

**In compliance with Article 24 of the EU Commission Delegated Regulation 2022/1288).**

Section	Mediterrania Capital Partners Limited ESG Approach
<b>Details of the Financial Product</b>	Mediterrania Capital Partners Limited (the “ <b>Fund Manager or MCP</b> ”) manages three private equity funds which have been classified as SFDR article 8 funds These are Mediterrania Capital II (SICAV) PLC, Mediterrania Capital III Spanish Fund, FCR, and Mediterrania Capital IV Mid-Cap Spanish Fund, FCR. For the purposes of this disclosure, these three private equity funds shall be collectively referred to as the “Financial Products”.
<b>Summary (Article 25)</b>	<p>This summary is being provided in compliance with article 25 of Commission Delegated Regulation (EU) 2022/1288 (the “<b>SFDR RTS</b>”).</p> <p>The Fund Manager is summarising the details provided below relating to the Financial Products. Reference is also made throughout the document to two key documents: (a) the MCP ESG Policy and (b) the 2023 MCP Impact Report. Both documents are already available through the Fund Manager’s website.</p> <p>The Financial Products do not have sustainability investment as their investment objective. Whilst the Fund Manager commits to promoting ESG characteristics in its products, the Financial Products per se are not bound to make one or more sustainable investments in its offering documentation.</p> <p>The Fund Manager has adopted an Environmental, Social and Governance (ESG) policy to address the environmental and social characteristics. The ESG Policy is applicable to all investments considered by the investment committees of the Financial Products. Section IV of the ESG Policy covers Investment Strategy, as pre below.</p> <p>The Fund Manager is providing detailed information on the proportion of investment In its Impact Report.</p> <p>The MCP ESG policy describes the ESG criteria implemented during screening potential investments as well as during the monitoring of the holding investees. Furthermore, the ESG Policy provides a methodology for identifying and managing the level of environmental and social risk to which the Financial Products are exposed through its investee companies. This enables the Fund Manager to make investment decisions based on the risk appraisal process.</p> <p>MCP is committed to promoting sustainable investments through the Financial Products and ensuring that they help to achieve the UN Sustainable Development Goals (SDGs)</p>

	<p>The Fund Manager developed a proprietary scoring methodology that leverages the IFC Performance Standards, and a common framework built around the three ESG pillars. This scoring system helps the Fund Manager to measure in a transparent and objective manner the sustainability and ethical impacts of a company's relative ESG performance as well as the ESG characteristics promoted by the Financial Products.</p> <p>MCP actively supervises and monitors the ESG performance of each of its investment projects through periodic meetings, monitoring visits, quarterly and annual reporting with regards to the implementation of critical mitigating actions and any significant ESG incidents.</p> <p>The Fund Manager 's ESG strategy in relation to the Financial Products is substantiated by ESG metrics and data. Information is being provided on the different controls applied to help the Fund Manager demonstrate its commitment to ESG principles. The Fund Manager does not feel that there are limitations to such methodologies and data. It provides details of the efforts to ensure consistency in the ESG metrics and data.</p> <p>The Fund Manager's section, "Due Diligence" applicable to the Financial Products refers to Section IV of the MCP ESG Policy.</p> <p>MCP has a Stakeholders Engagement Plan (SEP) that lists the Financial Products' stakeholders, their degree of influence and the engagement activities. This plan has been cascaded to the investee companies and fully implemented. Reference is also made to the disclosure in the Fund Manager's Impact Report.</p> <p>Section III of Fund Manager's ESG Policy provides details about the MCP Reference framework.</p>
<p><b>No sustainability investment objective (Article 26)</b></p>	<p>This Financial Products promote environmental or social characteristics but do not have as their objective sustainable investment. MCP adopts international frameworks and standards such as the UN Principles for Responsible Investment (PRI), Global Reporting Initiative (GRI), or the Sustainability Accounting Standards Board (SASB), and IFC Performance Standards to mitigate ESG-related risks and adverse impacts.</p> <p>MCP's approach towards sustainable investments is explicitly illustrated in the ESG policy on its website (link below).</p> <p><a href="https://www.mcapitalp.com/wp-content/uploads/2022/09/MCP-ESG-POLICY_September-2022_FINAL.pdf">https://www.mcapitalp.com/wp-content/uploads/2022/09/MCP-ESG-POLICY_September-2022_FINAL.pdf</a></p>

