

Article 10 (SFDR)

Website disclosure for an Article 8 fund

BRIGHT CAPITAL Credit Fund III SCSp

Does this financial product have a sustainable investment objective?

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
<input type="checkbox"/> It will make a minimum of sustainable investments with an environmental objective: __% <ul style="list-style-type: none"> <input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy 	<input type="checkbox"/> It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it had a proportion of __% of sustainable investments <ul style="list-style-type: none"> <input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> with a social objective
<input type="checkbox"/> It will make a minimum of sustainable investments with a social objective: __%	<input checked="" type="checkbox"/> It promotes E/S characteristics, but will not make any sustainable investments



A. Summary

BRIGHT CAPITAL Credit Fund III SCSp (the “**Partnership**”) invests in debt instruments (with or without an equity component and with or without collateral) to portfolio companies and promotes emissions reduction, renewably sourced energy, waste management and responsibly sourced materials as environmental characteristics and the social characteristics promoted by the financial product are occupational health & safety, inclusion and board gender diversity (together “**E/S Characteristics**”).

The investment strategy of the Partnership does not have sustainable investments within the meaning of the (EU) Regulation 2019/2088 (“**SFDR**”) as its objective.

The Partnership’s framework for integrating ESG matters in the lifetime of an investment incorporates four phases: sourcing and screening, pre-investment due diligence, portfolio, and exit. Each investment is being assessed against an exclusion list relating to specific industries and products and will not pursued if it is in conflict with the exclusion list. The exclusion covers weapons and ammunition, child labor, pornography or sale of alcoholic beverages, tobacco, cannabis and radioactive material, gambling or illegal software. Additionally, each investment will be examined for potential ESG risks before the investment and on a regular basis throughout the lifetime of the investment.

The ESG related data will be collected by the Partnership on a recurring basis from its portfolio companies. The Partnership monitors the ESG KPIs corresponding with the below mentioned E/S Characteristics and report them annually to its investors.

Throughout the holding period the Partnership actively engages with the portfolio company’s management to monitor and manage ESG matters. In cases where material ESG risks are identified and deemed unacceptable, a plan is developed and agreed with the management to improve or

remedy the issue. In addition, the portfolio company is required to commit to relevant compliance undertakings.



B. No sustainable investment objective

This financial product promotes environmental or social characteristics, but does not have as its objective a sustainable investment.

How does this financial product take into account principal adverse impacts on sustainability factors?

Not applicable.

Are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?

Not applicable.



C. Environmental or social characteristics of the financial product

What are the environmental or social characteristics promoted by this financial product?

Environmental characteristics

- Carbon emissions reduction
- Renewably sourced energy
- Waste management
- Responsibly sourced materials

Social characteristics

- Occupational health & safety
- Inclusion
- Board gender diversity

Additionally, the AIFM will adhere to a strict exclusion list relating to specific industries and products. Therefore, the Partnership applies a negative screening on all potential investments to determine unsuitable investments. In particular, the exclusion covers weapons and ammunition, child labor, pornography or sale of alcoholic beverages, tobacco, cannabis and radioactive material, gambling or illegal software.

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

Not applicable.

How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?

Not applicable.



D. Investment strategy

What investment strategy does this financial product follow and how is the strategy implemented in the investment process on a continuous basis?

During the entire investment process consisting of

- the pre-investment phase (sourcing and screening),
- the investment phase (due diligence),
- the holding phase (portfolio management, monitoring, reporting) and
- the exit phase (performance evaluation, disclosure)

the Partnership applies one or a combination of the following methods to collect information and to assess its alignment with the promotion of its E/S Characteristics listed above:

The pre-investment phase (sourcing and screening)

In order to attain each of the E/S Characteristics set out above the Partnership carefully selects its investments opportunities during the pre-investment phase. During the pre-investment phase, the Partnership will employ a questionnaire for its E/S Characteristics to assess the compliance of an investment. In accordance with its guidelines, the Fund will in particular pursue the more sustainable investment opportunity out of several equally suitable investment opportunities.

