



PUBLIC TRANSPARENCY REPORT

2023

Nordic Capital

Generated 15-12-2023

About this report

PRI reporting is the largest global reporting project on responsible investment. It was developed with investors, for investors.

PRI signatories are required to report publicly on their responsible investment activities each year. In turn, they receive a number of outputs, including a public and private Transparency Report.

The public Transparency Reports, which are produced using signatories' reported information, provide accountability and support signatories to have internal discussions about their practices and to discuss these with their clients, beneficiaries, and other stakeholders.

This public Transparency Report is an export of the signatory's responses to the PRI Reporting Framework during the 2023 reporting period. It includes the signatory's responses to core indicators, as well as responses to plus indicators that the signatory has agreed to make public.

In response to signatory feedback, the PRI has not summarised signatories' responses – the information in this document is presented exactly as it was reported.

For each of the indicators in this document, all options selected by the signatory are presented, including links and qualitative responses. In some indicators, all applicable options are included for additional context.

Disclaimers

Responsible investment definitions

Within the PRI Reporting Framework Glossary, we provide definitions for key terms to guide reporting on responsible investment practices in the Reporting Framework. These definitions may differ from those used or proposed by other authorities and regulatory bodies due to evolving industry perspectives and changing legislative landscapes. Users of this report should be aware of these variations, as they may impact interpretations of the information provided.

Data accuracy

This document presents information reported directly by signatories in the 2023 reporting cycle. This information has not been audited by the PRI or any other party acting on its behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented.

The PRI has taken reasonable action to ensure that data submitted by signatories in the reporting tool is reflected in their official PRI reports accurately. However, it is possible that small data inaccuracies and/or gaps remain, and the PRI shall not be responsible or liable for such inaccuracies and gaps.

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SENIOR LEADERSHIP STATEMENT (SLS)

SENIOR LEADERSHIP STATEMENT

SENIOR LEADERSHIP STATEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SLS 1	CORE	N/A	N/A	PUBLIC	Senior Leadership Statement	GENERAL

Section 1. Our commitment

- Why does your organisation engage in responsible investment?
- What is your organisation's overall approach to responsible investment, and what major responsible investment commitment(s) have you made?

Nordic Capital* is committed to investing responsibly, with a firm belief that responsible business practice is essential for achieving long-term success and value creation. With a clear commitment to making a positive contribution to society by helping to build strong companies, we drive sustainable development and awareness within our own organisation as well as throughout the portfolio and across all asset classes. Nordic Capital's fundamental ambition is to help our portfolio companies become successful, sustainable businesses and we seek to do this in a responsible way, with a clear understanding of the environmental and social impacts. As a result, sustainability factors are fully integrated into all stages of our investment and ownership processes from sourcing through to exit. Nordic Capital Advisors investment professionals are well placed to address sustainability risks and opportunities with the support of a dedicated in-house Sustainability Team and external advisors.

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 into our investment process.
- We expect our portfolio companies to focus on improving their sustainability performance 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 local Venture Capital Associations. 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 and ILPA ESG Data Convergence Initiative. Nordic Capital sets clear expectations with portfolio companies to address material sustainability risks and opportunities throughout their value chains. Each portfolio company's board of directors is responsible for developing the portfolio company's sustainability strategy and ensuring its implementation. Nordic Capital Advisors provides training and support to investment professionals and portfolio companies to help them set and achieve sustainability objectives as well as meet Nordic Capital's expectations within our sustainability focus areas. Nordic Capital's long-term commitment to responsible investment and track record of improvements in this area have provided a valuable foundation in the implementation of the evolving regulations, such as the Sustainable Finance Disclosure Regulation, both at entity and product level. Nordic Capital is committed to embedding the highest standards of sustainability practices within our own organisation while working hard to drive transformative sustainable change in the companies that we own.

* Throughout this report, unless otherwise stated "Nordic Capital", "we", "us", "our" (or similar terms) refer to, depending on the context, any, or all (i) Nordic Capital branded entities, vehicles, structures and associated entities (including the (a) the general partners and/or delegated portfolio managers, or (b) portfolio companies and intermediate investment vehicles, of such Nordic Capital entities and vehicles), and (ii) non-discretionary sub-advisory entities to such general partners and/or delegated portfolio managers (any or all of whom may be referred to as "Nordic Capital Advisors" herein). However, this does not imply from a legal, regulatory or tax perspective, nor should it be inferred, that the entities in the prior sentence are not separate and distinct entities, nor that there is any single Nordic Capital entity.

Section 2. Annual overview

- Discuss your organisation's progress during the reporting year on the responsible investment issue you consider most relevant or material to your organisation or its assets.
- Reflect on your performance with respect to your organisation's responsible investment objectives and targets during the reporting year. Details might include, for example, outlining your single most important achievement or describing your general progress on topics such as the following (where applicable):
 - refinement of ESG analysis and incorporation
 - stewardship activities with investees and/or with policymakers
 - collaborative engagements
 - attainment of responsible investment certifications and/or awards

Nordic Capital is focused on improving our integration of sustainability factors into the investment process while driving sustainable transformation throughout the portfolio. Nordic Capital's mission is to find, invest in and build stronger sustainable businesses that have the potential to shape their industries. In October 2022, Nordic Capital Fund XI successfully closed with a clear ESG commitment in line with SFDR classification Article 8 to promote specific environmental and social characteristics. This will allow Nordic Capital to apply deep and specialist experience to our core sectors; Healthcare, Technology □ Payments, Financial Services and Industrial □ Business Services. Nordic Capital proudly demonstrates increased sustainability maturity of our portfolio companies, with 87% of current portfolio companies integrating sustainability into business plans and more than two thirds reporting on sustainable impact in 2022.

Some of Nordic Capital's key sustainability related achievements in 2022 include:

- Updated RI policy to align with new regulatory requirements
- Expanded ESG-linked credit facilities to cover Fund X, XI, and Evolution Fund with a well-established framework
- Finetuned sub-sector specific ESG playbooks and tools enabling increased focus on sustainability in investment and ownership phase

- 216 attendees in sustainability training in three different training modules and spotlight sessions to increase awareness and share best practice in Nordic Capital and our portfolio companies
- Recruited a Sustainability Associate to further deepen our data-driven approach to sustainability performance
- Published a public annual and sustainability review to drive transparency on ESG metrics and performance
- Participated in the private equity industry's first-ever ESG Data Convergence initiative and completing first reporting cycle. Nordic Capital is committed to the global ILPA ESG Data Convergence Initiative, which seeks to standardise ESG metrics and provide a mechanism for comparative reporting for the private market industry
- Active engagement in Invest Europe ESG reporting guidelines to set the industry standard and guidelines for ESG reporting. Nordic Capital is represented both in different ESG related working groups and the Global Private Equity Platform Council
- Addressed the impact of climate change by identifying key climate related exposures in line with TCFD across the portfolio as well as actively shared best practice through Initiative Climat International
- Promoted ESG best practices publicly by speaking and sharing own experiences on topics such as diversity, sustainability regulation and sustainable value creation
- Expanded ESG expert network to ensure strong support across E, S and G topics aligned with the Nordic Capital funds' and vehicles' geographical scope
- Nordic Capital firmly believes in measuring sustainability with clear KPIs and being transparent in our efforts to drive sustainable performance. We are guided by the UN's Sustainable Development Goals (SDGs) on where we can make the greatest contribution and realise significant business opportunities
- Nordic Capital continued our engagement in Level20 to increase equality and diversity in the industry
- Fund XI successfully closed with a clear ESG commitment in line with SFDR classification Article 8 to promote specific social and environmental characteristics
- Achieved global top quartile UNPRI score for ESG integration in investment processes
- As a result of our ESG efforts in 2022 Nordic Capital received industry recognition and was nominated for three ESG awards: named as one of the "future 40 ESG innovators" for 2022 by leading industry publication Real Deals, shortlisted finalist in Real Deals ESG awards (Sector Specialist, Best ESG GP, Best deal of the year), winner of "ESG GP Large Cap" in the Real Deals Private Equity Awards 2023 following the successful close of Fund XI, a EUR 9 billion SFDR Article 8 Fund committed to high ESG standards.

Further reflections on Nordic Capital's performance with respect to our responsible investment objectives and targets include the additional important steps taken to deliver on our climate commitment by identifying key climate related exposures and associated risks and opportunities. In 2022 we also conducted an analysis of climate-related risk exposures in the portfolio and developed our thinking on how to incorporate these at a sector level. Based on TCFD recommendations, we have created a tailored framework by analysing the typical exposures in each of Nordic Capital's investment sectors. The climate exposure framework can be leveraged both in current and potential future investments. During 2023, a crucial focus area going forward will be to strengthen our climate commitment by increasing climate related disclosure and setting climate reduction targets both on organisation and portfolio level.

Section 3. Next steps

- What specific steps has your organisation outlined to advance your commitment to responsible investment in the next two years?

Nordic Capital is focused on improving our integration of sustainability factors into the investment process and to drive sustainable transformation in the portfolio. Belief in the transformative power of private equity to change the future for both people and the planet is embedded in Nordic Capital's culture and investment framework. As we look to the two years ahead, we approach them with optimism and caution as we continue Nordic Capital's mission to build healthier and more resilient companies that can make a lasting positive social and environmental impact.

Additional and more ambitious commitments are set to drive progress against key focus areas: climate change, social inequalities and prevention of corruption and unethical business practices. Aligned with our responsible investment framework, progress is measured against environmental and social targets as set out by our five selected UN SDGs and SFDR Principal Adverse Impacts (PAI) metrics which arise throughout the investment process. Some key steps to advance our commitment to responsible investment in the coming years include:

- Continuing our decarbonisation journey in line with the Paris Agreement by establishing targets which are to be validated by the Science Based Targets initiative, both at Nordic Capital, Nordic Capital Advisors and portfolio level
- Increase portfolio engagement in environmental and climate work
- Improve female representation in senior positions, within our own organisation and throughout the portfolio
- Ensure full compliance with new ESG regulations, promote best practice by staying at the forefront of industry developments including implementation of a third-party SFDR assurance process
- Drive sustainable transformation in the portfolio, improve understanding and measurement of ESG metrics, working towards better ESG data quality
- Promote improved disclosure of ESG data and encourage public reporting for increased transparency
- Further finetune ESG implementation into investment analysis and decision-making processes through training, tools, templates and guidelines

Section 4. Endorsement

'The Senior Leadership Statement has been prepared and/or reviewed by the undersigned and reflects our organisation-wide commitment and approach to responsible investment'.

Name

Elin Ljung

Position

Managing Director, Head of Communications & Sustainability, Nordic Capital Advisors

Organisation's Name

Nordic Capital

A

'This endorsement applies only to the Senior Leadership Statement and should not be considered an endorsement of the information reported by the above-mentioned organisation in the various modules of the Reporting Framework.

The Senior Leadership Statement serves as a general overview of the above-mentioned organisation's responsible investment approach. The Senior Leadership Statement does not constitute advice and should not be relied upon as such. Further, it is not a substitute for the skill, judgement and experience of any third parties, their management, employees, advisors and/or clients when making investment and other business decisions'.

B

Except where specified either in this 2023 PRI Report 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 and vehicles managed by Nordic Capital for the purposes of Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector. 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 and vehicles managed by Nordic Capital (in each case, at Nordic Capital's sole discretion).

ORGANISATIONAL OVERVIEW (OO)

ORGANISATIONAL INFORMATION

REPORTING YEAR

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 1	CORE	N/A	N/A	PUBLIC	Reporting year	GENERAL

What is the year-end date of the 12-month period you have chosen to report for PRI reporting purposes?

	Date	Month	Year
Year-end date of the 12-month period for PRI reporting purposes:	31	12	2022

SUBSIDIARY INFORMATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 2	CORE	N/A	OO 2.1	PUBLIC	Subsidiary information	GENERAL

Does your organisation have subsidiaries?

- (A) Yes
- (B) No

ASSETS UNDER MANAGEMENT

ALL ASSET CLASSES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 4	CORE	OO 3	N/A	PUBLIC	All asset classes	GENERAL

What are your total assets under management (AUM) at the end of the reporting year, as indicated in [OO 1]?

USD

(A) AUM of your organisation, including subsidiaries, and excluding the AUM subject to execution, advisory, custody, or research advisory only

US\$ 32,100,000,000.00

(B) AUM of subsidiaries that are PRI signatories in their own right and excluded from this submission, as indicated in [OO 2.2]

US\$ 0.00

(C) AUM subject to execution, advisory, custody, or research advisory only

US\$ 0.00

Additional information on the exchange rate used: (Voluntary)

As of December 31, 2022, Nordic Capital's AUM for all active funds and vehicles was EUR 30.1 bn, equivalent to USD 32.1 bn

ASSET BREAKDOWN

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5	CORE	OO 3	Multiple indicators	PUBLIC	Asset breakdown	GENERAL

Provide a percentage breakdown of your total AUM at the end of the reporting year as indicated in [OO 1].

	(1) Percentage of Internally managed AUM	(2) Percentage of Externally managed AUM
(A) Listed equity	0%	0%
(B) Fixed income	0%	0%
(C) Private equity	100%	0%
(D) Real estate	0%	0%
(E) Infrastructure	0%	0%
(F) Hedge funds	0%	0%
(G) Forestry	0%	0%
(H) Farmland	0%	0%
(I) Other	0%	0%
(J) Off-balance sheet	0%	0%

ASSET BREAKDOWN: INTERNALLY MANAGED PRIVATE EQUITY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.3 PE	CORE	OO 5	N/A	PUBLIC	Asset breakdown: Internally managed private equity	GENERAL

Provide a further breakdown of your internally managed private equity AUM.

(A) Venture capital 0%

(B) Growth capital 0%

(C) (Leveraged) buy-out 100%

(D) Distressed, turnaround or
special situations 0%

(E) Secondaries 0%

(F) Other 0%

GEOGRAPHICAL BREAKDOWN

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 7	CORE	Multiple, see guidance	N/A	PUBLIC	Geographical breakdown	GENERAL

How much of your AUM in each asset class is invested in emerging markets and developing economies?

AUM in Emerging Markets and Developing Economies

(F) Private equity (1) 0%

STEWARDSHIP

STEWARDSHIP

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 8	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Stewardship	GENERAL

Does your organisation conduct stewardship activities, excluding (proxy) voting, for any of your assets?

(5) Private equity

(A) Yes, through internal staff

(B) Yes, through service providers

(C) Yes, through external managers

(D) We do not conduct stewardship

ESG INCORPORATION

INTERNALLY MANAGED ASSETS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 11	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Internally managed assets	1

For each internally managed asset class, does your organisation incorporate ESG factors into your investment decisions?

(1) Yes, we incorporate ESG factors into our investment decisions

(2) No, we do not incorporate ESG factors into our investment decisions

(l) Private equity



ESG/SUSTAINABILITY FUNDS AND PRODUCTS

LABELLING AND MARKETING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18	CORE	OO 11–14	OO 18.1	PUBLIC	Labelling and marketing	1

Do you explicitly market any of your products and/or funds as ESG and/or sustainable?

(A) Yes, we market products and/or funds as ESG and/or sustainable

Provide the percentage of AUM that your ESG and/or sustainability-marketed products or funds represent:

100%

- (B) No, we do not offer products or funds explicitly marketed as ESG and/or sustainable
- (C) Not applicable; we do not offer products or funds

Additional information: (Voluntary)

83% of AUM is classified as Article 8 under EU SFDR and the remaining 17% of AUM is subject to clear guidelines to ensure integration of sustainability targets set out in our responsible investment policy and marketing materials of the Nordic Capital funds and vehicles.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18.1	CORE	OO 18	OO 18.2	PUBLIC	Labelling and marketing	1

Do any of your ESG and/or sustainability-marketed products and/or funds hold formal ESG and/or RI certification(s) or label(s) awarded by a third party?

- (A) Yes, our ESG and/or sustainability-marketed products and/or funds hold formal labels or certifications
- (B) No, our ESG and/or sustainability-marketed products and/or funds do not hold formal labels or certifications

SUMMARY OF REPORTING REQUIREMENTS

SUMMARY OF REPORTING REQUIREMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 21	CORE	Multiple indicators	Multiple indicators	PUBLIC	Summary of reporting requirements	GENERAL

The following table shows which modules are mandatory or voluntary to report on in the separate PRI asset class modules. Where a module is voluntary, indicate if you wish to report on it.

Applicable modules	(1) Mandatory to report (pre-filled based on previous responses)	(2.1) Voluntary to report. Yes, I want to opt-in to reporting on the module	(2.2) Voluntary to report. No, I want to opt-out of reporting on the module
Policy, Governance and Strategy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Confidence Building Measures	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(I) Private equity	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

OTHER ASSET BREAKDOWNS

PRIVATE EQUITY: SECTORS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 22	CORE	OO 21	N/A	PUBLIC	Private equity: Sectors	GENERAL

In which sector(s) are your internally managed private equity assets invested?

- (A) Energy
- (B) Materials
- (C) Industrials
- (D) Consumer discretionary
- (E) Consumer staples
- (F) Healthcare
- (G) Financials
- (H) Information technology
- (I) Communication services
- (J) Utilities
- (K) Real estate

PRIVATE EQUITY: OWNERSHIP LEVEL

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 23	CORE	OO 21	N/A	PUBLIC	Private equity: Ownership level	GENERAL

What is the percentage breakdown of your internally managed private equity investments by the level of ownership?

- (A) A majority stake (more than 50%)
Select from the list:
- (1) >0 to 10%
 - (2) >10 to 50%
 - (3) >50 to 75%
 - (4) >75%
- (B) A significant minority stake (between 10–50%)
Select from the list:
- (1) >0 to 10%
 - (2) >10 to 50%
- (C) A limited minority stake (less than 10%)

SUBMISSION INFORMATION

REPORT DISCLOSURE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 32	CORE	OO 3, OO 31	N/A	PUBLIC	Report disclosure	GENERAL

How would you like to disclose the detailed percentage figures you reported throughout the Reporting Framework?

- (A) Publish as absolute numbers
- (B) Publish as ranges

POLICY, GOVERNANCE AND STRATEGY (PGS)

POLICY

RESPONSIBLE INVESTMENT POLICY ELEMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 1	CORE	OO 8, OO 9	Multiple indicators	PUBLIC	Responsible investment policy elements	1, 2

Which elements are covered in your formal responsible investment policy(ies)?

- (A) Overall approach to responsible investment
- (B) Guidelines on environmental factors
- (C) Guidelines on social factors
- (D) Guidelines on governance factors
- (E) Guidelines on sustainability outcomes
- (F) Guidelines tailored to the specific asset class(es) we hold
- (G) Guidelines on exclusions
- (H) Guidelines on managing conflicts of interest related to responsible investment
- (I) Stewardship: Guidelines on engagement with investees
- (J) Stewardship: Guidelines on overall political engagement
- (K) Stewardship: Guidelines on engagement with other key stakeholders
- (M) Other responsible investment elements not listed here

Specify:

Approach to investment objectives, RI governance structure, internal/external reporting and verification related to RI

- (N) Our organisation does not have a formal responsible investment policy and/or our policy(ies) do not cover any responsible investment elements

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 2	CORE	PGS 1	Multiple, see guidance	PUBLIC	Responsible investment policy elements	1

Does your formal responsible investment policy(ies) include specific guidelines on systematic sustainability issues?

- (A) Specific guidelines on climate change (may be part of guidelines on environmental factors)
- (B) Specific guidelines on human rights (may be part of guidelines on social factors)
- (C) Specific guidelines on other systematic sustainability issues

Specify:

Fair tax practices, business ethics and legal compliance, healthy and safe working environments, expectation to promote employee well-being and diversity and inclusion, as well as biodiversity

- (D) Our formal responsible investment policy(ies) does not include guidelines on systematic sustainability issues

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 3	CORE	PGS 1, PGS 2	N/A	PUBLIC	Responsible investment policy elements	6

Which elements of your formal responsible investment policy(ies) are publicly available?

- (A) Overall approach to responsible investment**

Add link:

https://www.nordiccapital.com/media/510govnq/nordic-capital-responsible-investment-policy-vf_2022.pdf

- (B) Guidelines on environmental factors**

Add link:

https://www.nordiccapital.com/media/510govnq/nordic-capital-responsible-investment-policy-vf_2022.pdf

- (C) Guidelines on social factors**

Add link:

https://www.nordiccapital.com/media/510govnq/nordic-capital-responsible-investment-policy-vf_2022.pdf

- (D) Guidelines on governance factors**

Add link:

https://www.nordiccapital.com/media/510govnq/nordic-capital-responsible-investment-policy-vf_2022.pdf

- (E) Guidelines on sustainability outcomes**

Add link:

https://www.nordiccapital.com/media/510govnq/nordic-capital-responsible-investment-policy-vf_2022.pdf

- (F) Specific guidelines on climate change (may be part of guidelines on environmental factors)**

Add link:

https://www.nordiccapital.com/media/510govnq/nordic-capital-responsible-investment-policy-vf_2022.pdf

- (G) Specific guidelines on human rights (may be part of guidelines on social factors)**

Add link:

https://www.nordiccapital.com/media/510govnq/nordic-capital-responsible-investment-policy-vf_2022.pdf

- (H) Specific guidelines on other systematic sustainability issues**

Add link:

https://www.nordiccapital.com/media/510govnq/nordic-capital-responsible-investment-policy-vf_2022.pdf

- (I) Guidelines tailored to the specific asset class(es) we hold**

Add link:

https://www.nordiccapital.com/media/510govnq/nordic-capital-responsible-investment-policy-vf_2022.pdf

- (K) Guidelines on managing conflicts of interest related to responsible investment**

Add link:

https://www.nordiccapital.com/imported-media/2325/nordic-capital-code-of-conduct-2021_vf.pdf

(L) Stewardship: Guidelines on engagement with investees

Add link:

https://www.nordiccapital.com/media/510govnq/nordic-capital-responsible-investment-policy-vf_2022.pdf

(M) Stewardship: Guidelines on overall political engagement

Add link:

https://www.nordiccapital.com/imported-media/2325/nordic-capital-code-of-conduct-2021_vf.pdf

(N) Stewardship: Guidelines on engagement with other key stakeholders

Add link:

https://www.nordiccapital.com/media/510govnq/nordic-capital-responsible-investment-policy-vf_2022.pdf

(P) Other responsible investment aspects not listed here

Add link:

https://www.nordiccapital.com/imported-media/2325/nordic-capital-code-of-conduct-2021_vf.pdf

(Q) No elements of our formal responsible investment policy(ies) are publicly available

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 4	PLUS	PGS 1	N/A	PUBLIC	Responsible investment policy elements	1 – 6

Does your formal responsible investment policy(ies) identify a link between your responsible investment activities and your fiduciary duties or equivalent obligations?

