

TCFD Product Report

IFSL atomos Growth Fund

June 2025

IFSL atomos Growth Fund

Taskforce for Climate-Related Financial Disclosures (TCFD) Product Report

As at 31 December 2024

01. Purpose of this report

Climate change is a huge challenge, impacting us all. We recognise we have an urgent need to accelerate the transition towards net zero emissions to deliver the climate goals of the Paris Agreement, which is a pledge by world leaders to tackle global warming.

At Investment Fund Services (“IFS”) we appreciate that there is a growing demand for more climate risk-related information about how we are managing both our business operations and our investment exposure. We are firm believers in transparent disclosures and are working on improving this through our communications.

This report is designed to provide investors with consistent metrics and information to give a better understanding of the climate-related risks and opportunities associated with this Fund and its underlying holdings. While the investments in this Fund are managed by Towers Watson Limited on behalf of Atomos Investments Limited, IFS is the Authorised Corporate Director (ACD) of the Fund and is responsible for ensuring that the Fund is managed in line with regulations, among other duties. Under the rules of the Financial Conduct Authority (FCA), we are required to publish information annually on IFSL atomos Growth Fund’s carbon disclosures.

This report is published in line with the requirements of the FCA and TCFD. The Taskforce on Climate-related Financial Disclosures (TCFD) was created by the Financial Stability Board in 2015 to improve and increase reporting of climate-related financial information. More recently, the FCA created a regulatory framework for UK asset managers (and other regulated financial services companies) to report in line with TCFD.

For a greater understanding of the governance, strategy and risk management that we have in place to manage the risks and opportunities related to climate change as a firm, this product report should be read alongside our own TCFD report (referred to as an entity TCFD report) which can be found via the following link: <http://www.ifslfunds.com/tcf-d-reporting>

There may be some instances where we have not been able to disclose a particular metric recommended by the TCFD. This is highlighted where relevant and summarised in our entity TCFD report.

02. Key fund information (as at 31 December 2024)

| | |
|--------------------------------------|---|
| Name | IFSL atomos Growth Fund |
| Primary share class ISIN | GB00BHZ0CX07 |
| Fund size £ | £147,473,013.39 |
| Fund size \$ | \$199,088,568.08 |
| Benchmark or IA sector* | IA Flexible Investment |
| Second Benchmark or IA sector | None |
| Investment Manager | Towers Watson Limited on behalf of Atomos Investments Limited |
| Fund launch date | 11/03/2019 |
| Base currency | Pound Sterling |
| Fund objective and policy | <p>The aim of the Fund is to grow the value of your investment over a period of at least 5 years. This growth is expected to come from a combination of profit on investments and income paid out of investments, such as interest and dividends.</p> |

At least 70% of the Fund will be invested in other funds, including exchange traded funds and investment trusts. This may include other funds managed by the Authorised Corporate Director or Investment Manager. The Fund follows a higher risk strategy, with 70-100% exposure to shares in companies.

Up to 30% of the Fund will be exposed to bonds, which are loans typically issued by companies and governments. This may include investment grade bonds, where the issuer has a higher capacity to repay the debt, as well as sub-investment grade bonds, which can be more vulnerable to changing market conditions but typically pay a higher rate of interest.

The Fund may also invest Up to 20% in money market instruments (short-term loans); and up to 30% in property and commodities, such as gold and oil, with no more than 10% in any single commodity or property type. Other than property and commodities, the Fund may gain exposure by investing directly.

The Fund will invest globally, with no more than 30% in emerging or frontier markets. The Fund may hold up to 20% in cash.

*The Investment Association (IA) is the trade body representing the UK investment management industry. It divides funds into groups known as 'sectors' to enable investors to make like-for-like comparisons.

Source: IFS and Morningstar, data as at 31 December 2024

03. Climate-related fund information

Fund climate-related commitments

The Fund has not made any climate-related commitments.

Strategy for managing climate-related risks and opportunities

While the Fund does not have a specific climate-related strategy, TWL's research team integrates climate considerations into its overall view of a manager's ability to sustain a competitive advantage.

