

Statement on principal adverse impacts of investment decisions on sustainability factors

Financial market participant: Norvestor Investment Management S.à.r.l.

Legal entity identifier: 984500E3944EB10FBE07

Summary

Norvestor Investment Management S.à.r.l. ('NIM') (legal entity identifier: 984500E3944EB10FBE07) considers the principal adverse impacts of its investment decisions on sustainability factors. The present statement is the consolidated statement of principal adverse impacts on sustainability factors of NIM.

This statement relates to the reference period 1 January to 31 December 2022.

Article 4 of Regulation (EU) 2019/2088 ("**SFDR**") and articles 4-10 of Delegated Regulation (EU) 2022/1288 require NIM to disclose information about how principal adverse impacts of its investment decisions on sustainability factors are considered.

This statement describes how principal adverse impacts are considered and the consolidated impact on the fourteen mandatory sustainability indicators. Two additional indicators have been selected i) Investments in portfolio companies without carbon emission reduction initiatives aimed at aligning with the Paris Agreement, and ii) Investments in portfolio companies without policies on the protection of whistleblowers.

Principal adverse impacts on sustainability factors are identified, prioritised and assessed during the due diligence of potential portfolio companies and monitored continuously through Norvestor's continued engagement with portfolio companies. Norvestor adheres to internationally recognized responsible business conduct codes and internationally recognised standards for due diligence and reporting.

Translations of this summary are included in Appendix 1.

Description of the principal adverse impacts on sustainability factors

ESG considerations are continuously integrated into the investment decision-making process and throughout the Norvestor funds’ ownership period, including concerns regarding principal adverse impact indicators. NIM gathers data and monitors performance on the fourteen mandatory principal adverse impact indicators and two additional indicators.

Adverse sustainability indicator	Metric	Impact 2022	Explanation	Actions taken, actions planned and targets set for the next reference period	
CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS – MANDATORY INDICATORS					
Greenhouse gas emissions	1. GHG emissions	Scope 1 GHG emissions	5,087.5 tCO ₂ e	97.9% data coverage of current value of investment	No formal target in place.
		Scope 2 GHG emissions	3,655.6 tCO ₂ e	97.9% data coverage of current value of investment	Switching to certified renewable electricity where possible.
		Scope 3 GHG emissions	180,015.3 tCO ₂ e	All 14 categories (GHG Protocol) were assessed except for 21% of investee companies (only business travel assessed). 97.9% data coverage of current value of investment	-
		Total GHG emissions	188,758.4 tCO ₂ e	97.9% data coverage of current value of investment	No formal target in place. Absolute GHG emissions are expected to increase in line

					with new portfolio investments in NIM.
2. Carbon footprint	Carbon footprint	75.3 tCO ₂ e/EURm invested	97.9% data coverage of current value of investment	No specific reduction target but aim to reduce the carbon footprint year on year (like-for-like).	
3. GHG intensity of investee companies	GHG intensity of investee companies	100.8 tCO ₂ e/EURm invested	97.9% data coverage of current value of investment	-	
4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	0%	100% data coverage	Target 0% See Responsible Investment Policy for reference to excluded industries.	
5. Share of non-renewable energy consumption and production	Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage of total energy sources	96%	97.9% data coverage of current value of investment using market based approach. None of the investee companies are engaged in energy production. The impact relates to share of non-renewable energy consumption.	Targets to increase the share of renewable sources. Market based approach used resulting in a higher share of non-renewable sources.	
6. Energy consumption intensity per high impact climate sector	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector	0.106 GWh/EURm invested	97.9% data coverage of current value of investment	No target.	

Biodiversity	7. Activities negatively affecting biodiversity-sensitive areas	Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas	8%	100% data coverage. Investee Company First Camp (Norvestor SPV II SCSp) consist of 63 campsites where one (1) is located near biodiversity-sensitive area. 8% cover 100% of the company = not weighted.	Initiatives in place to reduce this to 0%.
Water	8. Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	0.00	97.9% data coverage of current value of investment	Target:0
Waste	9. Hazardous waste and radioactive waste ratio	Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average	131.9 tonnes of (hazardous waste)	97.9% data coverage of current value of investment None of the investee companies generate radioactive waste.	-
INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS – MANDATORY INDICATORS					
Social and employee matters	10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	0%	100% data coverage	Target 0%