(A) Yes

Elaborate:

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 seeks to deliver 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. 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 into our investment process.
- We expect our portfolio companies to focus on improving their sustainability performance and 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.

For further information, please refer to Nordic Capital's Code of Conduct.

- (B) No

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 5	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy elements	2

Which elements are covered in your organisation's policy(ies) or guidelines on stewardship?

- (A) Overall stewardship objectives
- (B) Prioritisation of specific ESG factors to be advanced via stewardship activities
- (C) Criteria used by our organisation to prioritise the investees, policy makers, key stakeholders, or other entities on which to focus our stewardship efforts
- (D) How different stewardship tools and activities are used across the organisation
- (E) Approach to escalation in stewardship
- (F) Approach to collaboration in stewardship
- (G) Conflicts of interest related to stewardship
- (H) How stewardship efforts and results are communicated across the organisation to feed into investment decision-making and vice versa
- (I) Other
- (J) None of the above elements is captured in our policy(ies) or guidelines on stewardship

RESPONSIBLE INVESTMENT POLICY COVERAGE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 8	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy coverage	1

What percentage of your total AUM is covered by the below elements of your responsible investment policy(ies)?

Combined AUM coverage of all policy elements

(A) Overall approach to responsible investment
 (B) Guidelines on environmental factors (7) 100%
 (C) Guidelines on social factors
 (D) Guidelines on governance factors

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 9	CORE	PGS 2	N/A	PUBLIC	Responsible investment policy coverage	1

What proportion of your AUM is covered by your formal policies or guidelines on climate change, human rights, or other systematic sustainability issues?

AUM coverage

(A) Specific guidelines on climate change (1) for all of our AUM

(B) Specific guidelines on human rights (1) for all of our AUM

(C) Specific guidelines on other systematic sustainability issues (1) for all of our AUM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 10	CORE	OO 8, OO 9, PGS 1	N/A	PUBLIC	Responsible investment policy coverage	2

Per asset class, what percentage of your AUM is covered by your policy(ies) or guidelines on stewardship with investees?

(C) Private equity

(1) Percentage of AUM covered

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%
- (11) 100%

GOVERNANCE

ROLES AND RESPONSIBILITIES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11	CORE	N/A	Multiple indicators	PUBLIC	Roles and responsibilities	1

Which senior level body(ies) or role(s) in your organisation have formal oversight over and accountability for responsible investment?

- (A) Board members, trustees, or equivalent
- (B) Senior executive-level staff, or equivalent

Specify:

Nordic Capital Advisors' Managing Partner, Sector Heads, COO

- (C) Investment committee, or equivalent

Specify:

Nordic Capital Advisors' Investment Review Committee, Ownership Excellence Team

- (D) Head of department, or equivalent

Specify department:

Head of ESG, Nordic Capital Advisors

- (E) None of the above bodies and roles have oversight over and accountability for responsible investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11.1	CORE	PGS 1, PGS 2, PGS 11	N/A	PUBLIC	Roles and responsibilities	1, 2

Does your organisation's senior level body(ies) or role(s) have formal oversight over and accountability for the elements covered in your responsible investment policy(ies)?

	(1) Board members, trustees, or equivalent	(2) Senior executive-level staff, investment committee, head of department, or equivalent
(A) Overall approach to responsible investment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Guidelines on environmental, social and/or governance factors	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(C) Guidelines on sustainability outcomes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(D) Specific guidelines on climate change (may be part of guidelines on environmental factors)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(E) Specific guidelines on human rights (may be part of guidelines on social factors)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(F) Specific guidelines on other systematic sustainability issues	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(G) Guidelines tailored to the specific asset class(es) we hold	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(I) Guidelines on managing conflicts of interest related to responsible investment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(J) Stewardship: Guidelines on engagement with investees	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(K) Stewardship: Guidelines on overall political engagement	<input type="checkbox"/>	<input checked="" type="checkbox"/>

(L) Stewardship: Guidelines on engagement with other key stakeholders

(N) This role has no formal oversight over and accountability for any of the above elements covered in our responsible investment policy(ies)

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11.2	CORE	N/A	N/A	PUBLIC	Roles and responsibilities	1 – 6

Does your organisation have governance processes or structures to ensure that your overall political engagement is aligned with your commitment to the principles of PRI, including any political engagement conducted by third parties on your behalf?

(A) Yes

Describe how you do this:

In alignment with Nordic Capital's commitment to the principles of the PRI, we have established robust governance processes that ensure adequate oversight and accountability for our overall political engagement activities. Since 2014 and the adoption of our first Responsible Investment Policy, Nordic Capital has taken an active role through ongoing engagement in sector initiatives to drive progress, share best practice and create lasting transparent results. Nordic Capital has sought to evolve our organisational model with a series of positive refinements which contribute to a sustainable economic system. Notably, over the last decade Nordic Capital has sharpened our investment framework whilst also introducing dedicated operational support with a distinctive sector model tailored by specialism. This is underpinned by a robust decision-making framework supported by well-informed investment advice. Nordic Capital also conducts corporate political engagement activities aligned with transparency and integrity to increase public and investor confidence. Nordic Capital believes that the organisation has strong momentum, clear leadership, clarity of vision and an established culture of teamwork and transparency.

Nordic Capital operates a fully integrated organisational model characterised by:

- i. Sector driven Investment Advisory Teams based across the advisory offices combining sector experience with local presence;
- ii. Specialised and fully integrated Ownership Excellence advisory team committed to maximising value across the portfolio;

- iii. A dedicated in-house Fund Operations unit; and
- iv. Transversal advisory support functions across Capital Markets, ESG, Investor Relations, Legal ☐ Tax, and Controlling ☐ Valuation.

Nordic Capital is a signatory of the United Nations Principles of Responsible Investments (PRI) and has addressed its six principles by integrating sustainability factors into the investment process. Nordic Capital is a member of the world's largest association for private capital providers and represented in Invest Europe's Global Private Equity Council as well as a member of local Venture Capital Association with representation on SVCA's Board of Directors and Nomination Committee. Nordic Capital actively participates in different forums of these organisations and has particularly through these organisations engaged in several initiatives to promote sustainability in the finance industry while reaching out to the broader public. Nordic Capital firmly believes in measuring sustainable impact with clear KPIs and being transparent in our efforts to drive sustainable performance. We are guided by the UN's Sustainable Development Goals (SDGs) and committed to the global ILPA ESG Data Convergence Initiative (EDCI) where we can make the greatest contribution and realise significant business opportunities while ensuring to standardise ESG metrics and provide comparative reporting for the private market industry. We follow and promote the professional standards set by these associations.

Given Nordic Capital's Northern European investment focus, sector teams have each been purposely organised across local investment advisory offices to seek to ensure on the ground deal support and nurturing of local networks. We have governance processes in place to monitor and address transactions and relationships that, if they materialise, may cause or be reasonably likely to result in conflicts of interest. Nordic Capital also has clearly defined governance processes and structures to ensure that political engagements are aligned with our commitment to the principles of the PRI. These are e.g., available and further specified in marketing materials for the Nordic Capital funds and vehicles where certain material risk factors are disclosed underlining investment risks, including with respect to the activities of identifying, structuring, completing and realising private equity investments which can involve a high degree of uncertainty and may in some cases be subject to the prevailing capital markets, regulatory or political environment. For more information, refer to our Outside Business Interests Policy, our Anti-Bribery Policy and Manual, our Insiders Policy and our Political Contributions Policy. Please also refer to the section "Disclose conflicts of interest" in the Invest Europe Code of Conduct.

- o (B) No
- o (C) Not applicable, our organisation does not conduct any form of political engagement directly or through any third parties

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 12	CORE	N/A	N/A	PUBLIC	Roles and responsibilities	1

In your organisation, which internal or external roles are responsible for implementing your approach to responsible investment?

- (A) Internal role(s)

Specify:

Nordic Capital Advisors' investment professionals are well placed to address sustainability risks and opportunities with the support of a dedicated in-house Sustainability Team and external advisors.

Roles include: Group BoD, portfolio company BoD representatives, Chief-level staff, Investment Review Committee, Legal advisory teams, Head of ESG, dedicated ESG team, portfolio managers, investment analysts, dedicated RI staff, investor relations, external advisors e.g., external consultants

- (B) External investment managers, service providers, or other external partners or suppliers
- (C) We do not have any internal or external roles with responsibility for implementing responsible investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 13	CORE	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

Does your organisation use responsible investment KPIs to evaluate the performance of your board members, trustees, or equivalent?

- (A) Yes, we use responsible investment KPIs to evaluate the performance of our board members, trustees, or equivalent

Describe: (Voluntary)

Nordic Capital has an approach to remuneration that promotes sound management of sustainability risks and opportunities in portfolio company investments. At Nordic Capital, ESG factors form an integral part of reviewing performance in areas of ownership and value creation, board meeting contribution, leveraging Nordic Capital Advisors' ownership excellence toolbox. The performance evaluation and compensation framework for portfolio company board members takes into account a range of criteria, including sustainability and other ESG-related risks identified and managed pursuant to our Responsible Investment Policy. Following the Performance Review Process, training/coaching sessions are undertaken to address areas for individual development. Sustainability is an important part of Nordic Capital's talent assessment and development program. All staff at Nordic Capital are required to attend annual ESG training covering important elements of corporate governance and basic sustainability, performing sustainability risk and opportunity assessments and building sustainable strategies.

Nordic Capital has identified material sustainability Key Performance Indicators (KPIs) aligned with the UN Sustainable Development Goals, which are measured to drive and incentivise both portfolio companies' and Nordic Capital's own ESG performance. Specific KPIs for performance evaluation regarding sustainability are developed for each individual as part of our talent development program, where key focus areas are climate action, diversity, and contribution to the SDGs. The KPIs are confidential and typically cover relevant sustainability metrics for the individual's function across areas of gender equality (SDG 5, target 5.5), decent work and economic growth (SDG 8, target 8.3), responsible consumption and production (SDG 12, targets 12.1, 12.6), carbon footprint (SDG 13, target 13.2), and ethical business conduct (SDG 16, target 16.5).

Additionally, Nordic Capital has implemented ESG-linked credit facilities for Fund X, XI and Evolution Fund. The revolving credit facilities strongly underline Nordic Capital's ongoing commitment to integrating sustainability into our own business model, as well as into our investments. A penalty/reward mechanism is built into each such revolving credit facility such that failure to uphold a top tier UN PRI scoring on ESG performance in the annual UN PRI assessment will increase such facility's cost, while conversely achieving ambitious, industry leading ESG targets in the portfolio reduces the cost of such facility. Through these efforts Nordic Capital has established a robust performance evaluation process linked to responsible investment which connects performance throughout the organisation and the Nordic Capital funds and vehicles.

- (B) No, we do not use responsible investment KPIs to evaluate the performance of our board members, trustees, or equivalent

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 14	CORE	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

Does your organisation use responsible investment KPIs to evaluate the performance of your senior executive-level staff (or equivalent), and are these KPIs linked to compensation?

● (A) Yes, we use responsible investment KPIs to evaluate the performance of our senior executive-level staff (or equivalent)

Indicate whether these responsible investment KPIs are linked to compensation

● (1) KPIs are linked to compensation

- (2) KPIs are not linked to compensation as these roles do not have variable compensation
- (3) KPIs are not linked to compensation even though these roles have variable compensation

Describe: (Voluntary)

Nordic Capital has an approach to remuneration that adheres to sound management of sustainability risks and opportunities in all our investments. At Nordic Capital Advisors, all executive-level staff and investment professionals are reviewed at least annually in their Performance Review Process during which skills, development areas and potential issues are discussed with each individual. ESG factors form an integral part of reviewing performance in areas of ownership and value creation, board meeting contribution and leveraging Nordic Capital Advisors' Ownership Excellence Toolbox. Following the Performance Review Process, training/coaching sessions are planned to address areas for individual development. Sustainability is an important part of Nordic Capital's talent assessment and development program. The learning agenda includes an intensive introduction program for all new recruits and responsible investing is a fundamental part of it. All staff at Nordic Capital are required to attend annual ESG training containing important elements of corporate governance and basic sustainability, performing sustainability risk and opportunity assessments as well as building sustainable strategies. The performance evaluation and compensation framework for Nordic Capital Advisors' executive-level staff and investment professionals 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.

Nordic Capital has identified material sustainability Key Performance Indicators (KPIs) aligned with the UN Sustainable Development Goals, which are measured to drive and incentivise both portfolio companies' and Nordic Capital's own ESG performance. Specific KPIs for performance evaluation regarding sustainability are developed for each individual as part of our talent development program, where key focus areas are climate action, diversity, and contribution to the SDGs. The KPIs are confidential and typically cover relevant sustainability metrics for the individual's function across areas of gender equality (SDG 5, target 5.5), decent work and economic growth (SDG 8, target 8.3), responsible consumption and production (SDG 12, targets 12.1, 12.6), carbon footprint (SDG 13, target 13.2), and ethical business conduct (SDG 16, target 16.5).

Nordic Capital monitors, tracks and reports on ESG performance linked KPIs of each portfolio company. These selected KPIs are considered and fully integrated both in individual and portfolio performance reviews as well as disclosed as part of Nordic Capital's reporting. Through these efforts Nordic Capital has established a robust performance evaluation process linked to responsible investment KPIs which connects performance throughout the organisation and the Nordic Capital funds and vehicles.

- (B) No, we do not use responsible investment KPIs to evaluate the performance of our senior executive-level staff (or equivalent)

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 15	PLUS	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

What responsible investment competencies do you regularly include in the training of senior-level body(ies) or role(s) in your organisation?

	(1) Board members, trustees or equivalent	(2) Senior executive-level staff, investment committee, head of department or equivalent
(A) Specific competence in climate change mitigation and adaptation	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Specific competence in investors' responsibility to respect human rights	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(C) Specific competence in other systematic sustainability issues	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(D) The regular training of this senior leadership role does not include any of the above responsible investment competencies	<input type="checkbox"/>	<input type="checkbox"/>

EXTERNAL REPORTING AND DISCLOSURES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 16	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

What elements are included in your regular reporting to clients and/or beneficiaries for the majority of your AUM?

- (A) Any changes in policies related to responsible investment
- (B) Any changes in governance or oversight related to responsible investment
- (C) Stewardship-related commitments
- (D) Progress towards stewardship-related commitments
- (E) Climate-related commitments
- (F) Progress towards climate-related commitments
- (G) Human rights-related commitments
- (H) Progress towards human rights-related commitments
- (I) Commitments to other systematic sustainability issues
- (J) Progress towards commitments on other systematic sustainability issues
- (K) We do not include any of these elements in our regular reporting to clients and/or beneficiaries for the majority of our AUM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 17	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, did your organisation publicly disclose climate-related information in line with the Task Force on Climate-Related Financial Disclosures' (TCFD) recommendations?

- (A) Yes, including all governance-related recommended disclosures
- (B) Yes, including all strategy-related recommended disclosures
- (C) Yes, including all risk management-related recommended disclosures
- (D) Yes, including all applicable metrics and targets-related recommended disclosures
- (E) None of the above

Explain why: (Voluntary)

In 2022, Nordic Capital has taken steps to identify key climate related exposures and associated risks and opportunities across our portfolio aligned with TCFD guidelines. Based on TCFD recommendations, we have created a tailored framework by analysing the typical sector exposures in each of Nordic Capital's sectors as well as the exposures for our portfolio companies. We conclude that the Nordic Capital portfolio to a large extent operates in lower-risk sectors and geographies. Nordic Capital typically considers evolving climate-related reporting recommendations and requirements as part of that process.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 18	PLUS	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, to which international responsible investment standards, frameworks, or regulations did your organisation report?

(A) Disclosures against the European Union's Sustainable Finance Disclosure Regulation (SFDR)

Link to example of public disclosures

https://www.nordiccapital.com/media/2obh211f/sfdr_website_disclosure-2022.pdf

(B) Disclosures against the European Union's Taxonomy

(C) Disclosures against the CFA's ESG Disclosures Standard

(D) Disclosures against other international standards, frameworks or regulations

Specify:

UN Sustainable Development Goals

Link to example of public disclosures

https://www.nordiccapital.com/media/s5mf2e1q/nordic-capital_annual_sustainability_review_2022_v-f.pdf

(E) Disclosures against other international standards, frameworks or regulations

(F) Disclosures against other international standards, frameworks or regulations

(G) Disclosures against other international standards, frameworks or regulations

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 19	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, did your organisation publicly disclose its membership in and support for trade associations, think tanks or similar bodies that conduct any form of political engagement?

(A) Yes, we publicly disclosed our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement

Add link(s):

<https://www.investeurope.eu/about-us/invest-europe-governance/invest-europe-platforms/#tab-global-private-equity>

<https://www.svca.se/om-svca/>

<https://www.esgdc.org/membership/>

<https://www.nordiccapital.com/our-impact/sustainability-strategy/>

- (B) No, we did not publicly disclose our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement
- (C) Not applicable, we were not members in or supporters of any trade associations, think tanks, or similar bodies that conduct any form of political engagement during the reporting year

STRATEGY

CAPITAL ALLOCATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 20	CORE	N/A	N/A	PUBLIC	Capital allocation	1

Which elements do your organisation-level exclusions cover?

- (A) Exclusions based on our organisation's values or beliefs regarding particular sectors, products or services
- (B) Exclusions based on our organisation's values or beliefs regarding particular regions or countries
- (C) Exclusions based on minimum standards of business practice aligned with international norms such as the OECD Guidelines for Multinational Enterprises, the International Bill of Human Rights, UN Security Council sanctions or the UN Global Compact
- (D) Exclusions based on our organisation's climate change commitments
- (E) Other elements
- (F) Not applicable; our organisation does not have any organisation-level exclusions

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 21	CORE	N/A	N/A	PUBLIC	Capital allocation	1

How does your responsible investment approach influence your strategic asset allocation process?

- (A) We incorporate ESG factors into our assessment of expected asset class risks and returns
Select from dropdown list:
 - (1) for all of our AUM subject to strategic asset allocation
 - (2) for a majority of our AUM subject to strategic asset allocation
 - (3) for a minority of our AUM subject to strategic asset allocation
- (B) We incorporate climate change-related risks and opportunities into our assessment of expected asset class risks and returns
Select from dropdown list:
 - (1) for all of our AUM subject to strategic asset allocation
 - (2) for a majority of our AUM subject to strategic asset allocation
 - (3) for a minority of our AUM subject to strategic asset allocation
- (C) We incorporate human rights-related risks and opportunities into our assessment of expected asset class risks and returns
Select from dropdown list:
 - (1) for all of our AUM subject to strategic asset allocation
 - (2) for a majority of our AUM subject to strategic asset allocation
 - (3) for a minority of our AUM subject to strategic asset allocation

(D) We incorporate risks and opportunities related to other systematic sustainability issues into our assessment of expected asset class risks and returns

Select from dropdown list:

- (1) for all of our AUM subject to strategic asset allocation
- (2) for a majority of our AUM subject to strategic asset allocation
- (3) for a minority of our AUM subject to strategic asset allocation

Specify: (Voluntary)

Fair tax practices, business ethics and legal compliance, healthy and safe working environments, expectation to promote employee well-being and diversity and inclusion, as well as biodiversity

- (E) We do not incorporate ESG factors, climate change, human rights or other systematic sustainability issues into our assessment of expected asset class risks and returns
- (F) Not applicable; we do not have a strategic asset allocation process

STEWARDSHIP: OVERALL STEWARDSHIP STRATEGY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 22	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

For the majority of AUM within each asset class, which of the following best describes your primary stewardship objective?

(3) Private equity

(A) Maximise our portfolio-level risk-adjusted returns. In doing so, we seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues.



(B) Maximise our individual investments' risk-adjusted returns. In doing so, we do not seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues.



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 23	PLUS	OO 5, OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

How does your organisation, or the external service providers or external managers acting on your behalf, prioritise the investees or other entities on which to focus its stewardship efforts?

Nordic Capital targets acquiring what it believes are robust, difficult to replicate businesses operating within non-cyclical and resilient sectors with the potential for Nordic Capital to accelerate the businesses' growth and drive transformation through our structured value creation approach. To provide sector teams with a consistent value creation framework, Nordic Capital has developed a value creation approach that the Investment Advisory Team can leverage across sectors. On a case-by-case basis, Nordic Capital partners with quality management teams, entrepreneurs, and advisors to ensure successful delivery of sustainable ownership practices.

Nordic Capital's value creation approach includes:

- Seeking to be experts in what we own;
- Building reporting and transparency on value drivers;
- Building advisor network to lead and advise on implementation; and
- Sharing best practices on value driver implementation.

Value creation across the portfolio is a co-ordinated effort led by Nordic Capital Advisors' sector teams with support from a well-resourced Ownership Excellence function comprising dedicated in-house Operating Advisers, People & Performance professionals, and Procurement Optimisation team. Nordic Capital also leverages our deep external network which has been developed through over 30 years of investing experience, comprising of leading industrialists, operational chairs, and external advisor experts.

