

PRIVACY POLICY

Impax Environmental Markets plc (the "**Company**", "**we**", "**us**" or "**our**") is committed to protecting the privacy of individuals whose data it processes ("**you**" or "**your**").

STRUCTURE OF THIS POLICY

This privacy policy is provided in a layered format so you can click through to the section which relates to the information that we collect about you below.

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1. IMPORTANT INFORMATION AND WHO WE ARE

The Company is committed to protecting the privacy and security of personal data which we process. This privacy policy provides information on how the Company collects and processes personal data as a controller of data held about shareholders, investors, potential shareholders, potential investors, business contacts and webpage users.

This policy outlines your data protection rights under the EU data protection regime introduced by the General Data Protection Regulation (Regulation 2016/679) as it forms part of the law in the United Kingdom (the "**UK GDPR**").

For the purposes of data protection law (including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018), the controller of your personal data is the Company, Impax Environmental Markets plc. Our registered office is One Fleet Place, London, EC4M 7WS.

The Company's alternative investment fund manager is Impax Asset Management (AIFM) Limited (the "**Manager**") and our company secretary is Juniper Partners Limited ("**Juniper**" or the "**Company Secretary**"). In certain circumstances, the Manager and other service providers may act as a controller of your personal data for their own purposes (for example, to comply with their legal obligations). In those cases, their processing of your personal data will be governed by their own privacy notices.

This website is not intended for children and children should not use or access our website. We do not knowingly collect data relating to children.

We may from time to time update this policy. Please refer back to this page regularly to see any changes or updates to this policy. We may update this Privacy Policy from time to time. Any changes will be posted on our website and will take effect on publication. This Privacy Policy was last updated in March 2026.

How to contact us: If you have any questions about this Privacy Policy or our data protection practices, please write to us at our registered office or via the contact details for the Company Secretary provided on our website (www.iemplc.co.uk).

2. CATEGORIES OF DATA SUBJECTS

(A) INVESTORS / SHAREHOLDERS / POTENTIAL INVESTORS

We process personal data relating to our investors and shareholders (and prospective investors/shareholders) for the purposes set out below.

Types of personal data

We may collect and process the following categories of personal data:

- Identity data (e.g. name, title, date of birth, personal identifiers where required by law).
- Contact data (e.g. postal address, telephone numbers, email addresses and communication preferences).
- Know Your Customer (KYC) and due diligence data (e.g. copies of ID documents, anti-money laundering and sanctions screening results, politically exposed person status).
- Financial and holding data (e.g. details of your shareholding in the Company, investment activity, dividend/payment instructions, bank details).
- Marketing preference data (e.g. your opt-in/opt-out preferences and the types of updates you wish to receive).
- Correspondence data (e.g. information you provide in forms, letters, emails and telephone calls).

How we collect personal data

We collect personal data:

- From you – for example when you complete application forms, communicate with us, our Company Secretary, registrar or the Manager, or otherwise interact with us.
- From third parties – for example from investment platforms/nominees through which you hold shares, our registrar, the Manager, corporate brokers and other service providers involved in administering your holding.
- From publicly available sources – for example Companies House and other public registers, where permitted by law.

Legal bases for processing

We will only process your personal data where permitted by law. Depending on the context, we rely on one or more of the following legal bases:

- Performance of a contract with you or taking steps at your request prior to entering into a contract (e.g. to administer your shareholding and pay dividends).
- Compliance with legal and regulatory obligations (e.g. under company law, tax law, anti-money laundering and sanctions regimes).
- Our legitimate interests (or those of a third party), provided these are not overridden by your interests and fundamental rights (e.g. operating and developing the Company, communicating with shareholders and prospective investors).
- Your consent (e.g. for certain electronic marketing communications, where required). Where we rely on consent, you may withdraw it at any time.

Purposes for which we use your personal data

- Administering and managing your shareholding (including maintaining statutory registers, facilitating shareholder meetings and votes, processing dividend payments and responding to queries).
- Carrying out KYC/AML, sanctions and other compliance checks, and preventing, detecting and investigating fraud and other crime.
- Providing shareholder communications, reports and updates on the Company's performance and activities.
- Conducting analysis and market research relevant to the Company's shareholder base and investor relations.

- Providing you with information about products, services and investments which we believe may be of interest to you (subject to applicable marketing laws and your preferences).
- Maintaining records, managing incidents and defending or establishing legal claims.

Failure to provide data

Where we need to collect personal data by law or under the terms of a contract with you and you fail to provide that data when requested, we may not be able to perform the contract (for example, to administer your shareholding or pay dividends). We will notify you if this is the case.

