

ELEVATION

The Operating Principals of Impact Management

Annual Disclosure 2026

Operating Principles of Impact Management Disclosure Statement

Elevation (the “Signatory”) hereby affirms its status as a Signatory to the Operating Principles for Impact Management (the “Impact Principles”).

This Disclosure Statement applies to the following assets or business lines (the “Covered Assets”):

- Elevation Healthcare Properties II (“EHP II”)
- Elevation Credit Partners III (“ECP III”)

The total Covered Assets in alignment with the Impact Principles is US$ 1.537bn as of 31 December 2025.

Signed:

Name of Institution:

Authorised Representative:

Title:

Date:

The information contained in this Disclosure Statement has not been verified by and is not endorsed by the Global Impact Investing Network, Inc. (“GIIN”), the Secretariat, or Advisory Board. The views, opinions, statements, analysis, and information expressed and contained in these materials are solely the responsibility of the person or entity providing such materials and do not necessarily reflect the views or opinion of the GIIN. The GIIN shall not be responsible for and expressly disclaims any and all liability for any loss, claim or liability, whether arising at law or in equity, that the person or entity publishing this Disclosure Statement or its investors, Affiliates (as defined below), advisers, employees or agents, viewers, or any other third party, may suffer or incur in relation to this Disclosure Statement or the impact investing principles to which it relates. For purposes hereof, “Affiliate” shall mean any individual, entity or other enterprise or organization controlling, controlled by, or under common control with the Signatory.

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Principle 1: Define strategic impact objective(s), consistent with the investment strategy

"The Manager shall define strategic impact objectives for the portfolio or fund to achieve positive and measurable social or environmental effects, which are aligned with the Sustainable Development Goals (SDGs), or other widely accepted goals. The impact intent does not need to be shared by the investee. The Manager shall seek to ensure that the impact objectives and investment strategy are consistent; that there is a credible basis for achieving the impact objectives through the investment strategy; and that the scale and/or intensity of the intended portfolio impact is proportionate to the size of the investment portfolio."

Elevation Advisors LLP ("Elevation") is a specialist investment manager in the healthcare real estate sector with over £2.4bn AUM across Europe (as of 31 December 2025). Established in 2018, we provide our investors with access to long-term partnerships with best-in-class operators across real estate equity, lending and joint venture strategies. We invest across the continuum of care including elderly care homes, rehabilitation clinics, and specialist assets for learning disabilities and mental health.

Elevation was established with a view to addressing the inefficiencies that are inherent in the healthcare real estate markets.

We believe our approach produces the best results for our stakeholders by:

- Providing operators with flexible capital solutions to promote sustainable growth
- Acting as a specialist conduit for institutional capital into the healthcare market, providing value and security for our investors
- Promoting positive social outcomes by backing the highest quality operators and investing in healthcare real estate that provides a great environment for residents and staff

Each of the impact-driven strategies managed by Elevation (EHP II and ECP III), target social and environmental objectives which are set out in a fund-level Social Framework Report (the 'Framework'). The Framework outlines each strategy's Intention, Contribution, Target Stakeholders, Theory of Change, SDG Alignment (including 3: Good Health and Wellbeing, 7; Affordable and Clean Energy, 11; Sustainable Cities and Communities and 13; Climate Action) and Execution and Measurement Process.

The Theory of Change for each strategy will vary slightly depending on the specific requirements of the platform however the general themes of the initiatives and outcomes are broadly similar. An example of the Theory of Change for one strategy is included below.

The Social Framework utilises both in-house and external data collection in respect of the real estate, operator performance and market conditions. External market experts, Carterwood, provide data on the current and future market conditions of the care home real estate sector, and the supply and demand utilised within the Framework reporting.