In the case of Nordic Capital's portfolio, our ambition is to help investee companies become successful, sustainable businesses. Nordic Capital seeks to do this in a responsible way, with a clear understanding of environmental, social and governance impacts. As a result, sustainability factors are integrated into all stages of the investment and ownership process from evaluation through to exit. Nordic Capital Advisors' deal teams, dedicated in-house sustainability team and external advisors work with portfolio companies to set sustainability plans and expectations during a structured on-boarding process. Sustainability roadmaps are to be fully integrated into value creation plans devised by Nordic Capital Advisors' Ownership Excellence function, which is dedicated to driving value across the portfolio. Nordic Capital offers training, tools, and resources to portfolio companies supporting them to embed sustainability into their business and value creation agendas. Furthermore, Nordic Capital extends support to portfolio companies by providing them access to sustainability playbooks and a sustainability portal.

In respect of the wider PE industry, our ambition is to influence and improve responsible investment practices as well as enhance transparency. As a result of our ESG efforts in 2022 Nordic Capital received industry recognition and was nominated for three ESG awards: named as one of the “future 40 ESG innovators” for 2022 by leading industry publication Real Deals, shortlisted finalist in Real Deals ESG awards (Sector Specialist, Best ESG GP, Best deal of the year), winner of “ESG GP Large Cap” in the Real Deals Private Equity Awards 2023 following the successful close of Fund XI, a EUR 9 billion SFDR Article 8 Fund committed to high ESG standards. These industry recognitions reinforce Nordic Capital's position as one of the leaders in ESG within the private equity industry. Nordic Capital's ESG work was recognised for our sustainability performance and achievements as well as credited for close engagement with our portfolio companies. Further, Nordic Capital is an active thought leader and champion for sustainability issues, speaking at industry forums, conferences as well as via many media channels, promoting the role of private equity in sustainable development. This provides an opportunity to share our learnings on the implementation of the UN -supported Principles for Responsible Investment (PRI), the future of sustainability reporting, industry trends and regulatory developments. Nordic Capital also encourages academic research into responsible investment and has sponsored studies into how employment growth can be achieved in different markets and how entrepreneurship can contribute to society at large. As an organisation that builds businesses and creates jobs, we believe it is important to have a thorough understanding of the business environment, its underlying conditions and how it can be improved.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 25	PLUS	OO 5, OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

Rank the channels that are most important for your organisation in achieving its stewardship objectives.

- (A) Internal resources, e.g. stewardship team, investment team, ESG team, or staff**
 Select from the list:
 1
- (B) External investment managers, third-party operators and/or external property managers, if applicable**
 Select from the list:
 2
- (C) External paid specialist stewardship services (e.g. engagement overlay services or, in private markets, sustainability consultants) excluding investment managers, real assets third-party operators, or external property managers**
 Select from the list:
 4
- (D) Informal or unstructured collaborations with investors or other entities**
 Select from the list:
 3
- (E) Formal collaborative engagements, e.g. PRI-coordinated collaborative engagements, Climate Action 100+, or similar**
 Select from the list:
 5
- (F) We do not use any of these channels

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 26	PLUS	OO 8, OO 9, PGS 1	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

How does your organisation ensure that its policy on stewardship is implemented by the external service providers to which you have delegated stewardship activities?

(A) Example(s) of measures taken when selecting external service providers:

Aligned with PRI principle 4 & 5, Nordic Capital actively promotes acceptance and implementation of the principles within the investment industry and strives to work collaboratively to enhance our effectiveness in implementing the principles. Nordic Capital seeks to be an early adopter and promoter of relevant industry and sector specific ESG initiatives and partially outsources stewardship activities through carefully selected specialised external service providers.

Nordic Capital takes a long-term view to responsible investment and always considers the outlook for development beyond our ownership period. Working closely with management, we evaluate a diverse range of criteria with the goal of enabling growth and sustainable operations. We have seen increasing interest in ESG from strategic buyers and the public financial markets, highlighting the benefit of Nordic Capital's Sustainability strategy. Nordic Capital Advisors' proprietary sustainability framework and annual follow up ensures that we are well positioned for increased scrutiny of our ESG processes, performance and selected initiatives. We actively promote the inclusion of sustainability factors throughout the investment process and maintain ongoing dialogues with portfolio companies to ensure that our operating model is supported by the right internal and external resources.

As part of our active ownership model, Nordic Capital works with selected external advisors who can provide fast and secure implementation of sustainability matters across E, S, and G. Nordic Capital has longstanding partners with experience in areas such as sustainability strategy development, sustainability reporting, whistleblowing, data privacy and information security, corporate compliance, climate data collection and calculation, as well as ESG data management. The external advisor network covers the full geographical reach of the Nordic Capital funds and vehicles. Our Sustainability Spotlight sessions allows portfolio companies to increase awareness on current topics and access external advisors who offer hands on support.

(B) Example(s) of measures taken when designing engagement mandates and/or consultancy agreements for external service providers:

(C) Example(s) of measures taken when monitoring the stewardship activities of external service providers:

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 27	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

How are your organisation's stewardship activities linked to your investment decision making, and vice versa?

Nordic Capital targets investment in businesses that can make a positive contribution to society at large and works hard to drive transformative sustainable change in the companies we own. We are also committed to embedding high standards of sustainable business practices within our own organisation through our values and core principles that underpin the way that Nordic Capital does business: analysis □ tenacity, teamwork, partnership, responsibility, creativity, and contribution.

To ensure that stewardship activities are closely linked to our investment strategy, Nordic Capital carefully selects partnerships to drive sustainable growth throughout the portfolio. Nordic Capital integrates sustainability from sourcing to exit, with diverse stewardship activities as part of our operating model. Across all investments, Nordic Capital takes a long-term view to ownership and always considers the outlook for development beyond our ownership period. Clear expectations for portfolio companies are set out to ensure that sustainability is addressed appropriately at boardroom level and throughout the organisation. To maximise the potential impact of our sustainability efforts, Nordic Capital focuses on areas that are material to the company in question and where Nordic Capital has the genuine ability to influence. To this end, Nordic Capital seeks to equip the portfolio companies by providing supportive training, tools, and resources to help them embed sustainability into their business agendas and value creation plans. To date, Nordic Capital has trained more than 1,044 investment professionals, board members and key management executives in sustainability, resulting in considerable progress and a growing awareness of how businesses can successfully address sustainability risks and opportunities. We are proud to report that our portfolio companies have focused on pushing their sustainability agendas forward during 2022 with some notable highlights that have received industry wide recognition.

We have noticed a significant increase in the interest our investors and stakeholders take to ESG integration and related decision-making activities. During 2022, Nordic Capital significantly updated our website, under “Our Impacts”, we share our approach to responsible investment. The ambition is to allow a broad range of stakeholders to gain an understanding of ESG at Nordic Capital and our portfolio companies, including targets, progress, and performance. Visitors can easily access key documentation such as the Responsible Investment Policy, PRI Transparency Reports, Climate Reports as well as the Annual Sustainability Review. Furthermore, the expectation from our investors for regular ESG reporting has grown exponentially. This valuable dialogue with LPs helps us to consider potential enhancements to our well-established responsible investment policy and framework.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 28	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

If relevant, provide any further details on your organisation's overall stewardship strategy.

Nordic Capital is a signatory to the United Nations-supported Principles for Responsible Investment (PRI) and has addressed its six principles by integrating sustainability factors into the investment process. Since 2014, and the adoption of our first Responsible Investment Policy, we have striven to drive progress and create lasting results. Aligned with PRI principle 5, Nordic Capital is committed to "Work together to enhance our effectiveness in implementing the Principles". Nordic Capital's mission is to find, invest in and build stronger businesses. Nordic Capital believes that supporting the development of strong, sustainable businesses will help deliver strong 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.

Through Nordic Capital's active ownership model, we engage with our portfolio companies throughout the ownership stage to promote the importance of sustainability, drive sustainable performance and share best practice. Nordic Capital sets out clear expectations for portfolio companies, ensuring that sustainability is addressed appropriately at the boardroom level and throughout the organisation. Nordic Capital believes in industry wide collaboration and the power of knowledge sharing. We want to play our part in driving awareness of sustainability matters and implementing best practice within the private equity industry. It is an important goal for Nordic Capital to develop and enhance our overall stewardship strategy. To this end, we encourage engagement and collaboration as a priority and take the lead to promote responsible investment practices together with other private equity investors.

STEWARDSHIP: ENGAGEMENT WITH POLICY MAKERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39	CORE	OO 8, OO 9	PGS 39.1, PGS 39.2	PUBLIC	Stewardship: Engagement with policy makers	2

Did your organisation, or the external investment managers or service providers acting on your behalf, engage with policy makers as part of your responsible investment approach during the reporting year?

- (A) Yes, we engaged with policy makers directly
- (B) Yes, we engaged with policy makers through the leadership of or active participation in working groups or collaborative initiatives, including via the PRI
- (C) Yes, we were members of, supported, or were in another way affiliated with third party organisations, including trade associations and non-profit organisations, that engage with policy makers, excluding the PRI
- (D) We did not engage with policy makers directly or indirectly during the reporting year beyond our membership in the PRI

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39.1	CORE	PGS 39	N/A	PUBLIC	Stewardship: Engagement with policy makers	2

During the reporting year, what methods did you, or the external investment managers or service providers acting on your behalf, use to engage with policy makers as part of your responsible investment approach?

- (A) We participated in 'sign-on' letters
- (B) We responded to policy consultations
- (C) We provided technical input via government- or regulator-backed working groups

Describe:

Nordic Capital understands that policy makers also cover industry associations. Nordic Capital proudly supports ESG initiatives such as: UN PRI, Invest Europe, SVCA, ILPA ESG Data Convergence Initiative, Initiative Climat International (ICI), and Level20. We believe that private equity has an important role to play in building a sustainable world and driving change within business to benefit society and the planet. Nordic Capital is committed to actively engage with selected ESG partnerships to share best practice and drive long-term sustainable change in the private equity industry.

By supporting and partnering up with selected ESG initiatives, Nordic Capital acts as a member, signatory, adopter and promoter of selected industry associations. Additionally, Nordic Capital is represented in Invest Europe's Global Private Equity Council as well as SVCA's Board of Directors and Nomination Committee. On a case-by-case basis, Nordic Capital participates in sign-on letters and policy consultations driven by the initiatives which we support. Similarly, Nordic Capital participates in different ESG related working groups and arranges meetings in local jurisdictions in which we are present.

- (D) We engaged policy makers on our own initiative
- (E) Other methods

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39.2	CORE	PGS 39	N/A	PUBLIC	Stewardship: Engagement with policy makers	2

During the reporting year, did your organisation publicly disclose details of your engagement with policy makers conducted as part of your responsible investment approach, including through external investment managers or service providers?

- (A) We publicly disclosed all our policy positions
- (B) We publicly disclosed details of our engagements with policy makers**
Add link(s):

<https://www.nordiccapital.com/our-impact/sustainability-strategy/>

- (C) No, we did not publicly disclose details of our engagement with policy makers conducted as part of our responsible investment approach during the reporting year

STEWARDSHIP: EXAMPLES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 40	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Examples	2

Provide examples of stewardship activities that you conducted individually or collaboratively during the reporting year that contributed to desired changes in the investees, policy makers or other entities with which you interacted.

- (A) Example 1:
Title of stewardship activity:

Sub-sector specific ESG playbooks and tools updated – enabling increased focus on sustainability in investment and ownership phase

- (1) Led by
- (1) Internally led
 - (2) External service provider led
 - (3) Led by an external investment manager, real assets third-party operator and/or external property manager
- (2) Primary focus of stewardship activity
- (1) Environmental factors
 - (2) Social factors
 - (3) Governance factors
- (3) Asset class(es)
- (1) Listed equity
 - (2) Fixed income
 - (3) Private equity
 - (4) Real estate
 - (5) Infrastructure
 - (6) Hedge funds
 - (7) Forestry
 - (8) Farmland
 - (9) Other
- (4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

Nordic Capital's Sustainability Playbooks and tools provide step-by-step approach on how to conduct an assessment of sustainability related risks and opportunities, company specific sustainability roadmaps, with supporting KPIs, baselines, targets and key actions to support growth have both proved valuable in helping portfolio companies progress their sustainability agendas.

- (B) Example 2:
Title of stewardship activity:

Annual sustainability training - in three different training modules and spotlight sessions to increase awareness and share best practices in Nordic Capital and across portfolio companies. To date, Nordic Capital has had 1,044 attendees in sustainability training

- (1) Led by
- (1) Internally led
 - (2) External service provider led
 - (3) Led by an external investment manager, real assets third-party operator and/or external property manager
- (2) Primary focus of stewardship activity
- (1) Environmental factors
 - (2) Social factors
 - (3) Governance factors
- (3) Asset class(es)
- (1) Listed equity
 - (2) Fixed income
 - (3) Private equity
 - (4) Real estate
 - (5) Infrastructure
 - (6) Hedge funds
 - (7) Forestry
 - (8) Farmland
 - (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

Nordic Capital believes that training and the sharing of best practice within Nordic Capital and our portfolio companies is critical and has therefore developed training programmes, tools, templates and guidelines on how to assess environmental, social and governance (ESG) factors prior to investment and during the ownership process. The established training programme has been in place since 2014 and has evolved to address relevant policy, standards and frameworks.

(C) Example 3:

Title of stewardship activity:

Private Equity First-Ever ESG Data Convergence Initiative - first reporting cycle completed to improve comparative reporting over the long-term

(1) Led by

- (1) Internally led
- (2) External service provider led
- (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- (1) Environmental factors
- (2) Social factors
- (3) Governance factors

(3) Asset class(es)

- (1) Listed equity
- (2) Fixed income
- (3) Private equity
- (4) Real estate
- (5) Infrastructure
- (6) Hedge funds
- (7) Forestry
- (8) Farmland
- (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

Nordic Capital is committed to the global ILPA ESG Data Convergence Initiative, which seeks to standardise ESG metrics and provide a mechanism for comparative reporting for the private market industry. Nordic Capital was one of the early adopters and strong promoters of the ESG Data Convergence Initiative (EDCI) and in 2022 the first reporting cycle was completed. Nordic Capital sees this as a beneficial mechanism for improving comparative reporting over the long term. Nordic Capital has also actively engaged with the initiative and provided feedback on how to improve the framework annually.

(D) Example 4:

Title of stewardship activity:

Active engagement in Invest Europe ESG Reporting Guidelines - to set the industry standard and guidelines for ESG Reporting

(1) Led by

- (1) Internally led
- (2) External service provider led
- (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- (1) Environmental factors
- (2) Social factors
- (3) Governance factors

(3) Asset class(es)

- (1) Listed equity
- (2) Fixed income
- (3) Private equity
- (4) Real estate
- (5) Infrastructure
- (6) Hedge funds
- (7) Forestry
- (8) Farmland
- (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

Nordic Capital is an active member of Invest Europe, the European industry association for Private Markets. In 2022, a new initiative was launched to set the industry standard and guidelines for ESG reporting. Nordic Capital Advisors' Sustainability team took an active role in the working group to share best practice and create the most advanced and user-friendly guidance on sustainability reporting in the European private capital sector. Nordic Capital has committed to report on own performance in accordance with these Guidelines.

(E) Example 5:

Title of stewardship activity:

Promoted ESG best practices publicly - by speaking and sharing best practices on the topics of such as diversity, sustainability regulation, and sustainable value creation

(1) Led by

- (1) Internally led
- (2) External service provider led
- (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- (1) Environmental factors
- (2) Social factors
- (3) Governance factors

(3) Asset class(es)

- (1) Listed equity
- (2) Fixed income
- (3) Private equity
- (4) Real estate
- (5) Infrastructure
- (6) Hedge funds
- (7) Forestry
- (8) Farmland
- (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

Nordic Capital is an active thought leader and champion for sustainability issues, speaking at industry forums and via many media channels. Elin Ljung, Head of Communication and Sustainability at Nordic Capital Advisors, has promoted the role of private equity as an agent for positive societal impact, speaking publicly at several events, for example IMpower Fund Forum, Real Deals' ESG Conference, Norrskan Impact Week and Di Sustainable Finance Summit. She also joined the Sustainable Business Podcast with Professor Laura Marie Edinger-Schons and the Green Horizons Podcast with James Williams.

CLIMATE CHANGE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 41	CORE	N/A	PGS 41.1	PUBLIC	Climate change	General

Has your organisation identified climate-related risks and opportunities affecting your investments?

(A) Yes, within our standard planning horizon

Specify the risks and opportunities identified and your relevant standard planning horizon:

With a growing focus on sustainable business practices, an increasing attention to related key aspects follows. Nordic Capital believes that a company aware of its impact on the environment is better able to manage associated risks and is more likely to have a long-term sustainable business model in place. Environmental consequences of climate change are affecting day-to-day business operations and pressuring companies to act.

In 2022, Nordic Capital took additional steps to identify key climate related exposures and associated risks and opportunities across our portfolio. As a signatory to the PRI-backed Initiative Climat International (iCI), a global, practitioner-led community of private businesses and investors that seek to better understand and manage the risks associated with climate change, we have been actively sharing best practice. In addition, important steps have been taken on our net-zero trajectory; setting clear climate reduction targets for Nordic Capital as an organisation, taking action to reduce our carbon footprint and offset all emissions to be climate neutral, and promoting and supporting portfolio companies to measure GHG emissions and set net-zero targets.

Nordic Capital also conducted an analysis of climate-related risk exposures in the portfolio and developed our thinking on how to incorporate this at a sector level. Based on TCFD recommendations, we have created a tailored framework by analysing the typical sector exposures in each of Nordic Capital's sectors as well as the exposures for our portfolio companies. We conclude that the Nordic Capital portfolio to a large extent operates in lower-risk sectors and geographies. The key physical exposures identified include increased frequency of acute weather events as well as chronic changes such as increase in temperature and precipitation. Transition exposures include regulatory changes, development of new technologies and shifts in customer expectation. The climate exposure framework can be leveraged for both current and potential investments. During 2023, Nordic Capital intends to integrate this analysis into the investment process so that portfolio companies can better address the impacts of climate change.

Using an environmental lens, we encourage our portfolio companies to take a precautionary approach, ensuring resource efficient practices and disclosing information on climate change mitigation. Nordic Capital remains committed to reducing our carbon footprint both within our organisation and throughout the entire portfolio. Our ambition is to increase awareness of critical environmental aspects amongst our portfolio companies and support them in the process of reducing both their carbon emissions and energy consumption.

(B) Yes, beyond our standard planning horizon

(C) No, we have not identified climate-related risks and/or opportunities affecting our investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 41.1	CORE	PGS 41	N/A	PUBLIC	Climate change	General

Does your organisation integrate climate-related risks and opportunities affecting your investments in its overall investment strategy, financial planning and (if relevant) products?

● (A) Yes, our overall investment strategy, financial planning and (if relevant) products integrate climate-related risks and opportunities

Describe how climate-related risks and opportunities have affected or are expected to affect your investment strategy, financial planning and (if relevant) products:

Throughout 2022, Nordic Capital has developed our approach towards climate related issues and taken additional steps to identify key climate related exposures, including associated risks and opportunities across the portfolio in line with the TCFD framework. In line with SFDR classification Article 8 and our ESG-linked credit facilities Nordic Capital aims to meet defined environmental and climate related characteristics through applying our investment framework and Responsible Investment policy. Through this approach, Nordic Capital drives progress on environmental characteristics through systematically tracking development within our portfolio companies and requiring regular reports on mandatory and selected additional environmental PAI indicators and our target associated with SDG 13.

In 2022, Fund XI successfully closed with SFDR classification Article 8 to promote specific social and environmental characteristics. Nordic Capital also expanded our ESG-linked credit facilities to cover Fund X, XI and Evolution Fund through a well-established framework. The revolving credit facilities strongly underline Nordic Capital's ongoing commitment to integrate sustainability into both our own business model as well as our investments. A penalty/reward mechanism is built into the revolving credit facility.

The Nordic Capital toolbox (which includes a clear responsible investment checklist and supporting DDQs to assess specific issues in due diligence) seeks to enable the Nordic Capital funds and vehicles to address and meet the identified environmental and climate related characteristics in a systematic and consistent manner. Nordic Capital requires portfolio companies to develop sustainability plans at the outset of the ownership period. This includes the development of a sustainability strategy, which (i) embeds measurable targets and KPIs, which track and seek to enable the achievement of the environmental and climate related characteristics on an aggregated basis across the portfolio and (ii) is approved and reviewed annually by the portfolio companies' boards of directors. Nordic Capital also encourages all portfolio companies to consider the UNGC's 10 principles together with the SDGs when developing their own sustainability strategies. When Nordic Capital makes an investment in a portfolio company, a structured on-boarding process is initiated to understand and identify material sustainability driven risks and opportunities, and set a sustainability agenda. This process includes analysis of PAI indicators such as carbon footprint, energy efficiency, and renewable energy. Nordic Capital actively engages with portfolio companies during the ownership stage to promote the importance of sustainability, drive sustainable performance and share best practice. In many cases, Nordic Capital is the majority shareholder, or in a position to influence the strategic transformation of the portfolio company, and thereby in a strong position to drive the sustainability agenda.

To decarbonise the global economy in line with the Paris Agreement's goals, reducing GHG emissions at a sufficient speed remains an important target. Nordic Capital recognises our role as a responsible investor to influence the carbon emissions reduction targets and initiatives of our portfolio companies. It is part of ownership excellence and our long-term investment strategy. We encourage portfolio companies to Integrate climate change measures in policies and planning and emphasise the importance of measuring their climate impact and act to reduce greenhouse gas emissions.

- (B) No, our organisation has not yet integrated climate-related risks and opportunities into its investment strategy, financial planning and (if relevant) products

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 42	PLUS	N/A	N/A	PUBLIC	Climate change	General

Which sectors are covered by your organisation's strategy addressing high-emitting sectors?

