



Sustainability-related disclosure linked to the Sustainable Finance Disclosure Regulation

March 2025

This document is established in accordance with the 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 (“SFDR”) and relates to Alba Infra Partners SAS (“Alba”).

Information is communicated below with respect to:

- **the sustainability risk policy (article 3 SFDR);**
- **the principal adverse impacts (PAI) (article 4 SFDR); and**
- **the remuneration policy in relation to the integration of sustainability risks (article (SFDR).**

Article 3 SFDR – Transparency of Sustainability Risks policies

Sustainability risks are defined by SFDR as “an environmental, social or governance (ESG) event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of the investment”.

Alba considers sustainability risks across its investment decision-making process and aims at reducing and mitigating them.

In general, a proactive approach to ESG engagement will be applied throughout the investment cycle of the investments, in accordance with Alba's commitment as a responsible investor and its Responsible Investment Policy:

- **pre-acquisition**, through:
 - the application of the exclusions referred to in the appendix of its Responsible Investment Policy;
 - the evaluation of sustainability risks and opportunities at an early stage of the investment process;
 - the conduct of an ESG due diligence that will inform the origination team's analysis of the sustainability risks and opportunities, including their evaluation of the portfolio company or assets capacity to address the sustainability risks identified;
 - a veto right of the ESG Director on the grounds of ESG over the Investment Committee's decision to proceed with the investment;
 - the integration of binding contractual ESG clauses into the legal documentation, when relevant;
- **during the holding period**, through:
 - the application of best governance practices;
 - the promotion of a dialogue with stakeholders on ESG matters;
 - a regular monitoring of the ESG agenda;
 - the monitoring of several ESG key performance indicators gathered through an annual ESG questionnaire;
- **at the time of the exit**, through the disclosure to potential buyers of material ESG matters, impacts and steps taken to manage them.

The most recent version of our Responsible Investment Policy detailing the integration of sustainability risks in their investment decision-making process is available [here](#).

Article 4 SFDR – Consideration by the Manager of the Principal Negative Impacts of investment decisions on sustainability factors

The main adverse sustainability impacts correspond to the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and personnel issues, respect for human rights and the fight against corruption and acts of corruption.

At entity level, Alba does not consider the specific adverse impact indicators Impacts (PAIs) set out in Annex 1 of the Commission Delegated Regulation (EU) 2022/1288 of 6 April 2022 in its investment decisions.

This decision is primarily due to the current challenges in obtaining reliable and comprehensive data necessary for accurate assessment, especially for investment funds created before, and not distributed since, the entry into force of the SFDR, like Alba European Operational Projects I SCSp.

We are actively monitoring developments in data availability and methodologies and will reassess our position periodically to ensure alignment with industry best practices. In the future, we could also consider the PAIs at the level of the investment funds managed by Alba.

In any case, we strive to reduce the potential negative impacts of our investments on sustainability factors by enforcing a strict exclusion policy, conducting thorough due diligence, actively engaging as responsible investors, and adhering to international standards

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

Alba pays staff a combination of fixed remuneration (salary and benefits) and variable remuneration (including bonus). Variable remuneration for relevant staff takes into account compliance with all Alba's policies and procedures, including those relating to the impact of sustainability risks on the investment decision making process.