<b>Environmental or social characteristics of the financial product (Article 27)</b>	<p>The Fund Manager has adopted an Environmental, Social and Governance (ESG) policy to address the environmental and social characteristics. The policy describes the ESG criteria implemented during screening potential investments as well as during the monitoring of the holding investees.</p> <p>The MCP ESG Policy is disclosed on its website (link below):</p> <p><a href="https://www.mcapitalp.com/wp-content/uploads/2022/09/MCP-ESG-POLICY_September-2022_FINAL.pdf">https://www.mcapitalp.com/wp-content/uploads/2022/09/MCP-ESG-POLICY_September-2022_FINAL.pdf</a></p>
<b>Investment strategy (Article 28)</b>	<p>The Fund Manager’s ESG Policy is applicable to all investments considered by the investment committees of the Financial Products.</p> <p>Section IV of the Fund Manager’s ESG Policy, entitled “The approach to ESG integration in the investment cycle” provides details about the Fund Manager’s risk appraisal process, when making reasonable investment decisions. It also provides a methodology for identifying and managing the level of environmental and social risk to which the Financial Products are exposed through its investee companies.</p> <p>The MCP ESG Policy is disclosed on its website (link below):</p> <p><a href="https://www.mcapitalp.com/wp-content/uploads/2022/09/MCP-ESG-POLICY_September-2022_FINAL.pdf">https://www.mcapitalp.com/wp-content/uploads/2022/09/MCP-ESG-POLICY_September-2022_FINAL.pdf</a></p>
<b>Proportion of investments (Article 29)</b>	<p>The Fund Manager publishes an annual Impact Report.</p> <p>The sections “Our Commitment To The SDGs” and “The UN Principles For Responsible Investment” in the MCP 2023 Impact Report (Pages 28-31) provide a detailed analysis and proportion of alignment to SDGs in the Financial Products as well as the Fund Manager’s commitment and assessment score to the UN Principles For Responsible Investment</p> <p>The Impact Report is available to the public through the Fund Manager’s website (link below):</p> <p><a href="https://www.mcapitalp.com/impact-principles/impact-report/">https://www.mcapitalp.com/impact-principles/impact-report/</a></p>
<b>Monitoring of environmental or social characteristics (Article 30)</b>	<p>Monitoring of environmental or social characteristics and the approach to ESG integration in the investment life cycle is illustrated in Section IV of the Fund Manager’s ESG Policy.</p> <p>The MCP ESG Policy is disclosed on its website (link below):</p>

	<p><a href="https://www.mcapitalp.com/wp-content/uploads/2022/09/MCP-ESG-POLICY_September-2022_FINAL.pdf">https://www.mcapitalp.com/wp-content/uploads/2022/09/MCP-ESG-POLICY_September-2022_FINAL.pdf</a></p>
<p><b>Methodologies for environmental or social characteristics (Article 31)</b></p>	<p>The Fund Manager developed a scoring methodology that leverages the IFC Performance Standards, and a common framework built around the three ESG pillars.</p> <p>Further details about this methodology are set out in the section “ESG Framework And Assessment Methodology” in the MCP 2023 Impact Report (Pages 26 27). The section provides a description of the ESG scoring system that helps the Fund Manager to measure in a transparent and objective manner the sustainability and ethical impacts of an investee company’s relative ESG performance as well as the ESG characteristics promoted by the Financial Products.</p> <p>The Impact Report is available to the public through the Fund Manager’s website (link below):</p> <p><a href="https://www.mcapitalp.com/impact-principles/impact-report/">https://www.mcapitalp.com/impact-principles/impact-report/</a></p>
<p><b>Data sources and processing (Article 32)</b></p>	<p>To ensure that the Financial Products’ ESG strategy is substantiated by ESG metrics and data effectively, different controls are applied to ensure f transparency and accountability.</p> <p><b>Data Collection and Verification.</b></p> <p>The Fund Manager implemented standardized methods for collecting ESG data from portfolio companies, ensuring consistency and comparability.</p> <p>MCP has an ESG Data Aggregation Platform which builds a deep understanding of the ESG performance of each portfolio company. The platform provides a picture of the ESG data, KPIs, action plan, and reporting. The platform allows MCP to have a smooth and efficient data collection methodology by centralizing and managing the data from all portfolio companies. Consequently, the Fund Manager has the leverage to track and manage ESG-related data more effectively. This ongoing assessment contributes to the overall stewardship of the investment and ensures alignment with ESG goals.</p> <p><b>ESG Reporting Standards</b></p>

