

Sands Capital Funds plc
c/o SEI Investments - Global Fund Services Limited
Styne House
Upper Hatch Street
Dublin 2
Ireland
Tel: (+353)1 638 2440
Fax: (+353)1 477 4768
Email: tadublin@seic.com

Completion Instructions

Applicants should complete all sections in full electronically, or in blue or black ink using BLOCK CAPITALS. Applicants should ensure that the Application Form is signed by the applicant(s) and/or the authorised signatories identified at Section 5 of this Application Form (see page 3) in blue or black ink. Neither the Prospectus for Sands Capital Funds plc (the "Company"), as may be amended from time to time (the "Prospectus") nor this Application Form constitutes an offer or solicitation to anyone in any jurisdiction in which such offer or solicitation is not authorised.

Any applicant wishing to subscribe for shares of the Sands Capital Emerging Markets Growth Fund (the "Fund") ("Shares") should complete and execute one copy of this Application Form and send a completed and executed copy by facsimile to the Company at 353-1-477-4768 or by e-mail to tadublin@seic.com. All applications must be received by SEI Investments - Global Fund Services Limited (the "Administrator") no later than the time specified in the Prospectus.

Payment should be made by electronic wire transfer referencing the name of the applicant to:

USD

Bank Name: The Northern Trust International Banking Corporation
Bank Address: Harborside Financial Center Plaza 10, Suite 1401
3 Second Street, Jersey City, New Jersey 07311-3988
SWIFT: CNORUS33
ABA #: 026-001-122
Chips Participant #: 0112
Account Name: Sands Capital Emerging Markets Growth Fund - USD
Account Number: 132258-20010
Reference: [Name of applicant investor]

GBP

Pay to: Barclays Bank PLC, London
Swift: BARCGB22
IBAN: GB64 BARC 2032 5353 5294 95
The Northern Trust International Banking Corporation
For Credit to: 604835-20010
Account Name: Sands Capital Emerging Markets Growth Fund – GBP
Reference: [Name of applicant investor]

EUR

Pay to: Barclays Bank PLC, London
Swift: BARCGB22
IBAN: GB43 BARC 2032 5356 0804 88
The Northern Trust International Banking Corporation
For Credit to: 604843-20010
Account Name: Sands Capital Emerging Markets Growth Fund – EUR
Reference: [Name of applicant investor]

Please note that this Application Form must be completed in full. All subscriptions are payable in full by electronic wire transfer of readily available funds to the account of the Company either within the Initial Offer Period (where relevant), or by 4pm (Irish time) on the third Business Day following the relevant Dealing Day.

Should you wish to amend any of the contact information provided, please request an Account Maintenance Form from the Administrator.

1. APPLICATION

I/We* having received, read and carefully considered a copy of the current Prospectus hereby irrevocably apply to subscribe the amount(s) specified below for Shares in the following Share class(es) of the Fund. The subscription price that I/we* agree to subscribe into the Fund is the price calculated in accordance with the Articles of Association of the Company (the "Articles") and I/we* undertake to settle therefor in full by electronic wire transfer to the account specified above.

Please indicate **either** the *amount* of your subscription **OR** the *number* of Shares for which you wish to subscribe.

Subscription Currency & Amount: _____

OR Number of Shares:* _____

* When specifying the number of Shares for which you wish to subscribe, please ensure that you observe the Minimum Initial Subscription requirements of Section 2 below.

Effective Date of Subscription: _____

Please indicate the Sands Capital Emerging Markets Growth Fund Share class you wish to subscribe for by ticking the relevant box below:

A US Dollar Accumulating Class	ISIN: IE00BDFMDW42	<input type="checkbox"/>
A Euro Accumulating Class	ISIN: IE00BF21WN20	<input type="checkbox"/>
A Sterling Accumulating Class	ISIN: IE00BF21WP44	<input type="checkbox"/>
H US Dollar Accumulating Class	ISIN: IE00BF21WQ50	<input type="checkbox"/>
H Euro Accumulating Class	ISIN: IE00BF21WR67	<input type="checkbox"/>
H Sterling Accumulating Class	ISIN: IE00BF21WS74	<input type="checkbox"/>
Z US Dollar Accumulating Class	ISIN: IE00BD5CXB36	<input type="checkbox"/>

