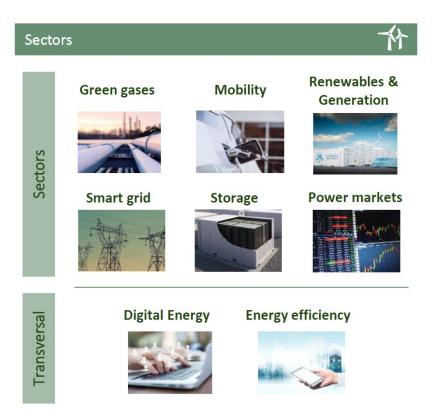
# WEBSITE at Fund Level (Klima Energy Transition Fund, FCR) – Art. 10 SFDR

Klima Energy Transition Fund, FCR, (hereinafter "Klima") managed by Alantra Enagás Energy Transition S.A. (hereinafter "The Management Company" or "The Investment Manager"), in compliance with Art. 10 of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (hereinafter "SFDR" or the "Regulation"), has prepared information and published this information on the website.

Klima's investment strategy is to invest in technology enablers of the energy transition, therefore making Klima an impact fund by nature. We believe in responsible investing: by incorporating a broad set of sustainability considerations, we improve the financial performance and value creation of our portfolio companies and provide alignment between investors and society. Our purpose is to promote and enable innovative technology companies tackling the decarbonization of the energy system. The sectorial focus includes digital energy, energy efficiency, low carbon solutions, renewables and generation, energy storage, smart grid, sustainable mobility, and power markets.



We consider Klima to be an article 9.2 fund where a financial product has sustainable investment as its objective and no index has been designated as a reference benchmark. An impact methodology to measure the environmental impact of each portfolio company of the Fund has been set up and will be implemented and reported on a yearly basis over the lifetime of the Fund.

# WEBSITE at Entity Level (Alantra Enagás Capital Privado) – Art. 3-4-5 SFDR

Alantra Enagás Energy Transition S.A. (hereinafter "The Management Company" or "The Investment Manager"), in compliance with Art. 3,4 and 5 of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (hereinafter "SFDR" or the "Regulation"), has prepared information on the policy of incorporating sustainability risks into its investment decision-making process as a participant in the financial market, and published this information on the website.

## Article 3 – Transparency of sustainability risk policies:

#### INTEGRATION OF SUSTAINABILITY RISKS IN THE DECISION-MAKING & INVESTMENT PROCESS

Alantra Enagás Energy Transition aligns the investment activities of the Klima Energy Transition Fund FCR (the "Fund") and the activities of its portfolio companies with most of the 17 sustainable development goals of the United Nations 2030 Agenda for Sustainable Development, with a special focus on the fight against the climate change.

Moreover, the Fund Manager is a signatory of the PRI Association and will align the investments of the Fund with the internationally recognised principles for responsible investments ("PRI"), set out below:

- Principle 1: We will incorporate ESG issues into investment analysis and decision-making processes;
- Principle 2: We will be active owners and incorporate ESG issues into our ownership policies and practices;
- Principle 3: We will seek appropriate disclosure on ESG issues by the entities in which we invest;
- Principle 4: We will promote acceptance and implementation of the Principles within the investment industry;
- Principle 5: We will work together to enhance our effectiveness in implementing the Principles;
- Principle 6: We will report on our activities and progress towards implementing the Principles.

The Investment Manager integrates ESG across the entire investment cycle, with the support of a third-party advisor:

## a. Pre-Investment

- i. All investments of the fund (and screening thereof) are technologies aiming at tackling climate change and environmental issues;
- ii. ESG due diligence and an improvement plan is agreed with the management teams;

### b. Monitoring

- i. Proposal and tracking of ESG initiatives at the board of directors' level;
- ii. A set of circa 14 key performance indicators (KPI) SFDR compliant are monitored with an ESG monitoring tool (third party support) for annual reporting;
- iii. One or several climate-related impact KPI(s) and targets for the full investment cycle agreed with the management teams and reported on an annual basis with third party support;

## c. Divestment

- i. Complying to internal assessment of potential buyers;
- ii. The final assessment of the climate-related KPI(s) over the investment cycle revealed at exit;

A significant percentage of the carried interest for the Investment Manager is linked to fulfilment of targets for the climate-related impact KPI(s) set for each portfolio company.

#### ALANTRA GROUP'S GOOD GOVERNANCE INTERNAL POLICIES

The Investment Manager belongs to the Alantra Group, a group of companies whose parent company is the Spanish entity Alantra Partners, S.A., whose shares are admitted to trading in the Spanish Stock Exchange ("Alantra").

