

# Web disclosure in accordance with Article 10 of Regulation (EU) 2019/2088 and Articles 25 to 36 of Delegated Regulation (EU) 2022/1288 of the Commission

**Product Name: Treset Infrastructure Fund I, F.C.R.E.**

**TESET CAPITAL S.G.E.I.C., S.A**

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## **a) Summary (art. 25)**

TESET INFRASTRUCTURE FUND I, F.C.R.E. (the “Fund”) discloses sustainability information about the product under Article 8 of Regulation (EU) 2019/2088 on the disclosure of sustainability-related information in the financial services sector (“SFDR”).

The Fund promotes environmental or social characteristics and does not aim to make sustainable investments. A substantial part of the Fund's investments is expected to promote environmental and social characteristics in accordance with Article 8 of the SFDR.

As part of its investment strategy, the Fund encourages the improvement of the environmental, social, and governance (ESG) performance of the companies in which it invests, taking into account adverse impacts. To comply, Treset engages with the management team and through the influence granted by exercising the political rights held over the company at the Board. Engagement is primarily conducted with the manager of the invested entity during the Due Diligence, Hiring, and Monitoring phases.

In an initial analysis phase, Treset has defined a series of sectoral exclusions in which its Funds cannot invest in certain activities, including, among others, specific sectors or activities defined in the ESG policy of the manager.

Secondly, Treset Capital analyzes ESG issues, including associated risks and opportunities, during the evaluation and due diligence process of target companies. The results of this assessment are systematically recorded in the investment memorandum to ensure that the investment committee is informed about ESG issues.

Thirdly, for each portfolio company, Key Performance Indicators (KPIs) and objectives will be defined, the compliance of which will be monitored. These ESG KPIs and objectives defined for the companies will be reported to the Board of Directors at least annually. Similarly, any matter that may significantly affect the value creation of the companies will be shared and evaluated with the management of the invested companies. Furthermore, the application of ESG criteria within the invested companies will be promoted, and good practices will be shared among the different portfolio companies to improve ESG performance across all of them.

Additionally, Treset conducts periodic monitoring of the ESG Policy during Board meetings and of the managed Funds.

The Fund does not use a benchmark for the purpose of promoting environmental or social characteristics.

#### **b) No sustainable investment objective (art. 26)**

This financial product promotes environmental or social characteristics, but does not have the objective of sustainable investment.

#### **c) Environmental or social characteristics of the financial product (art. 27)**

The Fund promotes, as part of its investment strategy, the improvement of the environmental, social, and governance (ESG) performance of the companies in which it invests.

The main objectives of improving the ESG performance of the invested companies are:

Reduction of negative externalities generated by companies, promoting efficient resource use, reducing waste generated, and encouraging good environmental practices and employee awareness in the invested companies regarding environmental matters.

Improving the social performance of the invested companies, with job creation and enhancement of diversity, equality, and inclusion in the workforce.

Promoting the improvement of good corporate governance structures and establishing strict policies that ensure compliance with all relevant laws to prevent corruption in all its forms, including extortion, money laundering, and bribery.

#### **d) Investment strategy (art. 28)**

The investment strategy to improve the ESG performance of the company is carried out through engagement with the management team and through the influence granted by exercising the political rights held in the company at the Board.

In the ESG due diligence of the companies in which investments are made, good governance practices are analyzed. The issues reviewed include:

- the existence and composition of the Board of Directors,
- the remuneration of directors,
- the existence of compliance policies,
- the existence of adequate information systems,
- the supplier policies,
- the cybersecurity and data protection policies.

Subsequently, in defining action plans, actions such as the inclusion of independent individuals on the Board of Directors, the existence of criminal compliance, and robust policies in managing the supply chain, cybersecurity, and data protection may be included.

#### **e) Proportion of investments (art. 29)**

The Fund aims for the majority of its investments to promote environmental and social characteristics in accordance with Article 8 of the SFDR, without having sustainable investment as one of its objectives.

#### **f) Monitoring of environmental or social characteristics (art. 30)**

To monitor progress in the ESG performance of the company, a system of indicators is employed that are evaluated at least once a year.

Similarly, any matter that may significantly affect the value creation of the invested companies will be shared and evaluated with the management of the invested companies. Furthermore, the application of ESG criteria will be promoted. The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance within the invested companies, and good practices will be shared among the different portfolio companies to improve ESG performance across all of them.

#### **g) Methods (art. 31)**

As part of the investment strategy aimed at improving the ESG performance of the invested companies, several binding elements have been established:

Due diligence is conducted to identify the main ESG risks and opportunities in the company prior to investment.

If material risks or relevant adverse incidents are detected, the company may be required to implement immediate measures to manage those risks and eliminate the identified negative impact.

#### **h) Sources and treatment of data (art. 32)**

The data used to measure the achievement of the Fund's environmental objectives are obtained from the companies themselves, but there is no specific process for reviewing or auditing the quality of the data.

For portfolio companies, when possible, Key Performance Indicators (KPIs) and objectives will be defined, the compliance of which will be monitored. These ESG KPIs and objectives defined for the companies will be reported to the Board of Directors at least annually. Similarly, any matter that may significantly affect the value creation of the companies will be shared and evaluated with the management of the invested companies.

The proportion of data obtained through estimation depends on the indicator in question and its availability. Estimated data, where applicable, will be made by extrapolating values or characteristics based on experience.

#### **i) Limitations of methods and data (art. 33)**

In some cases, it will not be possible to obtain the necessary data for calculating the indicators of the invested company when the latter has been recently acquired and, as a result, has not been able to implement the ESG processes required by the Manager.

The lack of data to measure the indicators does not prevent the invested company from achieving social or environmental characteristics.

#### **j) Due diligence (art. 34)**

Teset Capital analyzes ESG issues, including associated risks and opportunities, during the evaluation and due diligence process of target companies. The results of this assessment are systematically recorded in the investment memorandum to ensure that the investment committee is informed about ESG issues.

The Fund analyzes material ESG risks and potential negative impacts on sustainability factors. These are identified during the due diligence phase, and their management is actively carried out throughout the investment period by defining and implementing actions that contribute to their reduction.

#### **k) Engagement policies (art. 35)**

This is primarily carried out through active participation in the Governance Bodies of the invested companies, particularly through the Board of Directors. For each portfolio company, when possible, Key Performance Indicators (KPIs) and objectives will be defined, the compliance of which will be monitored. These ESG KPIs and objectives defined for the companies will be reported to the Board of Directors at least annually. Similarly, any matter that may significantly affect the value creation of the companies will be shared and evaluated with the management of the invested companies. Furthermore, the application of ESG criteria within the invested companies will be promoted, and good practices will be shared among the different portfolio companies to improve ESG performance across all of them.

#### **l) Designated benchmark (art. 36)**

The Fund does not use a benchmark for the purpose of promoting environmental or social characteristics.