2. MINIMUM HOLDING AND SUBSCRIPTION¹

Share Classes	Minimum Holding	Minimum Initial Subscription	Minimum Subsequent Subscription
A US Dollar Accumulating Class	\$500,000	\$500,000	\$5,000
A Euro Accumulating Class	€500,000	€500,000	€5,000
A Sterling Accumulating Class	£500,000	£500,000	£5,000
H US Dollar Accumulating Class	\$500,000	\$500,000	\$5,000
H Euro Accumulating Class	€500,000	€500,000	€5,000
H Sterling Accumulating Class	£500,000	£500,000	£5,000
Z US Dollar Accumulating Class	\$100,000	\$100,000	\$2,500

¹ Lesser figures may apply at the discretion of the Directors of the Company.

3. INVESTOR DETAILS [please complete in block capitals]

a) Please indicate whether you are an existing shareholder in the Company (a "Shareholder").

Yes No

If yes, please provide your account ID (*as per your statement of Value and Activity*):

b) Complete your full name and address below

Name of applicant: (as it will appear on the share register)

Residence address or principal place of business:

Country of Birth (*individual investors only*)

Phone: Fax:

Location of telephone number: (*insert country name*)

Email:

Mailing address of applicant (if different from above):
 Postcode

Where an email address has been provided, correspondence will be sent by e-mail. Correspondence will only be sent by fax where no email address has been provided.

Tax Residency:

Tax ID:

Type of Investor (Please check all that apply)

<input type="checkbox"/> Foundation <input type="checkbox"/> Designated Person <input type="checkbox"/> Nominee <input type="checkbox"/> Fund	<input type="checkbox"/> Pension Plan <input type="checkbox"/> School / College / University <input type="checkbox"/> Public Body <input type="checkbox"/> Charity	<input type="checkbox"/> Corporation <input type="checkbox"/> Trust <input type="checkbox"/> Partnership <input type="checkbox"/> Limited Liability Company ("LLC") <input type="checkbox"/> Other _____ Please state investor type
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4. BANK DETAILS

Redemption proceeds in respect of the Shares should be paid to the Shareholder as detailed below:

Bank Name	
Bank Address	
Swift/Sort Code	
Account Name	
IBAN	
Account No.	
Reference	

IMPORTANT NOTE: These bank account details should match the bank account details from which the subscription monies are being paid. In the event that a Shareholder requires payment of redemption proceeds to an account other than that specified in this Application Form, the Shareholder must provide a request to this effect to the Administrator in writing (by fax or email), executed by the Shareholder or by an authorised signatory of the Shareholder, on or prior to receipt of the relevant redemption notice. Redemption monies will be paid to the Shareholder by electronic transfer to an account in the name of the Shareholder only (and subscription payments will be received only from such an account). No third party payments will be made or accepted. Payment of redemption monies will only be processed upon receipt by the Administrator of a complete Application Form and the required anti-money laundering documentation.

5. AUTHORISED SIGNATORIES FOR THIS ACCOUNT

Please complete below or alternatively attach a certified copy of the Authorised Signatory List

Name:		Name:	
Position:		Position:	
Signature:		Signature:	
Country of Residence: <i>(individual investors only)</i>		Country of Residence: <i>(individual investors only)</i>	

Certified copy of the Authorised Signatory List is attached Yes No

6. ANTI-MONEY LAUNDERING INFORMATION

Details of all Directors/Trustees/Partners/Committee Members/Controllers as appropriate

Name	Residential Address	Date of Birth	Occupation	PEP ² Y/N

² **Politically Exposed Person** - Is the Director/Trustee/Partner/Committee Member/Controller or ultimate beneficial owner a senior government, political or military official, or an immediate family member or close associate of such a person? If yes, please provide an original signed letter confirming the individual's Source of Wealth (i.e. description of the economic activity which has generated the net worth) and attach to the subscription document.

