

Sands Capital Funds plc (the "Company")

Sands Capital Global Growth Fund (549300GLH4Z2UKSSD303)
Sands Capital Emerging Markets Growth Fund (5493005JRQV50BWT8256)
Sands Capital US Select Growth Fund (549300TSM1HBZMD4AE61)
Sands Capital Global Leaders Fund (54930003GDBJR0MFKW06)
Sands Capital Technology Innovators Fund (549300IH7BOWOW9S4R75)
Sands Capital Global Shariah Fund (549300QT8O77EY5RXL44)
(the "Funds")

No consideration of adverse impacts of investment decisions on sustainability factors

KBA Consulting Management Limited (the "**Manager**") has elected to not consider the adverse impacts of investment decisions of the Funds taken by Sands Capital Management, LLC (the "**Investment Manager**") as its delegate, on sustainability factors in accordance with 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 (as amended) ("**SFDR**") at this time. This decision has been made on the basis that, in the Manager's opinion, it is not currently possible to access or acquire the data necessary to conduct this assessment in accordance with the requirements of the SFDR. If, in due course, the Manager is satisfied that such an assessment can be properly conducted and that to do so would be in the best interests of the Company's shareholders it may, acting through the Investment Manager as its delegate, look at that stage to consider the adverse impacts of Company investment decisions on Sustainability Factors in the manner contemplated under Article 4(1)(a) of the SFDR.

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