

Stanley Capital Partners L.P. – Website Disclosures in accordance with SFDR (as defined below)

a) Summary

These sustainability-related disclosures relate to Stanley Capital Partners L.P. (the “Fund” or “financial product”, as applicable) and are made pursuant to Article 10(1) of Regulation (EU) 2019/2088 (“SFDR”).

Section	Summary
No sustainable investment objective	This section confirms that the Fund promotes environmental and social characteristics, but does not have as its objective sustainable investment.
Environmental or social characteristics of the financial product	<p>This section describes the environmental and social characteristics that the Fund promotes, within the meaning of the SFDR.</p> <p>This section describes how Stanley Capital Partners GP Limited (the “General Partner”) will, among other things, request that the Fund’s portfolio companies report on the key performance indicators (“KPIs”) and, where relevant, company-specific KPIs. It is intended that all of the Fund’s portfolio companies will report on the KPIs and will improve their environmental, social and governance (“ESG”) characteristics over time, becoming more resilient and sustainable businesses.</p>
Investment strategy	<p>This section describes the investment strategy of the Fund, which is to target predominantly profitable European and US companies which have EBITDA \$25 million - 150 million in the healthcare, resource efficiency and technology sectors. This section describes how the Fund will promote the environmental and social characteristics in pursuing this investment strategy by reference to the selection of assets, the due diligence process, the investment approval process and decision making throughout the investment lifecycle.</p> <p>This section also includes a description of the Fund’s policies to assess good governance practices of investee companies.</p>
Proportion of investments	This section sets out that the General Partner anticipates that 100% of the Fund’s asset allocation shall be towards investments that have environmental and/or social characteristics without being sustainable investments within the meaning of the regulation (EU) 2020/852 (the “Taxonomy”).
Monitoring of environmental or social characteristics	This section describes how the environmental characteristics promoted by the Fund are monitored throughout the lifecycle of the financial product through the use of a proprietary SCP ESG Scorecard, 'active value creation' plans for target deals and portfolio companies based on the KPIs and describes the use of bespoke sustainability indicators.
Methodologies	This section refers to the “Monitoring of environmental or social characteristics” section, which describes the methodologies used to measure how the environmental and social characteristics promoted by the fund are met.
Data sources and processing	This section describes the Fund’s use of market-leading SaaS ESG software platform Reporting 21 to monitor the ESG performance of portfolio companies against the sustainable investment objective.

Section	Summary
	Reporting 21 surveys the Fund's portfolio companies to source the data directly. This section also describes the measures taken to ensure data quality, how data is processed and confirms that no estimates are used because data is self-reported by the portfolio companies.
Limitation to methodologies and data	This section covers the limitations to the methodologies and data sources used, in particular, data gaps which may occur where portfolio companies are unable to complete the Reporting 21 survey or respond to specific questions.
Due diligence	This section describes the due diligence carried out on the underlying assets of the Fund, including the internal controls on due diligence and the external control on due diligence exercised through the use of external consultants to assist with the due diligence process.
Engagement policies	This section describes the engagement policies implemented with respect to investee companies, including active engagement with portfolio companies to create plans for ESG value creation / improvements.
Designated reference benchmark	This section includes a statement that there is no index designated as a reference benchmark.

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

The Fund promotes, among other characteristics, environmental and social characteristics, but does not have sustainable investment as its objective and will not make any sustainable investments.

Stanley Capital Partners GP Limited (the “**General Partner**”) will promote and monitor the progress of each portfolio company in which the Fund holds a controlling interest in promoting the above characteristics by, among other things, requesting that the Fund’s portfolio companies report on the key performance indicators (“**KPIs**”) (set out in further detail in Figure 1 below) and, where relevant, company-specific KPIs. It is not expected that portfolio companies will be able to report on the KPIs in the first year of investment but part of the General Partner’s engagement process is to help set up the systems and capabilities to be able to collect data on these KPIs in the first year of investment. It is intended that all of the Fund’s portfolio companies will report on the KPIs and will improve their environmental, social and governance (“**ESG**”) characteristics over time, becoming more resilient and sustainable businesses.