Ultimate Beneficial Owner Details³

(Natural person(s) who will ultimately benefit from the Shares regardless of how they are registered)

Name	Residential Address	Date of Birth	Occupation	PEP ⁴ Y/N

7. KEY INVESTOR INFORMATION DOCUMENT CONFIRMATIONS

1. I/We* acknowledge that I/we* have received the latest available Key Investor Information Document(s) ("KIID") in respect of the Share class(es) in which we are investing and hereby acknowledge and confirm that I/we* received such KIID free of charge and in good time prior to making this subscription application.
2. I/We* acknowledge and confirm, in respect of each KIID received, that I/we* specifically consented to receive each such KIID in the medium in which I/we* in fact received it and that I/we* were at the time of such receipt presented with the option of receiving the KIID in paper form free of charge.
3. *Please choose from the options below by ticking the relevant box:*

(i) I/We* hereby specifically choose and consent to receive the latest available KIID relevant to any future subscription I/we* make for shares of any class of any sub-fund of the Company in electronic form by accessing the latest version of such KIID online at the following website address: www.sandscapital.com, UNDER THE SECTION LABELED STRATEGIES, AND CHOOSING EMERGING MARKETS, FUND/UCITS INVESTORS (or such other website address as may be notified to me/us* from time to time via e-mail to my/our* email address as set out by me/us* below).

Yes

or

(ii) I/We* specifically undertake and agree to ensure that I/we* receive the latest available KIID relevant to any future subscription I/we* make for shares of any class of any sub-fund of the Company in good time prior to making such subscription by requesting a paper copy of same in writing from the Administrator (whose address is set out above).

Yes

Either option (i) or option (ii) above must be selected. In default of selecting either option, you will be deemed to have selected option (i) in circumstances where you have provided an email address or, where you have not provided an email address, you will be deemed to have selected option (ii).

4. *Please insert below an email address for receiving notice of any change to the website address at which the latest available versions of the Company's KIIDs will be made available:*

Email: _____

* (Delete as appropriate)

8. NON-IRISH RESIDENT DECLARATIONS

Every applicant applying for Shares on the applicant's own behalf is hereby obliged to notify the Company or the Administrator in writing if the applicant is or becomes resident or ordinarily resident in Ireland.

Every applicant applying for Shares on behalf of another is hereby obliged to notify the Company or the Administrator in writing if the applicant is, or becomes aware that any person who is beneficially entitled to any of those Shares, may be resident or ordinarily resident in Ireland or may have become resident in Ireland.

An individual is ordinarily resident in Ireland if the individual has been resident in Ireland for each of the 3 preceding years of assessment (i.e. calendar years) and that individual continues to be ordinarily resident in Ireland until the individual has not been resident in Ireland in each of the 3 preceding years of assessment.

³ Where no beneficial ownership information is provided, it will be assumed no beneficiary holds 25% or more of the assets of the subscribing entity.

⁴ See footnote 2 above.

9. CERTIFICATION OF NON-US OR US STATUS (for purposes of the Foreign Account Tax Compliance Act ("FATCA"))

Please complete either A. or B. below, as appropriate.

A. Certification of non-US status

Please send to the Administrator together with your Application Form either:

- (i) a self-certification form, available using the following links:
 - for entity investors: https://irishfunds-secure.s3.amazonaws.com/1527242963-1663-irish_funds_entity_self-certification_for_fatca_and_crs_may_final.pdf; or
 - for individual investors: https://irishfunds-secure.s3.amazonaws.com/1527242911-1665-irish_funds_individual_self-certification_for_fatca_and_crs_may_2018_final.pdf; or
- (ii) the appropriate US Internal Revenue Service ("IRS") W-8 tax form;

completed and signed as required.