Theory of Change:

	INITIATIVE	OUTPUT	OUTCOME
1/ Asset and Service Optimisation	Building/acquiring assets and where necessary, refurbishing, to provide high-quality care beds	Increased stable supply of age-appropriate residential and nursing facilities	Increased accessibility to quality living and care services
	Design and promote inclusive spaces within the assets	Increased inclusion, satisfaction and wellbeing of service providers and users	Improve interaction and sense of community through the delivery of high-quality living and social environments for residents and excellent working conditions for employees
	Active ESG asset management and maintenance	More resource-efficient and resilient housing meant to last long-term	Increased long-term asset value in mitigating ESG risks
2/ Operating Partner and Tenant Engagement	ESG engagement initiatives for Operating Partners	Consistent standard for ESG performance and commitments across all Operating Partners and assets	Increased visibility and cohesion across portfolio to accelerate ESG progress
	Reducing barriers to care	Providing Local Authority subsidised bed capacity in a stretched market	Giving access to quality care facilities to those who cannot fully fund their own care
	Promoting frequent quality interaction opportunities for service users	Creating space that allows for a semi-independent yet supportive environment	Increased sense of community fostered across the elderly, reducing loneliness
	Promote staff wellness and working conditions	Increase in employee retention in the care sector	Stabilisation of workforce supply and service quality
3/ Community Engagement	Tenant engagement with local communities	Increased engagement with local communities including individuals, groups and organisations	Benefit to both the residents and the community by increasing interaction to reduce loneliness, while promoting community groups which will also benefit indirect external stakeholders

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Principle 2: Manage strategic impact on a portfolio basis

"The Manager shall have a process to manage impact achievement on a portfolio basis. The objective of the process is to establish and monitor impact performance for the whole portfolio, while recognizing that impact may vary across individual investments in the portfolio. As part of the process, the Manager shall consider aligning staff incentive systems with the achievement of impact, as well as with financial performance."

EHP II and ECP III have commonalities in their approach to the delivery of impact. The Social Framework for each strategy has leveraged the theories behind market tools and initiatives including the Operating Principles of Impact Management and IRIS+.

We have aligned each of our impact-driven strategies with the principles behind the five dimensions of impact:

1. **What:** What is the impact intent of the investment?
2. **How much:** What is the current and expected impact of the investment?
3. **Who:** Which stakeholders experience the impact?
4. **Contribution:** What are the investee and investor financial and non-financial contributions?
5. **Risk:** What is the risk that could prevent the intended impact from materialising?

As demonstrated in our Theory of Change, we have identified the key stakeholders both receiving and delivering impact through our investment strategies. The targeted objectives are conceptualised in a three-tiered approach.

- The first tier, Asset and Service Optimisation, is closely affected by our operations and this is where we have the most control but the smallest scope for positive social outcomes.
- The second tier, Operating Partner and Tenant Engagement, allows collaborative impact working in partnership with our selected third parties.
- The third tier, Community Engagement, is the furthest away from our operational controls but we believe provides the widest opportunity for delivering positive outcomes.

Throughout all stages of the investment lifecycle, assets in the portfolio are assessed against the identified KPIs and outcomes. This assessment takes place during due diligence, Investment Advisory Committee approval, the holding period and, where relevant, at the point of disposal. Oversight during the holding period is carried out through several measures, including external audits of clinical governance for EHP II, development monitoring, building surveys, BREEAM In-Use assessments and sustainability audits. Internally, individuals from the investment, property management and ESG teams visit the homes annually and attend regular calls with operating partners to stay close to operations and report against the relevant social and environmental KPIs and outcomes.

Elevation Advisors LLP ("Elevation") has implemented a remuneration policy (the "Policy") to set out the policies and procedures for Elevation surrounding remuneration of Elevation's executives and employees. The policy has been drafted, approved, implemented and reviewed by Elevation's Board of Directors.

The Policy has been drafted in alignment with Elevation's long-term objectives which include the incorporation of ESG and sustainability opportunities and risks across all business operations and investment management activities. This policy aims to incentivise executives and employees to integrate sustainability risks into their daily activities and investment decision-making.

Principle 3: Establish the Manager's contribution to the achievement of impact

"The Manager shall seek to establish and document a credible narrative on its contribution to the achievement of impact for each investment. Contributions can be made through one or more financial and/or non-financial channels. The narrative should be stated in clear terms and supported, as much as possible, by evidence."

