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## RESPONSIBLE INVESTMENT AND ADDRESSING SUSTAINABILITY RISKS AND IMPACTS

Evli Fund Management Company takes account of sustainability risks in its investments and in particular of the investments' principal adverse impacts on sustainability factors in accordance with Evli Group's Principles for Responsible Investment. Sustainability risk refers to an environmental, social or governance event or condition that, if it occurred, could cause an actual or a potential material negative impact on the value of the investment. Sustainability factors refer to environmental, social and employee matters, respect for human rights, and anti-corruption and anti-bribery matters. Significant sustainability risks can affect the financial performance of investment instruments, and therefore the return of funds. Evli Group's Principles for Responsible Investment are asset class-specific and cover all the active investments under Evli's management. Evli Group's Principles for Responsible Investment are publicly available on Evli's website at [www.evli.com/en/responsibility/responsible-investing](http://www.evli.com/en/responsibility/responsible-investing).

Below is information on the consideration of sustainability risks in EGP Fund I and the fund's sustainable investment objective. EGP Feeder Fund I is a feeder fund that invests only in EGP Fund I.

The abbreviation ESG refers to the term Environmental, Social and Governance.

EU Taxonomy Regulation (2020/852) refers to legislation defining environmentally sustainable economic activities and the reporting obligations for companies and financial products related to such economic activities.

### Taking sustainability risks into account

The EGP Fund I takes account of the sustainability risks as part of the due diligence process and the investment decision. The Fund analyses the target company from the perspective of sustainability risks, determines the most important sustainability themes and risks for the company and the company's industry, and ensures that companies follow good corporate governance practices. Identifying key sustainability themes and risks helps focus on the most important areas in the investment monitoring phase and in discussions with the company management. If a company has significant and unresolved problems and risks related to sustainability factors, the company becomes ineligible for investment. In accordance with EGP I's role, EGP I strives to include responsibility objectives in shareholder agreements, for instance regarding the company's practices related to sustainability factors. If realized, significant sustainability risks can affect the financial performance of the Fund's investment instruments, and therefore the return of the Fund.

**SFDR classification: article 8**

### Corporate governance

The Fund requires good corporate governance practices from its investments. An assessment of the quality of corporate governance is an integral part of the assessment of the Fund's potential investments. The corporate governance assessment has to do with the ability of the company, its management and the Board of Directors to assess risks related to corporate governance and the tools available for this. At the same time, the rights and obligations associated with the good governance of shareholders, the Board of Directors and the management are clarified and decided upon in the shareholder agreement or corresponding contractual structure. The corporate governance assessment lays the foundation for long-term responsible value creation. The corporate governance assessment lays

the foundation for long-term responsible value creation. As part of the sustainability plan and strategy described below, sustainability indicators related to corporate governance are also established.

### **Promotion of sustainability factors**

The Fund promotes sustainability factors related to the environment and society as part of investment operations by systematically integrating responsibility factors into investment analyses and by engaging with and excluding companies. Therefore, sustainability factors are integrated throughout the investment process.

The Fund will draw up a sustainability plan with each target company with a view to finding the most suitable sustainability strategy for each target company. Once the strategy is complete, a set of sustainability indicators will be defined together with the company management and the Board of Directors as part of the implementation of the strategy. The indicators are always company-specific and may include measures for monitoring biodiversity, climate change, personnel satisfaction, occupational safety and diversity, the company's tax footprint and the diversity of decision-makers. For each company, as owners we aim to ensure that the company monitors and reports its sustainability indicators and, if necessary, changes the direction of its operations. The Fund reports annually on the performance of target companies to investors. The reports are comparable by company in a time series.

The fund promotes climate change mitigation as part of the promotion of characteristics associated with the environment by engaging with companies and excluding certain sectors, for example. The fund may make investments in environmentally sustainable economic activities, transitional activities or enabling economic activities that meet the criteria of the EU Taxonomy Regulation, but the fund does not undertake to make only such investments. In order for an economic activity to be considered environmentally sustainable under the EU Taxonomy Regulation it must not, in addition to contributing to one or more environmental objectives, cause significant harm to other environmental objectives mentioned in the Regulation. The "do no significant harm" principle applies only to fund investments that take into account the EU criteria applicable to sustainable economic activities. The "do no significant harm" principle applies only to those investments underlying the fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund do not take into account the EU criteria for environmentally sustainable economic activities.

Through active ownership, the fund promotes climate work in portfolio companies, including through semi-annual emissions calculations (Scope 1 & 2). The aim is to support all target companies in both emission calculation and emission reduction targets. For all target companies, the aim is for an independent third party to prepare a semiannual calculation of the company's carbon dioxide emissions together with the company. The fund is also committed to offsetting its share of the companies' emissions. As an owner, the Fund aims to improve the efficiency of the operations of each target company so that carbon dioxide emissions are annually reduced per unit produced. If the target companies do not themselves compensate for their carbon dioxide emissions, the fund management company will aim to compensate for the carbon dioxide emissions of each target company in proportion with the Fund's holding. If the amount of the emissions cannot be calculated for reasons beyond the control of the Fund, the amount of the emissions will be estimated by an external third party. The compensation will be paid by the third party. The results are annually reported to investors.

When analyzing the Fund's investments, certain corporate sectors, for example, are excluded. The Fund does not invest in companies with a higher than average carbon footprint (for example coal and steel companies). The Fund does not invest in companies with high social cost (for example betting, gambling or pornography). The Fund does not invest in companies whose corporate structure or model enables

aggressive tax evasion (where the domicile of the companies is determined primarily in order to minimize taxation).

The Fund also follows Evli's general exclusion practices and Evli's general and the Fund's own Principles for Responsible Investment, which are publicly available on Evli's website at [www.evli.com/en/responsibility/responsible-investing](http://www.evli.com/en/responsibility/responsible-investing). The Fund does not use a benchmark index. The Fund reports to its investors on the actions related to sustainability factors carried out by it and by the portfolio companies as part of Evli's investor reporting. In addition, the Fund will report on the achievement of the promotion of sustainability factors in accordance with the Sustainable Finance Disclosure Regulation.

More information about sustainable investing at Evli Group and disclosures in accordance with European Union Sustainable Disclosure Regulation is available at [www.evli.com/en/responsibility/responsible-investing](http://www.evli.com/en/responsibility/responsible-investing).