

# Group Sustainable Finance Framework

October 2025

*The information and opinions contained herein are for information purposes only and are provided as at the date of this document and are subject to change without notice. Clifford Capital Holdings Pte. Ltd. and its affiliates (collectively, "Clifford Capital") do not undertake any obligation to provide the recipient with access to any additional information or to update this document or any additional information or to correct any inaccuracies in any such information which may become apparent. This document does not constitute an invitation or offer to acquire, purchase or subscribe for any Clifford Capital's securities and is not intended to provide and should not be relied upon for tax, legal or accounting advice, investment recommendations or a credit or other evaluation regarding Clifford Capital or any of its securities. Each individual should consult its own tax, legal, financial and accounting advisors prior to engaging in any transaction with or in connection with Clifford Capital and its securities. Certain statements, including those relating to general business plans and strategy and future prospects may be considered to be "forward looking statements" and be based on certain assumptions and expectations, where actual results may differ due to changes or developments in political, economic, regulatory or social conditions. Therefore, no assurance is given by Clifford Capital with respect to the information and opinions contained herein nor that any assumption and expectation is, or will be, accurate or realised nor that any particular result will be achieved. Each Clifford Capital entity and its respective directors, officers, partners, employees, agents, representatives and professional advisers does not accept any liability for (i) accuracy, completeness or use of this document; and (ii) any loss or damage arising from any use, reliance on, or distribution of, this document or its contents or otherwise arising in connection with this document.*

## Contents

<b>1. Introduction to Clifford Capital</b>	<b>1</b>
a) About Clifford Capital	1
b) Our Sustainability Approach	2
<b>2. Clifford Capital’s Sustainable Finance Framework</b>	<b>3</b>
<b>3. Use of Proceeds</b>	<b>4</b>
<b>4. Project Evaluation and Selection</b>	<b>9</b>
<b>5. Management of Proceeds</b>	<b>10</b>
a) Tracking of proceeds	10
b) Allocation of proceeds	10
c) Use of unallocated proceeds	10
<b>6. Reporting</b>	<b>10</b>
<b>7. External review</b>	<b>11</b>
a) Second Party Opinion (Sustainable Finance Framework)	11
b) Verification (pre-issuance)	11
c) Verification (post-issuance)	11
<b>8. Appendix – Clifford Capital Exclusion List</b>	<b>12</b>

# 1. Introduction to Clifford Capital

## a) About Clifford Capital

Clifford Capital is an infrastructure credit platform specialising in global infrastructure debt origination, distribution and investment. Headquartered in Singapore, Clifford Capital benefits from government guarantees with a policy mandate to support companies with a Singapore nexus.

With over US\$11 billion in cumulative commitments, Clifford Capital delivers innovative financing solutions across the energy & utilities, natural resources, transportation & industrials, and digital & social infrastructure sectors.



Figure 1: Clifford Capital's overall structure

### Our businesses:



#### Client Coverage Group

Originates, structures and executes debt financing solutions for a wide range of infrastructure sectors.



#### Markets & Investor Services

Manages institutional client relationships, supports capital markets solutions and collateral management.