At Elevation, we recognise that investor contribution is a central pillar of impact investing and we must actively pursue opportunities to offer financial and/or non-financial support to the investments and stakeholders. Elevation recognises quality care beds to be those which exceed the market standard provision in terms of average size of the bedrooms, provide an environment conducive to wellbeing, and meet or exceed regulatory requirements.

All investments delivered by Elevation contribute to a societal need within their local communities however we understand that to deliver meaningful impact, we have to take an active approach to work in partnership with operators and other key stakeholders to identify and deliver strategies that will be of most impact.

Throughout our investment process, Elevation can provide flexibility and creativity to deliver capital solutions, ensuring a project is delivered in the most meaningful, time and cost-effective way possible. Both EHP II and ECP III, seek to address the structural undersupply of elderly care beds in the UK, a vital part of the healthcare infrastructure fabric of the country, through the provision of modern high-quality care environments.

Elevation acknowledges that our direct impact is limited, however we are also able to influence wider indirect impact. We have therefore divided the impact objectives and outcomes into a three-tiered approach:

- The first tier, Asset and Service Optimisation, is closely affected by our operations and this is where we have the most control but the smallest scope for positive social outcomes. This includes the provision of new care beds to under-supplied markets through the development of modern and sustainable care homes, delivering care beds back to the market where they have been formally removed and enhancing the quality of existing care bed provision.
- The second tier, Operating Partner and Tenant Engagement allows collaborative impact working in partnership with our selected third parties. This includes the delivery of quality care provision, operating the assets in a sustainable manner, ensuring policies and procedures are in place to enhance wellbeing and wellness of stakeholders including residents and employees.
- The third tier, Community Engagement, is the farthest away from our operational controls but we believe provides the widest opportunity for delivering positive outcomes. This includes the provision of community events and engagement both in and out of the home for the benefit of the residents, and those living within the local community to enhance wellness, reduce loneliness and enrich the activity offering within the homes.

KPIs relating to the above measures have been identified and outlined in the Social Frameworks and are reported annually through data provided by operators and market data analysts.

Further information on the core KPIs and outcomes that are monitored can be found in our **Social Framework Report**.

Principle 4: Assess the expected impact of each investment based on a systematic approach

"For each investment the Manager shall assess, in advance and, where possible, quantify the concrete, positive impact potential deriving from the investment. The assessment should use a suitable results measurement framework that aims to answer these fundamental questions: (1) What is the intended impact? (2) Who experiences the intended impact? (3) How significant is the intended impact? The Manager shall also seek to assess the likelihood of achieving the investment's expected impact. In assessing the likelihood, the Manager shall identify the significant risk factors that could result in the impact varying from ex-ante expectations. In assessing the impact potential, the Manager shall seek evidence to assess the relative size of the challenge addressed within the targeted geographical context. The Manager shall also consider opportunities to increase the impact of the investment. Where possible and relevant for the Manager's strategic intent, the Manager may also consider indirect and systemic impacts. Indicators shall, to the extent possible, be aligned with industry standards and follow best practice."

Elevation has put a robust investment process in place to diligence and benchmark all new investments coming into each investment strategy.

For both EHP II and ECP III we have been able to take benchmarking further through the application of the metrics outlined in the **Social Framework** for the respective strategies. The Framework is applied to each new investment and included in the Investment Advisory Committee approval paper. This is accompanied by the outcome of the investment review using the Elevation Investment House Standards; a benchmark of the environmental, social and governance performance of the investment.

The Social Frameworks are structured to identify the contribution of each investment towards the five dimensions of impact.

***What** is the intended impact outcome of the investment:*

The UK care home market is characterised by increasing demand, constrained supply and significant financial pressures. The nation's ageing population continues to intensify the need for care services, yet the growth in care home capacity continues to move at a slower pace than that of demand.

EHP II's focus continues to assist in meeting the demand for high-quality care beds in the UK by:

- Providing operators with a long-term relationship and solution-oriented approach to promote sustainable growth;
- Optimising access to the market for our investors, and providing stable long-term returns with downside protection, and
- Promoting positive social outcomes by backing the highest quality operators and funding real estate that provides a great environment for residents and staff.

***Who** is the intended beneficiary of the impact:*

For each of our social objectives, we have identified relevant key stakeholder groups to ensure alignment with their specific needs and monitor progress against the fulfilment of those needs.

