

## 1 INTRODUCTION

Mandatory disclosures under Regulation of the European Parliament and of the Council on sustainability-related disclosures in the financial services sector (EU) 2019/2088 (“SFDR”).

The Sustainable Finance Disclosure Regulation requires financial market participants and/or asset managers such as White Summit Capital (WSC) and its parent company Transiziona GP Sàrl with regard the management of WSC Helvetic Infrastructure Partners I SLP to provide information to investors regarding the integration of sustainability risks, the consideration of adverse sustainability impacts, the promotion of environmental or social characteristics, and sustainable investment.

This White Summit Capital Sustainability Policy specifically addresses the obligation in Article 3(1) of the Regulation:

*“Financial market participants shall publish on their websites information about their policies on the integration of sustainability risks in their investment decision-making process.”*

The following disclosures refer to the sustainability policies and investment decision-making processes of WSC and Transiziona GP Sàrl in general.

## 2 POLICIES ON THE INTEGRATION OF SUSTAINABILITY RISKS IN INVESTMENT DECISION-MAKING PROCESSES (ARTICLE 3 SFDR)

“Sustainability risks” refer to an environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of the investment. WSC has developed a proprietary sustainability framework, that incorporates such sustainability risk considerations into the manager selection and investment process, considering both the manager’s in-house operations as well as its investment business. The WSC’s sustainable investment and ESG approach ensures the adequate and systematic assessment of the relevant risk factors associated with a proposed investment and the adherence to the investment restrictions with respect to socially and ethically undesirable activities as defined for a specific fund product. Identified issues of concern need to be brought to the investment committee’s attention pre investment and an investment will not be pursued in case of a persistent red flag or if in aggregate the proposed investment does not meet the requirements of the White Summit Capital Sustainability Policy.

### 3 PRINCIPLE ADVERSE SUSTAINABILITY IMPACT STATEMENT (ARTICLE 4 SFDR)

Article 4 SFDR aims to achieve transparency with regard to principal adverse impacts (“PAIs”) of investment decisions on sustainability factors, defined as environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters. WSC acts primarily as long-term investor and has thus only limited influence on the reporting arrangements between its investee managers and the underlying companies. As a consequence, it cannot be foreseen whether the data capture requirements as specified in the Regulatory Technical Standards (RTS) can be met and at the current point in time WSC must assume to not be able to fully take into account and monitor the PAIs of its investment decisions as requested by Article 4. However, WSC seeks to engage with responsible managers that aim to create value and will indeed consider material adverse effects of their investment decisions. WSC will monitor developments with regard to available information and reporting practices to determine whether and when it will be reasonably possible in the future to fully implement the processes required by the Article 4 SFDR / RTS framework as it will be applicable at the time.

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