As the Fund's ACD, we have not yet implemented a strategy for managing climate-related risks and opportunities across our investment funds, but we have, however, developed a climate strategy across our operations – for further details see our entity TCFD report.

Management of climate-related risks and opportunities

The Fund does not have a formal strategy for the management climate-related risks and opportunities, however TWL engages with managers to improve their practices (and are willing to either sell or downgrade those that do not show sufficient improvement).

Governance of climate-related risks and opportunities

The Fund's investment process includes an assessment of climate-related issues when selecting underlying holdings, however this is not formally monitored as the Fund has no climate-related objective.

04. Fund climate metrics

This section of the report focuses on the carbon, and other greenhouse gas, emissions associated with the underlying companies in which the Fund ultimately invests.

These carbon metrics are designed to provide a starting point for understanding the Fund’s exposure to greenhouse gas emissions and may help you understand the impact of your investment on the environment.

Different emission Scopes

| Term used | Definition |
|--|--|
| Scope 1 greenhouse gas (GHG) emissions | Scope 1 emissions are <i>direct</i> emissions from owned or controlled sources, such as fuel combustion in a furnace or vehicle. |
| Scope 2 greenhouse gas (GHG) emissions | Scope 2 emissions are <i>indirect</i> emissions from the generation of purchased energy, such as the use of electricity in buildings. |
| Scope 3 greenhouse gas (GHG) emissions | Scope 3 emissions are not produced by the company itself. They are all other <i>indirect</i> emissions (not included in Scope 2) that occur in the value chain of the reporting company – in other words, emissions which are produced as a consequence of the company's activity but come from sources not owned by the company. For example, our own Scope 3 emissions include those emissions generated by the companies within our investment funds. |

Scope 1, Scope 2 and Scope 3 emissions are measured in tonnes of carbon dioxide equivalent (tCO2e). The higher the number, the greater the impact.

Please see the Frequently Asked Questions (FAQ) on the website for an explanation on tCO2e at the following link: <https://documentlibrary.ams3.cdn.digitaloceanspaces.com/tcfd/FAQ.pdf>

We publish our carbon metrics in line with the recommendations of the Greenhouse Gas Protocol – the world’s most widely used greenhouse gas accounting standard. This involves combining Scope 1 and 2 emissions and splitting out Scope 3 emissions, which are more complex to measure. Moreover, perhaps because of this complexity, not all companies report their Scope 3 emissions, therefore the data tends to be more inconsistent and less reliable.

Weighted Average Carbon Intensity (WACI)

A Fund’s WACI is a measurement of its aggregate exposure to the carbon intensity of each of its holdings. WACI is calculated by multiplying the carbon intensity of each company (holding) by the size of each holding within the Fund. WACI is measured in tonnes of carbon dioxide equivalent per million US dollar (USD) of revenue (tCO2e/\$m revenue). The data coverage expressed is the percentage of the Fund’s value covered in this metric.

| Metric: WACI (tCO2e/\$m revenue) | 2024 value | 2024 coverage (%) | 2023 value | 2023 coverage (%) |
|-------------------------------------|---------------|----------------------|---------------|----------------------|
| Fund WACI Scope 1 & 2 | 84.91 | 90.80% | 151.46 | 61.76% |
| Fund WACI Scope 3 | 463.17 | 90.79% | 1,093.68 | 61.86% |

Please note that the WACI figures provided do not include sovereign bond exposures.

The higher the WACI number, the more the Fund is likely to be exposed to highly carbon-intensive industries.