1/ Asset and Service Optimisation [internal]	2/ Operating Partner and Tenant Engagement [internal / external]	3/ Community Engagement [external]
Service users Relatives and carers of service users Service providers	Service providers Service users	Local community groups NHS / public sector organisations

***How much** impact will be realised by the investment:*

Each of the impact intentions and resulting outcomes is quantifiably measured through a series of KPIs which are linked to market, operational and internal data points. Elevation commissions external market and sustainability reports as part of our due diligence process and ongoing asset management. These reports outline the potential and realised impact of an investment against market-level benchmarks.

***Contribution** of the resulting outcomes:*

The contribution of each of the entity's anticipated outcomes is outlined in the Execution and Measurement section of the Social Framework

***Risk** of the impact deviating from expectation:*

Information collated in the due diligence process is reviewed internally and presented to the Investment Advisory Committee to confirm that the investment would contribute positively to the ESG and impact strategy of the entity.

In addition to the Social Frameworks applied to the investment screening process, Elevation has in place a proprietary due diligence document, the 'Investment House Standards', which is applied to all new investment and lending opportunities. The Investment House Standards benchmark investment against 91 environmental, social and governance criteria across 10 themes. Following an assessment completed by a third-party consultant, the findings of the review are discussed with developers and operators to identify opportunities to further enhance the specification of the assets and the impact throughout the portfolio.

The findings and outcomes of subsequent discussions are presented to the Investment Advisory Committee for consideration in the form of an ESG Scorecard and summary of the environmental, social and governance credentials for the investment and each underlying property.

Principle 5: Assess, address, monitor, and manage potential negative impacts of each investment

"For each investment the Manager shall seek, as part of a systematic and documented process, to identify and avoid, and if avoidance is not possible, mitigate and manage negative impact risks. Where appropriate, the Manager shall engage with the investee to seek its commitment to take action to address potential gaps in current investee systems, processes, and standards, using an approach aligned with good international industry practice. As part of portfolio management, the Manager shall monitor investees' negative impact risk and performance, and where appropriate, engage with the investee to address gaps and unexpected events."

Elevation has a robust investment and active asset management process that integrates oversight of operational activities and real estate performance. Individuals across the organisation are responsible for ensuring that investments perform in line with both financial and non-financial expectations, including sustainability, impact and financial returns.

ESG and sustainability performance is assessed throughout the investment lifecycle to provide a clearer understanding of risk characteristics and return potential. This includes reviewing social metrics in line with the relevant entity's Social Framework, conducting operational due diligence and assessing assets against the Investment House Standards, a benchmarking tool covering 91 ESG and sustainability.

Following a market review in 2024, Elevation identified a lack of social lease clauses in the market to complement existing green clauses. We therefore drafted a suite of social lease clauses to be negotiated into new lease agreements and included retrospectively where possible. This has since been extended to social clauses in facility agreements. The incorporation of green and social clauses in lease and facility agreements brings focus on the activities and outcomes the entities are promoting, encouraging collaboration with operators and borrowers to ensure they are delivered, and negative impacts are mitigated.

In addition to the social outcomes, Elevation has a net zero strategy aligned with the Science Based Targets initiative for Financial Institutions. The strategy includes a reduction in the carbon emissions of Assets Under Management. This commitment provides additional oversight of assets and further collaboration with operators to achieve positive outcomes. The targets include an interim target for 2033 and longer-term target to 2050.

Elevation is also a reporting member of the Global Real Estate Sustainability Benchmark (GRESB), reporting the performance of EHP II and three other funds under management, and the United Nations Principles of Responsible Investment (UNPRI), which measures organisational, entity and asset-level performance, benchmarked against others in the industry.

Since 2022, Elevation has worked to engage and educate operators and developers on key ESG and sustainability issues through the publication of an annual 'Advancing ESG in Healthcare' guide which is shared with stakeholders to drive the conversation and provide an additional touchpoint to discuss the topic further.

Investment in UK care homes can present potential negative impacts, including poor-quality accommodation, high energy consumption and carbon emissions, financial pressure on operators that may affect care standards, and social risks (eg workforce challenges, inequality and resident wellbeing concerns).

