Rubicon Partners VI SCSp (the *Fund*) – Sustainability-related disclosures

EU Sustainable Finance Disclosure Regulation

Date: 09/09/2024 (First Published 08/08/2024)

Version 2

The following information is required to be produced by article 10 of 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***).

Product name:	**Rubicon Partners VI SCSp** Legal Entity Identifier number: 213800AXPVGNIAZB4P38
Environmental or social characteristics of the financial product:	Certain of the Fund's investments (in whole or in part) seek to promote environmental and social characteristics, namely: the implementation of an ESG policy that considers certain ESG risks when evaluating investment decisions; and the promotion of environmental and social governance in its investee companies throughout the duration of an investment. For further detail please see section C of this summary document.

A. Summary

The Fund seeks to realise long term capital gains primarily from investments in industrial businesses, with a particular focus on investments with transactional or operational complexity.

Article 8 of the SFDR applies to alternative investment funds which "promote, among other characteristics, environmental or social characteristics, or a combination of those characteristics, provided that the companies in which the investments are made follow good governance practices". Rubicon Partners GP VI S.à r.l., the alternative investment fund manager of the Fund, (the ***Manager***) considers that the Fund falls within the type of financial product identified by article 8 of the SFDR. Certain of the Fund's investments (in whole or in part) seek to promote environmental and social characteristics, namely the implementation of an ESG policy that considers certain environmental and social risks when evaluating investment decisions and the promotion of environmental and social governance and initiatives in its investee companies throughout the duration of an investment. For further detail on these characteristics, please see section C of this summary document.

While the Manager considers that the Fund promotes environmental and social characteristics and complies with good governance practices for the purposes of article 8 of the SFDR, the Fund does not:

- use a designated index as a reference benchmark (within the meaning of article 8(1)(b) of the SFDR);
- commit to making a minimum proportion of investments which qualify as "environmentally sustainable" under article 3 of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088 (the ***Taxonomy Regulation***); or
- take into account the principal adverse impacts (***PAIs***) on sustainability factors within the meaning of the SFDR. Instead, the Manager considers material sustainability risks (and other operational concerns, which may impact on the value of the investment) that are most relevant to the given opportunities and investment objectives of the investments.

As the relevant terms are defined in the SFDR, the Fund does not (1) commit to investing in a "sustainable investment" (and so the Manager considers that the Fund is an Article 8 "Light" financial product), although the Fund is not restricted from doing so; and/or (2) have "sustainable investment" as its objective (within the meaning of article 9 of the SFDR).

The categories in the SFDR can be open to subjective interpretation, and the Manager's view on the appropriate classification may develop over time, including in response to statutory or regulatory guidance or changes in industry approach to classification.

B. No sustainable investment objective

This financial product promotes environmental and social characteristics, but does not have as its objective sustainable investment.

C. Environmental or social characteristics of the financial product

What are the environmental or social characteristics promoted by this financial product?

The Fund promotes environmental and social characteristics by:

- E&S screening - Implementing an environmental, social and governance (***ESG***) policy which considers environmental and social risks (as defined below) when evaluating investment decisions. Having identified material environmental and social risks, the Fund will not invest into a business where these environmental and social risks are deemed unacceptable and not capable of remediation or change, as determined through this diligence process.
- Promoting better governance - Looking to promote the governance of environmental and social issues in its investee companies throughout the duration of an investment including the sharing of best practices.

Environmental and social risks are defined as events or circumstances relating to the compliance with relevant environmental and health and safety at work laws which, if were to crystalise, would have a significant actual or potential negative impact in the value of the investment.

In the Manager's complete discretion, the Manager may, over time, choose to update the environmental and/or social characteristics of the Fund.

D. Investment strategy

What investment strategy does this financial product follow?

The Fund seeks to realise long term capital gains from investments in industrial businesses, with a particular focus on investments with transactional or operational complexity. The Fund aims to mainly invest in businesses headquartered in the United Kingdom, noting also that a minority of investments may be in businesses outside of the United Kingdom.

In pursuing the above investment strategy, the Fund will take into consideration the environment and social objectives noted in this disclosure.

What is the strategy used to meet the environmental or social characteristics promoted by the financial product?

The Fund requires potential investee companies to complete a standardised ESG questionnaire, so that the Fund can review the ESG status of each investment. In many occasions, as part of the due diligence process, the Manager instructs a third party advisor to prepare an environmental due diligence report on a standalone basis and this report is considered by the Fund's investment committee before undertaking an investment. The Fund is required to consider ESG risks prior to making an investment. Once an investment is made, the Fund uses the ESG responses to guide its ongoing monitoring of the investee company.

The Fund conducts an annual ESG review across its portfolio companies to identify good governance practices, and identify any areas for improvement.

The Fund uses a third party provider to facilitate annual ESG reporting at the investee company level which includes, where relevant, identified action points, policy recommendations and sectorial benchmarking

What is the policy to assess good governance practices of the portfolio companies, including with respect to sound management structures, employee relations, remuneration of staff and tax compliance?

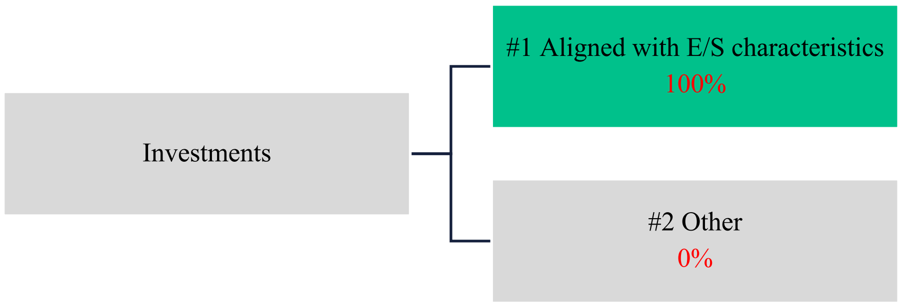
To assess the good governance practices of the Fund's investee companies, the Fund requires its potential investee companies to complete a standardised ESG questionnaire. The investee companies are encouraged to consider any material action points identified through the ESG questionnaire and associated recommendations relating to good governance. Through this process the Manager seeks to promote good governance practices.