(A) Coal

Describe your strategy:

Nordic Capital Advisors has developed a robust method that investment teams apply when performing risk and opportunity assessments during the due diligence phase. This enables Nordic Capital to address sustainability matters in a systematic and consistent manner at the earliest stage. The Nordic Capital toolbox includes a clear responsible investment checklist and supporting DDQs to address sustainability factors and risks in the pre-investment phase. Nordic Capital Advisors has for many years built our ESG analysis to incorporate sector specific issues into the due diligence process.

As part of Nordic Capital's Responsible Investment framework, high-emitting sectors are considered already in the investment phase i.e., throughout sourcing and analysis, DD and pre-closing. Questions on high-emitting sectors are included in the responsible investment critical checklist which is mandatory for all investments.

(B) Gas

Describe your strategy:

Nordic Capital Advisors has developed a robust method that investment teams apply when performing risk and opportunity assessments during the due diligence phase. This enables Nordic Capital to address sustainability matters in a systematic and consistent manner at the earliest stage. The Nordic Capital toolbox includes a clear responsible investment checklist and supporting DDQs to address sustainability factors and risks in the pre-investment phase. Nordic Capital Advisors has for many years built our ESG analysis to incorporate sector specific issues into the due diligence process.

As part of Nordic Capital's Responsible Investment framework, high-emitting sectors are considered already in the investment phase i.e., throughout sourcing and analysis, DD and pre-closing. Questions on high-emitting sectors are included in the responsible investment critical checklist which is mandatory for all investments.

(C) Oil

Describe your strategy:

Nordic Capital Advisors has developed a robust method that investment teams apply when performing risk and opportunity assessments during the due diligence phase. This enables Nordic Capital to address sustainability matters in a systematic and consistent manner at the earliest stage. The Nordic Capital toolbox includes a clear responsible investment checklist and supporting DDQs to address sustainability factors and risks in the pre-investment phase. Nordic Capital Advisors has for many years built our ESG analysis to incorporate sector specific issues into the due diligence process.

As part of Nordic Capital's Responsible Investment framework, high-emitting sectors are considered already in the investment phase i.e., throughout sourcing and analysis, DD and pre-closing. Questions on high-emitting sectors are included in the responsible investment critical checklist which is mandatory for all investments.

- (D) Utilities
- (E) Cement
- (F) Steel
- (G) Aviation
- (H) Heavy duty road
- (I) Light duty road
- (J) Shipping
- (K) Aluminium
- (L) Agriculture, forestry, fishery
- (M) Chemicals**

Describe your strategy:

Nordic Capital Advisors has developed a robust method that investment teams apply when performing risk and opportunity assessments during the due diligence phase. This enables Nordic Capital to address sustainability matters in a systematic and consistent manner at the earliest stage. The Nordic Capital toolbox includes a clear responsible investment checklist and supporting DDQs to address sustainability factors and risks in the pre-investment phase. Nordic Capital Advisors has for many years built our ESG analysis to incorporate sector specific issues into the due diligence process.

As part of Nordic Capital's Responsible Investment framework, high-emitting sectors are considered already in the investment phase i.e., throughout sourcing and analysis, DD and pre-closing. Questions on high-emitting sectors are included in the responsible investment critical checklist which is mandatory for all investments.

- (N) Construction and buildings
 - (O) Textile and leather
 - (P) Water
 - (Q) Other
- Specify:

Rare earth elements

Describe your strategy:

Nordic Capital Advisors has developed a robust method that investment teams apply when performing risk and opportunity assessments during the due diligence phase. This enables Nordic Capital to address sustainability matters in a systematic and consistent manner at the earliest stage. The Nordic Capital toolbox includes a clear responsible investment checklist and supporting DDQs to address sustainability factors and risks in the pre-investment phase. Nordic Capital Advisors has for many years built our ESG analysis to incorporate sector specific issues into the due diligence process.

As part of Nordic Capital's Responsible Investment framework, high-emitting sectors are considered already in the investment phase i.e., throughout sourcing and analysis, DD and pre-closing. Questions on high-emitting sectors are included in the responsible investment critical checklist which is mandatory for all investments.

- o (R) We do not have a strategy addressing high-emitting sectors

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 43	CORE	N/A	N/A	PUBLIC	Climate change	General

Has your organisation assessed the resilience of its investment strategy in different climate scenarios, including one in which the average temperature rise is held to below 2 degrees Celsius (preferably to 1.5 degrees Celsius) above pre-industrial levels?

- (A) Yes, using the Inevitable Policy Response Forecast Policy Scenario (FPS) or Required Policy Scenario (RPS)
- (B) Yes, using the One Earth Climate Model scenario
- (C) Yes, using the International Energy Agency (IEA) Net Zero scenario
- (D) Yes, using other scenarios
- (E) No, we have not assessed the resilience of our investment strategy in different climate scenarios, including one that holds temperature rise to below 2 degrees

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 44	CORE	N/A	N/A	PUBLIC	Climate change	General

Does your organisation have a process to identify, assess, and manage the climate-related risks (potentially) affecting your investments?

(A) Yes, we have a process to identify and assess climate-related risks

(1) Describe your process

Climate change represents both significant risks and opportunities for businesses. In addition to assessing climate related risks and opportunities in our investment process and disclosing climate related data, Nordic Capital seeks to act as a role model by measuring, acting, and increasing awareness within our own organisation and amongst all portfolio companies. To robustly address sustainability risks and opportunities, the inclusion of environmental risks is mandatory in all final bid materials. In the short-term Nordic Capital has not identified any significant risks related to climate change in our portfolio. As part of our long-term climate strategy, Nordic Capital has taken additional steps to deliver on our climate commitment by identifying key climate related exposures and associated risks and opportunities. Based on TCFD recommendations, we have created a tailored framework by analysing the typical sector exposures in each of Nordic Capital's sectors as well as the exposures for our portfolio companies.

The next step in Nordic Capital's climate journey is to progress our science-based target setting project, at both an organisation and portfolio level, which will include scenario modelling in different longer-term time trajectories.

(2) Describe how this process is integrated into your overall risk management

Nordic Capital Advisors' investment professionals are well placed to address sustainability risks and opportunities including climate related risks with the support of a dedicated in-house Sustainability Team and external advisors. The established due diligence process involves various climate related investigations including a review of environmental data disclosed by the target, environmental checklist, detailed discussions with the management team and legal due diligence. On a case-by-case basis, Nordic Capital may engage external advisors in the risk assessment process or conduct site visits.

ESG factors are well integrated into Nordic Capital Advisors' investment analysis. During the year, the Sustainability team has worked closely with the Investment, Operations and Legal teams to ensure that the sustainability toolkit and playbooks are updated and incorporate sustainability matters in a structured way. To align with regulatory requirements and address specific issues in each sector, we have developed the due diligence toolkit to include an assessment of Principle Adverse Impacts and selected sustainability characteristics, created new sector specific ESG related due diligence templates and materials as well as launched more comprehensive ESG Deal team Playbooks. The ESG Deal Team Playbooks address both sector-specific topics and ESG metrics, while providing guidance on the adverse impacts of investment decisions on sustainability factors as specifically set out in the SFDR.

To ensure that the toolkits are utilised appropriately, Nordic Capital Advisors trains investment professionals on an ongoing basis in how to apply the tools. These tools are regularly reviewed, developed and updated to ensure that Nordic Capital is aligned with industry and regulatory developments.

(B) Yes, we have a process to manage climate-related risks

(1) Describe your process

Nordic Capital recognises our role as a responsible investor to influence the carbon emissions reduction targets and initiatives of our portfolio companies. It is part of ownership excellence and our long-term investment strategy. Based on TCFD recommendations, Nordic Capital addresses the impact of climate change by managing key climate related exposures across the portfolio. As a signatory to iCi, Nordic Capital has committed to manage risks associated with climate change and set clear climate reduction targets at both an organisation and portfolio level.

Nordic Capital typically invests in low carbon intense sectors with a commitment to embedding the highest standards of sustainability practice within our own organisation and throughout the portfolio. Through our annual sustainability review, we encourage all portfolio companies to assess how climate change will affect them and to implement related mitigation actions. In the short-term Nordic Capital has not identified any significant risks related to climate change in our portfolio. Based on TCFD recommendations, we have created a tailored framework by analysing the typical sector exposures in each of Nordic Capital's sectors as well as the exposures for our portfolio companies. We conclude that the Nordic Capital portfolio to a large extent operates in lower-risk sectors and geographies. The key physical exposures identified include increased frequency of acute weather events as well as chronic changes such as increase in temperature and precipitation. Transition exposures include regulatory changes, development of new technologies and shifts in customer expectation. The Climate exposure framework can be leveraged for both current and potential investments.

The next step in Nordic Capital's climate journey is to progress our science-based target setting project, at both an organisation and portfolio level, which will further finetune our decarbonisation roadmap aligned with the Paris Agreement and offer a range of target-setting resources and guidance.

(2) Describe how this process is integrated into your overall risk management

Nordic Capital places a significant emphasis on sustainability considerations throughout the sourcing process and ESG factors play a major role in new acquisitions. Nordic Capital is focused on investing behind long-term, sustainable macro trends often with a major sustainability angle. Prior to any acquisition, Nordic Capital undertakes diligence to understand material, operational or reputational risks and identify opportunities for value potential through a sustainability lens. Nordic Capital's investment professionals can utilise a comprehensive sustainability toolbox and bench of resources to critically evaluate key ESG criteria that are carefully analysed prior to any investment being made.

Throughout ownership, Nordic Capital encourages portfolio companies to Integrate climate change measures in policies and planning and emphasise the importance of measuring their climate impact and act to reduce greenhouse gas emissions. During 2022, Nordic Capital has developed our approach towards climate related issues. Our external climate advisors support several of our portfolio companies in their climate emissions calculations, which means that we are constantly increasing the data quality of our portfolio footprint calculations. In accordance with the global standard of the Greenhouse Gas Protocol, we assess our portfolio companies and perform a climate impact report on a yearly basis.

In order to safeguard long-term business value, and taking into consideration rising energy costs, carbon taxation or the risk of products and services becoming stranded, decarbonisation will play an important role. Nordic Capital recognises that we must de-risk all our funds, in order for the value of our portfolio companies to grow. There is an increased awareness and knowledge of environmental aspects amongst the portfolio companies in the Nordic Capital funds, showing positive improvement in the reporting results. Nordic Capital will continue to develop our approach to climate-related risk management both on company and portfolio level.

- (C) No, we do not have any processes to identify, assess, or manage the climate-related risks affecting our investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 45	CORE	N/A	N/A	PUBLIC	Climate change	General

During the reporting year, which of the following climate risk metrics or variables affecting your investments did your organisation use and disclose?

(A) Exposure to physical risk

(1) Indicate whether this metric or variable was used and disclosed, including the methodology

(1) Metric or variable used

- (2) Metric or variable used and disclosed
- (3) Metric or variable used and disclosed, including methodology

(B) Exposure to transition risk

(1) Indicate whether this metric or variable was used and disclosed, including the methodology

(1) Metric or variable used

- (2) Metric or variable used and disclosed
- (3) Metric or variable used and disclosed, including methodology

(C) Internal carbon price

(D) Total carbon emissions

(1) Indicate whether this metric or variable was used and disclosed, including the methodology

- (1) Metric or variable used
- (2) Metric or variable used and disclosed
- (3) Metric or variable used and disclosed, including methodology

(2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

https://www.nordiccapital.com/media/s5mf2e1q/nordic-capital_annual_sustainability_review_2022_v-f.pdf

(E) Weighted average carbon intensity

(1) Indicate whether this metric or variable was used and disclosed, including the methodology

- (1) Metric or variable used
- (2) Metric or variable used and disclosed
- (3) Metric or variable used and disclosed, including methodology

(2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

https://www.nordiccapital.com/media/s5mf2e1q/nordic-capital_annual_sustainability_review_2022_v-f.pdf

(F) Avoided emissions

(G) Implied Temperature Rise (ITR)

(H) Non-ITR measure of portfolio alignment with UNFCCC Paris Agreement goals

(I) Proportion of assets or other business activities aligned with climate-related opportunities

(1) Indicate whether this metric or variable was used and disclosed, including the methodology

- (1) Metric or variable used
- (2) Metric or variable used and disclosed
- (3) Metric or variable used and disclosed, including methodology

(J) Other metrics or variables

(K) Our organisation did not use or disclose any climate risk metrics or variables affecting our investments during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 46	CORE	N/A	N/A	PUBLIC	Climate change	General

During the reporting year, did your organisation disclose its Scope 1, Scope 2, and/or Scope 3 greenhouse gas emissions?

(A) Scope 1 emissions

(1) Indicate whether this metric was disclosed, including the methodology

o (1) Metric disclosed

● (2) Metric and methodology disclosed

(2) Provide links to the disclosed metric and methodology, as applicable

https://www.nordiccapital.com/media/s5mf2e1q/nordic-capital_annual_sustainability_review_2022_v-f.pdf

(B) Scope 2 emissions

(1) Indicate whether this metric was disclosed, including the methodology

o (1) Metric disclosed

● (2) Metric and methodology disclosed

(2) Provide links to the disclosed metric and methodology, as applicable

https://www.nordiccapital.com/media/s5mf2e1q/nordic-capital_annual_sustainability_review_2022_v-f.pdf

(C) Scope 3 emissions (including financed emissions)

(1) Indicate whether this metric was disclosed, including the methodology

o (1) Metric disclosed

● (2) Metric and methodology disclosed

(2) Provide links to the disclosed metric and methodology, as applicable

https://www.nordiccapital.com/media/s5mf2e1q/nordic-capital_annual_sustainability_review_2022_v-f.pdf

o (D) Our organisation did not disclose its Scope 1, Scope 2, or Scope 3 greenhouse gas emissions during the reporting year

SUSTAINABILITY OUTCOMES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47	CORE	N/A	Multiple indicators	PUBLIC	Sustainability outcomes	1, 2

Has your organisation identified the intended and unintended sustainability outcomes connected to its investment activities?

● (A) Yes, we have identified one or more specific sustainability outcomes connected to our investment activities

o (B) No, we have not yet identified the sustainability outcomes connected to any of our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47.1	CORE	PGS 47	N/A	PUBLIC	Sustainability outcomes	1, 2

Which widely recognised frameworks has your organisation used to identify the intended and unintended sustainability outcomes connected to its investment activities?

- (A) **The UN Sustainable Development Goals (SDGs) and targets**
- (B) The UNFCCC Paris Agreement
- (C) The UN Guiding Principles on Business and Human Rights (UNGPs)
- (D) **OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors**
- (E) The EU Taxonomy
- (F) Other relevant taxonomies
- (G) The International Bill of Human Rights
- (H) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- (I) The Convention on Biological Diversity
- (J) **Other international framework(s)**
Specify:
UN Global Compact, EDCI
- (K) **Other regional framework(s)**
Specify:
SFDR
- (L) Other sectoral/issue-specific framework(s)
 - (M) Our organisation did not use any widely recognised frameworks to identify the intended and unintended sustainability outcomes connected to its investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47.2	CORE	PGS 47	PGS 48	PUBLIC	Sustainability outcomes	1, 2

What are the primary methods that your organisation has used to determine the most important intended and unintended sustainability outcomes connected to its investment activities?

- (A) **Identify sustainability outcomes that are closely linked to our core investment activities**
- (B) **Consult with key clients and/or beneficiaries to align with their priorities**
- (C) Assess which actual or potential negative outcomes for people are most severe based on their scale, scope, and irremediable character
- (D) **Identify sustainability outcomes that are closely linked to systematic sustainability issues**
- (E) **Analyse the input from different stakeholders (e.g. affected communities, civil society, trade unions or similar)**
- (F) Understand the geographical relevance of specific sustainability outcome objectives
- (G) Other method
- (H) We have not yet determined the most important sustainability outcomes connected to our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 48	CORE	PGS 47.2	PGS 48.1, SO 1	PUBLIC	Sustainability outcomes	1, 2

Has your organisation taken action on any specific sustainability outcomes connected to its investment activities, including to prevent and mitigate actual and potential negative outcomes?

- (A) Yes, we have taken action on some of the specific sustainability outcomes connected to our investment activities
- (B) No, we have not yet taken action on any specific sustainability outcomes connected to our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 48.1	PLUS	PGS 48	N/A	PUBLIC	Sustainability outcomes	1, 2

Why has your organisation taken action on specific sustainability outcomes connected to its investment activities?

- (A) We believe that taking action on sustainability outcomes is relevant to our financial risks and returns over both short- and long-term horizons
- (B) We believe that taking action on sustainability outcomes, although not yet relevant to our financial risks and returns, will become so over a long-time horizon
- (C) We have been requested to do so by our clients and/or beneficiaries
- (D) We want to prepare for and respond to legal and regulatory developments that are increasingly addressing sustainability outcomes
- (E) We want to protect our reputation, particularly in the event of negative sustainability outcomes connected to investments
- (F) We want to enhance our social licence-to-operate (i.e. the trust of beneficiaries, clients, and other stakeholders)
- (G) We believe that taking action on sustainability outcomes in parallel to financial return goals has merit in its own right
- (H) Other

HUMAN RIGHTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 49	PLUS	PGS 47	PGS 49.1	PUBLIC	Human rights	1, 2

During the reporting year, what steps did your organisation take to identify and take action on the actual and potentially negative outcomes for people connected to your investment activities?

(A) We assessed the human rights context of our potential and/or existing investments and projected how this could connect our organisation to negative human rights outcomes

Explain how these activities were conducted:

As part of being an active and engaged owner, Nordic Capital recognises our key role in addressing social issues and human rights across the Nordic Capital funds and vehicles. Nordic Capital respects human rights and the rights of workers, and believes that good relationships between all stakeholders, such as managers, employees, suppliers, and business partners, lead to better business results. Nordic Capital expects portfolio companies to respect and uphold internationally recognised human rights and labour rights, reject the use of any form of forced, child or compulsory labour, and have zero tolerance for any form of discrimination. As part of Nordic Capital's annual sustainability review, we have included questions related to human rights in the social module. Portfolio companies must confirm if they are committed to respect human rights and if they have a due diligence process in place to identify, prevent, mitigate, address, and communicate on adverse human rights impacts. We are developing our approach to identify and take action on human rights related issues across the portfolio through engagement and best practice sharing.

(B) We assessed whether individuals at risk or already affected might be at heightened risk of harm

(C) We consulted with individuals and groups who were at risk or already affected, their representatives and/or other relevant stakeholders such as human rights experts

(D) We took other steps to assess and manage the actual and potentially negative outcomes for people connected to our investment activities

(E) We did not identify and take action on the actual and potentially negative outcomes for people connected to any of our investment activities during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 49.1	PLUS	PGS 49	N/A	PUBLIC	Human rights	1, 2

During the reporting year, which stakeholder groups did your organisation include when identifying and taking action on the actual and potentially negative outcomes for people connected to your investment activities?

(A) Workers

(B) Communities

(C) Customers and end-users

(D) Other stakeholder groups

Specify:

Nordic Capital expects portfolio companies to respect and uphold internationally recognised human rights and labour rights, reject the use of any form of forced, child or compulsory labour, and have zero tolerance for any form of discrimination. Furthermore, Nordic Capital expects portfolio companies to provide healthy and safe working environments, and promote employee wellbeing, gender equality, diversity and inclusion. As part of Nordic Capital's annual sustainability review, we have included questions related to human rights in the social module. Portfolio companies must confirm if they are committed to respect human rights and if they have a due diligence process in place to identify, prevent, mitigate, address, and communicate on adverse human rights impacts. We are developing our approach to identify and take action on human rights related issues across the portfolio through engagement and best practice sharing. The stakeholder groups include Nordic Capital's portfolio companies and their respective supply chains.

Sector(s) for which each stakeholder group was included

- (1) Energy
- (2) Materials
- (3) **Industrials**
- (4) **Consumer discretionary**
- (5) **Consumer staples**
- (6) **Healthcare**
- (7) **Finance**
- (8) **Information technology**
- (9) Communication services
- (10) Utilities
- (11) Real estate

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 49.2	PLUS	PGS 47	N/A	PUBLIC	Human rights	1, 2

During the reporting year, what information sources did your organisation use to identify the actual and potentially negative outcomes for people connected to its investment activities?

- (A) Corporate disclosures
- (B) Media reports
- (C) Reports and other information from NGOs and human rights institutions
- (D) Country reports, for example, by multilateral institutions, e.g. OECD, World Bank
- (E) Data provider scores or benchmarks
- (F) Human rights violation alerts
- (G) Sell-side research
- (H) Investor networks or other investors
- (I) Information provided directly by affected stakeholders or their representatives
- (J) Social media analysis
- (K) **Other**

Specify:

Nordic Capital's annual sustainability review

Provide further detail on how your organisation used these information sources:

As part of Nordic Capital's annual sustainability review, we have included questions related to human rights in the social module. Portfolio companies must confirm if they are committed to respect human rights and if they have a due diligence process in place to identify, prevent, mitigate, address, and communicate on adverse human rights impacts. We are developing our approach to identify and take action on human rights related issues across the portfolio through engagement and best practice sharing. The stakeholder groups include Nordic Capital's portfolio companies and their respective supply chains. Related data is collected and aggregated annually.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 50	PLUS	PGS 47	N/A	PUBLIC	Human rights	1, 2

During the reporting year, did your organisation, directly or through influence over investees, enable access to remedy for people affected by negative human rights outcomes connected to your investment activities?

- (A) Yes, we enabled access to remedy directly for people affected by negative human rights outcomes we caused or contributed to through our investment activities
- (B) Yes, we used our influence to ensure that our investees provided access to remedies for people affected by negative human rights outcomes we were linked to through our investment activities
- (C) No, we did not enable access to remedy directly, or through the use of influence over investees, for people affected by negative human rights outcomes connected to our investment activities during the reporting year

Explain why:

In 2022, no cases of severe human rights incidents (e.g., cases of child/forced labour) were identified. This was confirmed by data collected through our annual sustainability review.