Elevation seeks to mitigate these risks through its specialist responsible investment approach, which integrates ESG and impact considerations throughout the investment lifecycle. This includes investing in high-quality, purpose-built care homes through a rigorous due diligence process, applying our proprietary ESG Investment House Standards to all new investments, and undertaking operator screening and disclosures. We seek to improve the environmental performance of existing assets both at acquisition and throughout the holding period, while incorporating market-leading green and social clauses and working closely with operator partners to promote high standards of care, community engagement, fair employment practices and positive social outcomes for residents.

Principle 6: Monitor the Progress of each investment in achieving impact against expectations and respond appropriately

"The Manager shall use the results framework (referenced in Impact Principle 4) to monitor progress toward the achievement of positive impacts in comparison to the expected impact for each investment. Progress shall be monitored using a predefined process for sharing performance data with the investee. To the best extent possible, this shall outline how often data will be collected; the method for data collection; data sources; responsibilities for data collection; and how, and to whom, data will be reported. When monitoring indicates that the investment is no longer expected to achieve its intended impacts, the Manager shall seek to pursue appropriate action. The Manager shall also seek to use the results framework to capture investment outcomes."

Ensuring that there is clear and measurable oversight of an investment throughout its holding period is integral to the delivery of anticipated environmental and social outcomes, and allows collaboration between parties to mitigate deviations from the intended impact of an investment at the earliest opportunity.

Active asset management and reporting throughout the holding period of the investment, across both environmental and social performance, is completed through regular communication and collaboration with stakeholders across both funds. Performance information is reported to investors on a quarterly basis through asset management reports as well as ad hoc reporting on request.

Elevation also publishes an annual sustainability report which is made available publicly as well as entity-level Social Framework reporting on an annual basis. The Social Framework reports for both EHP II and ECP III include reporting against the identified KPIs for the previous calendar year compared to the prior year's reporting where appropriate.

In 2025 EHP delivered 120 new care beds into the UK market, representing 1.78% of all care beds registered nationally during the year while ECP III financed 198 new care beds and preserved access to a further 75 existing beds, creating or maintaining access for 273 residents. Compared to a market average of 35.5% ensuite wetroom provision, EHP II delivered 92% ensuite wetroom beds.

Data feeding into reporting for both platforms is collated from our internal data systems, operator sustainability questionnaires and operational reporting, and collected from external market analysts, Carterwood.

Elevation is also a reporting member of the Global Real Estate Sustainability Benchmark (GRESB), reporting the performance of EHP II and three other funds under management, and the United Nations Principles of Responsible Investment (UNPRI), which measures organisational, entity and asset-level performance, benchmarked against others in the industry.

The above reporting measures ensure that we maintain oversight of the asset's performance and contribution, pulling on operational, market (from external sources) and internal data.

Should it be identified that an asset is not, or is not anticipated to, perform in line with our expectations, we leverage our strong operator relationships to meet with operators and discuss performance with an action plan to ensure that the asset is brought in line as quickly as possible. Following an initial meeting, further follow ups are scheduled as well as visits to the identified homes to monitor the tracking of the asset.

Principle 7: Conduct exits considering the effect on sustained impact

"When conducting an exit, the Manager shall, in good faith and consistent with its fiduciary concerns, consider the effect which the timing, structure, and process of its exit will have on the sustainability of the impact."

Due to the nature of ECP III and EHP II, the approach to exits differs between strategies. In both cases, Elevation seeks to avoid exiting an investment where possible, instead working collaboratively with the operator or borrower to restore performance before considering an exit scenario.

EHP II is an open-ended platform and seeks to retain its investments over the long term. Should an instance arise that the asset is not performing at the anticipated standard, Elevation will first seek to work with the operator on a remedy which avoids an exit from the investment.

If an acceptable option can be achieved in line with the entity's fiduciary duties, an exit may be considered. In such circumstances, Elevation would typically seek an exit that allows the asset to continue operating so that it can continue to deliver the targeted impact. Proceeds from an exit would be reinvested in the platform in line with our investment strategy, enabling further impact to be delivered to the market.