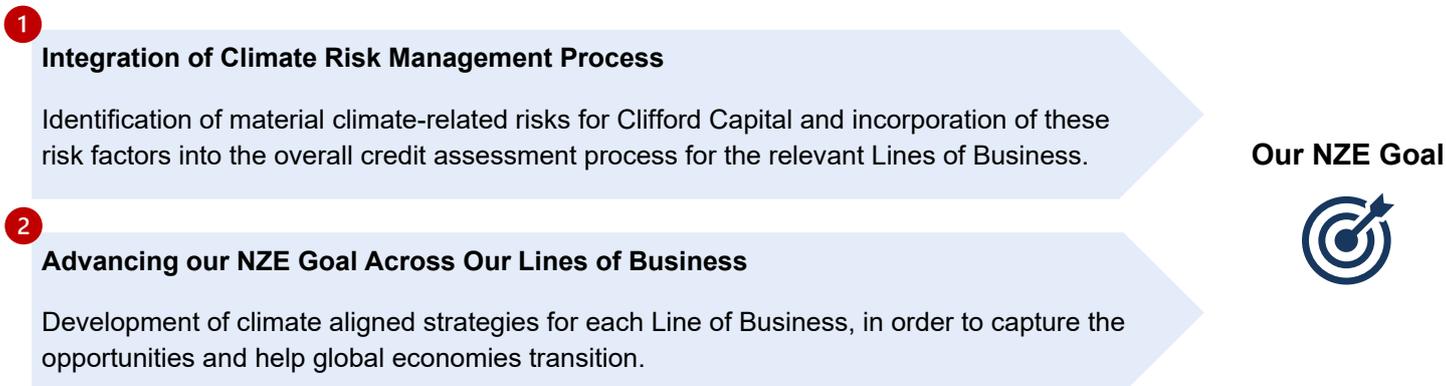
#### Asset Management

Develops infrastructure fund solutions to mobilise institutional capital.

## b) Our Sustainability Approach

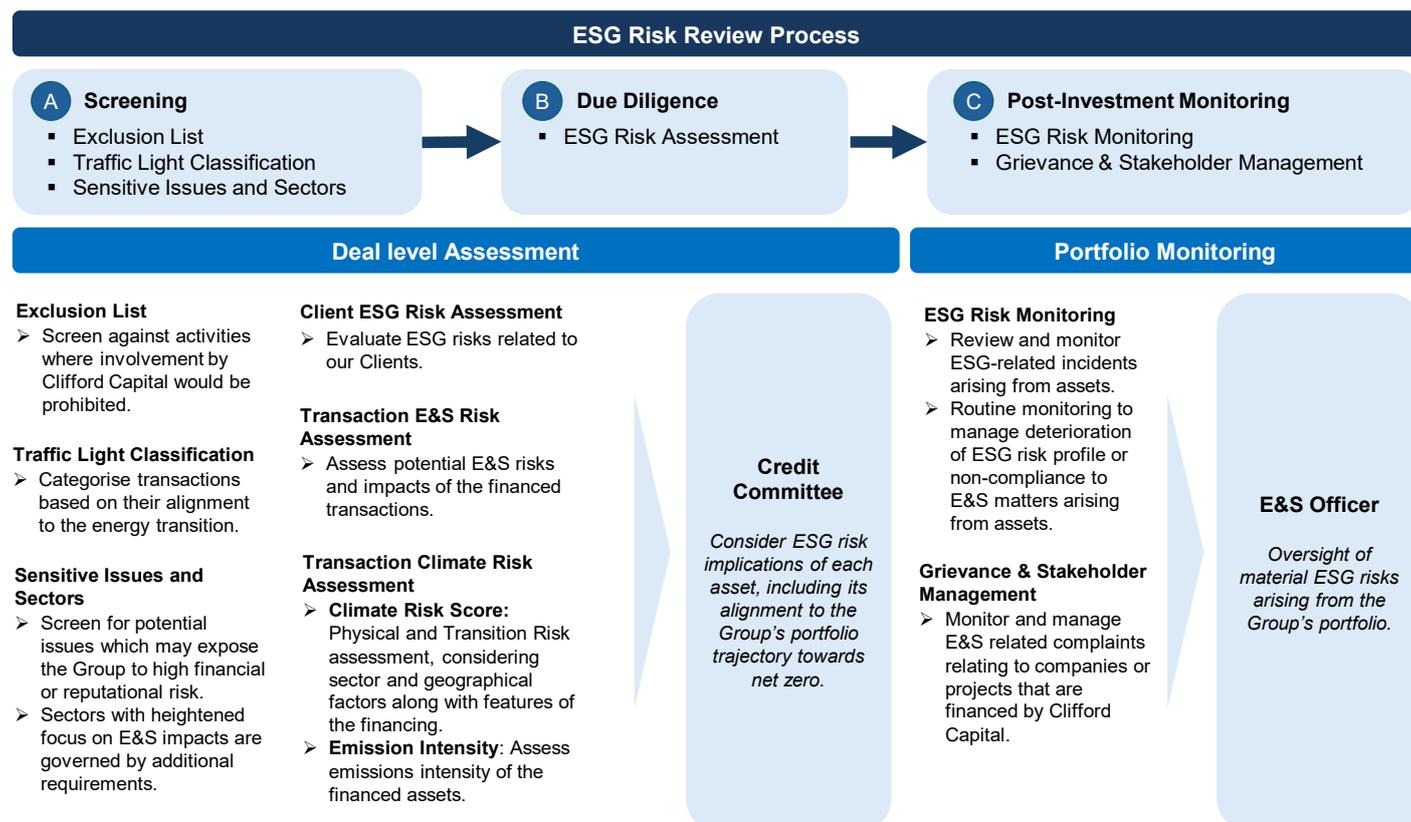
Recognising the impact of climate change and the need to take urgent action, Clifford Capital in 2022 initiated a group-wide exercise to incorporate the consideration of climate-related risks and opportunities into our long-term strategic plan and our decision-making process.