PRIVATE EQUITY (PE)

POLICY

INVESTMENT GUIDELINES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 1	CORE	OO 21	N/A	PUBLIC	Investment guidelines	1 to 6

What private equity-specific ESG guidelines are currently covered in your organisation's responsible investment policy(ies)?

- (A) Guidelines on our ESG approach tailored to the sector(s) and geography(ies) where we invest
- (B) Guidelines on our ESG approach tailored to the strategy(ies) and company stage(s) where we invest, e.g. venture capital, buy-out and distressed
- (C) Guidelines on pre-investment screening
- (D) Guidelines on minimum ESG due diligence requirements
- (E) Guidelines on our approach to ESG integration into short-term or 100-day plans (or equivalent)
- (F) Guidelines on our approach to ESG integration into long-term value-creation efforts
- (G) Guidelines on our approach to monitoring ESG risks, ESG opportunities and ESG incidents
- (H) Guidelines on our approach to ESG reporting
- (I) Our responsible investment policy(ies) does not cover private equity-specific ESG guidelines

FUNDRAISING

COMMITMENTS TO INVESTORS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 2	CORE	OO 21	N/A	PUBLIC	Commitments to investors	1, 4

For all of the funds that you closed during the reporting year, what type of formal responsible investment commitments did you make in Limited Partnership Agreements (LPAs), side letters or other constitutive fund documents?

- (A) We incorporated responsible investment commitments in LPAs (or equivalent) as a standard default procedure
- (B) We added responsible investment commitments in LPAs (or equivalent) upon clients' request
- (C) We added responsible investment commitments in side letters upon clients' request
- (D) We did not make any formal responsible investment commitments for the relevant reporting year
- (E) Not applicable; we have not raised funds in the last five years

PRE-INVESTMENT

MATERIALITY ANALYSIS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 3	CORE	OO 21	PE 3.1	PUBLIC	Materiality analysis	1

During the reporting year, how did you conduct ESG materiality analysis for your potential private equity investments?

- (A) We assessed ESG materiality at the portfolio company level, as each case is unique
 - Select from dropdown list
 - (1) for all of our potential private equity investments
 - (2) for the majority of our potential private equity investments
 - (3) for a minority of our potential private equity investments
 - (B) We performed a mix of industry-level and portfolio company-level ESG materiality analyses
 - (C) We assessed ESG materiality at the industry level only
 - (D) We did not conduct ESG materiality analyses for our potential private equity investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 3.1	CORE	PE 3	N/A	PUBLIC	Materiality analysis	1

During the reporting year, what tools, standards and data did you use in your ESG materiality analysis of potential private equity investments?

- (A) We used GRI standards to inform our private equity ESG materiality analysis
- (B) We used SASB standards to inform our private equity ESG materiality analysis
- (C) We used the UN Sustainable Development Goals (SDGs) to inform our private equity ESG materiality analysis
- (D) We used environmental and social factors detailed in the IFC Performance Standards (or other similar standards used by development-focused financial institutions) in our private equity ESG materiality analysis
- (E) We used climate disclosures, such as the TCFD recommendations or other climate risk and/or exposure analysis tools, to inform our private equity ESG materiality analysis
- (F) We used the UN Guiding Principles on Business and Human Rights (UNGPs) to inform our private equity ESG materiality analysis
- (G) We used geopolitical and macro-economic considerations in our private equity ESG materiality analysis
- (H) We engaged with the prospective portfolio company to inform our private equity ESG materiality analysis
- (I) Other

DUE DILIGENCE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 4	CORE	OO 21	N/A	PUBLIC	Due diligence	1

During the reporting year, how did material ESG factors influence the selection of your private equity investments?

- (A) Material ESG factors were used to identify risks
 - Select from dropdown list
 - (1) for all of our potential private equity investments
 - (2) for the majority of our potential private equity investments
 - (3) for a minority of our potential private equity investments
- (B) Material ESG factors were discussed by the investment committee (or equivalent)
 - Select from dropdown list
 - (1) for all of our potential private equity investments
 - (2) for the majority of our potential private equity investments
 - (3) for a minority of our potential private equity investments
- (C) Material ESG factors were used to identify remedial actions for our 100-day plans (or equivalent)
 - Select from dropdown list
 - (1) for all of our potential private equity investments
 - (2) for the majority of our potential private equity investments
 - (3) for a minority of our potential private equity investments
- (D) Material ESG factors were used to identify opportunities for value creation
 - Select from dropdown list
 - (1) for all of our potential private equity investments
 - (2) for the majority of our potential private equity investments
 - (3) for a minority of our potential private equity investments
- (E) Material ESG factors informed our decision to abandon potential investments in the due diligence phase in cases where ESG risks were considered too high to mitigate
 - Select from dropdown list
 - (1) for all of our potential private equity investments
 - (2) for the majority of our potential private equity investments
 - (3) for a minority of our potential private equity investments
- (F) Material ESG factors impacted investments in terms of the price offered and/or paid

Select from dropdown list

- (1) for all of our potential private equity investments
- (2) for the majority of our potential private equity investments
- (3) for a minority of our potential private equity investments
- (G) Material ESG factors did not influence the selection of our private equity investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 5	CORE	OO 21	N/A	PUBLIC	Due diligence	1

Once material ESG factors have been identified, what processes do you use to conduct due diligence on these factors for potential private equity investments?

(A) We do a high-level or desktop review using an ESG checklist for initial red flags

Select from dropdown list

- (1) for all of our potential private equity investments
- (2) for a majority of our potential private equity investments
- (3) for a minority of our potential private equity investments

(B) We send detailed ESG questionnaires to target companies

Select from dropdown list

- (1) for all of our potential private equity investments
- (2) for a majority of our potential private equity investments
- (3) for a minority of our potential private equity investments

(C) We hire third-party consultants to do technical due diligence on specific material ESG factors

Select from dropdown list

- (1) for all of our potential private equity investments
- (2) for a majority of our potential private equity investments
- (3) for a minority of our potential private equity investments

(D) We conduct site visits

Select from dropdown list

- (1) for all of our potential private equity investments
- (2) for a majority of our potential private equity investments
- (3) for a minority of our potential private equity investments

(E) We conduct in-depth interviews with management and/or personnel

Select from dropdown list

- (1) for all of our potential private equity investments
- (2) for a majority of our potential private equity investments
- (3) for a minority of our potential private equity investments

(F) We conduct detailed external stakeholder analyses and/or engagement

Select from dropdown list

- (1) for all of our potential private equity investments
- (2) for a majority of our potential private equity investments
- (3) for a minority of our potential private equity investments

(G) We incorporate ESG due diligence findings in all of our relevant investment process documentation in the same manner as other key due diligence, e.g. commercial, accounting and legal

Select from dropdown list

- (1) for all of our potential private equity investments
- (2) for a majority of our potential private equity investments
- (3) for a minority of our potential private equity investments

(H) Our investment committee (or an equivalent decision-making body) is ultimately responsible for ensuring all ESG due diligence is completed in the same manner as for other key due diligence, e.g. commercial, accounting, and legal

Select from dropdown list

- (1) for all of our potential private equity investments
- (2) for a majority of our potential private equity investments
- (3) for a minority of our potential private equity investments

(I) Other

- (J) We do not conduct due diligence on material ESG factors for potential private equity investments

POST-INVESTMENT

MONITORING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 6	CORE	OO 21	PE 6.1	PUBLIC	Monitoring	1

During the reporting year, did you track one or more KPIs on material ESG factors across your private equity investments?

(A) Yes, we tracked KPIs on environmental factors

Percentage of portfolio companies this applies to:

- (1) >0 to 10%
- (2) >10 to 50%
- (3) >50 to 75%
- (4) >75 to 95%
- (5) >95%

(B) Yes, we tracked KPIs on social factors

Percentage of portfolio companies this applies to:

- (1) >0 to 10%
- (2) >10 to 50%
- (3) >50 to 75%
- (4) >75 to 95%
- (5) >95%

(C) Yes, we tracked KPIs on governance factors

Percentage of portfolio companies this applies to:

- (1) >0 to 10%
- (2) >10 to 50%
- (3) >50 to 75%
- (4) >75 to 95%
- (5) >95%

- (D) We did not track KPIs on material ESG factors across our private equity investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 6.1	PLUS	PE 6	N/A	PUBLIC	Monitoring	1

Provide examples of KPIs on material ESG factors you tracked across your private equity investments during the reporting year.

(A) ESG KPI #1

Having a sustainability strategy in place

(B) ESG KPI #2

Having an assigned 'Sustainability responsible' in the company

(C) ESG KPI #3

Greenhouse gas emission intensity (tCO2e/sales MEUR)

(D) ESG KPI #4

Renewable energy share of total energy consumption

(E) ESG KPI #5

Female representation at Board of Directors / Female representation in Executive management

(F) ESG KPI #6

Measurement of employee engagement/satisfaction

(G) ESG KPI #7

Organic employment growth in current portfolio (year-on-year)

(H) ESG KPI #8

Code of Conduct in place

(I) ESG KPI #9

Whistleblowing policy or system in place

(J) ESG KPI #10

Having 'Sustainability' as a recurring item on the agenda for the board meetings

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 7	CORE	OO 21	PE 7.1	PUBLIC	Monitoring	1, 2

What processes do you have in place to support meeting your targets on material ESG factors for your private equity investments?

(A) We use operational-level benchmarks to assess and analyse the performance of portfolio companies against sector performance

Select from dropdown list

- (1) for all of our private equity investments
- (2) for a majority of our private equity investments
- (3) for a minority of our private equity investments

- (B) We implement international best practice standards, such as the IFC Performance Standards, to guide ongoing assessments and analyses**
 - Select from dropdown list
 - (1) for all of our private equity investments**
 - (2) for a majority of our private equity investments
 - (3) for a minority of our private equity investments
- (C) We implement certified environmental and social management systems across our portfolio**
 - Select from dropdown list
 - (1) for all of our private equity investments
 - (2) for a majority of our private equity investments**
 - (3) for a minority of our private equity investments
- (D) We make sufficient budget available to ensure that the systems and procedures needed are established**
 - Select from dropdown list
 - (1) for all of our private equity investments**
 - (2) for a majority of our private equity investments
 - (3) for a minority of our private equity investments
- (E) We hire external verification services to audit performance, systems, and procedures**
 - Select from dropdown list
 - (1) for all of our private equity investments
 - (2) for a majority of our private equity investments
 - (3) for a minority of our private equity investments**
- (F) We conduct ongoing engagement with all key stakeholders at the portfolio company level, e.g. local communities, NGOs, governments, and end-users**
 - Select from dropdown list
 - (1) for all of our private equity investments**
 - (2) for a majority of our private equity investments
 - (3) for a minority of our private equity investments
- (G) We implement 100-day plans, ESG roadmaps and similar processes**
 - Select from dropdown list
 - (1) for all of our private equity investments**
 - (2) for a majority of our private equity investments
 - (3) for a minority of our private equity investments
- (H) Other
 - (I) We do not have processes in place to help meet our targets on material ESG factors for our private equity investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 7.1	PLUS	PE 7	N/A	PUBLIC	Monitoring	1, 2

Describe up to two processes you have put in place during the reporting year to help meet your targets on material ESG factors.

(A) Process one

Sub-sector specific ESG playbooks and tools updated enabling increased focus on sustainability in investment and ownership phase. During the course of the year, the Sustainability team has worked closely with the Investment, Operations and Legal teams of Nordic Capital Advisors to ensure that the sustainability toolkit and playbooks incorporate sustainability matters in a structured way. To align with new regulatory requirements and address specific issues in each sector, a Due Diligence Toolkit has been developed that includes an assessment on Principle Adverse Impacts (PAI) and selected sustainability characteristics. Nordic Capital Advisors has also created new sector specific ESG related Due Diligence templates and materials and launched more comprehensive ESG Deal Team Playbooks. The ESG Deal Team Playbooks address both sector-specific topics and ESG metrics and provide guidance on the adverse impacts of investment decisions on sustainability factors as specifically set out in the SFDR.

(B) Process two

Training as part of the foundation for an integrated ESG approach

To increase awareness of ESG-related topics and issues in each sector and ensure compliance with our Responsible Investment Framework, Nordic Capital Advisors trains investment professionals on how to manage sustainability risks and opportunities across the investment cycle. Good governance is also a fundamental element of our approach to Responsible Investment, and we require all employees to undergo corporate compliance training. By the end of 2022, a total of 216 attendees participated in Nordic Capital's sustainability training offered in three different training modules and spotlight sessions to increase awareness and share best practices at an organisation and portfolio level. To date, Nordic Capital has had 1,044 attendees in our sustainability training.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 8	PLUS	OO 21	N/A	PUBLIC	Monitoring	1, 2

Describe material ESG risks and ESG opportunities that you integrate into your 100-day plans, including those accountable for their successful completion and how the process is monitored.

Nordic Capital funds and vehicles are committed to investing responsibly, with a firm belief that responsible business practice is essential for achieving long-term success and value creation. With a clear commitment to making a positive contribution to society by helping to build strong companies, we drive sustainable development and awareness within our own organisation as well as in the portfolio companies.

On a high-level, the ESG on-boarding is structured as follows:

- Start-up meeting

- High-level maturity assessment
- Training (ESG I □ III)
- Materiality analysis initiation

Nordic Capital Advisors has a structured ESG on-boarding process with guidance on how to successfully integrate sustainability into Value Creation Plans. The deal teams, a dedicated in-house sustainability team and external advisors work with portfolio companies to set sustainability roadmaps and expectations during the structured on-boarding process. The sustainability roadmaps are to be fully integrated into value creation plans devised by Nordic Capital's Ownership Excellence function, which is dedicated to driving value across the portfolio. Moreover, Nordic Capital offers training, tools, and resources to portfolio companies to embed sustainability into the business strategy and value creation agendas. Nordic Capital also offers support to portfolio companies by providing access to ESG playbooks and a sustainability portal. The company specific sustainability value creation plans are developed and finetuned to ensure that they are up to date and aligned with industry best practice and regulatory requirements. Nordic Capital requires that sustainability matters must be addressed at board level and that the sustainability strategy needs to be adopted by the portfolio companies' boards of directors and reported on annually. Nordic Capital monitors each portfolio company through our annual sustainability review and progress in each company is evaluated in the bi-annual Portfolio Performance Reviews.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 9	CORE	OO 21	N/A	PUBLIC	Monitoring	1, 2

Post-investment, how do you manage material ESG risks and ESG opportunities to create value during the holding period of your investments?

(A) We develop company-specific ESG action plans based on pre-investment research, due diligence and materiality findings

Select from dropdown list

- (1) for all of our private equity investments**
- (2) for a majority of our private equity investments
- (3) for a minority of our private equity investments

(B) We adjust our ESG action plans based on performance monitoring findings at least yearly

Select from dropdown list

- (1) for all of our private equity investments**
- (2) for a majority of our private equity investments
- (3) for a minority of our private equity investments

(C) We, or the external advisors that we hire, support our private equity investments with specific ESG value-creation opportunities

Select from dropdown list

- (1) for all of our private equity investments
- (2) for a majority of our private equity investments**
- (3) for a minority of our private equity investments

(D) We engage with the board to manage ESG risks and ESG opportunities post-investment

Select from dropdown list

- (1) for all of our private equity investments
- (2) for a majority of our private equity investments
- (3) for a minority of our private equity investments
- (E) Other
- (F) We do not manage material ESG risks and opportunities post-investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 10	PLUS	OO 21	N/A	PUBLIC	Monitoring	1, 2

Describe how you ensure that material ESG risks are adequately addressed in the private equity investments in which you hold a minority stake.

Nordic Capital applies the same approach to ESG integration in investments where we hold a minority stake as reported in indicator PE 8. In minority stake investments, the on-boarding process is completed in a similar manner as for all investments. It is during ownership, that procedures may differ depending on the investment partner relationship and arrangements. Hence, in the case of minority investments, ESG risks are usually addressed on a case-by-case basis during the ownership period.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 11	PLUS	OO 21	N/A	PUBLIC	Monitoring	2

Describe how your ESG action plans are currently defined, implemented and monitored throughout the investment period.

Following the acquisition of a portfolio company, ESG action plans, or so-called roadmaps, are initiated in light of findings from the ESG Due Diligence. It is the responsibility of the portfolio company's board of directors to monitor sustainability risks; however, Nordic Capital actively encourages portfolio companies to always, at minimum, meet external standards for sustainability. As per Nordic Capital's investment framework, we implement the following approach:

Invest well:

When Nordic Capital invests in a company, a structured on-boarding process is carried out to understand and identify material risks and opportunities related to sustainability and to set a sustainability agenda. This assessment may include environmental factors such as carbon footprint, energy efficiency, waste management; and also social, ethical and community impacts; as well as compliance such as anti-corruption, antitrust, trade sanctions and data protection. It is encouraged that this sustainability agenda is integrated into the value creation plan with clear objectives and targets (KPIs) set to measure progress over time. Nordic Capital typically expects portfolio companies and their boards of directors to address sustainability appropriately within two years of investment. We encourage to apply the responsible investment principles that we have developed and aim for improvement during the ownership period.

Own well:

Nordic Capital Portfolio companies are annually required to have their sustainability strategies approved and reviewed by their boards of directors as well as to report on their sustainability performance to Nordic Capital as part of the yearly sustainability review. Nordic Capital actively engages with our portfolio companies during the ownership stage to promote the importance of sustainability, drive sustainable performance and share best practices. We set out clear expectations for portfolio companies, ensuring that sustainability is addressed appropriately at boardroom level and throughout the organisation. In most cases, Nordic Capital is the majority shareholder or in a position to influence the strategic transformation of the company. To support portfolio companies to mitigate risks and seize opportunities, Nordic Capital Advisors' Sustainability team provides training, tools, and support during the ownership period to help portfolio companies strengthen their sustainability strategies and develop appropriate processes for assessment, compliance and reporting. This also includes providing networking opportunities, sustainability tools, regular reporting tools and reviews.

Sell well:

The target for Nordic Capital is to transfer ownership in the best possible way so that portfolio businesses continue to grow and outperform in the long-term. In preparation for exit, steps are taken to ensure the portfolio company is in a position to improve its performance within sustainability. Nordic Capital measures development during the ownership phase and factors sustainable progress into the sales process. The aim is that the value of improvements within sustainability made during the ownership phase will be realised upon exit.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 12	CORE	OO 21	PE 12.1	PUBLIC	Monitoring	1, 2

How do you ensure that adequate ESG-related competence exists at the portfolio company level?

(A) We assign the board responsibility for ESG matters

Select from dropdown list

- (1) for all of our private equity investments**
- (2) for a majority of our private equity investments
- (3) for a minority of our private equity investments

(B) We ensure that material ESG matters are discussed by the board at least yearly

Select from dropdown list

- (1) for all of our private equity investments**
- (2) for a majority of our private equity investments
- (3) for a minority of our private equity investments

(C) We provide training on ESG aspects and management best practices relevant to the portfolio company to C-suite executives only

Select from dropdown list

- (1) for all of our private equity investments**
- (2) for a majority of our private equity investments
- (3) for a minority of our private equity investments

(D) We provide training on ESG aspects and management best practices relevant to the portfolio company to employees (excl. C-suite executives)

Select from dropdown list

- (1) for all of our private equity investments**
- (2) for a majority of our private equity investments
- (3) for a minority of our private equity investments

(E) We support the portfolio company in developing and implementing its ESG strategy

Select from dropdown list

- (1) for all of our private equity investments
- (2) for a majority of our private equity investments
- (3) for a minority of our private equity investments

(F) We support portfolio companies by finding external ESG expertise, e.g. consultants or auditors

Select from dropdown list

- (1) for all of our private equity investments
- (2) for a majority of our private equity investments
- (3) for a minority of our private equity investments

(G) We share best practices across portfolio companies, e.g. educational sessions or the implementation of environmental and social management systems

Select from dropdown list

- (1) for all of our private equity investments
- (2) for a majority of our private equity investments
- (3) for a minority of our private equity investments

(H) We include penalties or incentives to improve ESG performance in management remuneration schemes

Select from dropdown list

- (1) for all of our private equity investments
- (2) for a majority of our private equity investments
- (3) for a minority of our private equity investments

(I) Other

- (J) We do not ensure that adequate ESG-related competence exists at the portfolio company level

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 12.1	PLUS	PE 12	N/A	PUBLIC	Monitoring	1, 2

Describe up to two initiatives taken as part of your ESG competence-building efforts at the portfolio company level during the reporting year.

(A) Initiative 1

Spotlights and functional events

During 2022, Nordic Capital hosted and arranged several spotlight sessions and events to increase awareness and share best practices with our portfolio companies. E.g., the Nordic Capital Sustainability Spotlight Session was dedicated to Sustainability reporting in 2022, to address the rapidly evolving approaches to sustainability reporting and an increasing need among portfolio companies to gain insight into regulatory reporting requirements. All spotlight sessions have been co-hosted by external advisors, to ensure portfolio companies gain access to renowned experts in their respective fields. Nordic Capital has longstanding partnerships with experts in areas such as sustainability strategy development, sustainability reporting, whistleblowing, data privacy and information security, corporate compliance, climate data collection and calculation, as well as ESG data management. The external advisor network covers the full geographical reach of our funds and vehicles. Nordic Capital Sustainability spotlight sessions allow portfolio companies to increase awareness on hot topics and access experts who offer hands on support. In addition, sustainability was also integrated into other cross functional events such as the Nordic Capital CFO Summit and the Procurement Summit. Sustainability webinars were also arranged for Chief Human Resources Officers and CEOs to support HR and Talent management and recruitment. Nordic Capital actively engages in various public events and roundtables to share best practice with the industry.