Figure 1

SCP Target KPIs

Environmental	
GHG Emissions	<ul style="list-style-type: none"> • Scope 1: direct emissions (tCO2e) under GHG Protocol • Scope 2: indirect emissions (tCO2e) under GHG Protocol • Scope 3: value chain emissions (tCO2e) under GHG Protocol (if collating)
Renewable Energy Consumption	<ul style="list-style-type: none"> • Total energy consumption (kWh) • Renewable energy consumption (kWh)
Carbon Intensity	<ul style="list-style-type: none"> • Volume of carbon emissions per million dollars of revenue (carbon efficiency of a portfolio), expressed in tons of CO2e/£M revenue
Social	
Diversity of board members	<ul style="list-style-type: none"> • Total number of board members • Number of women board members • Racial and ethnic diversity of board members (if collating) • Number of LGBTQ+ board members (if collating)
Work related injuries	<ul style="list-style-type: none"> • Number of work-related injuries • Number of work-related fatalities • Days lost due to injury (days)
Net new hires	<ul style="list-style-type: none"> • Organic Net New Hires • Total Net New Hires • Annual Percent Attrition (%)
Employee engagement	<ul style="list-style-type: none"> • Do you conduct an employee survey • % employees responding to survey (if collating) (%)
Corporate Social Responsibility	<ul style="list-style-type: none"> • Charitable contributions made in the last 12 months • Are you able to provide a (£) amount of donations made in the last 12 months
Governance	
Policies and Procedures	<ul style="list-style-type: none"> • Anti-bribery & corruption policy • Whistle blowing procedures formally documented and distributed to all employees • Modern slavery policy

Environmental	
	<ul style="list-style-type: none"> • Data & cyber security policy
ESG Governance	<ul style="list-style-type: none"> • Is there an ESG working group • Is ESG a standard board agenda item

d) Investment strategy

The Fund will target predominantly profitable European and US companies which have EBITDA \$25 million - 150 million in the healthcare, resource efficiency and technology sectors. SCP intends to invest in control situations but will consider minority investments where it has control-like governance rights. The Fund's investment strategy is focused on using research and technology to identify assets where growth can be unlocked through operational transformation, M&A and technology enablement. In pursuing this investment strategy, the Fund will promote the environmental and social characteristics described above.

In order to meet the environmental and social characteristics promoted by the Fund, the General Partner applies criteria to the selection of the underlying assets as part of its investment decision-making process, as further set out below. To ensure that the strategy is implemented into the investment process on a continuous basis, internal processes set out how these criteria are applied through the General Partner's investment due diligence process, investment approval process and decision making throughout the investment lifecycle:

- **ESG Assessment Framework:** The Fund will use a proprietary SCP ESG Scorecard for prioritising diligence and 'active value creation' plans for target deals. The General Partner will apply governance and sustainability criteria when selecting investments for the Fund's portfolio companies. The Fund's portfolio companies will be assessed on their governance, environmental, and social profile across a range of factors.
- **Investment Research:** As part of its investment research process, the General Partner will meet companies and their management teams such that it can raise questions that will allow it to properly understand the fundamentals of a business and its sector, including ESG characteristics, very early in the process. Actions to mitigate relevant Sustainability Risks will be raised by the General Partner's investment team where considered necessary and appropriate.
- **Due Diligence:** During the acquisition process, due diligence will be performed to identify and assess the key ESG risks the Fund's target portfolio companies are exposed to, as well as the policies, procedures and processes they have in place to mitigate these risks. Results of this due diligence will be documented and provided to the Fund's Investment Committee for consideration before it makes a final investment decision. The outcome of ESG diligence efforts (e.g. the degree to which the General Partner is reassured and/or successful in the design of change facilitation efforts) will have a substantial input into its investment thinking and decisions, potentially ultimately influencing whether it invests into a business, the size of the investment and/or whether further action is required. This process will be enabled through the implementation of technology.
- **Portfolio Companies:** At the post-closing stage, the Sustainability Risks and ESG-related opportunities faced by portfolio companies (resulting from the risk exposure they face and the quality of mitigation efforts) will be considered. Factors such as business activities or geography will be considered and triangulated with the General Partner's investment view as to which of these ESG factors are considered relevant to valuations, as well as the nature of that materiality (i.e. positive, negative, neutral). The performance of the Fund's portfolio companies in managing Sustainability Risks material to their business and stakeholders will also be thoroughly assessed, building upon due diligence conducted during the acquisition process. Results of this assessment will be used to establish with portfolio companies plans of action aimed at improving their ESG performance. Progress towards the implementation of such plans will be monitored by the General Partner during regular board meetings and site visits. To monitor and report on the environmental and social benefits delivered by the Fund's portfolio companies, at the beginning of the holding period, bespoke indicators will be defined case-by-case, based on the UN Sustainable Development Goals ("SDGs") the portfolio companies are directly contributing to,