Total carbon emissions

Total carbon emissions, also referred to as Fund ‘financed emissions’, takes the percentage of each company owned by the Fund, multiplied by that company’s carbon emissions. This is then summed across all companies in the Fund. A Fund’s total carbon emissions are measured by tonnes of CO2e (tCO2e). The higher the emissions of the Fund, the greater the extent of the Fund’s underlying holdings’ contribution to GHG emissions. It is important to note that this metric is heavily influenced by the size of the investment in a company, therefore larger funds tend to have higher total emissions. As a result, this metric is not comparable across funds.

| Metric: Total emissions (tCO2e) | 2024 value | 2024 coverage (%) | 2023 value | 2023 coverage (%) |
|-------------------------------------|---------------|----------------------|---------------|----------------------|
| Fund total Scope 1 & 2 emissions | 5,457.99 | 99.93% | 2,816.46 | 61.49% |
| Fund total Scope 3 emissions | 44,861.54 | 98.22% | 27,775.88 | 61.73% |

Portfolio carbon intensity/footprint

Portfolio carbon intensity (sometimes referred to as footprint) adjusts the Fund's total carbon emissions in accordance with the size of the Fund itself. This metric can indicate which funds are more carbon intensive, as it allows different-sized funds to be compared to each other. The higher the intensity number, the greater the extent of the Fund's underlying holdings' contribution to GHG emissions. Portfolio carbon intensity is measured in tonnes of carbon dioxide equivalent per million USD invested (tCO2e/\$m invested). This is similar to the WACI formula, however here, GHG emissions are examined in terms of the Fund's investment amount, rather than the underlying companies' revenue.

| Metric: Carbon intensity (tCO2e/\$m invested) | 2024 value | 2024 coverage (%) | 2023 value | 2023 coverage (%) |
|---|------------|-------------------|------------|-------------------|
| Fund Scope 1 & 2 carbon intensity | 48.67 | 99.93% | 51.06 | 61.49% |
| Fund Scope 3 carbon intensity | 407.00 | 98.22% | 501.54 | 61.73% |

Data for the climate-related information in these tables is provided by Clarity AI. Cash is included in the coverage calculation. For further information on these metrics and their interpretation, along with limitations, please refer to the glossary on the website.

Fund's exposure to carbon-intensive sectors

| Metric | 2024 value (%) | 2024 coverage (%) | 2023 value (%) | 2023 coverage (%) |
|--------------------------|----------------|-------------------|----------------|-------------------|
| Exposure to fossil fuels | 9.45% | 98.18% | 11.10% | 97.73% |

Data for the climate-related information in this table is provided by Clarity AI. Please note that Clarity AI excludes cash on the data coverage calculation.

- Excluding cash, 9.45% of the value of the Fund, for which we have data, is exposed to companies directly involved in the production and delivery of fossil fuels.
- The Fund is not deemed to have high exposure to carbon intensive sectors.
- We define having 'high exposure to carbon-intensive sectors' as those funds having greater than 33% of assets under management (AUM) exposed to fossil fuels.
- It should be noted that not all the Fund's holdings produce data relating to their fossil fuels emissions' exposures, therefore the actual figure may be higher than 9.45%.

Climate scenario analysis

Climate change poses significant investment risks. Evaluating risks is important for investors seeking to make informed decisions. Climate scenario analysis can provide an assessment of possible future risks, and also investment opportunities through technological advancement, and their impact on the Fund.

The climate scenarios in this report are hypothetical constructs around how the Fund may be financially impacted by the following categories of climate change risks:

1. **Physical risks** – these are the impacts arising *directly* from climate change, such as damage and disruption from extreme weather events. Physical risks from climate change affect all industries across all geographies but with different impacts.

- Acute physical risks refer to *events* such as drought, floods, wildfires and extreme heat waves, for example.
- Chronic physical risks refer to *longer-term shifts* in weather patterns, such as sustained higher temperatures or changing precipitation patterns.

2. **Transition risks** – these are risks associated with the costs of *transitioning* to a lower-carbon economy. These are taking the form of government policy changes and regulation (such as TCFD) and technological advancements aimed at mitigating climate change. As with physical risks, all industries may be affected but particular sectors such as energy and utilities might be impacted more as they are more sensitive to policies around emission control.