(B) Initiative 2

NCPO academy

As public awareness of supply chains and related issues grows, there are increasing expectations that companies sufficiently manage their exposure to potential supply chain risks. Nordic Capital's Operations team supports our portfolio companies to develop their procurement practices and supply chain management. The Nordic Capital Procurement Optimisation (NCPO) Programme was launched in 2009 to bring together a community of procurement professionals across the portfolio and ensure that procurement value creation is maximised. The programme offers voluntary trainings through the NCPO Academy to all portfolio companies to ensure that procurement professionals are familiar with best practice in their field and works along four key pillars: Community, NCPO Academy, Cross-portfolio sourcing and Strategy and company-specific programmes. We believe that procurement excellence is regarded as a key value lever that can deliver a sustainable competitive advantage, act as a catalyst for innovation and fuel future growth. By the end of 2022, we expanded our Sustainability Procurement toolkit by forming a partnership with Ecovadis. Ecovadis allows the Nordic Capital portfolio companies to identify risks and opportunities and assess sustainability practices across the supply chain. The ecovadis intelligence suite is linked to Nordic Capital's bespoke source-to contract platform, the NCPO engine, thereby enabling sustainability integration in core procurement processes. Our ambition is to further emphasise education of our portfolio companies and provide enhanced support to ensure steady development of procurement practices. We trust that such initiatives will help safeguard the reputation, operations, and financial performance of our funds and vehicles.

EXIT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 13	CORE	OO 21	N/A	PUBLIC	Exit	4, 6

During the reporting year, what responsible investment information was shared with potential buyers of private equity investments?

- (A) Our firm's high-level commitment to responsible investment, e.g. that we are a PRI signatory**
 - Select from dropdown list
 - (1) for all of our private equity investments**
 - (2) for a majority of our private equity investments
 - (3) for a minority of our private equity investments
- (B) A description of what industry and asset class standards our firm aligns with, e.g. TCFD**
 - Select from dropdown list
 - (1) for all of our private equity investments**
 - (2) for a majority of our private equity investments
 - (3) for a minority of our private equity investments
- (C) Our firm's responsible investment policy (at minimum, a summary of key aspects and firm-specific approach)**
 - Select from dropdown list
 - (1) for all of our private equity investments**
 - (2) for a majority of our private equity investments
 - (3) for a minority of our private equity investments
- (D) Our firm's ESG risk assessment methodology (topics covered in-house and/or with external support)**
 - Select from dropdown list
 - (1) for all of our private equity investments
 - (2) for a majority of our private equity investments**
 - (3) for a minority of our private equity investments
- (E) The outcome of our latest ESG risk assessment on the asset or portfolio company**
 - Select from dropdown list
 - (1) for all of our private equity investments
 - (2) for a majority of our private equity investments**
 - (3) for a minority of our private equity investments
- (F) Key ESG performance data on the asset or portfolio company being sold**
 - Select from dropdown list
 - (1) for all of our private equity investments**
 - (2) for a majority of our private equity investments
 - (3) for a minority of our private equity investments
- (G) Other
- (H) No responsible investment information was shared with potential buyers of private equity investments during the reporting year
- (I) Not applicable; we had no sales process (or control over the sales process) during the reporting year

DISCLOSURE OF ESG PORTFOLIO INFORMATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 14	CORE	OO 21	N/A	PUBLIC	Disclosure of ESG portfolio information	6

During the reporting year, how did you report your targets on material ESG factors and related data to your investors?

- (A) We used a publicly disclosed sustainability report
- (B) We reported in aggregate through formal reporting to investors
- (C) We reported at the portfolio company level through formal reporting to investors
- (D) We reported through a limited partners advisory committee (or equivalent)
- (E) We reported back at digital or physical events or meetings with investors
- (F) We had a process in place to ensure that reporting on serious ESG incidents occurred
- (G) Other

Specify:

We respond to LP-specific ESG DDQs throughout the year. These include data on both Nordic Capital's ESG processes and portfolio ESG performance. We also engage in dialogues with certain investors on specific portfolio companies and their sustainability performance.

- (H) We did not report our targets on material ESG factors and related data to our investors during the reporting year

SUSTAINABILITY OUTCOMES (SO)

SETTING TARGETS AND TRACKING PROGRESS

SETTING TARGETS ON SUSTAINABILITY OUTCOMES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 1	PLUS	PGS 48	SO 2, SO 2.1, SO 3	PUBLIC	Setting targets on sustainability outcomes	1, 2

What specific sustainability outcomes connected to its investment activities has your organisation taken action on?

- (A) Sustainability outcome #1
 - (1) Widely recognised frameworks used to guide action on this sustainability outcome
 - (1) The UN Sustainable Development Goals (SDGs) and targets
 - (2) The UNFCCC Paris Agreement
 - (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
 - (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
 - (5) The EU Taxonomy
 - (6) Other relevant taxonomies
 - (7) The International Bill of Human Rights

- (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- (9) The Convention on Biological Diversity
- (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

- (1) Environmental
- (2) Social**
- (3) Governance-related
- (4) Other

(3) Sustainability outcome name

SDG 5.5 women's participation in leadership: Female representation at Board of Directors (external board members)

(4) Number of targets set for this outcome

- (1) No target
- (2) One target**
- (3) Two or more targets

(B) Sustainability outcome #2

(1) Widely recognised frameworks used to guide action on this sustainability outcome

- (1) The UN Sustainable Development Goals (SDGs) and targets**
- (2) The UNFCCC Paris Agreement
- (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
- (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- (5) The EU Taxonomy
- (6) Other relevant taxonomies
- (7) The International Bill of Human Rights
- (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- (9) The Convention on Biological Diversity
- (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

- (1) Environmental
- (2) Social**
- (3) Governance-related
- (4) Other

(3) Sustainability outcome name

SDG 8.3 job creation and growing enterprises: organic employment growth in portfolio

(4) Number of targets set for this outcome

- (1) No target
- (2) One target**
- (3) Two or more targets

(C) Sustainability outcome #3

(1) Widely recognised frameworks used to guide action on this sustainability outcome

- (1) The UN Sustainable Development Goals (SDGs) and targets**
- (2) The UNFCCC Paris Agreement
- (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
- (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- (5) The EU Taxonomy
- (6) Other relevant taxonomies
- (7) The International Bill of Human Rights

- (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- (9) The Convention on Biological Diversity
- (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

- (1) Environmental
- (2) Social
- (3) **Governance-related**
- (4) Other

(3) Sustainability outcome name

SDG 12.1 sustainable consumption and production: % of portfolio companies that have a sustainability strategy in place
 SDG 12.6 sustainable practices and reporting: % of portfolio companies that have published a sustainability report

(4) Number of targets set for this outcome

- (1) No target
- (2) One target
- (3) **Two or more targets**

(D) **Sustainability outcome #4**

(1) Widely recognised frameworks used to guide action on this sustainability outcome

- (1) **The UN Sustainable Development Goals (SDGs) and targets**
- (2) The UNFCCC Paris Agreement
- (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
- (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- (5) The EU Taxonomy
- (6) Other relevant taxonomies
- (7) The International Bill of Human Rights
- (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- (9) The Convention on Biological Diversity
- (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

- (1) **Environmental**
- (2) Social
- (3) Governance-related
- (4) Other

(3) Sustainability outcome name

SDG 13.2 climate change measures: tCO2e carbon intensity (tCO2e/sales MEUR) in portfolio

(4) Number of targets set for this outcome

- (1) No target
- (2) **One target**
- (3) Two or more targets

(E) **Sustainability outcome #5**

(1) Widely recognised frameworks used to guide action on this sustainability outcome

- (1) **The UN Sustainable Development Goals (SDGs) and targets**
- (2) The UNFCCC Paris Agreement
- (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
- (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- (5) The EU Taxonomy
- (6) Other relevant taxonomies
- (7) The International Bill of Human Rights

- (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- (9) The Convention on Biological Diversity
- (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

- (1) Environmental
- (2) Social
- (3) Governance-related
- (4) Other

(3) Sustainability outcome name

SDG 16.5 anti-corruption and anti-bribery: % of portfolio companies that have a Code of Conduct
 SDG 16.5 anti-corruption and anti-bribery: % of portfolio companies that have a whistleblowing policy and/or system

(4) Number of targets set for this outcome

- (1) No target
- (2) One target
- (3) Two or more targets

- (F) Sustainability outcome #6
- (G) Sustainability outcome #7
- (H) Sustainability outcome #8
- (I) Sustainability outcome #9
- (J) Sustainability outcome #10

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 2	PLUS	SO 1	SO 2.1, SO 4, SO 5	PUBLIC	Setting targets on sustainability outcomes	1

For each sustainability outcome, provide details of up to two of your nearest-term targets.

(A1) Sustainability Outcome #1: Target details

(A1) Sustainability Outcome #1:	SDG 5.5 women's participation in leadership: Female representation at Board of Directors (external board members)
(1) Target name	Female representation at BoD, external
(2) Baseline year	2018
(3) Target to be met by	2025

(4) Methodology

Our Responsible Investment Policy recognises the Ten Principles of the United Nations Global Compact (UNGC) and the UN's Sustainable Development Goals (SDGs). We encourage our portfolio companies to consider these Principles and Goals when developing their own sustainability strategies. The promoted environmental and social characteristics are measured through progress on five environmental and social SDGs and the diligence of principal adverse impacts as part of the investment decision-making process.

(5) Metric used (if relevant) %

(6) Absolute or intensity-based (if relevant)

(7) Baseline level or amount (if relevant):

(8) Target level or amount (if relevant) 30%

(9) Percentage of total AUM covered in your baseline year for target setting 100%

(10) Do you also have a longer-term target for this? (2) No

(B1) Sustainability Outcome #2: Target details

(B1) Sustainability Outcome #2: SDG 8.3 job creation and growing enterprises: organic employment growth in portfolio

(1) Target name Organic employment growth in portfolio

(2) Baseline year 2018

(3) Target to be met by 2025

(4) Methodology

Our Responsible Investment Policy recognises the Ten Principles of the United Nations Global Compact (UNGC) and the UN's Sustainable Development Goals (SDGs). We encourage our portfolio companies to consider these Principles and Goals when developing their own sustainability strategies. The promoted environmental and social characteristics are measured through progress on five environmental and social SDGs and the diligence of principal adverse impacts as part of the investment decision-making process.

(5) Metric used (if relevant) Above industry peers

(6) Absolute or intensity-based (if relevant)

(7) Baseline level or amount (if relevant):

(8) Target level or amount (if relevant) Above industry peers

(9) Percentage of total AUM covered in your baseline year for target setting 100%

(10) Do you also have a longer-term target for this? (2) No

(C1) Sustainability Outcome #3: Target details

(C1) Sustainability Outcome #3: SDG 12.1 sustainable consumption and production: % of portfolio companies that have a sustainability strategy in place SDG 12.6 sustainable practices and reporting: % of portfolio companies that have published a sustainability report

(1) Target name Sustainability strategy in place

(2) Baseline year 2018

(3) Target to be met by 2025

(4) Methodology

Our Responsible Investment Policy recognises the Ten Principles of the United Nations Global Compact (UNGC) and the UN's Sustainable Development Goals (SDGs). We encourage our portfolio companies to consider these Principles and Goals when developing their own sustainability strategies. The promoted environmental and social characteristics are measured through progress on five environmental and social SDGs and the diligence of principal adverse impacts as part of the investment decision-making process.

(5) Metric used (if relevant) %

(6) Absolute or intensity-based (if relevant)

(7) Baseline level or amount (if relevant):

(8) Target level or amount (if relevant) Above 80%

(9) Percentage of total AUM covered in your baseline year for target setting 100%

(10) Do you also have a longer-term target for this? (2) No

(C2) Sustainability Outcome #3: Target details

(C2) Sustainability Outcome #3: SDG 12.1 sustainable consumption and production: % of portfolio companies that have a sustainability strategy in place SDG 12.6 sustainable practices and reporting: % of portfolio companies that have published a sustainability report

(1) Target name Sustainability reporting in place

(2) Baseline year 2018

(3) Target to be met by 2025

(4) Methodology

Our Responsible Investment Policy recognises the Ten Principles of the United Nations Global Compact (UNGC) and the UN's Sustainable Development Goals (SDGs). We encourage our portfolio companies to consider these Principles and Goals when developing their own sustainability strategies. The promoted environmental and social characteristics are measured through progress on five environmental and social SDGs and the diligence of principal adverse impacts as part of the investment decision-making process.

(5) Metric used (if relevant) %

(6) Absolute or intensity-based (if relevant)

(7) Baseline level or amount (if relevant):

(8) Target level or amount (if relevant) Above 80%

(9) Percentage of total AUM covered in your baseline year for target setting 100%

(10) Do you also have a longer-term target for this? (2) No

(D1) Sustainability Outcome #4: Target details

(D1) Sustainability Outcome #4: SDG 13.2 climate change measures: tCO2e carbon intensity (tCO2e/sales MEUR) in portfolio

(1) Target name Carbon intensity in portfolio

(2) Baseline year 2018

(3) Target to be met by 2025

(4) Methodology

Our Responsible Investment Policy recognises the Ten Principles of the United Nations Global Compact (UNGC) and the UN's Sustainable Development Goals (SDGs). We encourage our portfolio companies to consider these Principles and Goals when developing their own sustainability strategies. The promoted environmental and social characteristics are measured through progress on five environmental and social SDGs and the diligence of principal adverse impacts as part of the investment decision-making process.

(5) Metric used (if relevant) MSCI ACWI Low Carbon leaders Index

(6) Absolute or intensity-based (if relevant) (2) Intensity-based

(7) Baseline level or amount (if relevant):

(8) Target level or amount (if relevant) Below MSCI ACWI Low Carbon leaders index

(9) Percentage of total AUM covered in your baseline year for target setting 100%

(10) Do you also have a longer-term target for this? (2) No

(E1) Sustainability Outcome #5: Target details

(E1) Sustainability Outcome #5: SDG 16.5 anti-corruption and anti-bribery: % of portfolio companies that have a Code of Conduct SDG 16.5 anti-corruption and anti-bribery: % of portfolio companies that have a whistleblowing policy and/or system

(1) Target name Code of Conduct in place

(2) Baseline year 2018

(3) Target to be met by 2025

(4) Methodology

Our Responsible Investment Policy recognises the Ten Principles of the United Nations Global Compact (UNGC) and the UN's Sustainable Development Goals (SDGs). We encourage our portfolio companies to consider these Principles and Goals when developing their own sustainability strategies. The promoted environmental and social characteristics are measured through progress on five environmental and social SDGs and the diligence of principal adverse impacts as part of the investment decision-making process.

(5) Metric used (if relevant) %

(6) Absolute or intensity-based (if relevant)

(7) Baseline level or amount (if relevant):

(8) Target level or amount (if relevant) Above 80%

(9) Percentage of total AUM covered in your baseline year for target setting 100%

(10) Do you also have a longer-term target for this? (2) No

(E2) Sustainability Outcome #5: Target details

(E2) Sustainability Outcome #5: SDG 16.5 anti-corruption and anti-bribery: % of portfolio companies that have a Code of Conduct SDG 16.5 anti-corruption and anti-bribery: % of portfolio companies that have a whistleblowing policy and/or system

(1) Target name Whistleblowing policy and/or system in place

(2) Baseline year 2018

(3) Target to be met by 2025

(4) Methodology	Our Responsible Investment Policy recognises the Ten Principles of the United Nations Global Compact (UNGC) and the UN's Sustainable Development Goals (SDGs). We encourage our portfolio companies to consider these Principles and Goals when developing their own sustainability strategies. The promoted environmental and social characteristics are measured through progress on five environmental and social SDGs and the diligence of principal adverse impacts as part of the investment decision-making process.
(5) Metric used (if relevant)	%
(6) Absolute or intensity-based (if relevant)	
(7) Baseline level or amount (if relevant):	
(8) Target level or amount (if relevant)	Above 80%
(9) Percentage of total AUM covered in your baseline year for target setting	100%
(10) Do you also have a longer-term target for this?	(2) No

TRACKING PROGRESS AGAINST TARGETS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 4	PLUS	SO 2	SO 4.1	PUBLIC	Tracking progress against targets	1

Does your organisation track progress against your nearest-term sustainability outcomes targets?

(A1) Sustainability outcome #1:

(A1) Sustainability outcome #1: SDG 5.5 women's participation in leadership: Female representation at Board of Directors (external board members)

Target name: Female representation at BoD, external

Does your organisation track progress against your nearest-term sustainability outcome targets? (1) Yes

(B1) Sustainability outcome #2:

(B1) Sustainability outcome #2: SDG 8.3 job creation and growing enterprises: organic employment growth in portfolio

Target name: Organic employment growth in portfolio

Does your organisation track progress against your nearest-term sustainability outcome targets? (1) Yes

(C1) Sustainability outcome #3:

(C1) Sustainability outcome #3: SDG 12.1 sustainable consumption and production: % of portfolio companies that have a sustainability strategy in place SDG 12.6 sustainable practices and reporting: % of portfolio companies that have published a sustainability report

Target name: Sustainability strategy in place

Does your organisation track progress against your nearest-term sustainability outcome targets? (1) Yes

(C2) Sustainability outcome #3:

(C2) Sustainability outcome #3: SDG 12.1 sustainable consumption and production: % of portfolio companies that have a sustainability strategy in place SDG 12.6 sustainable practices and reporting: % of portfolio companies that have published a sustainability report

Target name: Sustainability reporting in place

Does your organisation track progress against your nearest-term sustainability outcome targets? (1) Yes

(D1) Sustainability outcome #4:

(D1) Sustainability outcome #4: SDG 13.2 climate change measures: tCO2e carbon intensity (tCO2e/sales MEUR) in portfolio

Target name: Carbon intensity in portfolio

Does your organisation track progress against your nearest-term sustainability outcome targets? (1) Yes

(E1) Sustainability outcome #5:

(E1) Sustainability outcome #5: SDG 16.5 anti-corruption and anti-bribery: % of portfolio companies that have a Code of Conduct SDG 16.5 anti-corruption and anti-bribery: % of portfolio companies that have a whistleblowing policy and/or system

Target name: Code of Conduct in place

Does your organisation track progress against your nearest-term sustainability outcome targets? (1) Yes

(E2) Sustainability outcome #5:

(E2) Sustainability outcome #5: SDG 16.5 anti-corruption and anti-bribery: % of portfolio companies that have a Code of Conduct SDG 16.5 anti-corruption and anti-bribery: % of portfolio companies that have a whistleblowing policy and/or system

Target name: Whistleblowing policy and/or system in place

Does your organisation track progress against your nearest-term sustainability outcome targets? (1) Yes

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 4.1	PLUS	SO 4	N/A	PUBLIC	Tracking progress against targets	1

During the reporting year, what qualitative or quantitative progress did your organisation achieve against your nearest-term sustainability outcome targets?

(A1) Sustainability Outcome #1: Target details

(A1) Sustainability Outcome #1:	SDG 5.5 women's participation in leadership: Female representation at Board of Directors (external board members)
(1) Target name	Female representation at BoD, external
(2) Target to be met by	2025
(3) Metric used (if relevant)	%
(4) Current level or amount (if relevant)	24%
(5) Other qualitative or quantitative progress	Quantitative progress of the Nordic Capital funds and vehicles is tracked annually on like-for-like basis.
(6) Methodology for tracking progress	Quarterly data collection and reporting as part of RCF. Annual YoY progress reporting as part of sustainability review.

(B1) Sustainability Outcome #2: Target details

(B1) Sustainability Outcome #2:	SDG 8.3 job creation and growing enterprises: organic employment growth in portfolio
(1) Target name	Organic employment growth in portfolio
(2) Target to be met by	2025
(3) Metric used (if relevant)	Above industry peers

(4) Current level or amount (if relevant)	4%
(5) Other qualitative or quantitative progress	Quantitative progress of the Nordic Capital funds and vehicles is tracked annually on like-for-like basis.
(6) Methodology for tracking progress	Quarterly data collection and reporting as part of RCF. Annual YoY progress reporting as part of sustainability review.

(C1) Sustainability Outcome #3: Target details

(C1) Sustainability Outcome #3:	SDG 12.1 sustainable consumption and production: % of portfolio companies that have a sustainability strategy in place SDG 12.6 sustainable practices and reporting: % of portfolio companies that have published a sustainability report
(1) Target name	Sustainability strategy in place
(2) Target to be met by	2025
(3) Metric used (if relevant)	%
(4) Current level or amount (if relevant)	87%
(5) Other qualitative or quantitative progress	Quantitative progress of the Nordic Capital funds and vehicles is tracked annually on like-for-like basis.
(6) Methodology for tracking progress	Quarterly data collection and reporting as part of RCF. Annual YoY progress reporting as part of sustainability review.

(C2) Sustainability Outcome #3: Target details

(C2) Sustainability Outcome #3:	SDG 12.1 sustainable consumption and production: % of portfolio companies that have a sustainability strategy in place SDG 12.6 sustainable practices and reporting: % of portfolio companies that have published a sustainability report
(1) Target name	Sustainability reporting in place
(2) Target to be met by	2025
(3) Metric used (if relevant)	%

(4) Current level or amount (if relevant)	61%
(5) Other qualitative or quantitative progress	Quantitative progress of the Nordic Capital funds and vehicles is tracked annually on like-for-like basis.
(6) Methodology for tracking progress	Quarterly data collection and reporting as part of RCF. Annual YoY progress reporting as part of sustainability review.

(D1) Sustainability Outcome #4: Target details

(D1) Sustainability Outcome #4:	SDG 13.2 climate change measures: tCO2e carbon intensity (tCO2e/sales MEUR) in portfolio
(1) Target name	Carbon intensity in portfolio
(2) Target to be met by	2025
(3) Metric used (if relevant)	MSCI ACWI Low Carbon leaders Index
(4) Current level or amount (if relevant)	14.3
(5) Other qualitative or quantitative progress	Quantitative progress of the Nordic Capital funds and vehicles is tracked annually on like-for-like basis.
(6) Methodology for tracking progress	Quarterly data collection and reporting as part of RCF. Annual YoY progress reporting as part of sustainability review.