Please see the links set out below to the IRS website for the various W-8 tax forms and instructions for their completion:

- Form **W-8BEN** - Certificate of Foreign Status of Beneficial Owner for United States Tax Withholding and Reporting (Individuals): <http://www.irs.gov/pub/irs-pdf/fw8ben.pdf>
- Form **W-8BEN-E** - Certificate of Status of Beneficial Owner for United States Tax Withholding and Reporting (Entities): <http://www.irs.gov/pub/irs-pdf/fw8bene.pdf>
- Form **W-8IMY** - Certificate of Foreign Intermediary, Foreign Flow-Through Entity, or Certain U.S. Branches for United States Tax Withholding and Reporting: <http://www.irs.gov/pub/irs-pdf/fw8imy.pdf>
- Form **W-8ECI** - Certificate of Foreign Person's Claim That Income Is Effectively Connected With the Conduct of a Trade or Business in the United States: <http://www.irs.gov/pub/irs-pdf/fw8eci.pdf>
- Form **W-8EXP** - Certificate of Foreign Government or Other Foreign Organization for United States Tax Withholding and Reporting: <http://www.irs.gov/pub/irs-pdf/fw8exp.pdf>

B. Certification of US status

Please send to the Administrator together with your Application Form, an IRS W-9 tax form, completed and signed as required.

Please see the link set out below to the IRS website for the US W-9 tax form and instructions for its completion:

- Form **W-9** - Request for Taxpayer Identification Number and Certification: <http://www.irs.gov/pub/irs-pdf/fw9.pdf>

You hereby acknowledge that neither the Company, the Investment Manager nor the Administrator are tax advisors and that they are unable to advise on the completion of the foregoing IRS W-8 or W-9 tax forms.

10. COMMON REPORTING STANDARD

The Common Reporting Standard ("CRS") is a new, single global standard on Automatic Exchange Of Information ("AEOI"). It was approved by the Organisation for Economic Co-operation and Development ("OECD") in February 2014 and draws on earlier work of the OECD and the EU, global anti-money laundering standards and, in particular, the Model FATCA Intergovernmental Agreement. Under the CRS, participating jurisdictions will be required to exchange certain information held by financial institutions regarding their non resident investors. The CRS has been effective in Ireland since 1 January 2016. Financial information to be exchanged includes information such as account balances, interest and dividend income and sales proceeds from financial assets.

In this regard, the Company is obliged to establish the identity and residence of non-Irish resident investors and therefore, please complete the Entity or Individual Self-Certification form available at the following links:

- for Entity Investors: https://irishfunds-secure.s3.amazonaws.com/1527242843-1662-irish_funds_entity_self-certification_for_crs_may_2018_final.pdf
- for Individual Investors: https://irishfunds-secure.s3.amazonaws.com/1527242727-1664-irish_funds_individual_self-certification_for_crs_may_2018_final.pdf
- Please note that the above mentioned financial information in respect of all non-Irish resident investors along with their tax identification information will be reported to the Irish Revenue Commissioners ("Revenue"). Revenue may exchange this information with other tax authorities.

For further information on the CRS please refer to the Revenue website at <http://www.revenue.ie/en/business/aeoi/index.html> or the following link to the OECD CRS Information Portal at <http://www.oecd.org/tax/automatic-exchange/>

11. DECLARATIONS (PLEASE DELETE AS APPROPRIATE)

A. General

I/We* hereby acknowledge that I/we have received and read the current Prospectus and that this application is based solely on the Prospectus together (where applicable) with the most recent annual audited report and accounts of the Company and (if issued after such report and accounts) its most recent unaudited semi-annual report.

I/We* hereby certify that I am/we are* aware of the risk involved in the proposed investment in the Company and of the fact that inherent in such investment is the potential to lose all of the sum invested.

I/We* hereby apply to be entered in the Register of Shareholders as the holder/holders of the Shares issued in relation to this application. I/We* hereby acknowledge that this application for Shares may be rejected in whole or in part by the Company or its delegates without assigning any reason therefor.

I/We hereby agree to be bound by the Articles (as may be amended from time to time) and the material contracts referred to in the Prospectus.

I/We* hereby represent and warrant to the Administrator and the Company the following:

- (a) I/We* have the full right, power, authority and legal capacity to enter into this agreement and purchase Shares and this agreement is enforceable against me/us* in accordance with its terms.
- (b) I/We* are purchasing the Shares for my/our* own account and solely for investment purposes and not with a view to any resale or distribution.
- (c) In purchasing Shares, I/we* have complied with any applicable guidelines, regulations or limitations on investments established by any federal, state, local or foreign regulatory body.
- (d) I/We* have received and read the Prospectus and have determined that the Shares are a suitable investment.

