NORDIC CAPITAL

Nordic Capital - SFDR Disclosures

EU SFDR - website disclosure

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

TRANSPARENCY OF SUSTAINABILITY RISK POLICIES

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 (ESG) 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 a well-established Responsible Investment Policy to ensure high environmental, social, and corporate governance standards from sourcing to exit. Nordic Capital is a signatory to the United Nations-supported Principles for Responsible Investment Initiative (PRI). As a signatory, Nordic Capital commits to taking active ownership of sustainability integration into its policies and practices, reporting on activities and advancements within the firm and portfolio-level, and promoting responsible investment practices throughout the investment management industry.
Together with other PRI signatories, Nordic Capital continues to adapt our investment activities to the changing imperatives impacting our companies, our communities, and our climate.

More information on Nordic Capital's policies on the integration of sustainability risks in investment decision-making process can be found on Nordic Capital's website at: Sustainability Performance | Nordic Capital.

NO CONSIDERATION OF ADVERSE IMPACTS OF INVESTMENT DECISIONS ON SUSTAINABILITY FACTORS

While we will continue to take into account sustainability 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 sustainability -focused laws and regulations, including the implementation of related and secondary legislation and regulatory guidance and will, where required or otherwise appropriate, make changes to our existing policies and procedures.

TRANSPARENCY OF REMUNERATION POLICIES IN RELATION TO THE INTEGRATION OF SUSTAINABILITY RISKS

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 and, where applicable, other personnel 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.

Update History

Date	Version
August 2023	1
March 2025	2
November 2026	3