Additionally, the Partnership adheres to a strict exclusion list relating to specific industries and products. Therefore, the Partnership applies a negative screening on all potential investments to determine unsuitable investments. In particular, the exclusion covers weapons and ammunition, child labor, pornography or sale of alcoholic beverages, tobacco, cannabis and radioactive material, gambling or illegal software.

Finally, the Partnership carries out investments only if potential portfolio companies agree to incorporate the Partnership's standard related to Sustainable Development Goals and Climate.

The investment phase (due diligence)

Same as above.

The holding phase (portfolio management, monitoring, reporting)

The following methodologies are implemented to monitor and manage ESG risks:

- Monitoring ESG impact through collecting the proprietary ESG questionnaire on a recurring basis (at least quarterly);
- Preparation of an annual sustainability report;
- Regular reporting from investee companies.

The ESG questionnaires collect a consistent set of data, including, among other parameters, KPIs that cover social and environmental aspects:

- Carbon emissions;
- Water and energy consumption;
- Share of female/male employees across different levels;
- Framework for labour representatives.

All data are initially collected in the due diligence of the respective investment. ESG due diligence is now a core part of the deal process of most equity sponsors and the Partnership can use the information for the ESG assessment. A complete view of all relevant risks and opportunities is critical in order to negotiate the right terms for a deal.

The exit phase (performance evaluation, disclosure)

Take stock of the ESG performance during the holding period of the Partnership and encourage the portfolio company to further engage with ESG matters and to commit to the UN Sustainable Development Goals.

What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

The Partnership does not invest in companies with substantial focus on the production of and trade in tobacco and alcoholic beverages, financing of the production of and trade in weapons and ammunition of any kind, gambling, adult entertainment, fossil fuel-based energy production and energy-intensive and/or high CO2-emitting industries.

What is the policy to assess good governance practices of the investee companies?

The assessment of good governance practices of portfolio companies is incorporated in the Partnership’s legal due diligence as far as good governance practices have been adopted by law. Furthermore, the Partnership requires portfolio companies to commit to the “Sustainable Developments Goals” of the United Nations. Thereby portfolio companies engage themselves to promote decent work and economic growth, the reduction of inequalities as well as peace, justice and strong institutions. Also, the Partnership continuously tracks the following indicators in its portfolio companies: Discrimination and harassment, fair and inclusive hiring, flexible work options, care taking support policies, employee benefits, data protection, employee satisfaction, remuneration, feedback, company purpose & codes and steering mechanisms.

Is there a commitment to reduce by a minimum rate the scope of investments considered prior to the application of the strategy? (Including an indication of the rate)

Not applicable.

Does this financial product consider principal adverse impacts on sustainability factors?

Yes

No

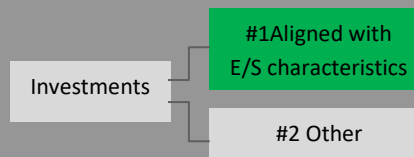


E. Proportion of investments

What is the planned asset allocation for this financial product?

The Partnership invests at least 70% of its invested capital in companies that qualify as aligned with E/S Characteristics (#1 Aligned with E/S characteristics).

The Partnership is allowed to invest up to 30% of its invested capital in cash, cash equivalents, and/or hedging instruments (#2 Other).



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#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.

How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

Not applicable.

What is the minimum share of investments with an environmental objective aligned with the EU Taxonomy? (including what methodology is used for the calculation of the alignment with the EU Taxonomy and why; and what the minimum share of transitional and enabling activities)