A two-pronged approach is undertaken to achieve our NZE Goal:



## Integration of ESG Risk Management Process

ESG risks are core to our investment review process. Guided by our Group ESG Principles, we embed ESG risk assessment at every stage of the deal lifecycle.



## 2. Clifford Capital’s Sustainable Finance Framework

Clifford Capital’s Sustainable Finance Framework (the “Framework”) sets out our approach for classifying financing as sustainable. We are committed to being transparent about our definitions and approach to sustainable finance.

The Framework is developed in alignment with the below sustainable finance principles and guidelines:

- Green Loan Principles (“GLP”) issued by the Loan Market Association (“LMA”) / Asia Pacific Loan Market Association (“APLMA”) / Loan Syndications and Trading Association (“LSTA”) in March 2025
- Green Bond Principles (“GBP”) issued by the International Capital Market Association (“ICMA”) in June 2025
- Social Loan Principles (“SLP”) issued by the LMA / APLMA / LSTA in March 2025
- Social Bond Principles (“SBP”) issued by the ICMA in June 2025
- Sustainability Bond Guidelines (“SBG”) 2021 issued by the ICMA in June 2021
- ASEAN Capital Markets Forum ASEAN Green Bond Standards 2018
- ASEAN Capital Markets Forum ASEAN Social Bond Standards 2018
- ASEAN Capital Markets Forum ASEAN Sustainability Bond Standards 2018

In addition, where relevant, we may make reference as required to the following:

- Singapore-Asia Taxonomy (“SAT”) issued by Monetary Authority of Singapore (“MAS”) in December 2023

Clifford Capital’s Sustainable Finance Framework is structured according to the following key pillars:



USE OF PROCEEDS



PROJECT EVALUATION  
AND SELECTION



MANAGEMENT OF  
PROCEEDS



REPORTING



EXTERNAL REVIEW

The Framework will be reviewed periodically to ensure alignment with evolving industry guidelines and market practices.

We seek an external review of our Framework and Sustainable Eligible Assets on a periodic basis to ensure that:

- a.) Eligible requirements defined in this Framework remain aligned with market standards; and
- b.) The Sustainable Eligible Assets identified align with the requirements prescribed by our Framework.

### 3. Use of Proceeds

“Sustainable Eligible Assets” will comprise “Green Eligible Assets” and “Social Eligible Assets, which are loans and bonds that comply with categories and eligibility requirements listed in Table 1 and 2 below. Sustainable Eligible Assets could also include general corporate purpose loans to “pure play companies”, which are defined as companies that derive over 90% of their revenues from the eligibility requirements defined below.