as well as the nature of their business activities. Furthermore, bespoke sustainability indicators will be defined for each of the Fund's portfolio companies to monitor and assess their ESG performance quarterly and annually.

- **Active Management and Stewardship:** The General Partner will actively engage with portfolio companies to define an ESG value creation plan that aims to bring change in the company's business strategy and/or management practices and improve ESG performance over the life of the investment. Engagement may occur as a one-off event or form an ongoing series of interactions.

With respect to the policy to assess good governance practices of investee companies, The General Partner will apply governance and sustainability criteria when selecting investments for the Fund's portfolio companies. The Fund's portfolio companies will be assessed on their governance, environmental, and social profile across a range of factors.

To ensure that the Fund's portfolio companies have good governance practices, the General Partner will mainly pursue investments where it can expect to acquire majority stakes, or have joint control with co-investors over a company by way of board representation and a list of reserved matters. Involvement at the highest level will allow them to ensure that the Fund's portfolio companies adopt and maintain good governance practices, and initiate change where required.

A company will be eligible for investment if its business activities are aligned with certain of the SDGs and/or by assessing how that company delivers or can otherwise deliver environmental or social benefits through their business activities.

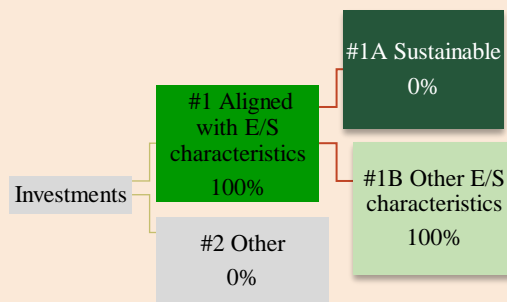
The General Partner's deal team will develop detailed 100-day plans for ESG improvements in new portfolio companies, and actively monitoring and seek to improve ESG performance through the life of investments as an active part of governance.

e) **Proportion of investments**

The General Partner anticipates that 100% of the asset allocation shall be towards investments that have environmental and/or social characteristics without being sustainable investments within the meaning of the regulation (EU) 2020/852 (the "**Taxonomy**") and which therefore qualify as '#1B Other' E/S characteristics.

The Fund promotes environmental and social characteristics but does not have sustainable investment as its objective. The General Partner does not commit to a minimum share of its investments being in "sustainable investments" (including sustainable investments with an environmental objective aligned with the Taxonomy) or "a reduction in carbon emissions" as its objective, as those terms are defined under SFDR.

The planned asset allocation is reviewed on an annual basis.



The category **#1 Aligned with E/S characteristics** covers:

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

#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.

f) **Monitoring of environmental or social characteristics**

The Fund will use a proprietary SCP ESG Scorecard for prioritising diligence and ‘active value creation’ plans for target deals and portfolio companies based on the KPIs (set out above), leveraging technology platform Reporting21 for consolidation and reporting of performance. This provides for a sector and company-specific model but informed by a standardised approach.