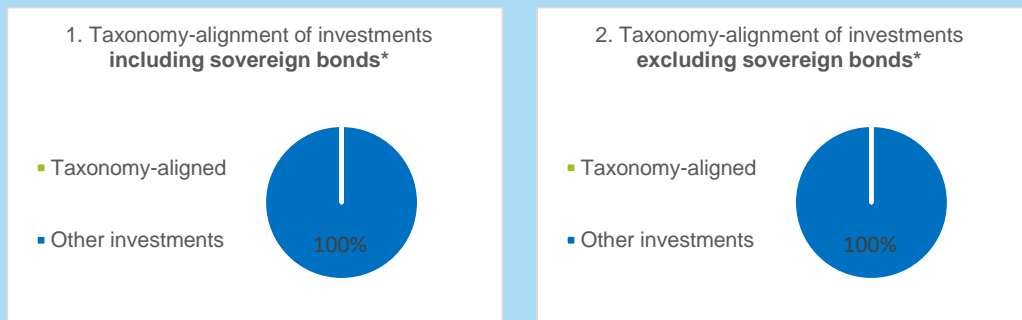
The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

The Partnership does not currently commit to invest in any “sustainable investment” within the meaning of the EU Taxonomy. However, the position will be kept under review as the underlying rules are finalized and the availability of reliable data increases over time.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



* For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures

What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

As the Partnership does not commit to invest any “sustainable investment” within the meaning of the EU Taxonomy, the minimum share of investments in transitional and enabling activities within the meaning of the EU Taxonomy is therefore also set at 0%.

What is the minimum share of sustainable investments with a social objective?

Not applicable.

What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

The “Other” investments may include investments in liquid assets (cash) held for the purposes of servicing the day-to-day requirements of the Partnership or investments for which there is insufficient data for them to be considered ESG-related Investment. This lack of data along with the intended use of this portion of the portfolio, precludes the existence of any E/S safeguards from being in place.



F. Monitoring of environmental or social characteristics

What sustainability indicators are used to measure the attainment of the environmental or social characteristics promoted by this financial product?

The Partnership will choose at least one adequate sustainability indicator as set out below to measure the attainment of each of the E/S Characteristics it promotes (“Sustainability Indicator”).

Where none of the following Sustainability Indicators can be applied to individual E/S Characteristics with a reasonable economic effort for the Partnership and/or the respective portfolio company, the Partnership may review and adjust the respective Sustainability Indicator.

Environmental characteristics

- Emissions reduction
- Renewably sourced energy
- Waste management
- Responsibly sourced materials

Sustainability Indicators

- Energy consumption density (GWh/EURm)
- Non-renewable energy consumption (%)
- Non-recycled waste ratio (%)
- Lack of a supplier code of conduct (% involved)

Social characteristics

- Occupational health & safety
- Inclusion
- Board gender diversity

Sustainability Indicators

- Sickness rate (%), number of accidents (#/FTE)
- % disabled
- % female

How are the environmental or social characteristics and the sustainability indicators monitored throughout the lifecycle of the financial product and the related internal/external control mechanism?

Please see above under D. Investment strategy sub-heading “holding phase”.



G. Methodologies

What is the methodology to measure the attainment of the environmental or social characteristics promoted by the financial product using the sustainability indicators?

The following methodologies are implemented to monitor and manage ESG risks:

- Monitoring ESG impact through collecting the proprietary ESG questionnaire on a recurring basis (at least quarterly);
- Preparation of an annual sustainability report;
- Regular reporting from portfolio companies.

The ESG questionnaires collect a consistent set of data, including, among other parameters, KPIs that cover social and environmental aspects:

- Carbon emissions;
- Water and energy consumption;
- Share of female/male employees across different levels;
- Framework for labour representatives;
- Etc.

All data are initially collected in the due diligence of the respective investment. ESG due diligence is now a core part of the deal process of most equity sponsors and the Partnership can use the information for the ESG assessment. A complete view of all relevant risks and opportunities is critical in order to negotiate the right terms for a deal. Where no ESG due diligence is available we regularly work side-by-side with industry experts to cover all relevant ESG aspects.



H. Data sources and processing

What are the data sources used to attain each of the environmental or social characteristics including the measures taken to ensure data quality, how data is processed and the proportion of data that is estimated?

The Partnership may apply one or a combination of the following methods to collect information and to assess its alignment with the promotion of the E/S Characteristics listed above.

During the pre-investment and portfolio phase the Partnership will employ a questionnaire for sustainability characteristics to assess the compliance of an investment with the Partnership's sustainability guidelines.

