

1 INTRODUCTION

This document responds to the disclosure obligations imposed on financial market participants under the Regulation (EU) 2019/2088 of 27 November 2019 on sustainability-related disclosures in the financial services sector (“**SFDR**”). This document is not exhaustive and makes reference to other policies such as the Responsible Investment Policy that is public and can be found in White Summit Capital website.

White Summit Capital Management SGEIC, S.A. (“**WSC**”), as alternative investment fund manager (AIFM), registered with CNMV (*Comisión Nacional del Mercado de Valores*) under number 189, is subject to the SFDR.

2 SUSTAINABILITY RISK POLICIES

WSC integrates sustainability risks in its investment decision-making process. Details on how the risks are integrated throughout the investment life cycle can be found in the Responsible Investment Policy.

3 ADVERSE SUSTAINABILITY IMPACTS

WSC considers principal adverse impacts (“PAI”) of investment decisions on sustainability factors.

WSC uses the definition of principal adverse sustainability impacts described in the SFDR: “those impacts of investment decisions and advice that result in negative effects on sustainability factors”. In turn, sustainability factors are defined as “environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters”.

WSC believes that investment decisions that negatively affect any environmental or social matter can have a significant impact to risk and value creation.

In addition, the regulatory technical standards (“RTS”) issued under the SFDR refer to the principal adverse impacts as a set of indicators that are to be collected and reported, starting June 2023 for the reference period 1 January 2022 to 31 December 2022. The “principal adverse impact indicators” of the SFDR range from environmental indicators to social and employee, respect for human rights, anti-corruption, and anti-bribery matters.

WSC will take the necessary steps to comply with the commitment to collect and report these indicators.

4 REMUNERATION POLICY

The Remuneration Policy of White Summit Capital Management SGEIC, S.A. is consistent with the integration of sustainability risks. The employees at White Summit Capital Management SGEIC, S.A. are remunerated through a combination of base salary and variable remuneration. The variable remuneration is made up of two main elements: a discretionary annual cash amount and a long-term incentive plan. A variable component is linked to the achievement of ESG goals, both at an individual and a firm level.

**White Summit Capital
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