(B) VISITORS TO OUR WEBSITE

When you visit our website (www.iemplc.co.uk), we may collect and process certain personal data about you, including via cookies, server logs, pixel tags and similar technologies. The types of data may include:

- Technical data (e.g. IP address, browser type and version, time zone setting and location, operating system and platform, device identifiers and other technology on the devices you use).
- Usage data (e.g. information about how you use and navigate our website and the content you view).
- Identity and contact data you provide through web forms (e.g. to subscribe to updates).
- Marketing preference data (e.g. your opt-in/opt-out choices).

We use this information to operate, secure and improve our website, to understand user behaviour, and (where permitted) to send you updates about the Company. Where we rely on your consent (for example, for certain non-essential cookies or marketing), you can withdraw it at any time using the tools provided on the website or by following the unsubscribe instructions in our communications.

Links to third-party websites

Our website may include links to third-party websites. We are not responsible for the privacy or cookie practices of those websites. You should review the privacy information provided on each website you visit.

(C) BUSINESS CONTACTS

We process personal data about our business contacts (such as representatives of service providers, suppliers, advisers, corporate brokers and other stakeholders). The kinds of data we may process include identity and contact data, financial data (where relevant for payments), marketing preferences and correspondence data. We use this information to manage our relationships, procure and receive services, make payments, conduct compliance checks,

maintain records and operate the Company, relying on performance of contract, legal obligations and/or our legitimate interests as appropriate.

Special category data and criminal convictions data

We do not intentionally collect special category personal data (e.g. data revealing racial or ethnic origin, political opinions, religious beliefs, trade union membership, genetic or biometric data, or data concerning health or sex life) or data relating to criminal convictions and offences in connection with the activities described above. Please do not provide such information to us. If you nevertheless provide such data, we will treat this as your explicit consent for us to process it for the limited purpose of deleting it, unless we have a separate lawful basis to retain it.

3. DISCLOSURES OF YOUR PERSONAL DATA

We share personal data with trusted third parties where necessary for the purposes set out in this policy. These include: the Manager (Impax Asset Management (AIFM) Limited); our registrar; our Company Secretary (Juniper Partners Limited); corporate brokers; printers and mailing houses; IT and cybersecurity service providers; website and analytics providers; banks and payment providers; auditors and professional advisers; background and compliance screening providers; and other suppliers engaged to support the Company. Where those third parties act as our processors, they are required to process personal data only on our instructions and to implement appropriate security measures.

We may also disclose personal data to third parties where required by law or regulation, to regulators and government authorities (such as the Financial Conduct Authority and HMRC), to law enforcement agencies, to courts and tribunals, and to prospective or actual buyers or other parties in connection with corporate transactions relating to the Company. If your shares are held through a nominee, and it is lawful to do so, we may provide relevant information to that nominee.

4. DATA RETENTION

We retain personal data only for as long as reasonably necessary to fulfil the purposes we collected it for, including to comply with legal, regulatory, tax, accounting or reporting requirements. To determine appropriate retention periods, we consider the amount, nature and sensitivity of the data, the potential risk of harm from unauthorised use or disclosure, the purposes of processing and whether those purposes can be achieved through other means.

5. INTERNATIONAL TRANSFERS

Some of our service providers (and their group companies or sub-processors) may be based outside the UK or the European Economic Area (EEA), or may process personal data in those locations. Where we transfer personal data internationally, we will ensure that appropriate safeguards are in place in accordance with data protection law (for example, adequacy regulations/decisions or standard contractual clauses, together with supplementary measures where required). Further information is available on request.

6. DATA SECURITY

We have implemented technical and organisational measures designed to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed. While we aim to use appropriate security to protect your personal data, we cannot guarantee the security of information transmitted over the internet.

7. YOUR LEGAL RIGHTS

Under data protection law, you have rights in relation to your personal data, subject to certain conditions and exemptions. These may include the right to request access, rectification, erasure, restriction, data portability and to object to processing (including to direct marketing). Where processing is based on your consent, you may withdraw that consent at any time. To exercise your rights, please contact us using the details in section 1 above. We may need to request specific information from you to help us confirm your identity and to ensure your right to access your personal data (or to exercise any of your other rights). We try to respond within one month; complex or multiple requests may take longer, and we will keep you informed.

You also have the right to lodge a complaint with the UK Information Commissioner's Office (ICO) if you are concerned about the way we process your personal data. We would appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

8. FURTHER INFORMATION

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us. If you have any questions about this Privacy Policy or how we handle your personal data, please write to Impax Environmental Markets plc, One Fleet Place, London, EC4M 7WS.

Additional information about the Company, including key documents and reports, is available on www.iemplc.co.uk.