	<p>MCP adheres to globally recognized ESG reporting standards, such as GRI, SASB, and TCFD, to structure its ESG disclosures.</p> <p>Furthermore, MCP is adopting a comprehensive reporting system which has been designed to highlight measurable ESG KPIs and significant impacts achieved alongside the financial return. The reporting system aims to provide the investors and stakeholders transparently with the ESG performance of the portfolio companies and enables them to analyse their investment impact more efficiently.</p> <p>Each shareholders' agreement requires the investment project concerned to report periodically on its ESG performance. MCP also requires timely reports from the investment project regarding the implementation of critical mitigating actions and any significant ESG incidents. We report to our investors on the ESG performance of the portfolio companies and the Financial Products on a quarterly basis.</p> <p><b>ESG Metrics Alignment</b></p> <p>The Fund Manager conducts regular materiality assessments to identify the most relevant ESG metrics for the organisation and stakeholders.</p> <p><b>ESG Strategy Integration</b></p> <p>The Fund Manager ensures that ESG metrics align with its ESG strategy and goals, so the data collected supports the strategic objectives. The Fund Manager developed clear policies on what ESG data is disclosed, to whom, and when, ensuring transparency with stakeholders.</p>
<p><b>Limitations to methodologies and data (Article 33)</b></p>	<p>The Fund Manager has not identified any limitations in the methodologies referred above or the data sources it uses for the Financial Product. This is primarily attributable to the Fund Manager's efforts to ensure consistency in the ESG metrics and data.</p> <p>This alignment is guaranteed through the different mechanism controls indicated in the section "<i>Data sources and processing</i>". The Fund Manager embeds the ESG data and metrics into the investment decision-making process to ensure these are reflected in the Financial Products' investment strategies.</p> <p>ESG metrics and data collection are also part of the regular monitoring of portfolio companies. The Fund Manager continuously updates ESG metrics and assesses the progress towards ESG goals.</p>

	The Fund Manager regularly reviews and updates the controls to ensure that its ESG strategy remains aligned with the organisation's goals and evolving stakeholder expectations.
<b>Due Diligence (Article 34)</b>	<p>MCP actively supervises and monitors the ESG performance of each of its investment projects through periodic meetings, monitoring visits, quarterly and annual reporting with regards to the implementation of critical mitigating actions and any significant ESG incidents.</p> <p>Section IV of the MEDC ESG Policy entitled "The approach to ESG integration in the investment cycle" detail the Fund Manager's approach and action plan for all underlying assets of the Financial Products.</p> <p>The MCP ESG Policy is disclosed on the Fund Manager's website (link below):</p> <p><a href="https://www.mcapitalp.com/wp-content/uploads/2022/09/MCP-ESG-POLICY_September-2022_FINAL.pdf">https://www.mcapitalp.com/wp-content/uploads/2022/09/MCP-ESG-POLICY_September-2022_FINAL.pdf</a></p>
<b>Engagement policies (Article 35)</b>	<p>MCP has a Stakeholders Engagement Plan (SEP) that lists the Financial Products' stakeholders, their degree of influence and the engagement activities. This plan has been cascaded to the investee companies and fully implemented.</p> <p>Section "Portfolio companies' best practices" of the MCP 2023 Impact Report illustrates the different community engagement activities carried out by the Financial Products' investee companies as required by the SEP.</p> <p>The Impact Report is available to the public through the Fund Manager's website (link below):</p> <p><a href="https://www.mcapitalp.com/impact-principles/impact-report/">https://www.mcapitalp.com/impact-principles/impact-report/</a></p>
<b>Where an index is designated as a reference benchmark to attain the environmental or social characteristics promoted by the financial product, 'Designated reference benchmark' (Article 36)</b>	<p>Section III of the MCP ESG Policy entitled "Reference Framework" provides details of the reference standards, guidelines and principles being considered by the Fund Manager to meet the environmental or social characteristics promoted by the Financial Products</p> <p>The MCP ESG Policy is disclosed on the Fund Manager's website (link below):</p> <p><a href="https://www.mcapitalp.com/wp-content/uploads/2022/09/MCP-ESG-POLICY_September-2022_FINAL.pdf">https://www.mcapitalp.com/wp-content/uploads/2022/09/MCP-ESG-POLICY_September-2022_FINAL.pdf</a></p>