

Environmental, Social and Governance policy

1. Introduction

Norvestor Equity AS ("Norvestor") recognises the impact private equity owned companies may have on the environment and society at large, and is therefore strongly committed towards promoting sound principles for the protection of the environment, social responsibility and proper governance practices (**ESG principles**) in the course of its business conduct.

This environmental, social and governance policy (**ESG policy**) is developed for the purpose of promoting and maintaining a proper decision-making processes that focuses on high environmental, social and governance standards. See also section 6 below for more details on the matter of responsible investments.

Norvestor in its capacity as investment adviser/manager to private equity funds is committed to be in compliance with applicable rules and regulations, which includes adherence to fundamental ESG principles as demonstrated by internationally recognised conventions and principles (such as the United Nations Universal Declaration of Human Rights, the UN Global Compact's ten principles, OECD Guidelines for Multinational Enterprises etc.).

2. Environmental

Norvestor seek to minimise environmental impact, and encourage environmental consciousness. Norvestor do not accept products or working routines that are unreasonably harmful to the environment or components of products that do not live up to high ethical, environmental and safety-related standards.

Environmental impact and risks are considered prior to any investment decision by the funds, and Norvestor seek to minimise the environmental impacts of the funds' businesses through means such as careful use of resources, optimisation of operations, recycling and handling of waste.

3. Social

The investment strategies of the funds reflect that all business activities must uphold respect for internationally recognised human rights principles.

Discrimination based on gender, age, race, sexual orientation or religion etc. is not tolerated, nor does Norvestor accept neglect of health and safety issues. Norvestor respects applicable national and international labour laws, and works to ensure proper labour and working conditions.

It is Norvestor's objective to be socially responsible with regard to investments, and to contribute to the development of the communities in which portfolio companies operate by promoting sustainable and profitable growth of the portfolio companies.

4. Governance

Norvestor acknowledges the importance of good corporate governance in connection with its business, and thus adheres to all applicable anti-corruption laws and best practice standards. The principles of fair business, marketing and advertising practices is upheld by Norvestor, and we will seek to take all reasonable steps to ensure the quality and reliability of the goods and services provided by Norvestor and the portfolio companies.

Norvestor will exhibit honesty, integrity, fairness and respect in all its business dealings, and not make representations or omissions, nor engage in any other practices that are deceptive, misleading, fraudulent or unfair.

5. Application

5.1 General

Norvestor will seek to conduct its activities and affairs in compliance with the ESG policy. ESG issues will be incorporated into investment analysis and decision-making processes and Norvestor will use reasonable endeavours to consider the ethical ramifications of the investment activities of the funds. If it becomes clear that Norvestor, the funds or any portfolio company, is in material breach of the adopted ESG policy, reasonably necessary actions will be made to rectify any such breach.

5.2 Certain ethical matters

Norvestor will use its reasonable endeavours to ensure any funds for which it acts as investment adviser/manager avoid investing in, or holding any investment in, any company, corporation or enterprise (whether directly or indirectly through controlling entities):

- (a) which is associated with material and/or systematic violations of the laws, rules or regulations laid down by the national authorities in the markets in which such enterprises operate where such violation has been evidenced by a decision of a court or another official source such as the UN, the OECD, governments or other similar bodies;
- (b) which contributes to or is responsible for material and/or systematic violations of fundamental and internationally recognised ethical principles, including the UN Global Compact and the OECD Guidelines for Multinational Enterprises, in each case as applicable;
- (c) which contributes to or is responsible for material and/or systematic violations of the human rights that are specified by the UN Universal Declaration of Human Rights or labour rights as specified by the UN/International Labour Organisation core conventions as set out at www.ilo.org (e.g. murder, torture, deprivation of liberty, forced labour, child labour or other form of child exploitation);
- (d) the core business of which is engaged in activities resulting in material and/or systematic breaches of internationally recognised conventions, norms or protocols instituted by the UN, the OECD or other supranational or intergovernmental organisations regarding environment protection which are ratified, endorsed or otherwise formally recognised by the Kingdom of Norway. Such material and/or significant breaches must be evidenced by an official source such as the UN, the OECD, governments or other similar bodies, or be admitted by the company or corporation itself; and
- (e) which is associated with material and/or systematic corruption where such material and/or systematic corruption must be evidenced by an official source such as the UN, the OECD, governments or other similar bodies, or be admitted by the company or corporation itself;

6. Responsible investment

6.1 Principles for Responsible Investment

Through this ESG policy Norvestor seeks to comply with the United Nations-supported Principles for Responsible Investment (“PRI”) (please see: <http://www.unpri.org/about-pri/the-six-principles/>). In accordance with PRI, Norvestor is committed to the incorporation of ESG issues into investment

analysis, decision-making processes, and portfolio companies' policies and practices. As part of this commitment Norvestor considers and identifies performance on ESG issues not only to mitigate risks but also to find opportunities that can add value by way of enhancing the management's focus on ESG issues.

6.2 Portfolio companies

Norvestor will work closely with portfolio companies to build businesses with a likeminded commitment towards ESG issues. As a consequence of this, Norvestor provides portfolio companies with appropriate tools and guidance, and encourage and support the portfolio companies in their adaptation of a structured approach to managing ESG risks and opportunities.

Norvestor requires portfolio companies to review their ESG work, and report to Norvestor on their adherence and progress. Norvestor makes use of the information to quantitatively measure ESG issues and their impacts on the performance of each portfolio company.