

## Nordic Capital Responsible Investment Policy

Nordic Capital's mission is to find, invest in, and build stronger businesses. It is by supporting the development of strong sustainable businesses that the Nordic Capital funds can consistently deliver excellent financial returns to investors across economic cycles.

We recognise the importance of responsible investment, and sustainability plays a major part in the way we build long-term business success.

### Purpose

The purpose of the policy is to outline Nordic Capital's approach to responsible investment throughout the investment, ownership, and exit phases of the investment process. Nordic Capital believes that attention to Environmental, Social and Corporate Governance (ESG) matters is a prerequisite for long-term value creation. We are committed to investing responsibly and our ambition is to develop companies into successful and sustainable businesses.

### Responsible investment commitments

In its role as a responsible owner, Nordic Capital makes the following commitments to its stakeholders.

- We are committed to compliance with applicable laws in the jurisdictions in which we operate.
- We integrate ESG considerations into our investment process.
- We expect our portfolio companies to comply with applicable laws, and we encourage them to strive for long-term continuous improvement on ESG matters.
- We promote transparency on ESG matters by providing clear and timely communication to our investors and other stakeholders.

Nordic Capital adheres to the United Nations Principles of Responsible Investment (PRI) and this policy takes into consideration the Ten Principles of the United Nations Global Compact. We encourage our portfolio companies to consider these principles when developing their ESG strategies.

Nordic Capital is a member of Invest Europe and the local Venture Capital Associations where Nordic Capital is present. We follow the professional standards set by those associations. We seek to disclose information in line with the guidance on responsible investment provided by Invest Europe.

### Responsible investment focus areas

To maximise the potential impact of our ESG efforts, we choose to focus on areas material to the investment that we have the ability to influence by virtue of our ownership stake. We aim to equip our portfolio companies to achieve long-lasting results in these focus areas by providing the guidance and resources to help them develop sustainable business practices.

#### Environment

We believe that a company that is aware of its impact on the environment is better able to manage associated risks and is more likely to have a long-term sustainable business model in place. We encourage companies to use energy efficiently, lower greenhouse gas emissions, use water responsibly, reduce waste, and choose sustainable materials when sourcing.

#### Social

Nordic Capital respects the rights of workers and believes that good relationships between managers, employees, suppliers, and business partners lead to better results. Respecting labour rights, providing a safe work environment, and protecting consumers are prioritised within the portfolio company itself and throughout the supply chain. We reject the use of any form of forced, child, or compulsory labour.

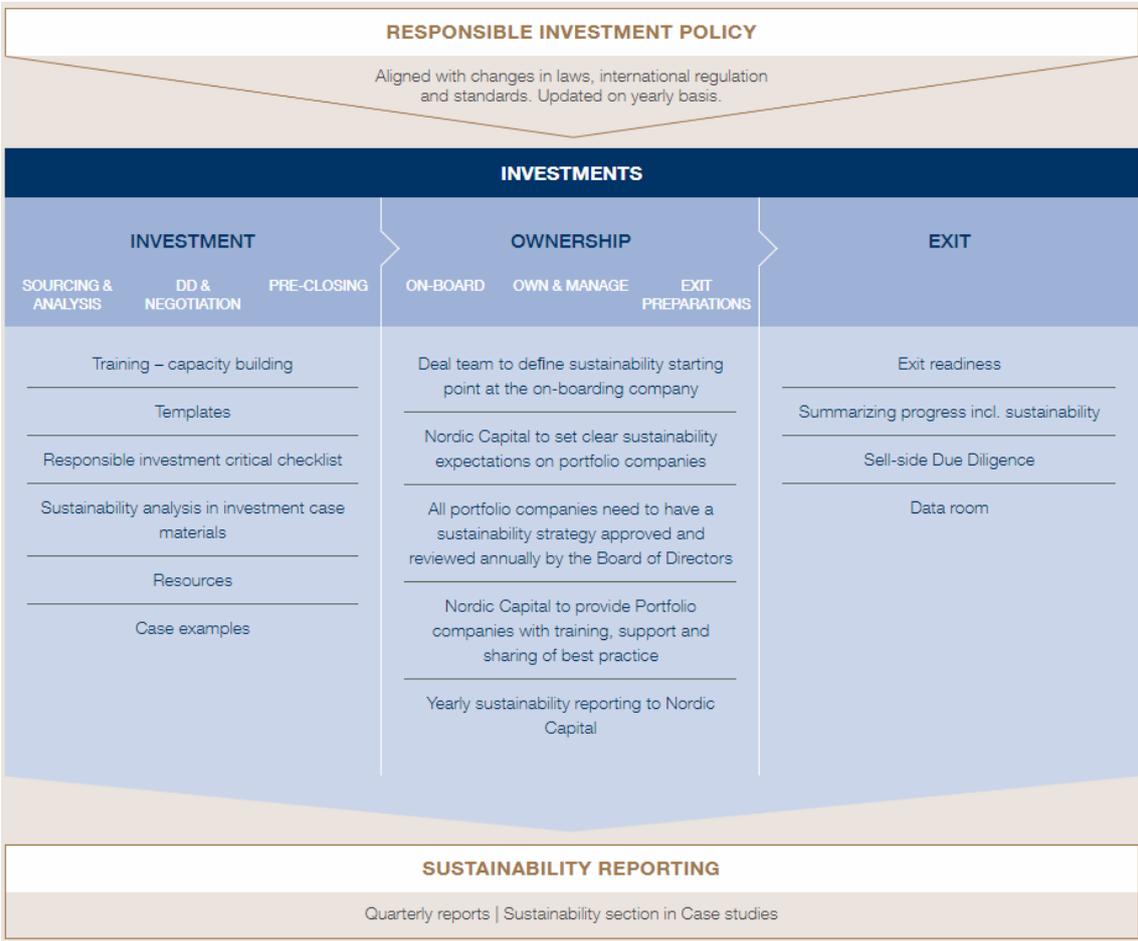
Nordic Capital encourages the promotion of diversity and does not tolerate discrimination on the basis of age, gender, marital or parental status, sexual orientation, ethnic or national origin, political affiliation, physical ability, appearance, education, or religious background.