*Table 1 Eligible Green Assets*

Green Eligible Category	Description of Green Eligible Assets	Contribution to the SDGs
<b>Renewable energy</b>	<p>Loans and bonds to renewable energy projects such as:</p> <ul style="list-style-type: none"> <li>▪ Solar photovoltaics or concentrated solar power</li> <li>▪ Wind power</li> <li>▪ Geothermal<sup>1</sup></li> <li>▪ Hydropower<sup>2</sup></li> <li>▪ Green hydrogen (production of hydrogen by electrolysis that is fully powered by the above-mentioned renewable energy sources or with a lifecycle GHG emissions intensity at or below 3kgCO<sub>2</sub>e/kgH<sub>2</sub>)</li> <li>▪ Transmission and distribution infrastructure dedicated to a direct connection or an expansion of connection between power plants or newly connected generation capacity, supporting at least 90 per cent renewable electricity</li> <li>▪ Green ammonia with hydrogen as its feedstock (meeting the Green hydrogen criteria) or ammonia which is recovered from wastewater. CO<sub>2</sub> from ammonia production should not be used for urea production</li> <li>▪ Bioenergy production and power generation with lifecycle emission intensity lower than 100gCO<sub>2</sub>e/kWh, generated from waste sources that do not compete with food production and do not deplete existing terrestrial carbon pools (e.g. qualifying agricultural residues or forestry residues)<sup>3</sup></li> </ul>	

<sup>1</sup> Indicative CO<sub>2</sub> emissions: direct carbon emissions of the power plant < 100g CO<sub>2</sub>e/kWh.

<sup>2</sup> Indicative CO<sub>2</sub> emissions: meeting one of the following criteria: (i) Small-scale (< 25 MW) or run-of-river (with low storage capacity), (ii) Life-cycle carbon emissions < 100g CO<sub>2</sub>e /kWh, (iii) Power density is greater than 5W/m<sup>2</sup> as referenced by the OECD.

<sup>3</sup> Such biofuel projects must have biodiversity safeguards built in and should not involve the burning of peat.

Green Eligible Category	Description of Green Eligible Assets	Contribution to the SDGs
	<ul style="list-style-type: none"> <li>▪ Electricity storage systems, which may be stored in the form of mechanical energy, thermal energy, pumped hydropower or electrochemical method</li> <li>▪ Offshore support vessels dedicated to the installation and maintenance of offshore wind facilities such as wind turbines</li> </ul>	
<b>Clean transportation</b>	<p>Loans and bonds to clean transportation projects such as:</p> <ul style="list-style-type: none"> <li>▪ Light rail (passenger or freight), tram, metro, electric/hybrid bus rapid transit and other public transportation systems</li> <li>▪ Zero direct emissions, electric, hybrid or hydrogen trains or passenger vehicles (including buses)</li> <li>▪ Charging networks or stations for electric vehicles</li> <li>▪ Cycleways and other forms of bicycle infrastructure</li> <li>▪ Pedestrian thoroughfares and other transportation infrastructure that encourages modal shifts that reduce harmful emissions</li> </ul>	
<b>Energy efficiency</b>	<p>Loans and bonds to projects with the following characteristics:</p> <ul style="list-style-type: none"> <li>▪ Data centres with design or average annual operating Power Usage Effectiveness (“PUE”)<sup>4</sup> ≤1.4</li> <li>▪ Smart metering</li> </ul>	 
<b>Sustainable water and wastewater management</b>	<p>Loans and bonds to sustainable water and wastewater management projects such as:</p> <ul style="list-style-type: none"> <li>▪ Desalination plants powered by energy with an average carbon intensity at or below 100gCO<sub>2</sub>e/kWh over the residual asset life and based on reverse osmosis technology<sup>5</sup></li> <li>▪ Water abstraction and treatment systems where the net average energy consumption for abstraction and</li> </ul>	

<sup>4</sup> Energy efficiency of data centres is usually measured in PUE ratio. It is determined by dividing the total amount of power entering a data centre by the power used to run the IT equipment within it. PUE is expressed as a ratio, with overall efficiency improving as the quotient decreases toward 1.0.

<sup>5</sup> Eligible loans under this sub-category will be classified as an Eligible Green Asset and will not be assessed as an Eligible Social Asset under the Social Eligible category “Affordable Basic Infrastructure” indicated below.