I/We* agree (i) to provide these representations to the Company at such times as the Company may request, and (ii) to provide on request such certifications, documents or other evidence as the Company may reasonably require to substantiate such representations. I/We* agree to notify the Company immediately if I/we* become aware that any of the representations are no longer accurate and complete in all respects and agree immediately either to sell or to tender to the Company for redemption a sufficient number of Shares to allow the representation to be made or all Shares which I/we* hold, in the event that such representations are no longer true and accurate.

I/We* hereby agree to promptly advise the Company of any change to the information provided in this Application Form in the future.

The Administrator and the Company are each hereby authorised and instructed to accept and execute any instructions in respect of the Shares to which this application relates given by me/us* by facsimile or e-mail. I/We* hereby agree to indemnify each of the Administrator and the Company and agree to keep each of them indemnified against any loss of any nature whatsoever arising to any of them as a result of any of them acting upon my/our* facsimile or e-mail instructions or due to a breach by me/us* of any of my/our* representations or warranties. The Administrator and the Company may rely conclusively upon and shall incur no liability in respect of any action taken upon any notice, consent, request, instruction or other instrument believed in good faith to be genuine or to be signed by properly authorised persons. It is the Shareholder's responsibility to receive confirmation from the Administrator that they can confirm receipt of the document once it is sent by facsimile or other electronic means of communication.

I/We* hereby acknowledge, confirm and represent that in subscribing for Shares I/we* are not involved in: (i) concealing or disguising any property which is, or which directly or indirectly represents, the proceeds of a criminal activity; or (ii) converting or transferring any property which is, or which directly or indirectly represents, the proceeds of criminal activity for the purpose of avoiding prosecution for an offence. I/We* hereby acknowledge, confirm and represent that I/we* do not know or suspect and have no reason to suspect that any of the subscription monies forwarded by me/us* for Shares is, or directly or indirectly represents, another person's proceeds of a criminal activity and the Administrator, the Directors and the Company shall be held harmless and indemnified against any penalty or loss arising as a result of the foregoing representations and undertaking being shown to be untrue or incorrect in any way. I/We* acknowledge that due to money laundering requirements operating within their respective jurisdictions the Administrator or the Company (as the case may be) may require further identification of the applicant(s) and the Administrator and the Company shall be held harmless and indemnified against any loss arising as a result of a failure to process the application if such information as has been required by the parties referred to has not been provided by me/us*. I/We* acknowledge that redemption proceeds will not be paid until all anti-money laundering procedures have been completed.

In consideration of the Company processing this Application Form and making a provisional allotment of Shares I/we* hereby agree to indemnify and hold harmless the Company, the Directors, the Investment Manager, the Administrator and the Custodian against any losses, costs or expenses incurred by them as a result of my/our* failure to pay the required subscription monies for this application of Shares within the time required by the Directors.

I/We* confirm that I/we* have received a copy of Appendix 1 – Data Protection Notice and that I/we* have read and fully understand all of the information it contains. To the extent that the information contained in this Application Form, or any other information that I/we* provide to the Company in connection with my/our* investment, relates to another identifiable individual on whose behalf I/we* am/are* applying for Shares, I/we* also confirm that I/we* have provided the information contained in Appendix 1 – Data Protection Notice to each such individual as required pursuant to Regulation (EU) 2016/679.

(Corporate applicants only)

I/We* hereby confirm that I/we* have the full right and power to make this Application and invest in Shares and all necessary corporate action has been taken to authorise this application and such investment.

(Designated Persons only)⁵

I/We* declare that I am/we are* licensed as..... (description) by the (regulatory body) under the laws of (a

⁵ A Designated Person is an entity or an individual which provides certain prescribed financial services and which is established and regulated in respect of those services in one of the countries prescribed for the purpose pursuant to The Criminal Justice (Money Laundering and Terrorist Financing) Acts, 2010 and 2013 of Ireland.

prescribed country under the legislation specified in footnote 3 below) and am/are* thereby subject to regulations and/or guidelines which to the best of my/our* knowledge and understanding are in accordance with the Financial Action Task Force Recommendations on the prevention of money laundering and that this application is made in my/our* name on behalf of my/our* clients whose identity has been properly verified by me/us* in accordance with applicable anti-money laundering regulations and guidelines.