E. Proportion of investments

Insert the information referred to in article 14 of Commission Delegated Regulation (EU) 2022/1288 and distinguish between direct exposures in investee entities and all other types of exposures to those entities

Article 14 of Commission Delegated Regulation (EU) 2022/1288 (the ***SFDR RTS***) refers to the template pre-contractual disclosures required pursuant to article 8(1), (2) and (2a) of the SFDR (in the format of the template set out in Annex II of the SFDR RTS).

Please refer to the diagram below, which sets out how the asset allocation is displayed in Annex II of the SFDR RTS, as completed in respect of the Fund.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The Fund does not commit to making a minimum proportion of sustainable investments or Taxonomy aligned investments (accordingly the Fund does not commit to making a minimum proportion of Taxonomy aligned fossil gas and/or nuclear energy related investments). For the purposes of this section E, no distinction is made between direct exposures in investee entities and all other types of exposures to those entities.

F. Monitoring of environmental or social characteristics

What sustainability indicators are used to measure the attainment of the environmental or social characteristics promoted by this financial product?

Throughout the Fund’s ownership of its investee companies, the Fund will seek to promote ESG governance in those companies. The environmental and social characteristics promoted by the Fund are monitored as part of the Fund’s ongoing monitoring of its investments. The Fund conducts an annual ESG review across its portfolio companies to identify good governance practices, and identify any areas for improvement.

How are the environmental or social characteristics and the sustainability indicators monitored throughout the lifecycle of the financial product and what are the related internal/external control mechanisms?

The Manager will monitor the progress of the sustainability indicators (including for example, statistics on the application of the ESG policy and investments not made due to identified ESG risks) through the collection and monitoring of available metrics on a commercially reasonable efforts basis and (for equity investments) through engagement with the portfolio company. The internal and external control mechanisms are as set out in sections G and H below.

G. Methodologies

What is the methodology to measure the attainment of the environmental or social characteristics promoted by the financial product using the sustainability indicators?

The Fund uses information received from its investment teams when considering potential investments and from its ongoing monitoring of its investee companies to measure the attainment of the environmental and social characteristics. The focus of this monitoring process is the annual ESG review that the Fund conducts across its portfolio companies to identify good governance practices, and identify any areas for improvement.

H. Data sources and processing

What are the data sources used to attain each of the environmental or social characteristics including the measures taken to ensure data quality, how data is processed and the proportion of data that is estimated?

The Fund obtains majority of its data from its investee companies. In particular, qualitative data may be provided regularly by the investee companies and the Fund focuses on obtaining data during its annual ESG review of investee companies.

The Manager takes reasonable commercial steps to "sense check" data provided to it by its investee companies, however the Manager does not seek to fully audit or verify all information. Please also see Section J for further information.

Where data is obtained or generated internally, the Manager shall take such steps as it considers practical and appropriate to ensure data quality. This data is not expected to be estimated.

I. Limitations to methodologies and data

What are the limitations to the methodologies and data sources? (Including how such limitations do not affect the attainment of the environmental or social characteristics and the actions taken to address such limitations)

The information that the Fund receives from investee companies is not necessarily audited. Consequently, without prejudice to other risks applicable to the Fund, one of the primary limitations is that the Manager is reliant on data obtained from portfolio investments and/or other third parties, and some of that data may itself be reliant on estimates, qualitative assessments and/or any limitations in the self-review or data collection processes.

These limitations are not considered to materially limit the monitoring or attainment of the Fund's promoted characteristics as self-reported data is usually provided by portfolio companies in a timely fashion and information obtained from third parties is typically provided pursuant to a contract specifying minimum quality standards. Where the Manager becomes aware that information is incomplete or materially inaccurate, it will take such steps as it considers practical and appropriate in order to ensure data quality.

J. Due diligence

What is the due diligence carried out on the underlying assets and what are the internal and external controls in place?

Before making investments for the Fund, the Manager will typically conduct due diligence that it deems reasonable and appropriate based on the facts and circumstances applicable to each investment. In particular, and in compliance with the Fund's ESG policy, each potential investee company is required to complete an ESG questionnaire. The Fund's investment committee will then review this, and other available information, when making an investment decision. In many occasions, as part of the due diligence process, the Manager instructs a third party advisor to prepare an environmental due diligence report on a standalone basis. The Fund is required to consider ESG risks prior to making an investment.

As stated above, where the Manager becomes aware that information is incomplete or materially inaccurate, it will take such steps as it considers practical and appropriate in order to manage data quality.

K. Engagement policies

Is engagement part of the environmental or social investment strategy? If so, what are the engagement policies? (Including any management procedures applicable to sustainability-related controversies in portfolio companies)

Engagement forms part of the Fund's strategy and is a core part of the attainment of the Fund's environmental and social promoted characteristics and ongoing monitoring of the Fund's sustainability indicators. Please refer to section F of this summary document above for more details.

The Fund does not maintain specific management procedures in respect of sustainability-related controversies in investee companies. Sustainability-related controversies in investee companies will be taken into account where they cause an actual or potential material negative impact on the value of an investment.