Green Eligible Category	Description of Green Eligible Assets	Contribution to the SDGs
	<p>treatment equals to or is lower than 0.5kWh/m<sup>3</sup> of water produced for supply</p> <ul style="list-style-type: none"> <li>▪ Water distribution networks where the distribution loss is less than 10% for the segment of the network</li> <li>▪ Water treatment plants that improve water quality and the sustainable management of water resources</li> <li>▪ Wastewater treatment plants aimed at reducing pollution, including sewer networks, sewage and sludge treatment facilities</li> <li>▪ Projects that increase water-use efficiency such as digital water metering, smart control centres, leakage prevention</li> <li>▪ Drought-resistant crops and water-efficient irrigation systems</li> </ul>	
<p><b>Pollution prevention and control</b></p>	<p>Loans and bonds to pollution prevention and control projects such as:</p> <ul style="list-style-type: none"> <li>▪ Waste to energy (with sorting of recyclable materials prior to incineration and bottom ash recovery with at least 75% recovery of metal from ash)</li> <li>▪ Collection and transport of non-hazardous waste for preparation for reuse or recycling operations, where the non-hazardous waste is segregated. Includes waste collection containers, transfer stations, transportation vehicles and other related infrastructure. Vehicles used in transportation to have zero direct CO<sub>2</sub> emissions</li> <li>▪ Anaerobic digestion or co-digestion of bio-waste. The biowaste that is composted is source segregated and collected separately. Processes should be put in place to minimize methane leakage. The produced digestate should be used as a fertiliser and soil improver</li> <li>▪ Waste recycling facilities</li> </ul> <p>Loans and bonds to low carbon steel projects with the following characteristics:</p> <ul style="list-style-type: none"> <li>▪ Hydrogen-based Direct Reduced Iron (“DRI”) facilities meeting criteria of Green hydrogen above</li> <li>▪ Electric Arc Furnace (“EAF”) with at least 70% of total annual inputs sourced from combined scrap and Hydrogen-based DRI above</li> </ul>	 

Green Eligible Category	Description of Green Eligible Assets	Contribution to the SDGs
<b>Environmentally sustainable management of living natural resources and land use</b>	<p>Loans and bonds to environmentally sustainable forestry, including afforestation, reforestation and rehabilitation of degraded forests, that are:</p> <ul style="list-style-type: none"> <li>▪ Certified under eligible third-party schemes such as Forest Stewardship Council (“FSC”) and Programme for the Endorsement of Forest Certification (“PEFC”), or</li> <li>▪ Approved by the local authorities, such as through registration under national emissions trading schemes (“ETS”), and meet minimum national environmental standards or regulations for forestry</li> </ul>	
<b>Green buildings</b>	<p>Loans and bonds to green buildings with regional, national or internationally recognised standards or certifications for environmental performance, such as:</p> <ul style="list-style-type: none"> <li>▪ Leadership in Energy and Environmental Design (“LEED”) – Gold and above</li> <li>▪ Excellence in Design for Greater Efficiencies (“EDGE”) – Only able to be used in developing countries<sup>6</sup></li> <li>▪ Living Building Challenge Certified</li> </ul>	 
<b>Climate change resilience and adaptation</b>	<p>Loans and bonds to projects that make infrastructure more resilient to impacts of climate change, such as:</p> <ul style="list-style-type: none"> <li>▪ Climate observation and early warning systems for natural disasters</li> <li>▪ Development of flood control systems</li> </ul>	

<sup>6</sup> Developing countries refer to those listed under “Emerging Market and Developing Economies” as defined by International Monetary Fund’s World Economic Outlook Database – <https://www.imf.org/en/Publications/WEO/weo-database/2023/April/groups-and-aggregates>

Table 2 Eligible Social Assets

Social Eligible Category	Description of Social Eligible Assets	Contribution to the SDGs
<b>Affordable basic infrastructure</b>	<p>Loans and bonds to infrastructure projects such as:</p> <ul style="list-style-type: none"> <li>▪ Water desalination plants, including desalination and/or water treatment components of independent water and power plants, based in high water stress regions (e.g. low rainfall levels) or providing water to underserved populations</li> <li>▪ Electric power transmission and distribution assets aimed at providing power to areas to access electricity for the first time or significantly increase the electrification rate</li> <li>▪ Roads, rails, ports that increase access for populations based in rural/remote areas in countries eligible to receive official development assistance (“ODA”) per OECD<sup>7</sup></li> <li>▪ Telecommunication projects including internet coverage, 5G mobile network infrastructure and mobile phone usage to increase connectivity in rural/remote areas or countries eligible to receive ODA per OECD</li> <li>▪ Hygiene infrastructure, providing clean water and sanitation facilities to populations lacking access to such facilities</li> </ul>	 
<b>Access to essential services</b>	<p>Loans and bonds to infrastructure projects such as:</p> <ul style="list-style-type: none"> <li>▪ Schools, vocational and education centres (including student accommodation for such institutions) that expand access to affordable education and/or target minority inclusion in education (and expand access to affordable student accommodation)</li> <li>▪ Hospitals, clinics, healthcare centres and elderly care homes that expand the provision of public, non-profit and/or subsidised health services</li> <li>▪ Infrastructure and equipment for the provision of emergency medical response and disease control services</li> </ul>	 