	Multinational Enterprises				
	11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance/complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	0%	100% data coverage	Target 0% See Norvestor Responsible Investment Policy for reference to excluded industries.
	12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	26%	88% data coverage of current value of investment	
	13. Board gender diversity	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members	21%	100% coverage	
	14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investments in investee companies involved in the manufacture or selling of controversial weapons	0%	100% data coverage	Target 0%
ADDITIONAL CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS					
Emissions	15. Investments in companies without carbon emission	Share of investments in investee companies without carbon emission reduction initiatives aimed at aligning with the Paris Agreement	50%	100% data coverage	Incorporating carbon reduction initiatives in investee companies is a matter of both

	reduction initiatives				responsibility, risk mitigation and long-term value creation. NIM proactively assess and engage with investee companies to integrate reduction initiatives aligned with the Paris Agreement targeting 100%.
ADDITIONAL INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS					
Social and employee matters	16. Insufficient whistleblower protection	Share of investments in entities without policies on the protection of whistleblowers	0%	100% data coverage	All investee companies are required to implement a whistleblower policy within 100 days of the investment if not already in place.

Description of policies to identify and prioritise principal adverse impacts on sustainability factors

Policies to identify and prioritise principal adverse impacts on sustainability factors are anchored in the relevant internal policies and procedures. The overarching approach to responsible investments is set out in our Responsible Investment Policy, which describes how sustainability considerations are integrated into all stages of the investment process and through Norvestor funds’ ownership period. The Responsible Investment Policy and this statement are reviewed and approved by the Board of Directors of NIM annually.

Principal adverse impacts on sustainability factors are identified, prioritised and assessed during the due diligence of potential portfolio companies. Companies are monitored regularly through Norvestor’s continued engagement with portfolio companies during annual ESG

reviews. The probability of occurrence and severity of the adverse impacts are considered, including their potentially irremediable character. Further information on Norvestor's investment process is included in Norvestor's Responsible Investment Policy (available at www.norvestor.com under "Sustainability Related Disclosures")

The following additional indicators have been selected, as referenced in the table above:

- *Share of investments in portfolio companies without carbon emission reduction initiatives aimed at aligning with the Paris Agreement*
- *Share of investments in entities without policies on the protection of whistleblowers*

The two additional indicators are selected as they are considered relevant across the entire portfolio. Carbon emission reduction initiatives aligned with the Paris Agreement are essential in mitigating the threats posed by climate change. Further, businesses cannot operate responsibly without due attention to the health and well-being of employees and the trust of customers and other stakeholders. Policies on the protection of whistleblowers are considered essential tools to ensure responsibility, transparency, and accountability.

NIM has not identified any margin of error associated with the methodologies used to select the sustainability indicators described above. NIM does not currently use other indicators to identify and assess additional principal adverse impacts on a sustainability factor other than as set out in the table above. However, other company-specific KPIs that are material for each portfolio company will be monitored and, if relevant, disclosed in Norvestor's annual sustainability report (available at www.norvestor.com under "Sustainability Related Disclosures").

NIM is primarily responsible for the processes to identify and prioritise the principal adverse impacts of investment decisions. All investment team members are trained regarding principal adverse impacts on sustainability factors to integrate these considerations into the investment process.

NIM will principally obtain data on the principal adverse impact indicators directly from portfolio companies and measurements will, to some extent, be subjective and based on judgements. NIM will seek to ensure accuracy by implementing internal and external reviews where appropriate to reduce the margin of errors and increase the reliability of the indicators.

Engagement policies

NIM generally invests in portfolio companies whose shares are not admitted to trading on a trading venue. NIM has not adopted engagement policies referred to in Article 3g of Directive 2007/36/EC.

Engagement with portfolio companies during the ownership of Norvestor funds is an integral part of Norvestor's commitment to responsible investment. An annual ESG review is conducted for all portfolio companies, including identifying actions to reduce or eliminate negative consequences of the company's activities, such as the principal adverse impact indicators. The responsibility for making an impact on ESG and reporting on progress entirely resides with the company.

Further information on Norvestor's engagement during NIM's ownership is set out in the Responsible Investment Policy.

References to international standards

Norvestor adheres to internationally recognized responsible business conduct codes and internationally recognised standards for due diligence and reporting. Norvestor is a signatory of the United Nations Principles for Responsible Investment (UN PRI) and the Task Force on Climate-related Financial Disclosure (TCFD). Norvestor further ensures that portfolio companies adhere to and comply with the principles in the UN Global Compact, UN's Universal Declaration of Human Rights and guidelines outlined in the Organization for Economic Co-Operation and Development (OECD) for Multinational Enterprises. Norvestor measures and monitors the carbon emissions of the portfolio companies as defined by the Greenhouse Gas Protocol.