Shifting consumer preferences to ‘greener alternatives’ may impact the value and profitability of certain industries and assets. However, they also present *opportunities* for investors who can identify and capitalise on the transition to a low-carbon economy.

3. **Sentiment shock** – this is the risk associated with a potential *abrupt market repricing* of assets due to a delayed and sudden awareness of the potentially devastating impacts of climate change. The risk is incorporated into the ‘*Net zero, but with a financial crisis*’ scenario.

These risk and impacts are calculated across the three following possible scenarios around achieving a net zero economy by 2050.

Achieving a net zero economy:

- What changes and costs, such as government policies and strict regulations around lowering emissions, are required to transition in an orderly manner to net zero emissions globally by 2050?
- What are the financial risks, and any opportunities, occurring from this transition?
- This scenario assumes an average global temperature increase of 1.5°C by 2100.
- This scenario considers acute and chronic physical risks, and transition risk but not the risk of sentiment shock, described above.

Net zero, but with a financial crisis:

- What could be the impact if the transition to net zero is more disorderly, prompting a sudden need to align economies and companies?
- This scenario also assumes an average global temperature increase of 1.5°C by 2100 but achieved in a different manner (through an initial delay in government policy, followed by aggressive action to compensate, which results in a financial shock).

High warming:

- What could be the impact if we failed to curb emissions and average temperatures increase further?
- This scenario assumes that no new climate policies are implemented after the Covid-19 crisis, and infers an average global temperature increase of 4.3°C by 2100. This scenario may also be referred to as a 'hothouse world.'
- This scenario considers acute and chronic physical risks and assumes that no new government policies around climate control are implemented within transition risk. The risk of sentiment shock, as described above, is not a contributing factor here.

Climate impacts for the Fund are estimated for each of these three scenarios – *Net zero*, *Net zero but with a financial crisis* and *High warming* – over three different time horizons: 5, 10 and 20 years from the end of 2022.

The examples below show how the Fund's returns may be impacted from climate change risk, using the scenarios described above. This is based on current holdings (as at end of December 2024) and projected out over short-, medium- and long-term periods. The more negative the number, the higher the potential negative impact on the value of the Fund's underlying holdings. We also show these scenarios based on the Fund's underlying holdings at the end of December 2023 for comparison.

Potential climate impact on returns over the short term – based on holdings at the end of 2024

| Scenario | Net zero | Net zero financial crisis | High warming |
|-----------------------------|----------------|---------------------------|----------------|
| Total impact on returns (%) | -4.04% | -14.71% | -1.86% |
| Transition risk | -0.61% | -0.51% | 0.00% |
| Physical – acute | -0.61% | -0.69% | -0.26% |
| Physical – chronic | -2.82% | -3.16% | -1.59% |
| Sentiment shock | Not applicable | -10.35% | Not applicable |

Potential climate impact on returns over the short term – based on holdings at the end of 2023

| Scenario | Net zero | Net zero financial crisis | High warming |
|-----------------------------|----------------|---------------------------|----------------|
| Total impact on returns (%) | -4.58% | -14.98% | -1.81% |
| Transition risk | -1.25% | -1.24% | 0.00% |
| Physical – acute | -0.59% | -0.65% | -0.26% |
| Physical – chronic | -2.74% | -3.04% | -1.55% |
| Sentiment shock | Not applicable | -10.04% | Not applicable |

Potential climate impact on returns over the medium term – based on holdings at the end of 2024

| Scenario | Net zero | Net zero financial crisis | High warming |
|-----------------------------|----------------|---------------------------|----------------|
| Total impact on returns (%) | -3.08% | -12.65% | -7.81% |
| Transition risk | 0.87% | 1.14% | 0.00% |
| Physical – acute | -0.74% | -0.80% | -1.10% |
| Physical – chronic | -3.21% | -3.51% | -6.71% |
| Sentiment shock | Not applicable | -9.49% | Not applicable |

