

IDÉKAPITAL

Idékapital Growth Horizon IS

Disclosure of Sustainability-Related Information About Idékapital Growth Horizon IS

Idékapital Investment Management AS ("Idékapital") is the manager of the alternative investment fund Idékapital Growth Horizon IS (the "Fund"). It is Idékapital's assessment that the Fund promotes environmental and social characteristics and that companies in which investments will be made follow good governance practices within the meaning of Article 8 of Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector (the "SFDR"). Therefore, Idékapital is required to include a sustainability-related product disclosure section on its website, pursuant to Article 10 SFDR. The below paragraphs provide the information required.

Summary

The Fund promotes environmental or social characteristics, but does not have sustainable investment as its objective.

Idékapital believes that an investment thesis targeting software companies and integrating environmental, social and governance considerations, forms a solid foundation for the value creation in the Fund's portfolio.

Idékapital has established an ESG framework where ESG related topics are an integral part of Idékapital's due diligence process and Idékapital's ongoing engagement with portfolio companies. ESG scores for all portfolio companies are monitored yearly to encourage and monitor improvement.

Idékapital looks to reduce the Fund's exposure to sustainability risks that Idékapital deems to be too high. Idékapital will therefore exclude investments due to unacceptable and unmanageable sustainability risks identified. All investments will be screened against a specific exclusion list.

No Sustainable Investment Objective

This financial product promotes environmental or social characteristics, but does not have as its objective sustainable investment.

Environmental or Social Characteristics of the Financial Product

Idékapital believes that an investment thesis targeting software companies and integrating environmental, social and governance ("ESG") considerations, forms a solid foundation for the value creation in the Fund's portfolio.

The environmental and social characteristic promoted by the Fund is the integration of such ESG considerations in the Fund's investment decisions and ongoing portfolio management. Specifically, ESG considerations are integrated in the Fund's investment activities by way of the following main elements:

First, Idékapital has established an ESG framework for assessing all potential investments of the Fund. Under this framework, ESG related topics are an integral part of Idékapital's due diligence process and Idékapital's ongoing engagement with portfolio companies. A key part of this ESG assessment is that all portfolio companies are granted scores on each ESG related topic. All potential investments are screened against these ESG related topics and this screening may affect the Fund's investment decisions as well as the Fund's ongoing engagement with portfolio companies.

Second, the ESG scores for all portfolio companies are monitored yearly to encourage and monitor improvement.

Third, Idékapital looks to reduce the Fund's exposure to sustainability risks that Idékapital deems to be too high. Idékapital will therefore exclude investments due to unacceptable and unmanageable sustainability risks identified. Notwithstanding this criteria for excluding investments, Idékapital will seek opportunities to improve identified sustainability risks it deems manageable, so as to reduce the vulnerabilities and improve the potential of portfolio companies.

Fourth, there are certain activities in which Idékapital will not invest due to ethical or ESG-related considerations and all investments will be screened against a specific exclusion list.

Investment Strategy

The investment strategy used to meet the environmental or social characteristics promoted by the Fund.

The environmental and social characteristics promoted by the Fund is the implementation of ESG considerations in Idékapital's investment decisions and ongoing portfolio management on behalf of the Fund. Accordingly, the investment strategy used to meet the environmental or social characteristics promoted by the Fund is the adherence to this approach.

The strategy includes (i) criteria related to environmental and social matters that Idékapital will consider when screening for potential investments; (ii) ESG metrics that Idékapital will apply in the ongoing engagement with its portfolio, and use to measure any ESG-related developments in the companies; and (iii) ESG-related exclusion criteria limiting the Fund's investments universe.

The Fund will not invest in companies dealing in or involved with:

- production of coal or coal-based energy,
- production of nuclear weapons or cluster munitions,
- serious violations of individuals' rights in situations of war or conflict,
- production of tobacco,
- severe environmental damage,
- other particularly serious violations of fundamental ethical norms,
- serious violations of human rights,
- gross corruption,
- production of cannabis, or
- unacceptable greenhouse gas emissions.