Where no ESG due diligence is available the Partnership regularly works side-by-side with industry experts to cover all relevant ESG aspects.

All data are stored centrally in a portfolio monitoring data warehouse which provides for on-demand availability of data and high data consistency and reliability.



I. Limitations to methodologies and data

What are the limitations to the methodologies and data sources? (Including how such limitations do not affect the attainment of the environmental or social characteristics and the actions taken to address such limitations)

Please see above under H. Data sources and processing.



J. Due diligence

What is the due diligence carried out on the underlying assets and what are the internal and external controls in place?

During the pre-investment due diligence phase the investment teams identify whether there are any ESG-related risks or opportunities within the business or external factors affecting the business or the markets in which the company operates. The initial ESG assessment is an integral part of the due diligence and overall risk and opportunities assessment and includes strict exclusion criteria based on sectors and the identified long-term risks with a potentially significant impact.

Identification and assessment of risks and opportunities

Based on in-depth knowledge and best practices, the investment team identifies the key ESG risk and opportunity areas for each investment. If ESG issues are identified, the investment team initializes internal discussions with Sustainable Investing Team and members of the investment committee to determine on a case-by-case basis whether further risks can be mitigated, or further assessment is required. The Partnership has created standardized ESG and UN SDG (UN Sustainable Development Goals) questionnaires to ensure the highest level of objectivity.

Presentation of ESG risk and mitigants to the Investment Committee

ESG considerations are included in investment papers, presented to, and considered by the Investment Committee. A detailed section of ESG is required in all Investment Committee papers. The Investment Committee must give its unanimous approval. The Partnership subsequently considers if there are any ESG risks which are deemed unacceptable, and thus will reject the investment or determines that any risks identified need to be addressed, managed, or improved during the holding period. The improvement requirement must be reflected as a covenant in the documentation.



K. Engagement policies

Is engagement part of the environmental or social investment strategy?

Yes

No

If so, what are the engagement policies? (Including any management procedures applicable to sustainability-related controversies in investee companies)

The Partnership actively engages with the portfolio company's management to monitor and manage ESG matters. In cases where material ESG risks are identified and deemed unacceptable, a plan is developed and agreed with the management to improve or remedy the issue. In addition, the portfolio company is required to commit to relevant compliance undertakings.



L. Reference benchmark

Has a reference benchmark been designated for the purpose of attaining these characteristics promoted by the financial product?

Yes

No

How is that index designated as a reference benchmark aligned with the environmental or social characteristics promoted by the financial product? (including the input data, the methodologies used to select those data, the rebalancing methodologies and how the index is calculated)

Not applicable.



A. Zusammenfassung

BRIGHT CAPITAL Credit Fund III SCSp (die „**Fondsgesellschaft**“) investiert in Schuldtitel (mit oder ohne Eigenkapitalkomponente und mit oder ohne Sicherheiten) für Portfoliounternehmen und fördert Emissionsreduzierung, erneuerbare Energien, Abfallmanagement und verantwortungsvoll beschaffte Materialien als ökologische Merkmale und die sozialen Merkmale, die durch das Finanzprodukt gefördert werden, sind Gesundheit und Sicherheit am Arbeitsplatz, Inklusion und Geschlechtervielfalt im Vorstand (zusammen „**E/S-Merkmale**“).

Die Anlagestrategie der Fondsgesellschaft zielt nicht auf nachhaltige Investitionen im Sinne der Verordnung (EU) 2019/2088 („**SFDR**“) ab.

Die Leitlinien der Fondsgesellschaft für die Integration von ESG-Aspekten in die Lebensdauer einer Investition umfasst vier Phasen: Beschaffung und Screening, Due Diligence vor der Investition, Portfolio und Ausstieg. Jede Investition wird anhand einer Ausschlussliste für bestimmte Branchen und Produkte geprüft und nicht weiterverfolgt, wenn sie im Widerspruch zur Ausschlussliste steht. Die Ausschlussliste umfasst Waffen und Munition, Kinderarbeit, Pornografie oder den Verkauf von alkoholischen Getränken, Tabak, Cannabis und radioaktivem Material, Glücksspiel oder illegaler Software. Darüber hinaus wird jede Investition vor der Investition und in regelmäßigen Abständen während der gesamten Laufzeit auf potenzielle ESG-Risiken untersucht.