Potential climate impact on returns over the medium term – based on holdings at the end of 2023

| Scenario | Net zero | Net zero financial crisis | High warming |
|-----------------------------|----------------|---------------------------|----------------|
| Total impact on returns (%) | -3.96% | -13.26% | -7.57% |
| Transition risk | -0.13% | 0.11% | 0.00% |
| Physical – acute | -0.71% | -0.77% | -1.06% |
| Physical – chronic | -3.11% | -3.38% | -6.51% |
| Sentiment shock | Not applicable | -9.22% | Not applicable |

Potential climate impact on returns over the long term – based on holdings at the end of 2024

| Scenario | Net zero | Net zero financial crisis | High warming |
|-----------------------------|----------------|---------------------------|----------------|
| Total impact on returns (%) | -5.61% | -14.85% | -32.99% |
| Transition risk | 0.27% | 0.94% | 0.00% |
| Physical – acute | -1.12% | -1.13% | -4.70% |
| Physical – chronic | -4.76% | -4.88% | -28.29% |
| Sentiment shock | Not applicable | -9.78% | Not applicable |

Potential climate impact on returns over the long term – based on holdings at the end of 2023

| Scenario | Net zero | Net zero financial crisis | High warming |
|-----------------------------|----------------|---------------------------|----------------|
| Total impact on returns (%) | -6.98% | -15.96% | -32.07% |
| Transition risk | -1.29% | -0.68% | 0.00% |
| Physical – acute | -1.07% | -1.09% | -4.56% |
| Physical – chronic | -4.62% | -4.70% | -27.51% |
| Sentiment shock | Not applicable | -9.49% | Not applicable |

| Coverage | 2024 data coverage (%) | 2023 data coverage (%) |
|--|------------------------|------------------------|
| Data coverage – percentage of the Fund’s value covered in this metric | 68.53% | 60.63% |

Data for the climate-related information in these tables is provided by Clarity AI, using the 5-year, 10-year and 20-year scenarios calculated at the end of 2022, that correspond to our short-, medium- and long-term scenarios when examining climate impact from an investment perspective. For further information on these metrics and their interpretation, along with limitations, please refer to the Glossary and FAQ sections on the website under Fund literature for your chosen sponsor at <http://www.ifslfunds.com/tcfd-reporting>. Direct links can be found by clicking on the name of the document listed immediately above.

Unsurprisingly over the long-term, an orderly transition to achieve net zero by 2050 has the least negative impact on returns, arising from the risks associated around climate change. With regards to the Net zero, but with a financial crisis scenario, a financial crisis has dented overall potential returns, particularly over the short-term, highlighted here through the sentiment shock.

Meanwhile, the High Warming scenario – in other words, assuming no new government policies around climate change are implemented – suggests significant adverse effects on the Fund’s returns over the long term. The potential impact is most pronounced from failure to curb chronic physical consequences from climate change (such as rising sea levels, extreme heat, drought or flooding, for example). The projected, less-negative physical impacts on returns over the short term simply come from a delayed market pricing reaction to these effects within the High warming scenario. The Net zero scenario considers an early and progressive recognition of these risks, which is detrimental to returns at an earlier stage.

Note that not all the Fund’s underlying holdings contribute to these scenarios, and we believe that a data coverage of less than 70% is too low to be relied upon, as is the case here. The low coverage may be as a result of climate or financial data not being reported for the underlying organisations and/or asset types.

Implied Temperature Rise

Implied temperature rise (ITR) estimates how companies are aligned to a Net zero world where average temperature rise is contained through curbing emissions. The Paris Agreement, a pledge put together by 194 of the world’s nations in 2015, is working to limit average global temperature rise to no more than 1.5°C by 2100 compared to pre-industrial levels.

The ITR considers companies’ publicly available near-term reduction plans and makes a forward-looking projection to indicate the *temperature alignment* of that business.

| Fund Temperature Alignment | 2024 value | 2024 coverage (%) | 2023 value | 2023 coverage (%) |
|--------------------------------------|------------|-------------------|------------|-------------------|
| Fund temperature rating Scopes 1 & 2 | 2.3 °C | 58.94% | 2.2 °C | Data unavailable |
| Fund temperature rating Scopes 3 | 2.6 °C | 58.92% | 2.6 °C | Data unavailable |

Data for ITR is provided by Clarity AI. For further information on this metrics and interpretation, along with limitations, please refer to the Glossary and FAQ on the website.

