



## 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 Nordic Capital can consistently deliver excellent financial returns to investors across economic cycles. We recognise the importance of responsible investment, and that 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. This policy is applicable to all Nordic Capital funds, vehicles and other entities and their respective processes, as well as to all Nordic Capital advisory entities and their processes. In addition, specific sustainability requirements will apply to those of our Funds that are subject to the Regulation 2019/2088 on sustainability-related disclosures in the financial services sector dated 27 November 2019 (SFDR).

Nordic Capital believes that attention to sustainability, including Environmental, Social and Corporate Governance (ESG) related business opportunities, and ESG related events or conditions that could negatively impact the value of our investments; 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

Nordic Capital is a signatory of the United Nations Principles of Responsible Investments (PRI) and we are committed to integrating sustainability factors into all stages of our investment process. Our Responsible Investment Policy takes into consideration the Ten Principles of the United Nations Global Compact (UNGC) and the sustainability objectives set out in the United

Nations Sustainable Development Goals (SDGs), which are used as guidelines in our investment process. We also encourage our portfolio companies to consider both the Ten Principles of the UNGC and the SDGs when developing their own business strategies and value creation plans.

In our role as a responsible owner, Nordic Capital makes the following commitment to our business stakeholders:

- We are committed to complying with applicable laws and regulations in the jurisdictions in which we operate.
- We integrate considerations of sustainability risks and objectives into our investment process.
- We expect our portfolio companies to continuously sharpen their sustainability objectives and improve their sustainability risk mitigation efforts, in line with our commitments. We expect them to comply with applicable laws and regulations.
- We integrate and promote transparency on sustainability matters in our communication to our investors and other business stakeholders.

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. In addition to upholding our PRI reporting obligations, we seek to disclose information in line with the guidance on responsible investment provided by Invest Europe.

## SUSTAINABILITY FOCUS AREAS

Nordic Capital sets clear expectations of portfolio companies to, in line with our own commitment to the Ten Principles of the UNGC's 10 principles and the Sustainable Development Goals (SDGs), meet defined sustainability objectives, find sustainability related opportunities and to address material sustainability risks to the company and to people and planet in their own operations and throughout their value chains. The Board of Directors is responsible for integrating these sustainability considerations into the portfolio company's business strategy and value creation plans; and for ensuring their implementation. We annually measure portfolio companies' performance using a set of sustainability KPIs.

Nordic Capital provides training and support to investment professionals and portfolio companies to help them set and achieve sustainability objectives and meet Nordic Capital's expectations within our sustainability focus areas (stated below). Among other activities, Nordic Capital's Sustainability team:

- develops training programmes to build capacity and to promote and share best practice;

- hosts annual Sustainability Conferences and bespoke roundtable events throughout the year for portfolio companies;
- connects portfolio companies with knowledgeable external sustainability experts;
- supports portfolio companies with practical tools;
- assists portfolio companies in collecting sustainability data and conducting annual sustainability reporting.

## ENVIRONMENT

We believe that a company that is aware of its impacts on the climate and environment is better at managing associated risks and is more likely to have a long-term sustainable business model in place. Nordic Capital expects portfolio companies to integrate sustainability considerations into their business strategy and value creation plans, and to meet their climate and environmental targets, as determined by the Board of Directors; and otherwise to find ways to lower their greenhouse gas emissions and to choose sustainable materials when sourcing.



## SOCIAL

Nordic Capital is committed to respecting internationally recognised human rights, including the rights of workers. We believe that good relationships between managers and employees, and similarly, between suppliers, business partners and their employees, lead to better business results. Nordic Capital expects portfolio companies to conduct their business with respect for internationally recognised human rights, reject the use of any form of forced, child or compulsory labour and have zero tolerance for all forms of discrimination, harassment or bullying. Furthermore, the portfolio companies shall provide healthy and safe working environments, are expected to promote employee well-being, and are highly encouraged to promote diversity and inclusion.

