

Sands Capital Funds plc

Statement on the Integration of Sustainability Risks in Remuneration Policies

This disclosure is being published to comply with the obligation of Sands Capital Funds Public Limited Company (the “**Company**”) under Article 5(1) of 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 (the “**SFDR**”) relating to describing the manner in which Sustainability Risks (as defined below) are integrated into the remuneration policies of the Company.

In compliance with UCITS and AIFMD remuneration rules (the “**Remuneration Rules**”), the Company has established a remuneration policy that seeks to promote sound and effective risk management and neither encourage risk taking which is inconsistent with the risk profiles, rules or instruments of incorporation of the Company’s sub-funds (the “**Funds**”) nor impair compliance with the Company’s duty to act in the best interest of the Funds (the “**Remuneration Policy**”).

As provided for under the Remuneration Policy and in line with the Remuneration Rules, the Company has in place contractual arrangements with the Investment Manager which seek to ensure compliance by the Investment Manager with the Remuneration Rules particularly in the context of payments made to identified staff of the Investment Manager as compensation for the performance of investment management activities on behalf of the Company.

In line with the SFDR, the Investment Manager has integrated sustainability risk in its investment decision processes. See the Company’s Article 3 SFDR disclosure for further details of the Company’s sustainability risk integration. In doing so, the Investment Manager ensures that the relevance of sustainability risk to the Funds is considered along with all other potentially relevant financial risks as part of its investment due diligence and decision-making process.

The Remuneration Policy is considered consistent with the Company’s approach to sustainability risk integration as the Remuneration Policy specifically provides for remuneration to be consistent with and promote sound and effective risk management including sustainability risk management and the discouragement of excessive risk-taking, including in respect of sustainability risk. Additionally, sustainability risk is identified as a potentially relevant risk to the Funds and as such is assessed as part of the calculation of performance-related variable remuneration.