By adhering to these standards, NIM seeks to ensure that its operations and portfolio companies' operations are conducted responsibly. However, the standards adherence do not, independently of implementation in portfolio companies and measures taken thereunder, ensure that operations are aligned with the 2015 Paris Agreement.

Portfolio companies' adherence to the standards are reviewed during the annual ESG review.

Data on principal adverse impact indicators are mainly obtained directly from portfolio companies. Through the data gathering and subsequent analysis and assessment, areas of improvement on the principal adverse impact indicators are identified. The company's ESG action plan is updated if necessary to reduce such impacts in the future.

Norvestor does not currently apply forward-looking climate scenarios. This is mainly due to the lack of a framework applicable to Norvestor's portfolio.

Historical comparison

This statement relates to the reference period 1 January to 31 December 2022 which is the first reporting period, hence no historical comparison. NIM will include a historical comparison in the table above of the period reported on with the previous period reported on, the second time NIM reports in line with the table above. Subsequently, NIM will include historical comparisons with every previous period reported up to the last five previous periods.

Appendix 1

Opsummering (Danish)

Norvestor Investment Management S.à.r.l. ("NIM") (identifikator for juridiske enheder: 984500E3944EB10FBE07) tager hensyn til de vigtigste negative indvirkninger af sine investeringsbeslutninger på bæredygtighedsfaktorer. Nærværende erklæring udgør en samlet erklæring om de vigtigste negative indvirkninger på bæredygtighedsfaktorer i NIM.

Denne erklæring opdateres årligt senest den 30. juni for at omfatte de relevante referenceperioder fra 1. januar til 31. december det foregående år, og den første fuldstændige erklæring skal offentliggøres senest den 30. juni 2023, og derefter årligt.

Ifølge artikel 4 i disclosureforordningen (EU) 2019/2088 ("**SFDR**") og artikel 4-10 i den delegerede forordning (EU) 2022/1288 skal NIM offentliggøre oplysninger om, hvordan der tages hensyn til de vigtigste negative indvirkninger af investeringsbeslutninger på bæredygtighedsfaktorer.

Denne erklæring beskriver, hvordan de væsentligste negative indvirkninger tages i betragtning, og den samlede indvirkning på de 14 obligatoriske bæredygtighedsindikatorer. Der er udvalgt yderligere to frivillige indikatorer i) Investeringer i porteføljeselskaber uden initiativer til reduktion af CO₂-emissioner med henblik på tilpasning til Parisaftalen og ii) Investeringer i porteføljeselskaber uden politikker for beskyttelse af whistleblowere.

De vigtigste negative indvirkninger på bæredygtighedsfaktorer identificeres, prioriteres og vurderes i løbet af due diligence af potentielle porteføljeselskaber og overvåges løbende gennem Norvestors løbende aktive ejerskab i forhold til porteføljeselskaber. Norvestor overholder internationalt anerkendte adfærdskodekser og internationalt anerkendte standarder for due diligence og rapportering.

Santrauka (Lithuanian)

„Norvestor Investment Management S.à.r.l.“ (NIM) (juridinio asmens kodas: 984500E3944EB10FBE07) atsižvelgia į pagrindinį neigiamą savo investavimo sprendimų poveikį tvarumo veiksniams. Ši ataskaita yra konsoliduota pagrindinio neigiamo poveikio NIM tvarumo veiksniams ataskaita.

Ši ataskaita bus atnaujinama kasmet iki birželio 30 d., kad apimtų atitinkamus ataskaitinius laikotarpius, t. y. nuo sausio 1 d. iki gruodžio 31 d. praėjusiais metais; pirmoji išsami ataskaita bus pateikta iki 2023 m. birželio 30 d., o vėliau kiekvienais metais.

Reglamento (ES) 2019/2088 (**toliau – SFDR**) 4 straipsnyje ir Deleguotojo reglamento (ES) 2022/1288 4–10 straipsniuose reikalaujama, kad NIM atskleistų informaciją apie tai, kaip atsižvelgiama į jos investavimo sprendimų pagrindinį neigiamą poveikį tvarumo veiksniams.