I/We* acknowledge that measures aimed at the prevention of money laundering may require verification of my/our* identity. I/We* acknowledge that Shares will not be issued until such time as the Administrator has received and is satisfied with all the information and documentation requested to verify my/our* identity.

* (Delete as appropriate)

B. For the attention of applicants domiciled or resident in South Africa only

I/We* hereby acknowledge that:

- Collective Investment Schemes in Securities (CIS) should be considered as medium to long-term investments;
- the value of a CIS may go up as well as down and past performance is not necessarily a guide to future performance;
- CIS can engage in scrip lending and borrowing, however the Company does not engage in scrip lending;
- a schedule of fees, charges and maximum commissions is available on request from the Company or its agent;
- there is no guarantee in respect of capital or returns in a portfolio;
- a CIS may be closed to new investors in order for it to be managed more efficiently in accordance with its investment policy;
- CIS prices are calculated on a net asset basis, which is the total value of all the assets in the portfolio including any income accruals and less any permissible deductions (e.g. brokerage, STT, VAT, auditor’s fees, bank charges, trustee and custodian fees and the investment management fee) from the portfolio divided by the number of shares in issue;
- forward pricing is used by the Company; and
- where foreign securities are included in a portfolio there may be potential constraints on liquidity and the repatriation of funds, macroeconomic risks, political risks, foreign exchange risks, tax risks, settlement risks and potential limitations on the availability of market information. The investor acknowledges the inherent risk associated with the selected investments and that there are no guarantees.

12. COMPLAINTS

Any complaints concerning the Company may be sent to Sands Capital Funds plc, c/o SEI Investments - Global Fund Services Limited, Styne House, Upper Hatch Street, Dublin 2, Ireland. Shareholders are entitled to make complaints free of charge and all information surrounding the Company’s complaints procedure will be made available to Shareholders on request, free of charge.

For completion by all applicants:

Confirmation of acceptance of this trade should be e-mailed to

Print registered name of Subscriber

Signature

Signature

Print Name

Print Name:

Title

Title

Date

Date

Notes:

1. To be valid, the Application Form must be signed by the applicant. Where there is more than one applicant, each person must sign. If the applicant is a company, it must be signed by the company secretary or another authorised officer.
2. If the Application Form is signed under power of attorney, a copy of the power of attorney must be furnished in support of the signature.
3. An "Intermediary" means a person who:

- (a) carries on a business which consists of, or includes, the receipt of payments, from an investment undertaking resident in the Republic of Ireland, on behalf of other persons; or
 - (b) holds units in an investment undertaking on behalf of other persons.
4. No Share certificates will be issued.
 5. Shareholders wishing to make an additional subscription request should request an Additional Subscription Request Form from the Administrator for completion.
 6. Shareholders wishing to redeem Shares should obtain a Redemption Notice for completion from the Administrator.

APPENDIX 1: DATA PROTECTION NOTICE

DATA PROTECTION NOTICE

Sands Capital Funds plc (the "Fund")

1. Purpose of Notice

This notice sets out details on how personal information relating to you, as a shareholder in the Fund, or, as applicable, as a director, trustee, partner, committee member, controller, beneficial owner, authorised signatory or relevant employee/officer of a shareholder of the Fund ("**Personal Data**") will be handled by the Fund, as controller of the Personal Data (as specified in Section 3 of this notice below) and on its behalf by its third party service providers and its or their affiliates or delegates as and from 25 May 2018. This notice also sets out details of the limited circumstances in which SEI Investments – Global Fund Services Limited (the "**Administrator**") is a controller of the Personal Data (as specified in section 5 of this notice below).