The Alantra Group is strongly committed to environmental, social, and good governance practices and has several internal policies in place that are applicable to all the subsidiaries within the group.

As part of the Alantra Group, the Investment Manager is subject to the following group policies:

- Anti-Money Laundering Manual which requires us to determine the risk profile of investors and target investments;
- Alantra Group Code of Ethics which dictates the ethical principles and rules that all the executives and employees of the Group should adhere to with the supervision and support of the Risk and Compliance Department;
- Corporate Governance Agreement which supports objective decision making to maximize our investor's returns;
- Also, Alantra follows other policies established by Alantra Group such as the Corporate Social Responsibility Policy and the Whistleblowing Policy

The referred policies are available on our website at: www.alantra.com

## Article 4 – Transparency of adverse sustainability impacts at entity level

#### SUSTAINABILITY RISKS

Sustainability Risks are seen by Alantra as part of broader risk categories (such as market, operating etc.), and as such are handled in accordance with internal regulations.

## a. Environmental Risks

The Investment Manager expects a positive impact on sustainability since the Fund currently under management will only invest in sectors and companies with innovative technologies that provide products and services in an environmentally friendly manner to decarbonize the economy. The Investment Manager is selective among investment opportunities applying exclusion criteria (i.e. environmentally unacceptable projects which are not aligned with our investment strategy), and conducting when relevant, environmental due diligence in the pre-investment phase.

The Investment Manager supports the enforcement of the environmental laws in the countries where its portfolio companies are based.

## b. Social Risks

Spain is a member of several international organizations, and as a result, is bound by international contracts and agreements that ensure a high degree of employee protection, such as equal treatment and remuneration, or occupational health and safety. The Investment Manager will reduce these risks by strictly adhering to generally binding legislation in the field of labour law as well as internal regulations.

Additionally, The Investment Manager believes that it is essential that the employees of the portfolio companies enjoy a good work environment that would allow them to grow and contribute to the value creation process. With this belief, The Investment Manager considers it relevant to offer an environment that will respect the diversity of people and cultural backgrounds, give access to workers with reduced mobility, comply with the international conventions on human rights, promote fundamental employee working conditions such as

minimum wages, working hours, health & safety at the workplace and the management of individual career plans.

#### c. Governance risks

Governance is one of the first aspects that The Investment Manager seeks to improve in a portfolio company. The investee company would generally constitute a Board of Directors that would bring relevant sectorial experience and contribute to defining the strategy with the highest ESG standards, including independence, transparency, and a correct management of conflicts of interest and ethics.

The Investment Manager is committed to the Alantra Group Code of Ethics which seeks to denounce conflicts of interest, be accountable, and transparent in all its activities, and it intends to transmit the same values to its portfolio companies. Some of the most relevant aspects procured in portfolio companies include:

- Compliance to international best practice standards to prevent corruption, bribery, financial crime, money laundering risks etc.,
- · Promoting accountability, transparency, honesty, and integrity at the time of conducting business,
- Cooperating with regulators and complying with their requirements,
- Establishing proper systems for risk management and reporting.

## INCORPORATION OF SUSTAINABILITY RISKS

As explained above, The Investment Manager evaluates Sustainability Risks at the start of the investment process and throughout the investment and divestment processes. It conducts an initial ESG due diligence, and the investment process is stopped if significant wrongdoing in the areas indicated under Section 4. of this policy on Sustainability Risks is discovered.

Additionally, The Investment Manager will closely follow legislative developments in the field of sustainability in financial services, and documentation made available to investors will be updated in accordance with recognized legislation and advice from the relevant authorities.

# Article 5 – Transparency of remuneration policies in relation to the integration of sustainability risks

Alantra Group Remuneration Policy applies to all employees and to The Investment Manager.

It is consistent and promotes a sound and efficient risk management with respect to sustainability risk considerations and does not encourage risk taking that would be incompatible with the risk profile of the Fund.

It is in line with the business strategy, objectives, corporate culture and long-term interests of the Fund managed, its investors and The Investment Manager.

It also considers the effect of potential conflicts of interest on remuneration in a way that is consistent with the integration of sustainability risk.

The Appointments and Remuneration Committee shall review and evaluate the Alantra Group's Remuneration Policy at least annually.

Sustainability and impact are considered when setting targets and evaluating performance for the variable remuneration of The Investment Manager. A significant percentage of the carried interest for The Investment Manager is linked to fulfilment of climate-related impact KPI(s) and targets set for each portfolio company at the beginning of the investment cycle. The Remuneration Policy is approved by the Board and reviewed at least annually.