Šioje ataskaitoje aprašoma, kaip atsižvelgiama į pagrindinį neigiamą poveikį ir konsoliduotą poveikį keturiolikai privalomų tvarumo rodiklių. Pasirinkti du papildomi savanoriški rodikliai: i) investicijos į portfelio įmones, neturinčias anglies dioksido išmetimo mažinimo iniciatyvų, kuriomis siekiama suderinimo su Paryžiaus susitarimu, ir ii) investicijos į portfelio įmones, neturinčias informatorių apsaugos politikos.

Pagrindinis neigiamas poveikis tvarumo veiksniams yra nustatomas, prioritetizuojamas ir vertinamas atliekant galimų portfelio įmonių išsamų patikrinimą ir nuolat stebimas „Norvestor“ nuolat bendradarbiaujant su portfelio įmonėmis. „Norvestor“ laikosi tarptautiniu mastu pripažintų atsakingo verslo elgesio kodeksų ir tarptautiniu mastu pripažintų išsamaus patikrinimo ir ataskaitų teikimo standartų.

Samenvatting (Dutch)

Norvestor Investment Management S.à.r.l.('NIM') (identificator juridische entiteit: 984500E3944EB10FBE07) houdt rekening met de belangrijkste ongunstige effecten van de eigen beleggingsbeslissingen op duurzaamheidsfactoren. De huidige verklaring is de geconsolideerde verklaring inzake de belangrijkste ongunstige effecten op duurzaamheidsfactoren van de NIM.

Deze verklaring wordt jaarlijks op 30 juni bijgewerkt om de relevante referentieperioden te bestrijken, van 1 januari tot 31 december van het voorgaande jaar. De eerste volledige verklaring moet op 30 juni 2023 worden bekendgemaakt, en daarna jaarlijks.

Artikel 4 van Verordening (EU) 2019/2088 ('SFDR') en artikelen 4-10 van Gedelegeerde Verordening (EU) 2022/1288 vereisen dat de NIM informatie bekendmaakt over hoe de belangrijkste ongunstige effecten van haar beleggingsbeslissingen op duurzaamheidsfactoren in aanmerking worden genomen.

Deze verklaring beschrijft hoe de belangrijkste ongunstige effecten worden beoordeeld en wat het vastgestelde effect is op de veertien verplichte duurzaamheidsindicatoren. Er zijn twee aanvullende vrijwillige indicatoren uitgekozen i) Beleggingen in portefeuilleondernemingen zonder initiatieven om de koolstofuitstoot te verminderen, die zich willen aanpassen aan het Akkoord van Parijs, en ii) Beleggingen in portefeuilleondernemingen zonder beleid ter bescherming van klokkenluiders.

De belangrijkste ongunstige effecten op duurzaamheidsfactoren worden geïdentificeerd, geprioriteerd en beoordeeld tijdens de due diligence van potentiële portefeuilleondernemingen en voortdurend gemonitord met Norvestor's voortdurende betrokkenheid bij die portefeuilleondernemingen. Norvestor houdt zich aan internationaal erkende gedragscodes voor verantwoord ondernemen en internationaal erkende normen voor due diligence en rapportage.

Sammendrag (Norwegian)

Norvestor Investment Management S.à.r.l. («NIM») (juridisk enhetsidentifikator: 984500E3944EB10FBE07) vurderer de viktigste negative konsekvensene deres investeringsbeslutninger har på bærekraftsfaktorer. Denne erklæringen er den konsoliderte erklæringen for de viktigste negative konsekvensene på bærekraftsfaktorene til NIM.

Erklæringen vil årlig, og innen 30.juni, bli oppdatert for å dekke den relevante referanseperioden, herunder fra 1. januar til 31. desember det foregående år. Den første fullstendige erklæringen vil bli offentliggjort innen 30. juni 2023, og årlig deretter. Denne erklæringen dekker referanseperioden fra 1. januar til 31. desember 2022.

Forordning (EU) 2019/2088 («SFDR») artikkel 4 og delegert kommisjonsforordning (EU) 2022/1288 artikkel 4-10 pålegger NIM å offentliggjøre informasjon om hvordan de viktigste negative konsekvensene av investeringsbeslutninger på bærekraftsfaktorer blir vurdert.

Denne erklæringen beskriver hvordan de viktigste negative konsekvensene vurderes, og den konsoliderte innvirkningen på de fjorten obligatoriske bærekraftsindikatorne. Det er valgt to tilleggsindikatorer i) Investeringer i porteføljeselskaper uten fastsatte initiativ for reduksjon av karbonutslipp for det formål å overholde Paris-avtalen, og ii) Investeringer i porteføljeselskaper uten retningslinjer for beskyttelse av varslere.

