

Responsible Investment Policy

Nordic Capital's mission is to find, invest in and build stronger businesses through active ownership. 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 this 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 SFDR¹.

Nordic Capital believes that attention to sustainability, including Environmental, Social and Corporate Governance (ESG) related business opportunities, and ESG risk protection - i.e. events or conditions that, if they occur, could cause an actual or potential negative impact on the value of our investments - are prerequisites 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, whilst the Ten Principles of the United Nations Global Compact (UNGC) and the sustainability objectives set out in the United Nations Sustainable Development Goals (SDGs) 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 into our investment process.
- We expect our portfolio companies to continuously sharpen their sustainability performance, improve their sustainability risk mitigation efforts, and promote transparency on ESG disclosures, in line with our commitments. We expect them to comply with applicable laws and regulations.
- We integrate and promote transparency and disclosure on sustainability matters in our communication to our investors and other business stakeholders.
- We are committed to supporting the transition to a low-carbon economy aligned with the 1.5° C pathway outlined in the Paris Agreement, on firm and portfolio level.

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, local industry associations and ILPA ESG Data Convergence Initiative. Nordic Capital is also a signatory to the PRI-backed Initiative Climate International and has committed to Science Based Target Initiative to foster meaningful climate action, including a transition to a low-carbon economy.

¹ Regulation 2019/2088 on sustainability-related disclosures in the financial services sector dated 27 November 2019 (as amended)

Sustainability Focus Areas

Nordic Capital sets clear expectations of portfolio companies, in line with our own commitment to the Ten Principles of the UNGC and the SDGs, to find sustainability related opportunities and to identify and mitigate material sustainability risks to the company in their own operations and throughout their value chains. 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 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; and
- assists portfolio companies in collecting, managing and verifying sustainability data and conducting annual sustainability reporting.

Environment

Nordic Capital acknowledges the pressing concern of climate change and is committed to supporting the transition to a low-carbon economy. 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 to find ways to lower their greenhouse gas emissions, protect biodiversity and to choose sustainable materials when sourcing.

Social

We recognise our role to play in addressing social issues and 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 diversity and inclusion.

Corporate Governance

We encourage an open culture, seeking to ensure the highest standards in corporate governance. Nordic Capital's credibility and long-term success requires that our actions reflect our values and ethical guidelines. 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, whistle blowing systems and promoting transparency on ESG performance. 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.

Responsible 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. Sub sector specific sustainability themes are actively used and appropriate steps are taken to avoid or mitigate potential risks as well as capturing value creation opportunities. Nordic Capital's Investment, Sustainability and Legal teams, together with external advisers when needed, provide support in conducting the relevant analysis.

Ownership

We emphasise long-term value creation by being an engaged and active owner. During the ownership phase, Nordic Capital's investment professionals work together with the portfolio company's Board of Directors and management to strengthen sustainability performance. 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, capitalise on opportunities and meet established business objectives in their own operations and throughout their value chains.

Exit

By ensuring that sustainability matters are taken seriously, Nordic Capital believes that disclosure and transparency are key aspects of a robust exit process. In preparation for the exit phase of an investment, steps are taken to ensure that 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.

Roles and Responsibilities

The relevant Nordic Capital boards review and, where necessary, update this Policy annually to reflect our ongoing efforts to improve our responsible investment approach, as well as emerging requirements from stakeholders and evolving good practices.

Nordic Capital actively communicates this Policy to investment professionals and uses it as a basis to engage internal and external stakeholders on sustainability.

Nordic Capital's Head of Sustainability is the main owner of this Policy and is accountable for its implementation.

For portfolio companies, the Board of Directors of each portfolio company, in which the Nordic Capital Funds and Vehicles invest, is responsible for integrating company specific sustainability considerations into its business strategy and value creation plans; and for ensuring their implementation. 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.

Latest updated in December 2024.

** For ease of reading, the term "Nordic Capital" and any derivative terms such as "NC", "we" or "our" may be used in this Policy to refer to all or any of: (i) the Nordic Capital general partners, the Nordic Capital delegated portfolio managers, the Nordic Capital funds and vehicles, (ii) NC Advisory AB, NC Advisory A/S, NC Advisory AS, NC Advisory GmbH, NC Advisory Oy, NC Advisory (UK) LLP, Nordic Capital Investment Advisory AB, Nordic Capital Investment Advisory A/S, Nordic Capital Investment Advisory AS, Nordic Capital Investment Advisory GmbH, Nordic Capital Investment Advisory Oy, Nordic Capital Investment Advisory LLP, Nordic Capital Investment Advisory LLC and Nordic Capital Operations Advisory AB (collectively referred to as "Nordic Capital Advisors"), (iii) Nordic Capital Limited, (iv) Nordic Capital S.à r.l., (v) Nordic Capital Management S.à r.l., their respective affiliated entities and their respective members, partners, directors, officers, principals, secondees, employees and consultants (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. Nordic Capital Advisors are non-discretionary sub-advisory entities and only provide non-binding investment advice to the general partners and/or delegated portfolio managers of the Nordic Capital funds and vehicles.*

Except where specified either in this Responsible Investment Policy or any other documents, any ESG or impact goals, targets, commitments, incentives, initiatives or outcomes referenced in any information, reporting or disclosures published by Nordic Capital are not being marketed to investors or promoted and do not bind any investment decisions made in respect of, or the management or stewardship of, any funds managed by Nordic Capital for the purposes of the SFDR. Any measures in respect of such ESG or impact goals, targets, commitments, incentives, initiatives or outcomes may be overridden, may not be implemented or may not be immediately applicable to the investments of any funds managed by Nordic Capital (in each case, at Nordic Capital's sole discretion).

The UNSDGs are aspirational in nature. The analysis involved in determining whether and how certain initiatives may contribute to, or be aligned with, the UNSDGs is inherently subjective and dependent on a number of factors. There can be no assurance that reasonable parties will agree on a decision as to whether certain projects or investments contribute to a particular UNSDG. Accordingly, investors should not place undue reliance on Nordic Capital's application of the UNSDGs, as such application is subject to change at any time and in Nordic Capital's sole discretion. Further, statistics and metrics relating to ESG matters are estimates and may be based on assumptions or developing standards (including Nordic Capital's internal standards and policies).