Bespoke sustainability indicators will be defined for each of the Fund’s portfolio companies to monitor and assess their ESG performance annually. The bespoke sustainability indicators will be consistent with best practice referencing of SASB industry standards and are aligned with the SDGs.

g) **Methodologies**

There is no index designated as a reference benchmark to promote the environmental or social characteristics. Please refer to section (f) “*Monitoring of environmental or social characteristics*” above for a description of the methodologies used to measure how the environmental and social characteristics promoted by the Fund are met.

h) **Data sources and processing**

SCP is implementing market-leading SaaS ESG software platform Reporting 21 across its portfolio to monitor the ESG performance of portfolio companies including relevant benchmarking and scoring of performance against a custom but industry-consistent framework.

Reporting 21 surveys the portfolio companies, sourcing the data directly. Guardrails may be set up to identify outliers and ensure that comments are made if numbers vary significantly from one year to the next. A full audit trail is available for reported data and comments. This data is also reviewed by Reporting 21 consultants. Data is then aggregated at the Fund level. Calculated indicators may also be populated through the system. All calculation formulas are displayed and transparent to all users. As data is self-reported by the portfolio companies, no estimates are used.

i) **Limitations to methodologies and data**

Investors should be aware that portfolio companies may fail to meet reporting or performance goals where insufficient data is available or where adoption of new ESG practices takes time due to resourcing limitations.

When portfolio companies are unable to complete the survey or respond to specific questions, there may be gaps in the data. If insufficient data is available, aggregations at the Fund level will not be representative of the entire portfolio. Therefore, there may be challenges in demonstrating the attainment of certain goals. The General Partner will work with portfolio companies to encourage completion of the data which informs performance and ESG value creation, as outlined in section (k) below.

j) Due diligence

In order to meet the environmental and social characteristics promoted by the Fund, the General Partner applies criteria to the selection of the underlying assets as part of its investment decision-making process, as further set out below. It is expected that external advisors will be engaged to assist with the due diligence process described below.

ESG Assessment Framework:

The Fund will use a proprietary SCP ESG Scorecard for prioritising diligence and ‘active value creation’ plans for target deals. The General Partner will apply governance and sustainability criteria when selecting investments for the Fund’s portfolio companies. The Fund’s portfolio companies will be assessed on their governance, environmental, and social profile across a range of factors.

Investment Research:

As part of its investment research process, the General Partner will meet companies and their management teams such that it can raise questions that will allow it to properly understand the fundamentals of a business and its sector, including ESG characteristics, very early in the process. Actions to mitigate relevant Sustainability Risks will be raised by the General Partner’s investment team where considered necessary and appropriate.

Due diligence:

During the acquisition process, due diligence will be performed to identify and assess the key ESG risks the Fund’s target portfolio companies are exposed to, as well as the policies, procedures and processes they have in place to mitigate these risks. Results of this due diligence will be documented and provided to the Fund’s Investment Committee for consideration before it makes a final investment decision. The outcome of ESG diligence efforts (e.g. the degree to which the General Partner is reassured and/or successful in the design of change facilitation efforts) will have a substantial input into its investment thinking and decisions, potentially ultimately influencing whether it invests into a business, the size of the investment and/or whether further action is required. This process will be enabled through the implementation of technology.

k) Engagement policies

The General Partner will actively engage with portfolio companies to define an ESG value creation plan that aims to bring change in the company’s business strategy and/or management practices and improve ESG performance over the life of the investment. The SCP deal teams develop 100-day plans for ESG improvements in new portfolio companies and actively monitor and seek to improve ESG performance through the life of investments as an active part of governance. ESG will be discussed at the board level of portfolio companies. Engagement may occur as a one-off event or form an ongoing series of interactions.

l) Designated reference benchmark

Not applicable – there is no index designated as a reference benchmark.