

## Nordic Capital - SFDR Disclosures

### 1. EU SFDR - website disclosure

#### **Regulation 2019/2088 on sustainability-related disclosures in the financial services sector dated 27 November 2019 (SFDR).**

Nordic Capital has implemented a Responsible Investment Policy, which sets out, amongst other matters, how sustainability risks are integrated into its investment decision-making process. For further information, please review our [Responsible Investment Policy](#). For the purposes of the SFDR, a sustainability risk is an environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of the investment.

Nordic Capital has an approach to remuneration that is consistent with sound risk management, which we consider including the management of sustainability risks in our investments. The performance evaluation and compensation framework for our investment teams take into account a range of criteria, including adherence to our due diligence procedures that are designed to identify and mitigate the risks inherent in each of our investments, including sustainability

and other ESG-related risks identified and managed pursuant to our Responsible Investment Policy.

While we will continue to take into account ESG factors in our investment process, we do not consider adverse impacts of investment decisions on sustainability factors as specifically set out in the SFDR. We have chosen not to do so for the present time, since we consider our existing due diligence process and Responsible Investment Policy to be appropriate and proportional to the investment strategies of our funds. We continue to monitor regulatory developments with respect to the SFDR and other applicable ESG-focused laws and regulations, and will, where required or otherwise appropriate, make changes to our existing policies and procedures.