De viktigste negative konsekvensene på bærekraftsfaktorer blir identifisert, prioritert og vurdert under selskapsgjennomgangen av potensielle porteføljeselskaper og overvåkes kontinuerlig gjennom Norvestors kontakt med porteføljeselskapene. Norvestor følger internasjonalt anerkjente retningslinjer for ansvarlig forretningsdrift og internasjonalt anerkjente standarder for aktsomhet og rapportering.

Resumen (Spanish)

Norvestor Investment Management S.à.r.l. («NIM») (identificador de entidad jurídica: 984500E3944EB10FBE07) considera las principales incidencias adversas de sus decisiones de inversión sobre los factores de sostenibilidad. La presente declaración es la declaración consolidada sobre las principales incidencias adversas en los factores de sostenibilidad de NIM.

La presente declaración se actualizará antes del 30 de junio para abarcar los periodos de referencia relevantes, del 1 de enero al 31 de diciembre del año anterior; la primera declaración completa deberá publicarse antes del 30 de junio de 2023 y, posteriormente, con una frecuencia anual.

El artículo 4 del Reglamento (UE) 2019/2088 («SFDR») y los artículos 4-10 del Reglamento Delegado (UE) 2022/1288 exigen a la NIM que revele información sobre cómo se tienen en cuenta las principales incidencias adversas de sus decisiones de inversión sobre los factores de sostenibilidad.

Esta declaración describe cómo se tienen en cuenta las principales incidencias adversas y el impacto consolidado sobre los catorce indicadores obligatorios de sostenibilidad. Se han seleccionado dos indicadores voluntarios adicionales i) Inversiones en sociedades de cartera sin iniciativas de reducción de emisiones de carbono dirigidas a ajustarse al Acuerdo de París, e ii) Inversiones en sociedades de cartera sin políticas de protección de alertadores.

Se identifican, priorizan y evalúan las principales incidencias adversas sobre los factores de sostenibilidad durante el proceso de diligencia debida de las posibles empresas de la cartera y se supervisan continuamente mediante la implicación continua Norvestor con las empresas en cartera. Norvestor cumple con los códigos de conducta empresarial responsable reconocidos internacionalmente y las normas reconocidas internacionalmente para la diligencia debida y la presentación de informes.

Sammanfattning (Swedish)

Norvestor Investment Management S.à.r.l ("NIM") (LEI-kod: 984500E3944EB10FBE07) beaktar de huvudsakliga negativa effekterna av sina investeringsbeslut på hållbarhetsfaktorer. Denna rapport är koncernens rapport över huvudsakliga negativa effekter på NIM:s hållbarhetsfaktorer.

Denna sammanställning kommer att uppdateras årligen senast den 30 juni för att täcka de relevanta referensperioderna, från den 1 januari till den 31 december föregående år, och den första fullständiga sammanställningen kommer att offentliggöras senast den 30 juni 2023 och därefter årligen.

Artikel 4 i förordning (EU) 2019/2088 ("SFDR") och artikel 4-10 i den delegerade förordningen (EU) 2022/1288 kräver att NIM lämnar information om hur de huvudsakliga negativa effekterna av NIMs investeringsbeslut på hållbarhetsfaktorer beaktas.

Detta uttalande beskriver hur huvudsakliga negativa effekter beaktas och de konsoliderade effekterna på de fjorton obligatoriska hållbarhetsindikatorerna. Ytterligare två frivilliga indikatorer har valts ut i) Investeringar i portföljbolag som saknar initiativ för minskning av koldioxidutsläpp i syfte att anpassa sig till Parisavtalet, och ii) Investeringar i portföljbolag utan policyer för skydd av visseblåsare.

De huvudsakliga negativa effekterna på hållbarhetsfaktorerna identifieras, prioriteras och utvärderas under due diligence av potentiella portföljbolag och övervakas kontinuerligt genom Norvestors fortsatta engagemang i portföljbolag. Norvestor följer internationellt erkända uppförandekoder för ansvarsfullt företagande och internationellt erkända standarder för due diligence och rapportering.

Version history

Version	Scope	Date
1	The initial publication of this disclosure	10 March 2021
2	Align disclosure with Regulation (EU) 2022/1288	29 December 2023
3	Annual update for the reference period 2022	30 June 2023