(E1) Sustainability Outcome #5: Target details

(E1) Sustainability Outcome #5:	SDG 16.5 anti-corruption and anti-bribery: % of portfolio companies that have a Code of Conduct SDG 16.5 anti-corruption and anti-bribery: % of portfolio companies that have a whistleblowing policy and/or system
(1) Target name	Code of Conduct in place
(2) Target to be met by	2025
(3) Metric used (if relevant)	%
(4) Current level or amount (if relevant)	92%

(5) Other qualitative or quantitative progress	Quantitative progress of the Nordic Capital funds and vehicles is tracked annually on like-for-like basis.
(6) Methodology for tracking progress	Quarterly data collection and reporting as part of RCF. Annual YoY progress reporting as part of sustainability review.
(E2) Sustainability Outcome #5: Target details	
(E2) Sustainability Outcome #5:	SDG 16.5 anti-corruption and anti-bribery: % of portfolio companies that have a Code of Conduct SDG 16.5 anti-corruption and anti-bribery: % of portfolio companies that have a whistleblowing policy and/or system
(1) Target name	Whistleblowing policy and/or system in place
(2) Target to be met by	2025
(3) Metric used (if relevant)	%
(4) Current level or amount (if relevant)	95%
(5) Other qualitative or quantitative progress	Quantitative progress of the Nordic Capital funds and vehicles is tracked annually on like-for-like basis.
(6) Methodology for tracking progress	Quarterly data collection and reporting as part of RCF. Annual YoY progress reporting as part of sustainability review.

INDIVIDUAL AND COLLABORATIVE INVESTOR ACTION ON OUTCOMES

LEVERS USED TO TAKE ACTION ON SUSTAINABILITY OUTCOMES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 5	PLUS	SO 2	Multiple	PUBLIC	Levers used to take action on sustainability outcomes	1, 2, 5

During the reporting year, which of the following levers did your organisation use to take action on sustainability outcomes, including to prevent and mitigate actual and potential negative outcomes?

- (A) Stewardship with investees, including engagement, (proxy) voting, and direct influence with privately held assets
Select from drop down list:
 - (1) Individually
 - (2) With other investors or stakeholders
- (B) Stewardship: engagement with external investment managers
- (C) Stewardship: engagement with policy makers

Select from drop down list:

- (1) Individually
- (2) With other investors or stakeholders

(D) Stewardship: engagement with other key stakeholders

Select from drop down list:

- (1) Individually
- (2) With other investors or stakeholders

(E) Capital allocation

(F) Our organisation did not use any of the above levers to take action on sustainability outcomes during the reporting year

CAPITAL ALLOCATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 6	PLUS	SO 5	N/A	PUBLIC	Capital allocation	1

During the reporting year, how did your organisation use capital allocation to take action on sustainability outcomes, including to prevent and mitigate actual and potential negative outcomes?

(A) Across all sustainability outcomes

(1) Capital allocation activities used

(1) Asset class allocation
(2) Sector allocation

(2) Explain through an example

Nordic Capital is focused on empowering portfolio companies to navigate challenging market conditions and create resilient businesses. This is done through being deeply experienced in focus sectors, working in close partnership with the portfolio companies and providing a blend of financial firepower and operational expertise. Nordic Capital Advisors has developed sector specific ESG related Due Diligence templates and materials and launched comprehensive ESG Deal Team Playbooks.

The playbooks increase awareness of ESG-related topics and issues in each sector and ensure compliance with Nordic Capital's Responsible Investment Framework. The ESG Deal Team Playbooks address both sector-specific topics and ESG metrics and provide guidance on the adverse impacts of investment decisions on sustainability factors as specifically set out in the SFDR.

Assessments of sustainability risks and opportunities are provided in all final investment recommendation material that is presented to the GP Board. The final bid materials include an assessment of all mandatory PAI indicators as well as our SDG targets. The 2022 reporting shows that portfolio companies recognise that opportunities and risks related to sustainability could impact their businesses in the near and long-term future, and we support them in mitigating key risks and realising material opportunities.

(B) Sustainability Outcome #1:

(B) Sustainability Outcome #1: SDG 5.5 women's participation in leadership: Female representation at Board of Directors (external board members)

(1) Capital allocation activities used	(1) Asset class allocation (2) Sector allocation
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At Nordic Capital, we consider diversity, equality, and inclusion to be key contributors to business performance and long-term value creation. Our long-term goal is that the boards, management teams and employees of our portfolio companies will be diversified.

(2) Explain through an example Nordic Capital endeavours to search and select female board representatives as part of the selection process for appointments to portfolio companies' boards of directors. This also involves clear instructions to executive search firms to select a diverse candidate pool. Nordic Capital is typically a controlling owner, allowing higher influence over the portfolio. Nordic Capital actively engages with industry sectors to increase diversity at BoD level. Through our engagement work, Nordic Capital wants to ensure that diversity, equality, and inclusion remain high on the Nordic Capital funds and vehicles' agendas.

(C) Sustainability Outcome #2:

(C) Sustainability Outcome #2: SDG 8.3 job creation and growing enterprises: organic employment growth in portfolio

(1) Capital allocation activities used	(1) Asset class allocation (2) Sector allocation
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(2) Explain through an example

As a private equity firm, Nordic Capital seeks to build businesses that drive innovation, create jobs, and provide employment. Nordic Capital has a long-term view in terms of value creation and sustainable growth sets the foundation for strategy development as part of value creation plans. Nordic Capital believes that our highly specialist approach and understanding of specific segments as well as operational expertise will create the greatest opportunities. Managing employment growth sustainably through economic cycles is key to protecting our portfolio in downturn. This includes a specific focus on people and employment to create a healthy balance. Nordic Capital wants to encourage all portfolio companies to recognise the importance of matching talent to the right roles at the right time. The ability to attract, develop and retain talent, as well as safeguard employees is critical for all our portfolio companies. In 2022, Nordic Capital's portfolio companies employed in total around 76,000 people across the world and as such this area of responsibility is highly relevant.

(D) Sustainability Outcome #3:

(D) Sustainability Outcome #3:

SDG 12.1 sustainable consumption and production: % of portfolio companies that have a sustainability strategy in place
SDG 12.6 sustainable practices and reporting: % of portfolio companies that have published a sustainability report

(1) Capital allocation activities used

(1) Asset class allocation
(2) Sector allocation

(2) Explain through an example

Nordic Capital's ambition is to enable our portfolio companies to integrate sustainability into their business strategy and processes, while simultaneously forming durable business practices and accelerating growth. We see sustainability as a fundamental part of reaching our portfolio companies' full potential. Sustainable business practices and a strong ESG profile of our portfolio companies are a prerequisite for Nordic Capital. Nordic Capital recognises that as a private equity investor we can play a key role in shaping businesses and markets.

Nordic Capital actively engages with our portfolio companies during ownership to help better understand the importance of sustainability. Clear expectations for portfolio companies are set out to ensure that sustainability is addressed appropriately at boardroom level and throughout the organisation. In order to maximise the potential impact of our sustainability efforts, Nordic Capital focuses on areas that are material to the company in question and where Nordic Capital has the genuine ability to influence. To this end, Nordic Capital seeks to equip the portfolio companies by providing supportive training, tools, and resources to help them embed sustainability into their business agendas and value creation plans. To date, Nordic Capital has trained more than 1,044 investment professionals, board members and key management executives in sustainability, resulting in considerable progress and a growing awareness of how businesses can successfully address sustainability risks and opportunities.

(E) Sustainability Outcome #4:

(E) Sustainability Outcome #4:	SDG 13.2 climate change measures: tCO2e carbon intensity (tCO2e/sales MEUR) in portfolio
(1) Capital allocation activities used	(1) Asset class allocation (2) Sector allocation
(2) Explain through an example	<p>Awareness of the importance of climate action and the consequences of climate change is growing rapidly and putting pressure on businesses to act. Nordic Capital is committed to reducing the carbon footprint within our own organisation and throughout the entire portfolio. Applying an environmental lens, Nordic Capital seeks to encourage our portfolio companies to take a precautionary approach, ensuring resource-efficient practices and disclosing information on carbon reduction efforts.</p> <p>Nordic Capital's ambition is to increase awareness of critical environmental considerations and support portfolio companies in reducing both their carbon emissions and energy consumption.</p> <p>Nordic Capital seeks to act as a role model by measuring, acting, and increasing environmental awareness within our own organisation. We encourage portfolio companies to integrate climate change measures in policies and planning as well as emphasise the importance of measuring their climate impact and to reduce greenhouse gas emissions. Throughout 2022, Nordic Capital has developed our approach towards climate related issues. Our external climate advisors support several of our portfolio companies in their climate emissions calculations, which means that we are constantly increasing the data quality of our portfolio footprint calculations.</p>

There is an increased awareness and knowledge of environmental aspects amongst the portfolio companies in the Nordic Capital funds and vehicles, showing positive improvement in the reporting results. Nordic Capital will continue to develop our approach to carbon emissions and energy consumption reduction initiatives both on company and portfolio level.

(F) Sustainability Outcome #5:

(F) Sustainability Outcome #5:

SDG 16.5 anti-corruption and anti-bribery: % of portfolio companies that have a Code of Conduct
SDG 16.5 anti-corruption and anti-bribery: % of portfolio companies that have a whistleblowing policy and/or system

(1) Capital allocation activities used

(1) Asset class allocation
(2) Sector allocation

(2) Explain through an example

Nordic Capital acknowledges the importance of strategy and governance. Nordic Capital engages with our portfolio companies to encourage strong corporate governance, including legal compliance as well as business ethics. We expect our portfolio companies to work proactively against corruption in all its forms, to place sustainability requirements on their suppliers and to follow-up on their level of compliance. We involve our portfolio companies in a Corporate Compliance Programme, which covers key areas such as anti-corruption, competition, information security, data protection, trade sanctions and whistleblowing. The programme includes training, risk assessments, policy templates alongside implementation plans and support.

During Nordic Capital's ownership, our portfolio companies often experience a rapid pace of transformation. In such an environment, adequate and well-established governance structures lay the foundation on which successful and sustainable business practices can be built. We expect our portfolio companies to put in place relevant policies to their operations, including Anti-corruption policy, Antitrust/Competition policy, Trade sanctions policy, Data protection policy and Information security policy. In order to track performance, Nordic Capital monitors how the policies are implemented into the organisation on an annual basis. Our 2022 results indicate that there is a positive trend amongst the portfolio companies to ensure that policies are well implemented shortly after they have been established. The majority of companies with established policies generally report that these policies are well implemented in the organisation within a year after being introduced.

STEWARDSHIP WITH INVESTEES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 8	PLUS	SO 5	N/A	PUBLIC	Stewardship with investees	2

During the reporting year, how did your organisation use stewardship with investees to take action on sustainability outcomes, including preventing and mitigating actual and potential negative outcomes?

(A) Across all sustainability outcomes

(1) Describe your approach	<p>At Nordic Capital, we seek to invest in companies that actively work to solve global challenges and contribute positively to society; and we drive sustainable change in the companies we own. We are proud to report that our portfolio companies have focused on pushing their sustainability agendas forward during 2022 with some notable highlights that have received industry-wide recognition.</p> <p>When a company joins the Nordic Capital portfolio, it joins a strong community. This community includes experienced investors with deep sector expertise, operational and functional experts and industrial advisors, as well as many other companies with a shared ambition to grow and develop.</p>
(2) Stewardship tools or activities used	<p>(1) Engagement</p> <p>(5) Leveraging roles on the board or board committees (e.g. nomination committees)</p> <p>(6) Taking roles on investee boards</p> <p>(7) Working directly with portfolio companies and/or real asset management teams</p>
(3) Example	<p>Nordic Capital is an active and engaged owner that works in close collaboration with our portfolio companies. We emphasise that companies should establish fundamental processes to enable sustainability integration across the business and apply a data-driven approach to ensure sustainability performance. Across the portfolio, Nordic Capital promotes sustainability characteristics and ESG is targeted as a key driver of value and requirement for building companies that will flourish and strongly compete over the long term.</p>

As such it is an important element of Nordic Capital's investment strategy and value creation plans. Nordic Capital provides our portfolio companies with both internal and external sustainability expertise.

A large external network of experts across sectors, functional areas and geographies allows Nordic Capital to bring in the right people to support the businesses on their journey.

Support is focused on results and tangible outcomes that accelerate the value creation journey. In addition to our ongoing portfolio engagement, Nordic Capital encourages our companies to leverage the Nordic Capital Sustainability toolbox to refine and improve maturity in their processes to improve performance. To achieve robust results, Nordic Capital ensures that the portfolio implements sustainability objectives with related targets and metrics closely tied to the UN Sustainable Development Goals. We monitor and track progress on quarterly, bi-annual, and annual basis.

(B) Sustainability Outcome #1:

(B) Sustainability Outcome #1: SDG 5.5 women's participation in leadership: Female representation at Board of Directors (external board members)

At Nordic Capital, we consider diversity, equality, and inclusion to be key contributors to business performance and long-term value creation. Our long-term goal is that the boards, management teams and employees of our portfolio companies will be diversified.

(1) Describe your approach

Nordic Capital endeavours to search and select female board representatives as part of the selection process for appointments to portfolio companies' boards of directors. This also involves clear instructions to executive search firms to select a diverse candidate pool. Nordic Capital is typically a controlling owner, allowing higher influence over the portfolio. Nordic Capital actively engages with industry sectors to increase diversity at BoD level. Through our engagement work, Nordic Capital wants to ensure that diversity, equality, and inclusion remains high on the Nordic Capital funds and vehicles' agenda.

(2) Stewardship tools or activities used

- (1) Engagement
- (4) Nominating directors to the board
- (5) Leveraging roles on the board or board committees (e.g. nomination committees)
- (6) Taking roles on investee boards
- (7) Working directly with portfolio companies and/or real asset management teams

(3) Example

24% female representation on Board of Directors (external board members) in 2022

(C) Sustainability Outcome #2:

(C) Sustainability Outcome #2:	SDG 8.3 job creation and growing enterprises: organic employment growth in portfolio
(1) Describe your approach	<p>As a private equity firm, Nordic Capital seeks to build businesses that drive innovation, create jobs, and provide employment. Nordic Capital has a long-term view in terms of value creation and sustainable growth sets the foundation for strategy development as part of value creation plans. Nordic Capital's highly specialist approach and understanding of specific segments as well as operational expertise will create opportunities for positive outcomes. Managing employment growth sustainably through economic cycles is key to protecting our portfolio in downturn. This includes a specific focus on people and employment to create a healthy balance. Nordic Capital wants to encourage all portfolio companies to recognise the importance of matching talent to the right roles at the right time. The ability to attract, develop and retain talent, as well as safeguard employees is critical for all our portfolio companies. In 2022, Nordic Capital's portfolio companies employed in total around 76,000 people across the world and as such this area of responsibility is highly relevant.</p>
(2) Stewardship tools or activities used	<p>(1) Engagement (5) Leveraging roles on the board or board committees (e.g. nomination committees) (6) Taking roles on investee boards (7) Working directly with portfolio companies and/or real asset management teams</p>
(3) Example	<p>4% organic employment growth in 2022. 14.1% net sales growth across all funds in 2022</p>

(D) Sustainability Outcome #3:

(D) Sustainability Outcome #3:	SDG 12.1 sustainable consumption and production: % of portfolio companies that have a sustainability strategy in place SDG 12.6 sustainable practices and reporting: % of portfolio companies that have published a sustainability report
(1) Describe your approach	<p>Nordic Capital's ambition is to enable our portfolio companies to integrate sustainability into their business strategy and processes, while simultaneously forming durable business practices and accelerating growth. We see sustainability as a fundamental part of reaching our portfolio companies' full potential. Sustainable business practices and a strong ESG profile of our portfolio companies are a prerequisite for Nordic Capital. Nordic Capital recognises that as a private equity investor we can play a key role in shaping businesses and markets.</p>

Nordic Capital actively engages with our portfolio companies during ownership to help better understand the importance of sustainability. Clear expectations for portfolio companies are set out to ensure that sustainability is addressed appropriately at boardroom level and throughout the organisation. In order to maximise the potential impact of our sustainability efforts, Nordic Capital focuses on areas that are material to the company in question and where Nordic Capital has the genuine ability to influence. To this end, Nordic Capital seeks to equip the portfolio companies by providing supportive training, tools and resources to help them embed sustainability into their business agendas and value creation plans. To date, Nordic Capital has trained more than 1,044 investment professionals, board members and key management executives in sustainability, resulting in considerable progress and a growing awareness of how businesses can successfully address sustainability risks and opportunities.

(2) Stewardship tools or activities used	<p style="text-align: center;">(1) Engagement</p> <p>(5) Leveraging roles on the board or board committees (e.g. nomination committees)</p> <p style="text-align: center;">(6) Taking roles on investee boards</p> <p>(7) Working directly with portfolio companies and/or real asset management teams</p>
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(3) Example	<p>87% report having a sustainability strategy in place in 2022</p> <p>61% with regular sustainability reporting in place in 2022</p>
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(E) Sustainability Outcome #4:

(E) Sustainability Outcome #4:	SDG 13.2 climate change measures: tCO2e carbon intensity (tCO2e/sales MEUR) in portfolio
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(1) Describe your approach

Awareness of the importance of climate action and the consequences of climate change is growing rapidly and putting pressure on businesses to act. Nordic Capital is committed to reducing the carbon footprint within our own organisation and throughout the entire portfolio. Applying an environmental lens, Nordic Capital encourages our portfolio companies to take a precautionary approach, ensuring resource-efficient practices and disclosing information on carbon reduction efforts.

Nordic Capital's ambition is to increase awareness of critical environmental considerations and support portfolio companies in reducing both their carbon emissions and energy consumption.

Nordic Capital seeks to act as a role model by measuring, acting, and increasing environmental awareness within our own organisation.

We encourage portfolio companies to Integrate climate change measures in policies and planning and emphasise the importance of measuring their climate impact and act to reduce greenhouse gas emissions. Throughout 2022, Nordic Capital has developed our approach towards climate related issues. Our external climate advisors support several of our portfolio companies in their climate emissions calculations, which means that we are constantly increasing the data quality of our portfolio footprint calculations.

There is an increased awareness and knowledge of environmental aspects amongst the portfolio companies in the Nordic Capital funds and vehicles, showing positive improvement in the reporting results. Nordic Capital will develop our approach to energy consumption reduction initiatives both at company and portfolio level.

(2) Stewardship tools or activities used	<p>(1) Engagement</p> <p>(5) Leveraging roles on the board or board committees (e.g. nomination committees)</p> <p>(6) Taking roles on investee boards</p> <p>(7) Working directly with portfolio companies and/or real asset management teams</p>
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(3) Example	14.3 (tCO2e)/sales MEUR compared to 84.1 (tCO2e)/sales MEUR MSCI ACWI Low Carbon leaders index
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(F) Sustainability Outcome #5:

(F) Sustainability Outcome #5:	SDG 16.5 anti-corruption and anti-bribery: % of portfolio companies that have a Code of Conduct SDG 16.5 anti-corruption and anti-bribery: % of portfolio companies that have a whistleblowing policy and/or system
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(1) Describe your approach	<p>Nordic Capital acknowledges the importance of strategy and governance. Nordic Capital engages with our portfolio companies to encourage strong corporate governance, including legal compliance as well as business ethics. We expect our portfolio companies to work proactively against corruption in all its forms, to place sustainability requirements on their suppliers and to follow-up on their level of compliance. We involve our portfolio companies in a Corporate Compliance Programme, which covers key areas such as anti-corruption, competition, information security, data protection, trade sanctions and whistleblowing. The programme includes training, risk assessments, policy templates alongside implementation plans and support.</p>
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During Nordic Capital's ownership, our portfolio companies often experience a rapid pace of transformation. In such an environment, adequate and well-established governance structures lay the foundation on which successful and sustainable business practices can be built. We expect our portfolio companies to put in place relevant policies to their operations, including Anti-corruption policy, Antitrust/Competition policy, Trade sanctions policy, Data protection policy and Information security policy. In order to track performance, Nordic Capital monitors how the policies are implemented into the organisation on an annual basis. Our 2022 results indicate that there is a positive trend amongst the portfolio companies to ensure that policies are well implemented shortly after they have been established. The majority of companies with established policies generally report that these policies are well implemented in the organisation within a year after being introduced.

(2) Stewardship tools or activities used

(1) Engagement
 (5) Leveraging roles on the board or board committees (e.g. nomination committees)
 (6) Taking roles on investee boards
 (7) Working directly with portfolio companies and/or real asset management teams

(3) Example

100% of portfolio companies have attended the Corporate Compliance training in 2022
 92% with Code of Conduct in place in 2022
 95% with a Whistleblowing policy and/or system in place in 2022

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 9	PLUS	SO 5	N/A	PUBLIC	Stewardship with investees	2

How does your organisation prioritise the investees you conduct stewardship with to take action on sustainability outcomes, including preventing and mitigating actual and potential negative outcomes?

(A) We prioritise the most strategically important companies in our portfolio.

Describe how you do this:

Nordic Capital actively engages with our portfolio companies during ownership to help better understand the importance of sustainability. Clear expectations for portfolio companies are set out to ensure that sustainability is addressed appropriately at boardroom level and throughout the organisation. In order to maximise the potential impact of our sustainability efforts, Nordic Capital focuses on areas that are material to the company in question and where Nordic Capital has the genuine ability to influence. To this end, Nordic Capital seeks to equip the portfolio companies by providing supportive training, tools, and resources to help them embed sustainability into their business agendas and value creation plans.

Nordic Capital has a structured approach which is realised through our engagement model. Nordic Capital endeavours to search and select female board representatives as part of the selection process for appointments to portfolio companies' boards of directors. Nordic Capital is typically a controlling owner, allowing higher influence over the portfolio. Aligned with Nordic Capital's investment framework, all acquired companies take part in a structured on-boarding process where their maturity and competence are internally evaluated. Material risks and adverse impacts are considered to identify opportunity and valuation premium potential.

Select from the list:

- 2
- 4

(B) We prioritise the companies in our portfolio most significantly connected to sustainability outcomes.