2. Personal Data Processed by the Fund

The Fund processes your Personal Data as provided to it or its relevant service provider(s) on the application form received in respect of your subscription for shares in the Fund, that it collects, generates or observes while administering the account and other Personal Data you provide to us or the Fund's third party service providers acting on the Fund's behalf such as AML/KYC information. This information includes:

a. Information provided to the Fund by you or (if different) the applicant:

- *if you are an individual shareholder* this includes your name and residence address (including proofs of name and address), country of birth, contact details (phone number, fax number, location of phone number, email address and mailing address (if different to residence address)), tax residency and tax identification information, bank details, signature, title, passport/driver's licence or similar, shareholder register account number/social security identifier code or similar, date of birth, source of funds, year-end account value, yearly payments and account currency, transaction instruction and detail, bank statement for subscription account and full bank account payment details;
- *if you are an authorised signatory of the shareholder's account with the Fund* this includes your name, position, signature and, where relevant, country of residence;
- *if you are a Director/trustee/partner/committee member/controller or beneficial owner of the shareholder* this includes your name, residential address, date of birth, occupation and Politically Exposed Person status, passport, driver's licence or similar, contact details (phone/fax number and email address), ID number (tax identifier code, social security identifier code or similar); and
- your email address, if provided for the purpose of receiving confirmation of acceptance of trades.

b. Information that the Fund collects, generates or observes: this might include information relating to your/an applicant's investment in the Fund, emails, call recordings and website usage data.

c. Information that the Fund obtains from third party sources: This might include information obtained for the purpose of the Fund's AML/KYC procedures, information from public websites and information received from your/the applicant's advisers or from intermediaries. Such third parties include Lexis Nexis and World Check.

3. Why the Fund Processes your Personal Data

The Fund collects and processes your Personal Data on various legal bases and for numerous different purposes, including those set out below.

Legal Basis	Purpose(s)
<p>Legitimate Interests The Fund may process your Personal Data in order to exercise or preserve its legitimate business interest(s).</p>	<ul style="list-style-type: none"> • To assess the initial application for shares and to facilitate the opening of the account with the Fund. • To facilitate the management and administration of holdings and dealing in the Fund including, without limitation, the processing of redemption, conversion, transfer and additional subscription requests and the processing and verification of instructions. • To make relevant disclosures in the course of a merger, acquisition or bankruptcy of the Fund or any sub-fund. • To validate and verify information for security purposes, including for the prevention of fraud. • To manage the Fund, including monitoring and resolving complaints. • To send administrative information relevant to the investment in the Fund. • To exercise or defend a legal claim, including in the context of litigation, arbitration and similar proceedings.
<p>Compliance with Legal Obligation The Fund may process your Personal Data in order to comply with its relevant legal and regulatory obligations.</p>	<ul style="list-style-type: none"> • To ensure compliance with the Fund's business, tax and regulatory obligations, including its FATCA/CRS reporting obligations. • To assist the Fund's auditors in the auditing of the Fund in accordance with its legal obligations. • To investigate, detect, prevent or prosecute crimes in relation to the prevention of fraud, money laundering and/or terrorist financing, including "know your customer" and other necessary onboarding and ongoing investor checks.

4. Third Party Recipients of your Personal Data

The Fund may disclose your Personal Data to its relevant service providers and/or other third parties and their affiliates and delegates including:

- the Administrator, Registrar and Transfer Agent, currently SEI Investments – Global Fund Services Limited;
- the Depository, currently Brown Brothers Harriman Trustee Services (Ireland) Limited;
- the Auditors, currently PricewaterhouseCoopers;
- its Legal Advisors, including William Fry;
- the Secretary, currently Wilton Secretarial Limited;
- Clifton Consulting Limited, t/a KB Associates;
- the MLRO, currently Clifford Burke;
- the Investment Manager and Distributor, currently Sands Capital Management, LLC;
- any relevant paying agents, representative agents and sub-distributors;
- the Irish Revenue and other national revenue authorities;
- national regulators, including the Central Bank of Ireland;
- An Garda Síochána;
- banking providers;
- SEI Global and affiliates;
- Lexis Nexis; and

- World Check.

The Fund or its service providers may also disclose your Personal Data to any other persons or entities as agreed between the Fund and the relevant service provider, or as may be required or expressly permitted by applicable laws.