Die ESG-bezogenen Daten werden von der Fondsgesellschaft in regelmäßigen Abständen von ihren Portfoliounternehmen erhoben. Die Fondsgesellschaft überwacht die ESG-KPIs, die den unten genannten E/S-Merkmalen entsprechen, und erstattet ihren Anlegern jährlich Bericht.

Während der gesamten Haltedauer arbeitet die Fondsgesellschaft aktiv mit dem Management des Portfoliounternehmens zusammen, um ESG-Angelegenheiten zu überwachen und zu verwalten. In Fällen, in denen wesentliche ESG-Risiken identifiziert und als inakzeptabel erachtet werden, wird ein Plan entwickelt und mit dem Management vereinbart, um das Problem zu verbessern oder zu beheben. Darüber hinaus muss sich das Portfoliounternehmen verpflichten, einschlägige Compliance-Verpflichtungen einzuhalten.



A. Resumen

BRIGHT CAPITAL Credit Fund III SCSp (la “**Sociedad del Fondo**”) invierte en títulos de deuda (con o sin un componente de capital y con o sin garantía) para las empresas de la cartera y promueve la reducción de las emisiones, la energía renovable, la gestión de los residuos y los materiales de origen responsable como características medioambientales, y las características sociales promovidas por el producto financiero son la salud y la seguridad en el trabajo, la inclusión y la diversidad de género en el consejo (en conjunto, las “**Características E/S**”).

La estrategia de inversión de la Sociedad del Fondo no tiene como objetivo las inversiones sostenibles en el sentido del Reglamento (UE) 2019/2088 (“**SFDR**”).

Las directrices de la Sociedad del Fondo para integrar las consideraciones ASG en el ciclo de vida de una inversión incluyen cuatro fases: Búsqueda y selección, diligencia debida previa a la inversión, cartera y salida. Cada inversión se coteja con una lista de exclusión de sectores y productos específicos y no se persigue si entra en conflicto con la lista de exclusión. La lista de exclusión incluye armas y municiones, trabajo infantil, pornografía o venta de bebidas alcohólicas, tabaco, cannabis y material radiactivo, juegos de azar o software ilegal. Además, cada inversión se examina para detectar posibles riesgos ASG antes de la inversión y a intervalos regulares a lo largo de su vida.

La Sociedad del Fondo recopila periódicamente los datos relacionados con el ASG de las empresas de su cartera. La Sociedad del Fondo hace un seguimiento de los KPIs ESG correspondientes a las características E/S mencionadas a continuación e informa a sus inversores anualmente.

A lo largo del periodo de tenencia, la Sociedad del Fondo trabaja activamente con la dirección de la empresa en cartera para supervisar y gestionar las cuestiones ASG. En los casos en los que se identifican riesgos ASG importantes y se consideran inaceptables, se elabora un plan y se acuerda con la dirección para mejorar o abordar la cuestión. Además, la empresa en cartera debe comprometerse a cumplir con las obligaciones de cumplimiento pertinentes.



A. Yhteenveto

BRIGTH CAPITAL Credit Fund III SCSp ("**Rahastoyhtiön**") sijoittaa salkkuyhtiöiden velkapapereihin (osakekomponentilla tai ilman ja vakuuksilla tai ilman) ja edistää ympäristöominaisuuksina päästöjen vähentämistä, uusiutuvaa energiaa, jätehuoltoa ja vastuullisesti hankittuja materiaaleja. Rahoitustuotteella edistettävät sosiaaliset ominaisuudet ovat työterveys ja -turvallisuus, osallisuus ja sukupuolten moninaisuus hallintoneuvostossa (yhdessä "**E/S-ominaisuudet**").