As a lending platform, ECP III has a shorter holding period for its transactions. Exiting a transaction would be a last resort, considered only after all reasonable avenues to resolve borrower-related issues have been explored. If an exit were considered, Elevation would assess the reasons for the exit and the available options to minimise disruption to the targeted impact outcomes, before proceeding with the most appropriate course of action.

Elevation maintains a tracker of assets in the portfolio and evaluates market conditions, asset quality, alignment with anticipated social outcomes, financial performance, operator performance, sustainability performance and exposure to climate related risks.

In the reporting period, there were no exits from funds.

Principle 8: Review, document, and improve decisions and processes based on achievement of impact and lessons learned

"The Manager shall review and document the impact performance of each investment, compare the expected and actual impact, and other positive and negative impacts, and use these findings to improve operational and strategic investment decisions, as well as management processes."

This report constitutes Elevation's first Annual Disclosure to OPIM.

Elevation reports on the impact performance of underlying investments in EHP II and ECP III on an annual basis through alignment with the Social Framework for each entity. This process allows monitoring of performance and reflection on lessons learned throughout the reporting period.

Given the stage at which we are in our reporting and disclosure, we are continuing to grow and develop our strategies learning from previous reporting periods.

In addition to reporting against the KPIs and outcomes in the Social Framework, Elevation publishes an annual sustainability report which also reflects on other assets under management and the activities conducted by the company.

As previously referenced, Elevation is also a reporting member of GRESB and signatory of UNPRI. The annual reporting and benchmarking allows for reflection on the performance of portfolios and underlying investments both in and out of the scope of our impact reporting.

The findings of this report will be considered by the Director of ESG and Portfolio Management and shared throughout the organisation to allow learnings to be reviewed and actions to further enhance processes to be identified and implemented. These matters will also be raised at fund-specific meetings throughout the year.

Principle 9: Publicly disclose alignment with the Impact Principles and provide regular independent verification of the alignment

"The Manager shall publicly disclose, on an annual basis, the alignment of its impact management systems with the Impact Principles and, at regular intervals, arrange for independent verification of this alignment. The conclusions of this verification report shall also be publicly disclosed. These disclosures are subject to fiduciary and regulatory concerns."

Elevation Advisors LLP is committed to maintaining a high level of transparency and accountability in the management of impact across our identified investment strategies. We disclose relevant information regarding the alignment of our impact management systems with the OPIM framework and obtain periodic independent verification.

The Disclosure Statement provides public disclosure of our approach to impact management, including our investment strategy, impact objectives, impact measurement processes and engagement approach. These materials clearly outline how our practices align with each of the nine Principles, and describes any planned improvements to our processes.

Elevation has engaged BDO, an independent, qualified external reviewer, to verify our alignment with the Operating Principles for Impact Management. This verification assesses the design and implementation of our impact management system, the robustness of our processes, and the extent to which we systematically integrate impact considerations throughout the investment lifecycle for the identified entities, as reflected in the Verifier Statement.

This report constitutes Elevation's first Annual Disclosure to OPIM and will be updated annually with independent verification completed on a biennial basis.

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Certain statements in this presentation that are not historical facts are forward-looking statements. These forward-looking statements are necessarily estimates reflecting the judgment of our senior management based on our current estimates, expectations, forecasts and projections and include comments that express our current opinions about trends and factors that may impact future operating results. Some of the forward-looking statements may be identified by words like “believes”, “expects”, “anticipates”, “estimates”, “plans”, “intends”, “projects”, “indicates”, “could”, “may” and similar expressions. These statements are not guarantees of future performance and involves risks, uncertainties and assumptions. Accordingly, actual results or the performance of Elevation or its subsidiaries may differ significantly, positively or negatively, from forward-looking statements made herein. Unanticipated events and circumstances are likely to occur. Readers should not place undue reliance on forward-looking statements. Forward-looking statements speak only as of the date of such statements and, except as required by applicable law, we do not have any intention or obligation to update publicly any forward-looking statements, whether as a result of new information, future events, change in assumptions, or otherwise. Nothing in this presentation should be construed as a profit forecast.

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