5. Why the Administrator, as data controller, Processes your Personal Data

The Administrator has advised that, for the most part, Personal Data is processed by it as a data processor on behalf of the Fund and under the Fund's instruction pursuant to the purposes outlined in 3. above. However, the Administrator wishes to inform you that in certain circumstances the Administrator may use your Personal Data where this is necessary for compliance with a legal obligation to which it is directly subject (i.e. to comply with applicable law in the area of anti-money laundering and counter terrorist financing or where mandated by a court order or regulatory sanction). The Administrator, in respect of this specific use of Personal Data, acts as a data controller.

6. International Transfer of your Personal Data

The disclosure of your Personal Data to the third party recipients set out above may involve the transfer of data to the USA, Singapore, South Africa, Switzerland and other jurisdictions outside the European Economic Area ("**EEA**"), including, in particular, any such jurisdictions in which the Fund may be registered or marketed, which are not the subject of an adequacy decision by the EU Commission. Such countries may not be subject to equivalent data protection laws as countries within the EEA. Any transfer of your Personal Data to jurisdictions outside the EEA may only occur in accordance with the requirements of the EU General Data Protection Regulation (the "**GDPR**"). For example, in connection with the transfer of your Personal Data to jurisdictions outside the EEA, the Fund has authorised the Administrator as its delegate to enter into standard contractual clauses, as prescribed under the GDPR, with relevant parties to whom your Personal Data will be transferred. Copies of these clauses may be sought from the Client Service Team at Sands Capital Management, LLC at clientserviceteam@sandscap.com.

7. Retention of your Personal Data

The Fund and the Administrator will retain Personal Data for as long as necessary or permitted in light of the purpose(s) for which it was obtained. The criteria used to determine the retention periods include:

- the length of the Fund's relationship with you/its client;
- whether there is a legal obligation to which the Fund or Administrator are subject (such as retaining Personal Data obtained for the performance of AML and related checks, which will be kept for **5 years** after termination of the relationship); and
- whether retention is advisable in light of the Fund or Administrator's legal position (such as with respect to statutes of limitations, litigation or regulatory investigations), in which case the Personal Data may be kept for up to **7 years**.

8. Your Data Protection Rights

You have a number of rights in relation to your Personal Data, which are set out in the table below. **In particular these rights include the right to object to processing of your Personal Data where that processing is carried out for the Fund's legitimate interests.** Note that in certain circumstances these rights might not be absolute.

Right	Further Information
Right of Access	You have the right to request a copy of the Personal Data held by the Fund about you and to access the information which the Fund holds about you. The Fund may charge you for making such an access request where it feels your request is unjustified or excessive.

Right to Object	You have a right to object at any time to the processing of your Personal Data where the Fund processes your Personal Data on the legal basis of pursuing the Fund's legitimate interests.
Right to Rectification	You have the right to have any inaccurate Personal Data which the Fund holds about you updated or corrected.
Right to Erasure	In certain circumstances, you may also have your personal information deleted, for example if you exercise your right to object (see above) and the Fund does not have an overriding reason to process your Personal Data or if the Fund no longer requires your Personal Data for the purposes as set out in this notice.
Right to Restriction of Processing	You have the right to ask the Fund to restrict processing your Personal Data in certain cases, including if you believe that the Personal Data the Fund holds about you is inaccurate or the Fund's use of your information is unlawful. If you validly exercise this right, the Fund will store your Personal Data and will not carry out any other processing until the issue is resolved.
Right to Data Portability	You may request the Fund to provide you with your Personal Data which you have given the Fund in a structured, commonly used and machine-readable format and you may request the Fund to transmit your Personal Data directly to another data controller where this is technically feasible. This right only arises where: (1) the Fund processes your Personal Data with your consent or where it is necessary to perform the Fund's contract with you; and (2) the processing is carried out by automated means.

Should you consider that the processing of your Personal Data by the Fund or its service providers infringes the provisions of the GDPR, you may lodge a complaint with a supervisory authority in the EU Member State of your habitual residence, place of work, or in the place of an alleged infringement.

9. Contact Us

If you have any questions in relation to the Fund's use of your Personal Data, or would like to submit a request with respect to your rights above, please contact the Client Service Team at Sands Capital Management, LLC at clientserviceteam@sandscap.com.