

KPS Capital Partners, LP (together with its affiliates, “KPS”)

Disclosures required under Article 3 of Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector dated 27 November 2019 (“SFDR”).

TRANSPARENCY OF SUSTAINABILITY RISK POLICIES (Article 3, SFDR)

“Sustainability Risk” is defined in SFDR as “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”.

Before making investment decisions, KPS will seek to identify relevant Sustainability Risks through its standard health, safety and environmental due diligence process which includes a review of documentation, workforce composition and engagement (including, where appropriate, union activities and relationships), on-site audits, permit compliance review, remediation cost estimates, and a technical assessment by qualified personnel. KPS will additionally seek to diligence governance considerations such as the composition of the investment’s governing body and any corruption or bribery concerns. When KPS considers it appropriate, to augment its own diligence, KPS may engage external experts in specific areas of expertise including, but not limited to, technical environmental and safety risks, employee benefits, and regulatory and legal compliance.

Sustainability Risks form part of the overall investment analysis and the identified risks are assessed alongside other relevant considerations. Further information can be provided on request.

NO CONSIDERATION OF ADVERSE IMPACTS OF INVESTMENT DECISIONS ON SUSTAINABILITY FACTORS (Article 4, SFDR)

KPS does not consider adverse impacts of investment decisions on “sustainability factors” as specifically defined by the SFDR. It has elected not to do so at the present time as it considers its existing policies and procedures to be appropriate, proportional and tailored to the investment strategies of its funds. It will continue to monitor closely regulatory and market developments with respect to the SFDR and other applicable sustainability-focused laws and regulations.