Describe how you do this:

Nordic Capital actively engages with our portfolio companies during ownership to help better understand the importance of sustainability. Clear expectations for portfolio companies are set out to ensure that sustainability is addressed appropriately at boardroom level and throughout the organisation. In order to maximise the potential impact of our sustainability efforts, Nordic Capital focuses on areas that are material to the company in question and where Nordic Capital has the genuine ability to influence. To this end, Nordic Capital seeks to equip the portfolio companies by providing supportive training, tools, and resources to help them embed sustainability into their business agendas and value creation plans.

Nordic Capital sets clear sustainability expectations on portfolio companies. On a case-by-case basis, Nordic Capital identifies which companies in the portfolio that should be prioritised in terms of our selected SDG targets and related sustainability outcomes.

Select from the list:

- 3
- 4

(C) We prioritise the companies in our portfolio to ensure that we cover a certain proportion of the sustainability outcomes we are taking action on.

Describe how you do this:

Nordic Capital actively engages with our portfolio companies during ownership to help better understand the importance of sustainability. Clear expectations for portfolio companies are set out to ensure that sustainability is addressed appropriately at boardroom level and throughout the organisation. In order to maximise the potential impact of our sustainability efforts, Nordic Capital focuses on areas that are material to the company in question and where Nordic Capital has the genuine ability to influence. To this end, Nordic Capital seeks to equip the portfolio companies by providing supportive training, tools, and resources to help them embed sustainability into their business agendas and value creation plans.

Through our established engagement model, on-boarding process and current state analysis, opportunity and valuation premium potential are identified. Driven by our ESG linked credit facility to achieve set targets, Nordic Capital identifies which companies in the portfolio that should be prioritised.

Select from the list:

- 1
- 4

(D) Other

STEWARDSHIP: ENGAGEMENT WITH POLICY MAKERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 11	PLUS	SO 5	N/A	PUBLIC	Stewardship: Engagement with policy makers	2

During the reporting year, how did your organisation use engagement with policy makers to take action on sustainability outcomes, including preventing and mitigating actual and potential negative outcomes?

(A) Across all sustainability outcomes

(1) Describe your approach

Nordic Capital understands that policy makers also cover industry associations. Nordic Capital proudly supports ESG initiatives such as: UN PRI, Invest Europe, SVCA, ILPA ESG Data Convergence Initiative, Initiative Climat International (iCI), Level20. We believe that private equity has a critical role to play in building a sustainable world and driving change within business to benefit society and the planet. Nordic Capital is committed to actively engage with selected ESG partnerships to ensure that critical action is taken on our selected SDG targets and related sustainability outcomes.

By supporting and partnering up with selected ESG initiatives, Nordic Capital acts as a member, signatory, adopter and promoter of selected industry associations. Additionally, Nordic Capital is represented in Invest Europe's Global Private Equity Council as well as SVCA's Board of Directors and Nomination Committee.

(2) Engagement tools or activities used

- (1) We participated in 'sign-on' letters
- (2) We responded to policy consultations
- (4) We engaged policy makers on our own initiative

(3) Example(s) of policies engaged on

By supporting selected ESG initiatives, such as Invest Europe and SVCA, Nordic Capital commits to take an active role in the working groups in which we are present to share best practice and drive long-term sustainable change in the European private capital sector. On a case-by-case basis, Nordic Capital participates in sign-on letters and policy consultations driven by the initiatives which we support. Similarly, Nordic Capital participates in different ESG related working groups and arranges meetings with local jurisdictions in which we are present and is committed to respond to demand from regulators, peers and stakeholders.

(B) Sustainability Outcome #1:

(B) Sustainability Outcome #1: SDG 5.5 women's participation in leadership: Female representation at Board of Directors (external board members)

(1) Describe your approach

Nordic Capital understands that policy makers also cover industry associations. Nordic Capital proudly supports ESG initiatives such as: UN PRI, Invest Europe, SVCA, ILPA ESG Data Convergence Initiative, Initiative Climat International (iCI), Level20. We believe that private equity has a critical role to play in building a sustainable world and driving change within business to benefit society and the planet. Nordic Capital is committed to actively engage with selected ESG partnerships to ensure that critical action is taken on our selected SDG targets and related sustainability outcomes.

By supporting and partnering up with selected ESG initiatives, Nordic Capital acts as a member, signatory, adopter, and promoter of selected industry associations. Additionally, Nordic Capital is represented in Invest Europe's Global Private Equity Council as well as SVCA's Board of Directors and Nomination Committee.

(2) Engagement tools or activities used

(5) Other methods

(3) Example(s) of policies engaged on

By supporting selected ESG initiatives, such as Level20, Nordic Capital commits to take an active role in the working groups in which we are present to share best practice and drive long-term sustainable change in the European private capital sector. On a case-by-case basis, Nordic Capital engages through appropriate methods to increase equality and diversity in the industry as well as respond to demand from regulators, peers and stakeholders on this matter.

(C) Sustainability Outcome #2:

(C) Sustainability Outcome #2: SDG 8.3 job creation and growing enterprises: organic employment growth in portfolio

(1) Describe your approach

Nordic Capital understands that policy makers also cover industry associations. Nordic Capital proudly supports ESG initiatives such as: UN PRI, Invest Europe, SVCA, ILPA ESG Data Convergence Initiative, Initiative Climat International (iCI), Level20. We believe that private equity has a critical role to play in building a sustainable world and driving change within business to benefit society and the planet. Nordic Capital is committed to actively engage with selected ESG partnerships to ensure that critical action is taken on our selected SDG targets and related sustainability outcomes.

By supporting and partnering up with selected ESG initiatives, Nordic Capital acts as a member, signatory, adopter, and promoter of selected industry associations. Additionally, Nordic Capital is represented in Invest Europe's Global Private Equity Council as well as SVCA's Board of Directors and Nomination Committee.

(2) Engagement tools or activities used

(5) Other methods

(3) Example(s) of policies engaged on

By supporting selected ESG initiatives, Nordic Capital commits to take an active role in the working groups in which we are present to share best practice and drive long-term sustainable change in the European private capital sector. On a case-by-case basis, Nordic Capital engages through appropriate methods to achieve sustainable employment growth in different markets and the industry at large.

(D) Sustainability Outcome #3:

(D) Sustainability Outcome #3:

SDG 12.1 sustainable consumption and production: % of portfolio companies that have a sustainability strategy in place
SDG 12.6 sustainable practices and reporting: % of portfolio companies that have published a sustainability report

(1) Describe your approach

Nordic Capital understands that policy makers also cover industry associations. Nordic Capital proudly supports ESG initiatives such as: UN PRI, Invest Europe, SVCA, ILPA ESG Data Convergence Initiative, Initiative Climat International (iCI), Level20. We believe that private equity has a critical role to play in building a sustainable world and driving change within business to benefit society and the planet. Nordic Capital is committed to actively engage with selected ESG partnerships to ensure that critical action is taken on our selected SDG targets and related sustainability outcomes.

By supporting and partnering up with selected ESG initiatives, Nordic Capital acts as a member, signatory, adopter, and promoter of selected industry associations. Additionally, Nordic Capital is represented in Invest Europe's Global Private Equity Council as well as SVCA's Board of Directors and Nomination Committee.

(2) Engagement tools or activities used

(5) Other methods

(3) Example(s) of policies engaged on

Invest Europe: In 2022, a new initiative was launched to set the industry standard and guidelines for ESG reporting. Nordic Capital Advisors' Sustainability team took an active role in the working group to share best practice and create the most advanced and user-friendly guidance on sustainability reporting in the European private capital sector. Nordic Capital has committed to annually report on own performance in accordance with these Guidelines.

(E) Sustainability Outcome #4:

(E) Sustainability Outcome #4: SDG 13.2 climate change measures: tCO2e carbon intensity (tCO2e/sales MEUR) in portfolio

(1) Describe your approach

Nordic Capital understands that policy makers also cover industry associations. Nordic Capital proudly supports ESG initiatives such as: UN PRI, Invest Europe, SVCA, ILPA ESG Data Convergence Initiative, Initiative Climat International (iCI), Level20. We believe that private equity has a critical role to play in building a sustainable world and driving change within business to benefit society and the planet. Nordic Capital is committed to actively engage with selected ESG partnerships to ensure that critical action is taken on our selected SDG targets and related sustainability outcomes.

By supporting and partnering up with selected ESG initiatives, Nordic Capital acts as a member, signatory, adopter, and promoter of selected industry associations. Additionally, Nordic Capital is represented in Invest Europe's Global Private Equity Council as well as SVCA's Board of Directors and Nomination Committee.

(2) Engagement tools or activities used

(5) Other methods

(3) Example(s) of policies engaged on

By supporting selected ESG initiatives, such as iCI, Nordic Capital commits to take an active role in the working groups in which we are present to share best practice and drive long-term sustainable change in the European private capital sector. On a case-by-case basis, Nordic Capital engages through appropriate methods to better understand and manage the risks associated with climate change and is committed to respond to demand from regulators, peers and stakeholders on this matter.

(F) Sustainability Outcome #5:

(F) Sustainability Outcome #5:	SDG 16.5 anti-corruption and anti-bribery: % of portfolio companies that have a Code of Conduct SDG 16.5 anti-corruption and anti-bribery: % of portfolio companies that have a whistleblowing policy and/or system
(1) Describe your approach	<p>Nordic Capital understands that policy makers also cover industry associations. Nordic Capital proudly supports ESG initiatives such as: UN PRI, Invest Europe, SVCA, ILPA ESG Data Convergence Initiative, Initiative Climat International (iCI), Level20. We believe that private equity has a critical role to play in building a sustainable world and driving change within business to benefit society and the planet. Nordic Capital is committed to actively engage with selected ESG partnerships to ensure that critical action is taken on our selected SDG targets and related sustainability outcomes.</p> <p>By supporting and partnering up with selected ESG initiatives, Nordic Capital acts as a member, signatory, adopter, and promoter of selected industry associations. Additionally, Nordic Capital is represented in Invest Europe's Global Private Equity Council as well as SVCA's Board of Directors and Nomination Committee.</p>
(2) Engagement tools or activities used	(5) Other methods
(3) Example(s) of policies engaged on	By supporting selected ESG initiatives, Nordic Capital commits to take an active role in the working groups in which we are present to share best practice and drive long-term sustainable change in the European private capital sector. On a case-by-case basis, Nordic Capital engages through appropriate methods to encourage strong and transparent corporate governance practices as well as respond to demand from regulators, peers and stakeholders.

STEWARDSHIP: ENGAGEMENT WITH OTHER KEY STAKEHOLDERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 12	PLUS	SO 5	N/A	PUBLIC	Stewardship: Engagement with other key stakeholders	2, 5

Does your organisation engage with other key stakeholders to support the development of financial products, services, research, and/or data aligned with global sustainability goals and thresholds?

(A) Across all sustainability outcomes

(1) Key stakeholders engaged	(1) Standard setters (6) External service providers (e.g. proxy advisers, investment consultants, data providers) (7) Academia
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(2) Provide further detail on your engagement	Nordic Capital proudly supports the following ESG initiatives such as: UN PRI, Invest Europe, SVCA, ILPA ESG Data Convergence Initiative, Initiative Climat International (iCI), Level20. We believe that private equity has a critical role to play in building a sustainable world and driving change within business to benefit society and the planet. Nordic Capital is committed to actively engage with selected ESG initiatives to ensure that critical action is taken on our selected SDG targets and related sustainability outcomes. By supporting selected ESG initiatives, Nordic Capital commits to take an active role in the working groups in which we are present to share best practice and drive long-term sustainable change in the European private capital sector. On a case-by-case basis, particularly when new policies/frameworks are developed and implemented, Nordic Capital participates in consultations arranged by the initiatives which we support to share industry expertise.
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(B) Sustainability Outcome #1:

(B) Sustainability Outcome #1:	SDG 5.5 women's participation in leadership: Female representation at Board of Directors (external board members)
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(1) Key stakeholders engaged	(8) NGOs
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(2) Provide further detail on your engagement	Nordic Capital has been a member of Level20 since 2017 and is committed to increasing equality and diversity in the industry. Level20 is a not-for-profit organisation founded in 2015 aligned around a common vision of improving gender diversity in the industry. Through our membership, Nordic Capital has taken an active role to plan and arrange events in Europe aiming to drive female BoD questions in the Private Equity industry.
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(C) Sustainability Outcome #2:

(C) Sustainability Outcome #2:	SDG 8.3 job creation and growing enterprises: organic employment growth in portfolio
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(1) Key stakeholders engaged	(7) Academia
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(2) Provide further detail on your engagement

Nordic Capital actively engages with various research institutes. Nordic Capital encourages academic research into responsible investment and has sponsored studies into how employment growth can be achieved in different markets and how entrepreneurship can contribute to society at large. As an organisation that builds businesses and creates jobs, we believe it is important to have a thorough understanding of the local business environments, underlying conditions and how they can be improved. Since 2017, Nordic Capital has sponsored a study from the research institute 'European Centre for Policy Reform and Entrepreneurship' (ECEPR) and in 2022, Nordic Capital provided support to 'The Research Institute of Industrial Economics' (IFN), a private and independent foundation that conducts economic research in the Swedish business sector.

(D) Sustainability Outcome #3:

(D) Sustainability Outcome #3:

SDG 12.1 sustainable consumption and production: % of portfolio companies that have a sustainability strategy in place
SDG 12.6 sustainable practices and reporting: % of portfolio companies that have published a sustainability report

(1) Key stakeholders engaged

(1) Standard setters

(2) Provide further detail on your engagement

Nordic Capital is an active member of Invest Europe, the European industry association for Private Markets, and is represented both in different ESG related working groups and the Global Private Equity Platform Council. In 2022, a new initiative was launched to set the industry standard and guidelines for ESG reporting. Nordic Capital Advisors' Sustainability team took an active role in the working group to share best practice and create the most advanced and user-friendly guidance on sustainability reporting in the European private capital sector. Nordic Capital has committed to annually report on own performance in accordance with these Guidelines.

(E) Sustainability Outcome #4:

(E) Sustainability Outcome #4:

SDG 13.2 climate change measures: tCO2e carbon intensity (tCO2e/sales MEUR) in portfolio

(1) Key stakeholders engaged

(1) Standard setters

(2) Provide further detail on your engagement

As a signatory to the PRI-backed Initiative Climat International (iCI), a global, practitioner-led community of private businesses and investors that seek to better understand and manage the risks associated with climate change, we have been actively driving climate initiatives and sharing best practice. By being a signatory to iCI, Nordic Capital has committed to sharing best practice on climate strategies, better understand and manage the risks associated with climate change and set clear climate reduction targets.

(F) Sustainability Outcome #5:

(F) Sustainability Outcome #5:

SDG 16.5 anti-corruption and anti-bribery: % of portfolio companies that have a Code of Conduct
SDG 16.5 anti-corruption and anti-bribery: % of portfolio companies that have a whistleblowing policy and/or system

(1) Key stakeholders engaged

(1) Standard setters
(6) External service providers (e.g. proxy advisers, investment consultants, data providers)

(2) Provide further detail on your engagement

Nordic Capital is an active member of SVCA, the Swedish Private Equity Venture Capital Association, an independent, non-profit interest association for companies and people operating in the Swedish private equity field, including both buyout and venture capital as well as business angels and business angel networks. The association, which was founded in 1985, has the task of working for a well-functioning private equity market in Sweden as well as spreading knowledge and educating the public about the Swedish private equity market. Nordic Capital is represented on SVCA's Board of Directors and Nomination Committee. Nordic Capital takes an active role to participate in policy consultations and sign-on letters.

STEWARDSHIP: COLLABORATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 13	PLUS	SO 5	N/A	PUBLIC	Stewardship: Collaboration	2

During the reporting year, to which collaborative initiatives did your organisation contribute to take action on sustainability outcomes, including preventing and mitigating actual and potential negative outcomes?

(A) Initiative #1

(1) Name of the initiative

ILPA ESG Data Convergence Initiative

(2) Indicate how your organisation contributed to this collaborative initiative

(C) We publicly endorsed the initiative

(3) Provide further detail on your participation in this collaborative initiative

Nordic Capital is committed to the global ILPA ESG Data Convergence Initiative, which seeks to standardise ESG metrics and provide a mechanism for comparative reporting for the private market industry globally. Nordic Capital was one of the early adopters and promoters of the initiative. In 2022, the first reporting cycle was completed, and Nordic Capital sees this as a beneficial mechanism for improving comparative reporting over the long term.

(B) Initiative #2

(1) Name of the initiative

Backing Academic Research

(2) Indicate how your organisation contributed to this collaborative initiative

(C) We publicly endorsed the initiative
 (F) We provided financial support
 (H) We contributed to the development of the initiative's materials and/or resources (e.g. co-authored a report)

(3) Provide further detail on your participation in this collaborative initiative

Nordic Capital encourages academic research into responsible investment and has sponsored studies into how employment growth can be achieved in different markets and how entrepreneurship can contribute to society at large. As an organisation that builds businesses and creates jobs, we believe it is important to have a thorough understanding of the business environment, its underlying conditions and how it can be improved. Since 2017, Nordic Capital has sponsored a study from research institute the European Centre for Policy Reform and Entrepreneurship (ECEPR) and in 2022, Nordic Capital provided support to The Research Institute of Industrial Economics (IFN), a private and independent foundation that conducts economic research in the Swedish business sector.

(C) Initiative #3

(1) Name of the initiative

UN Sustainable Development Goals

(2) Indicate how your organisation contributed to this collaborative initiative

(C) We publicly endorsed the initiative

(3) Provide further detail on your participation in this collaborative initiative

Nordic Capital firmly believes in measuring sustainable impact with clear KPIs and being transparent in our efforts to drive sustainable performance. We are guided by the UN's Sustainable Development Goals (SDGs) on where we can make the greatest contribution and realise significant business opportunities.

(D) Initiative #4

(1) Name of the initiative	Norrskan Foundation
(2) Indicate how your organisation contributed to this collaborative initiative	(D) We provided pro bono advice, research or training (F) We provided financial support
(3) Provide further detail on your participation in this collaborative initiative	<p>Through the partnership with Norrskan Foundation, Nordic Capital employees have the opportunity to engage with impact start up entrepreneurs. During 2022, Nordic Capital employees have donated their time to act as jury members in Norrskan showcase events where entrepreneurs pitch their ideas to investors, provided mentorship as part of the Norrskan Impact Accelerator Programme, and provided coaching sessions a number of Norrskan entrepreneurs.</p> <p>The partnership is part of the philanthropy agenda and strategy to build long term sustainable companies that contribute positively to society which is overseen by the Nordic Capital Corporate and Social Responsibility Committee*.</p> <p>* The Nordic Capital Corporate and Social Responsibility Committee consists of senior partners at Nordic Capital Advisors with a deep and long-term commitment to Nordic Capital's mission, vision and values, and oversees CSR-commitments by Nordic Capital Advisors, its partners and Nordic Capital foundations.</p>

CONFIDENCE-BUILDING MEASURES (CBM)

CONFIDENCE-BUILDING MEASURES

APPROACH TO CONFIDENCE-BUILDING MEASURES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 1	CORE	N/A	Multiple indicators	PUBLIC	Approach to confidence-building measures	6

How did your organisation verify the information submitted in your PRI report this reporting year?

- (A) We conducted independent third-party assurance of selected processes and/or data related to the responsible investment processes reported in our PRI report, which resulted in a formal assurance conclusion
- (B) We conducted a third-party readiness review and are making changes to our internal controls or governance processes to be able to conduct independent third-party assurance next year
- (C) We conducted an internal audit of selected processes and/or data related to the responsible investment processes reported in our PRI report

- (D) Our board, trustees (or equivalent), senior executive-level staff (or equivalent), and/or investment committee (or equivalent) signed off on our PRI report
- (E) We conducted an external ESG audit of our holdings to verify that our funds comply with our responsible investment policy
- (F) We conducted an external ESG audit of our holdings as part of risk management, engagement identification or investment decision-making
- (G) Our responses in selected sections and/or the entirety of our PRI report were internally reviewed before submission to the PRI
- (H) We did not verify the information submitted in our PRI report this reporting year

INTERNAL AUDIT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 4	CORE	OO 21, CBM 1	N/A	PUBLIC	Internal audit	6

What responsible investment processes and/or data were audited through your internal audit function?

- (A) Policy, governance and strategy
 - Select from dropdown list:
 - (1) Data internally audited
 - (2) Processes internally audited
 - (3) Processes and data internally audited
- (E) Private equity
 - Select from dropdown list:
 - (1) Data internally audited
 - (2) Processes internally audited
 - (3) Processes and data internally audited

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 5	PLUS	CBM 1	N/A	PUBLIC	Internal audit	6

Provide details of the internal audit process regarding the information submitted in your PRI report.

Internal auditing is performed annually by Nordic Capital Advisors' compliance function. An internal audit is conducted of selected policies, processes and data related to Nordic Capital's responsible investment framework reported in our PRI report. The internal audit is aligned with the third-party readiness review conducted by KPMG on key policies and processes related to the PRI modules: Policy, Governance and Strategy, Private Equity and Confidence Building Measures. The third-party readiness review also includes recommendations on how to further develop and strengthen internal audit processes. The third-party readiness review and internal audit processes ensure that Nordic Capital is making changes to internal controls and governance processes with the aim of conducting an independent third-party assurance process for the [2024] reporting year.

INTERNAL REVIEW

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 6	CORE	CBM 1	N/A	PUBLIC	Internal review	6

Who in your organisation reviewed the responses submitted in your PRI report this year?

(A) Board, trustees, or equivalent

Sections of PRI report reviewed

(1) the entire report

(2) selected sections of the report

(B) Senior executive-level staff, investment committee, head of department, or equivalent

Sections of PRI report reviewed

(1) the entire report

(2) selected sections of the report

(C) None of the above internal roles reviewed selected sections or the entirety of the responses submitted in our PRI report this year