

### Entity level disclosures with regards to the Sustainable Finance Disclosure Regulation

In this statement we address the public sustainability related disclosure requirements in accordance with Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 (the Sustainable Finance Disclosure Regulation, in short "SFDR"). SFDR requires alternative investment fund managers to disclose information about:

- Policies on the integration of sustainability risks in their investment processes (Article 3)
- If and how principal adverse impacts of investment decisions on sustainability factors are considered in their investment processes (Article 4)
- How their remuneration policy is consistent with the integration of sustainability risks (Article 5)

#### Integration of sustainability risks

Article 3 of the SFDR requires: "Financial market participants shall publish on their websites information about their policies on the integration of sustainability risks in their investment decision-making process." Nordian has integrated sustainability in the entire investment process. We assess which Environmental, Social and Governance risks are material in the early stages of investment selection and further define risks and ESG opportunities during due diligence. Throughout the investment period we work with our companies to limit ESG risks and act upon ESG opportunities. We believe this creates value for the company and its shareholders but also for society and stakeholders.

#### Principal Adverse Impact Statement

Article 4 of the SFDR requires: "Financial market participants which consider the principal adverse impacts (PAI) of investment decisions on sustainability factors should disclose in the pre-contractual information for each financial product, concisely in qualitative or quantitative terms, how such impacts are considered as well as a statement that information on the principal adverse impacts on sustainability factors is available in the ongoing reporting. Principal adverse impacts should be understood as those impacts of investment decisions and advice that result in negative effects on sustainability factors."

Nordian considers potential negative effects of investment decisions on sustainability factors and has integrated PAI analysis in its entire investment process:

- During selection we assess whether the target has potential adverse impacts on sustainability indicators;
- During our due diligence, we establish sustainability risks and opportunities and material indicators are defined for the particular company;
- At the start of our investment period Nordian develops and implements an ESG strategy and action plan together with company management to improve the portfolio companies' performance on selected indicators;
- Nordian reports on progress on ESG indicators and on PAIs at fund level, by taking into consideration data from our portfolio companies. Nordian's ESG team collects this data from portfolio companies through a questionnaire, which is integrated in the ESG reporting platform.