<sup>7</sup> <https://www.oecd.org/en/topics/sub-issues/oda-eligibility-and-conditions/dac-list-of-oda-recipients.html>

Social Eligible Category	Description of Social Eligible Assets	Contribution to the SDGs
<b>Food security and sustainable food systems</b>	<p>Loans and bonds to infrastructure projects promoting objectives such as:</p> <ul style="list-style-type: none"> <li>Access to adequate food and meeting nutrition needs, including investment in infrastructure and facilities (e.g., warehouses) to provide adequate storage, improve food conservation or connectivity in the food chain to reduce food losses</li> <li>Increasing agricultural productivity and resilient agricultural practices that support smallholder farmers</li> </ul>	

The eligibility of all outstanding Green Eligible Assets or Social Eligible Assets will be assessed periodically based on the eligibility criteria stated in this Framework. The eligible use of proceeds also contributes to the SDGs as listed above (this list is not exhaustive given the interconnectedness of the SDGs).

In case of sustainability notes issuance, the net proceeds of green, social and/or sustainability notes issued will be used to finance and/or refinance the Eligible Asset Portfolio. The Eligible Asset Portfolio comprises the “Eligible Green Asset Portfolio” and “Eligible Social Asset Portfolio”, which are formed by Green Eligible Assets and Social Eligible Assets respectively.

#### 4. Project Evaluation and Selection

Clifford Capital’s Credit Committee (“Credit Committee”) shall evaluate Sustainable Eligible Assets proposed. The Credit Committee comprises the following members as of the date of this Framework:

- Group Chief Executive Officer
- Group Chief Risk Officer
- Group Head of Client Coverage and Chief Executive Officer for Clifford Capital Credit Solutions Pte. Ltd.
- Group Head of Markets and Investor Services and Chief Executive Officer for Clifford Capital Asset Finance Pte. Ltd.
- Group Chief Financial Officer (Advisory Member)
- Group General Counsel (Advisory Member)

To ensure Sustainable Eligible Assets are identified in accordance with the Sustainable Finance Framework, the Credit Committee will review the project, asset, business model being financed against the green and/or social eligibility requirements of the loans based on the categories stated above. The same evaluation process is applicable for Sustainable Eligible Assets that are allocated and pooled for the purpose of green, social and/or sustainability note issuance.

All loans are thoroughly reviewed during deal acquisition stage and post-investment stage under our ESG Risk Management process (see prior section under “Our sustainability approach”).

## 5. Management of Proceeds

In case of green, social and/or sustainability notes issuance, all proceeds received will be managed utilizing a portfolio approach as below:

### a) Tracking of proceeds

The green, social and sustainability note proceeds will be managed by Clifford Capital utilizing a portfolio approach. Clifford Capital intends to allocate Sustainable Eligible Assets to the Eligible Asset Portfolio accordingly, selected in accordance with the use of proceeds criteria and evaluation and selection process presented above.

The net proceeds from green, social and/or sustainability notes issued under this Framework will be deposited in the general accounts. Clifford Capital will aim to achieve and maintain, on a best-efforts basis, a level of allocation for the Eligible Asset Portfolio that matches or exceeds the balance of net proceeds from its outstanding green, social and/or sustainability notes. Eligible Assets will be added, or removed, from Clifford Capital's Eligible Asset Portfolio to the extent required.