**Governance**

Nordic Capital engages with its portfolio companies to encourage strong corporate governance. We involve portfolio companies in a centralised programme, which covers key corporate compliance areas such as anti-corruption, competition, cybersecurity, data protection, and trade sanctions. The programme includes training, risk-assessments, a policy package, and implementation plans and support. Nordic Capital expects its portfolio companies, as well as their suppliers and business partners, to conduct business in an ethical manner at all times – working against corruption in all of its forms, promoting a culture of good governance, and seeking necessary and positive engagement with key stakeholders.

**Responsible investment process**

The following illustration shows how sustainability is integrated into each stage of the investment and ownership process.



Nordic Capital aims to conduct its responsible investment process in line with this section of the policy. In the event Nordic Capital determines that limitations on its ability to execute the responsible investment process as outlined in this section are outweighed by its duty to maximise returns for its investors, Nordic Capital may in its sole discretion choose to deviate from this process to the extent it deems it necessary to do so.

## Investment

Nordic Capital's investment professionals are primarily responsible for integrating ESG considerations into the investment process with the support of Nordic Capital's Sustainability and Legal team.

When evaluating a potential investment, Nordic Capital's investment professionals identify and assess material risks and opportunities related to ESG matters. Reasonable steps are taken to mitigate ESG-related risks. Nordic Capital's Sustainability and Legal team, together with external advisers as needed, provide necessary support in conducting this review.

## Ownership

### Sustainability status review

During the ownership phase, Nordic Capital's investment professionals, working together with the portfolio company's board of directors and management, analyse the sustainability status of the company and assist in developing a plan to mitigate ESG risks and capitalise on ESG opportunities. Portfolio companies are required to perform a sustainability status review each year-end.

### Expectations

Nordic Capital sets out clear expectations for portfolio companies that are designed to ensure material ESG risks and opportunities are addressed. While the board of directors is ultimately responsible for developing the portfolio company's sustainability strategy and ensuring it is implemented, we provide guidance to help the company achieve its strategic aims and meet our expectations.

### Training and support

Nordic Capital provides investment professionals and portfolio companies with training and support designed to assist in setting and achieving ESG objectives. Among other activities, Nordic Capital's Sustainability team:

- develops training programs to promote and share best practices;
- hosts an annual Sustainability Conference and bespoke roundtable events throughout the year for portfolio companies;
- connects portfolio companies with knowledgeable external sustainability service providers;
- supports portfolio companies with practical tools; and
- assists portfolio companies in conducting annual sustainability reporting.

## Exit

In preparation for the exit phase of an investment, reasonable steps are taken to ensure the portfolio company is positioned to continually improve its ESG performance. The value generated by ESG improvements made during the ownership phase aim to be clarified and realised upon exit.

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