequently lower primary energy consumption, we further developed the dialogue on improving waste energy reuse processes in a collaboration between the waste energy producer, the waste energy user and the local energy supplier. The findings of the dialogue are planned to be technically

implemented in 2026 and expected to lead to improved energy reutilization rates in the subsequent year.

Operations of buildings utilizing the waste heat was transitioned to a subsidiary company which will, as a side-effect, promote access and hence insights into operational data relevant to alignment and further the Fund's sustainability objectives.

Overall, learnings from the previous year were turned into leapfrogging solutions and processes in the current year; in particular learnings from the operational Phase I to inform the construction of a new asset in Phase II and steps to streamline data accessibility and analysis through more suitable contracting.

How did this financial product perform compared to the reference sustainable benchmark?

N/A

- How did the reference benchmark differ from a broad market index?

N/A

- How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the sustainable investment objective?

N/A

- How did this financial product perform compared with the reference benchmark?

N/A

- How did this financial product perform compared with the broad market index?

N/A