To prevent double counting, Clifford Capital will ensure that any Eligible Assets (especially those with more than one affiliation with the Use of Proceeds category) will not be listed more than once in the Eligible Asset Portfolio.

### b) Allocation of proceeds

Clifford Capital will demonstrate that the net proceeds of the green, social and/or sustainability notes issued by Clifford Capital have been allocated to Eligible Assets.

### c) Use of unallocated proceeds

Pending the allocation of the net proceeds of green, social and/or sustainability notes to the Eligible Asset Portfolio, all or a portion of the net proceeds may be used for the payment of outstanding indebtedness or other capital management activities that do not fall within the exclusionary criteria outlined in the Appendix and exclude temporary investment in fossil fuel projects and greenhouse gas ("GHG") intensive activities.

## 6. Reporting

Clifford Capital aims to be transparent in communicating our sustainability metrics. On an annual basis, we will make available our climate or sustainability report (referencing Task Force on Climate-related Financial Disclosures or International Sustainability Standards Board).

In the case of sustainability notes issuance, allocation and impact reporting will be made available until full allocation of the proceeds.

## 7. External review

### a) Second Party Opinion (Sustainable Finance Framework)

Clifford Capital's Sustainable Finance Framework and Sustainable Eligible Assets have been reviewed by DNV Business Assurance Singapore Pte Ltd, who has issued a Second Party Opinion. A copy of the Second Party Opinion for each review period will be published on Clifford Capital's website, as appropriate.

### b) Verification (pre-issuance)

Clifford Capital may seek a limited assurance report from an external review provider for the green, social or sustainability notes including description and breakdown of Eligible Assets financed through the notes and their alignment with the Framework.

### c) Verification (post-issuance)

Clifford Capital may request on an annual basis, starting one year after issuance and full allocation, a limited assurance report of the allocation of the green, social and/or sustainability notes proceeds to Eligible Assets, provided by an external review provider.

## 8. Appendix – Clifford Capital Exclusion List

Clifford Capital's ESG Principles commit us to support responsible economic growth by creating a positive environmental and social impact for our clients, employees and investors. In applying these principles, we have identified activities which would trigger a "no go" on a transaction. This exclusion list shall be reviewed periodically.

Clifford Capital's restrictions on coal related financing are primarily aimed at limiting the use of thermal coal and curbing the addition of coal fired power generation capacity due to concerns over the impact of greenhouse gas emissions on climate change. We will therefore not be involved in transactions involving thermal coal except in accordance with our ESG Principles where we are prepared to consider financing credible coal transition.

### Exclusion List

Clifford Capital will not knowingly finance, directly or indirectly, transactions involving any of the following:

- Production of or trade in any product or activity deemed illegal under host country laws or regulations or international conventions and agreements to which Singapore is party or subject to international phase outs or bans, such as trade in wildlife or production of, or trade in wildlife products regulated under the Convention on International Trade in Endangered Species of Wild Fauna and Flora ("CITES"), and transboundary trade in waste or waste products.
- Activities prohibited by host country legislation or international conventions to which Singapore is party relating to the protection of biodiversity resources or cultural heritage or which are located in/significantly impact these types of locations.
- Production of or trade in weapons and munitions, including paramilitary materials unless directly authorised by the Government of Singapore.
- Production or activities involving forms of labour that violate host country laws or are contrary to relevant International Labour Organisation conventions.
- Commercial logging operations involving primary tropical moist forest or old-growth forest, or production or trade in wood or other forestry products other than from sustainably managed forests.
- Marine and coastal fishing practices, such as large-scale pelagic drift net fishing and fine mesh net fishing, harmful to vulnerable and protected species in large numbers and damaging to marine biodiversity and habitats.
- Shipment of oil or other hazardous substances in tankers that do not comply with International Maritime Organisation requirements.
- Coal fired power generation, including construction, expansion and refurbishment of existing plants, except in accordance with Clifford Capital's ESG Principles.
- Thermal coal mining.

We may nonetheless consider transactions which are aligned with the policies of the Government of Singapore in fulfilling our mandate. To the extent that any transactions deviate from these guidelines, Clifford Capital's participation will be subject to approval from the ESG Committee.