With regards to Scope 1 & Scope 2 emissions, the Fund’s implied temperature rise is 2.3 °C, therefore it is currently categorised as misaligned with regards to the Paris Agreement.

With regards to Scope 3 emissions, the Fund’s implied temperature rise is over 2.6 °C, therefore it is currently categorised as misaligned with regards to the Paris Agreement.

Note that not all the Fund’s underlying holdings are included in these metrics.

Temperature Alignment categories:

- 1.5°C aligned - ITR of ≤ 1.5°C
- 2°C aligned - ITR of ≥ 1.5°C - 2°C
- Misaligned - ITR of >2°C - 3.2°C
- Strongly misaligned - ITR > 3.2°C

Data gaps and assumptions

With regards to emissions data, we have recently started working with Clarity AI – a specialist climate data provider – currently covering various emissions data of around 58,000 companies for scope 1 & 2, and 50,000 for scope 3, across 180 countries. Following a review across several providers, we chose to partner with Clarity AI as their emissions data coverage is amongst the widest available. Where emissions data is missing for a company, in some instances, Clarity AI uses its proprietary machine learning algorithms to estimate specific data, alongside other estimation models such as input-output models, physical activity-based models, and interpolation techniques to ensure accuracy and consistency across different types of emissions.

However, it must be noted that not all companies, by any means, are currently reporting their emissions. This will vary across different jurisdictions, depending on local regulatory requirements, and also size of company – there can often be limited climate data disclosure among smaller companies. Additionally, significant data gaps exist within certain asset classes, such as government bonds and currencies. Clarity AI is working on various methodologies to increase its emissions data coverage and calculations within the more ‘challenging’ asset

classes. In addition, we expect to see steady improvement in equity and corporate bond data coverage as increasing regulation should lead to more companies being required to disclose their emissions.

As a result of evolving, but inconsistent, regulatory requirements and the evolution of carbon reporting methodologies and ensuing metrics, our investment funds have varying degrees of data coverage in terms of certain carbon metrics. We have taken the decision not to report on funds that have less than 50% data coverage, as measured by the percentage of the Fund's value covered in specific metric, according to data from Clarity AI. The rationale behind this decision is that low coverage feeding into a carbon metric may potentially be meaningless, or even misleading. In addition, we believe that data coverage under 70% of a Fund's investments should not be relied upon and have highlighted this where relevant.

We have determined a sufficient level of data coverage for the Fund's investments is available in order to provide the key metrics described earlier in this report.

Data vendor differences across fund and firm level reporting

Atomos Investments Ltd may use different data vendors, each with their own methodologies, assumptions, and coverage; and therefore, climate metrics in this report may differ from those presented in their firm-level TCFD reporting or other disclosures. These differences reflect the evolving and non-standardised nature of climate data, and the information presented should not be seen as directly comparable across different data vendors.

Looking ahead

As the ACD of your investment Fund, we have overall responsibility of ensuring that the Fund is managed in-line with its strategy and regulations however, we do not directly manage the underlying investments and therefore, are not involved in investment decisions. Currently, we do not monitor the emissions of our funds, and this is something we are considering implementing.

Some of the climate metrics shown in the report are based on historical emissions data, which may not be a reliable indicator of future emissions, and these should not be the sole basis on which you base your investment decisions. The forward-looking climate metrics are formulated by models based on a number of assumptions and therefore the resulting impact of climate change on your investments predicted by the model may not actually occur in the future. The source of the data used in the report includes Clarity AI. While every care has been taken in populating this output, it must be appreciated that neither IFS nor the sources used guarantee the accuracy, adequacy or completeness of this information or make any warranties regarding results from its usage.

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