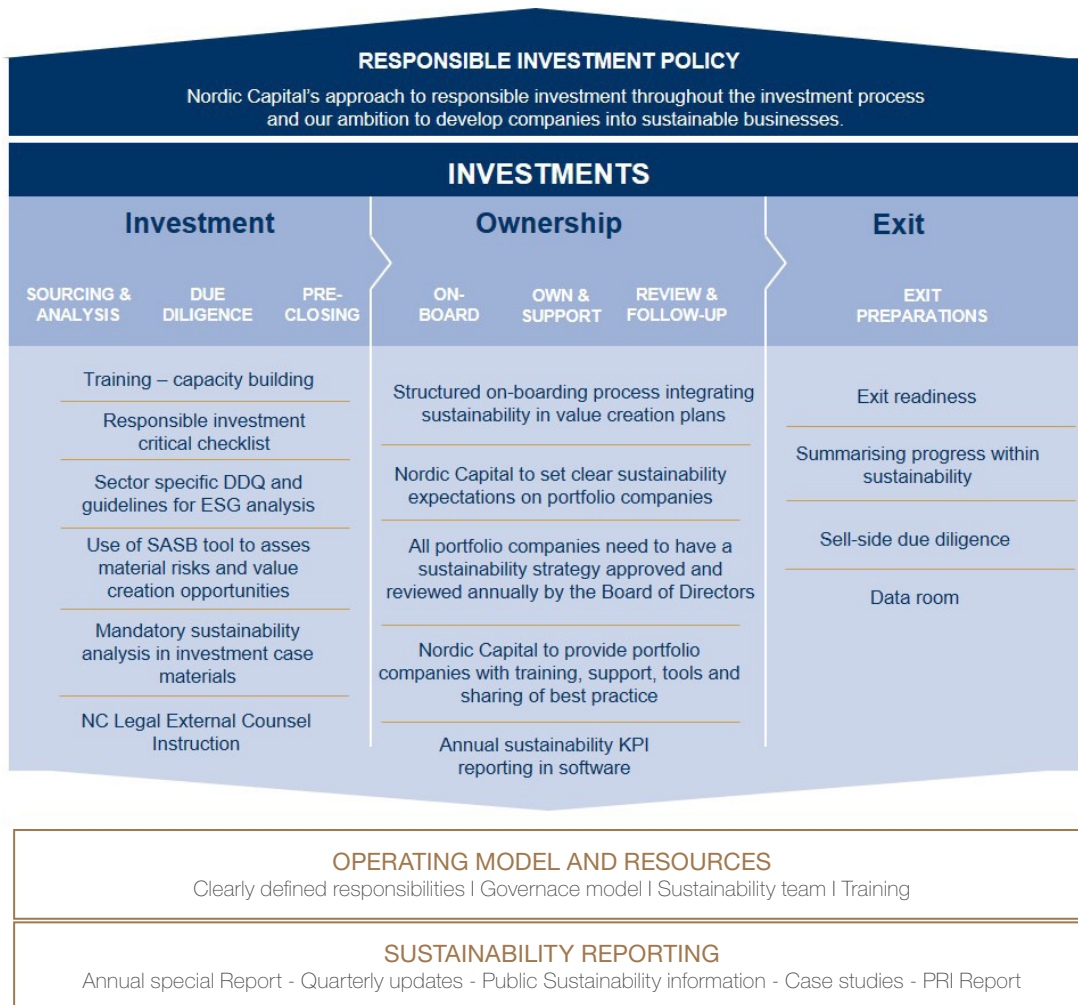
## CORPORATE GOVERNANCE

Nordic Capital engages with its portfolio companies to embed strong corporate governance, which includes sustainable supply chain management, legal compliance, business ethics, fair tax practices and whistleblowing systems. We expect portfolio companies to work proactively against corruption in all its forms. We also ask them to place sustainability requirements on their suppliers and other business relations and to engage with them to ensure sustainability risks are addressed.

\*For ease of reading, the term "Nordic Capital" and any derivate terms such as "we" or "our" are used in this policy to refer to all or any of the Nordic Capital general partners, the Nordic Capital funds and vehicles, the Nordic Capital Advisors, Nordic Capital Limited, Nordic Capital S.à.r.l. Nordic Capital Management S.à.r.l. and their respective affiliated entities (as applicable in the context). However, this does not imply from a legal, regulatory or tax perspective, nor should it be inferred, that such entities are not separate and distinct entities, nor that there is any single Nordic Capital entity. The Nordic Capital Advisors are non-discretionary sub-advisory entities and only provide non-binding investment advice to the general partners of the Nordic Capital funds and vehicles.

## RESPONSIBLE INVESTMENT PROCESS

The following illustration shows how sustainability is integrated into each stage of Nordic Capital's investment process.



### INVESTMENT

Nordic Capital's investment professionals are primarily responsible for integrating sustainability considerations into the investment process. They are supported in their endeavours by Nordic Capital's Sustainability and Legal teams.

When evaluating a potential investment, Nordic Capital's investment professionals identify and assess material sustainability risks and opportunities. Appropriate steps are taken to avoid or mitigate these risks. Nordic Capital's Sustainability and Legal teams, together with external advisers when needed, provide support in conducting relevant analysis.

### OWNERSHIP

#### SUSTAINABILITY REQUIREMENTS

During the ownership phase, Nordic Capital's investment professionals work together with the portfolio company's Board of Directors and management to identify and address sustainability risks and opportunities. Supported by Nordic Capital's Sustainability and Legal teams, the investment professionals analyse the sustainability status

of the company and assist the portfolio company in developing plans to address sustainability risks to people, planet and the company, capitalise on opportunities and meet established sustainability objectives in their own operations and throughout their value chains. Each portfolio company is required to integrate such sustainability considerations in their business strategies and value creation plans for annual review and approval by the Board of Directors; and to annually report on their sustainability performance to Nordic Capital.

### EXIT

By ensuring that sustainability matters are taken seriously, Nordic Capital creates profitable and sustainable growth. In preparation for the exit phase of an investment, steps are taken to ensure the portfolio company is in a strong position to maintain and continually improve its sustainable business practice. Our aim is that the value generated by an improved approach to Sustainability during the ownership period will be realised upon exit.

*This policy is reviewed on annual basis and updated if deemed necessary. Latest updated in December 2021.*