Rahastoyhtiön sijoitusstrategia ei tähtää asetuksessa (EU) 2019/2088 ("**SFDR**") tarkoitettuihin kestäviin sijoituksiin.

Rahastoyhtiön ohjeet ESG-näkökohtien sisällyttämiseksi sijoituksen elinkaareen sisältävät neljä vaihetta: Hankinta ja seulonta, sijoitusta edeltävä due diligence, salkku ja irtautuminen. Kukin sijoitus tarkastetaan tiettyjä aloja ja tuotteita koskevan poissulkemisluehtelon perusteella, eikä sijoituksia tehdä, jos ne ovat poissulkemisluehtelon vastaisia. Poikkeusluetteloon sisältyvät aseet ja ampumatarvikkeet, lapsityövoima, pornografia tai alkoholijuomien, tupakan, kannabiksen ja radioaktiivisen materiaalin myynti, uhkapelit tai laittomat ohjelmistot. Lisäksi jokainen sijoitus seulotaan mahdollisten ESG-riskien varalta ennen sijoitusta ja säännöllisin väliajoin koko sen elinkaaren ajan.

Rahastoyhtiö kerää ESG-tietoa salkkuyhtiöiltään säännöllisin väliajoin. Rahastoyhtiö seuraa jäljempänä mainittuja E/S-ominaisuuksia vastaavia ESG-tunnuslukuja ja raportoi niistä sijoittajilleen vuosittain.

Rahastoyhtiö tekee koko omistusjakson ajan aktiivista yhteistyötä salkkuyhtiön johdon kanssa ESG-asioiden seuraamiseksi ja hoitamiseksi. Tapauksissa, joissa tunnistetaan olennaisia ESG-riskkejä, joita ei voida hyväksyä, laaditaan ja sovitaan johdon kanssa suunnitelma asian parantamiseksi tai ratkaisemiseksi. Lisäksi salkkuyhtiön on sitouduttava noudattamaan asiaankuuluvia velvoitteita.



A. Sammendrag

BRIGHT CAPITAL Credit Fund III SCSp («**Fondsselskapet**») investerer i gjeldsinstrumenter (med eller uten egenkapitalkomponent og med eller uten sikkerhet) for porteføljeselskaper og fremmer utslippsreduksjon, fornybar energi, avfallshåndtering og ansvarlig hentet materiale som miljøegenskaper og de sosiale egenskapene som fremmes av finansproduktet er arbeidsmiljø, inkludering og kjønns mangfold i styret (samlet kalt «**E/S-egenskaper**»).

Fondsselskapets investeringsstrategi er ikke rettet mot bærekraftige investeringer i henhold til forordning (EU) 2019/2088 («**SFDR**»).

Fondsselskapets retningslinjer for integrering av ESG-aspekter i levetiden til en investering består av fire faser: anskaffelse og screening, due diligence før investering, portefølje og exit. Hver investering vurderes opp mot en eksklusjonsliste for spesifikke bransjer og produkter og vil ikke bli fulgt opp dersom den er i strid med eksklusjonslisten. Unntakslisten inkluderer våpen og ammunisjon, barnearbeid, pornografi eller salg av alkoholholdige drikkevarer, tobakk, cannabis og radioaktivt materiale, gambling eller ulovlig programvare. I tillegg screenes hver investering for potensielle ESG-risikoer før investering og med jevne mellomrom gjennom hele levetiden.

De ESG-relaterte dataene samles inn av fondsselskapet med jevne mellomrom fra porteføljeselskapene. Fondsselskapet overvåker ESG-KPI-ene som tilsvarer E/S-egenskapene som er oppført nedenfor, og rapporterer årlig til investorene.

Gjennom hele beholdningsperioden jobber fondsselskapet aktivt med porteføljeselskapets ledelse for å overvåke og håndtere ESG-saker. I tilfeller der vesentlige ESG-risikoer identifiseres og anses som uakseptable, utarbeides en plan og avtales med ledelsen for å forbedre eller løse problemet. I tillegg må porteføljeselskapet forplikte seg til å overholde relevante samsvarsforpliktelser.