

# SFDR pre-contractual and website disclosures

## Rubicon Partners VI SCSp (the "Fund")

Date: 09/09/ 2024 (First Published 26/07/2024)

Version 3

**Rubicon Partners GP VI S.à r.l.** (the "**Fund Manager**") is a financial market participant as defined in the Sustainable Financial Disclosure Regulation (EU) 2019/2088 (the "**SFDR**") amended by Regulation (EU) 2020/852 (the "**Taxonomy Regulation**") as in force since March 10, 2021.

The Fund Manager makes the following disclosures in accordance with Articles 3(1), 4(1)(b), 5(1), 6 and 7(2) of the SFDR.

### **Transparency of sustainability risk policies and transparency of the integration of sustainability risks – article 3(1) and article 6 SFDR**

"**Sustainability risk**" means 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.

The Fund Manager considers sustainability risks as with other operational risks, which may impact on the value of the investment, in its investment decision-making process, notably in light of the investment diligence strategy applicable to the Fund. The Fund is implementing an environmental, social and governance (ESG) policy that considers environmental and social risks when evaluating investment decisions. The Fund requires potential investee companies to complete a standardised ESG questionnaire. In many occasions, as part of the due diligence process, the Fund 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.

### **No consideration of adverse impacts of investment decisions on sustainability factors – article 4(1)(b) and article 7(2) SFDR**

The Fund Manager does not consider the adverse impacts of its investment decisions on sustainability factors in the manner prescribed by Article 4 of the SFDR (at its own level nor in respect of investments of the Fund). Instead the Fund 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. This approach also reflects that there may be a lack of reliable and sufficiently available or accessible data to perform the level of impact measurement or to provide the mandatory reporting imposed by the regulatory technical standards in a consistent manner. As such, the Fund Manager does not intend to consider principal adverse impacts of investment decisions on sustainability factors.

### **Transparency of remuneration policies in relation to the integration of sustainability risks – article 5(1) SFDR**

The Fund Manager pays staff a combination of fixed remuneration (salary and benefits) and variable remuneration (including bonus). Variable remuneration allocated to relevant staff reflects personal, team and fund manager performance. Compliance with all the Fund Manager's policies and procedures, including policies and procedures relating to the impact of sustainability risks on the investment decision making process, shall be taken into account as part of that overall assessment.

Rubicon Partners VI SCSp Legal Entity Identifier number: 213800AXPVGNIAZB4P38