The Fund may invest in companies only after Idékapital has performed an ESG related screening of the company (which may or may not lead to the exclusion of the investment under consideration) and has made sure that the company is not dealing in or involved with any of the activities included in the exclusion list.

The policy to assess good governance practices of the investee companies.

Idékapital will, both as part of the investment process and by way of ongoing engagement, assess the investee companies' governance practices in relation to matters such as management structures, employee relations, remuneration of staff and tax compliance.

To that end, Idékapital will apply indicators such as the investee companies' compliance with international standards and conventions (i.e., the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights), accurate reporting to markets and the public, taxation and accounting practices, and respect of shareholder rights.

Proportion of Investments

Idékapital will apply the strategy set out above in relation to all the Fund's potential and completed investments. Accordingly, 100 % of the investments of the Fund will be aligned with the promoted environmental and social characteristics. The Fund does not commit to make a minimum proportion of sustainable investments as defined in the SFDR and/or environmentally sustainable economic activities as defined in the EU Taxonomy Regulation.

Monitoring of Environmental or Social Characteristics

Idékapital measures the attainment of the environmental or social characteristics promoted by the Fund by monitoring the number of investments made pursuant to assessment in accordance with the ESG framework.

This includes measuring potential portfolio companies' *initial* score on all ESG topics the companies were screened against (such as, but not limited to, a portfolio company's resource use, procurement practices, including use of responsibly sourced materials, and diversity and accommodation of equal opportunities), measuring portfolio companies' ongoing score on such ESG topics and thereby any improvement on such topics from year to year; and ensuring that no investments are made in activities on the Fund's exclusion list.

These processes is internally monitored by Idékapital and its board. At this stage, Idékapital has not adopted external mechanisms for the purposes of monitoring the environmental and social characteristics and the sustainability indicators used to measure the attainment of these characteristics.

Methodologies for Environmental or Social Characteristics

In order to carry out the measurements described in the section above, Idékapital gathers information on the companies that are considered for investment through diligent review of the companies' activities, interviews with managers and, where accessible, review of the companies' internal ESG policies where such policies exist. A similar methodology will regularly be applied to portfolio companies in order to measure developments in the companies' ESG scores.

Data Sources and Processing

The data used to attain each of the environmental or social characteristics promoted by the Fund is collected from potential and existing portfolio companies. In order to ensure data quality, Idékapital's team members make sure they understand the data and ask the data provider for clarifications and/or confirmations if needed. The data is processed by way of review by Idékapital's team members. Some data points may be estimated where such estimations are necessary and appropriate, and there is no maximum proportion of data that may be estimated.

Limitations to Methodologies and Data

The methodologies described in the sections above rely on data collection from portfolio companies, both in the form of documents and interviews. Such information may be flawed or incomplete due to, e.g., limited access to data, dishonesty or withholding of information among management or staff at the companies assessed or insufficient knowledge and/or experience in relation to the data collected among team members in Idékapital and/or the companies. Estimations are by definition an limited source of data.

As the environmental and social characteristics promoted by the Fund is the application of and adherence to the ESG elements of the Fund's investment approach, limitations to data will in itself not affect the attainment of the promoted characteristics.

Due Diligence

Idékapital carries out a due diligence process on the underlying assets of the Fund. An overview of this process is provided in the section "Investment Strategy" above.

The Fund may invest in companies only after Idékapital has performed an ESG related screening of the company (which may or may not lead to the exclusion of the

investment under consideration) and has made sure that the company is not dealing in or involved with any of the activities included in the exclusion list.

The adherence to this due diligence process, i.e., Fund's ESG Investment and Risk Policy when investing or considering investments for the Fund, will be controlled by the board of Idékapital and an investor committee.

Engagement Policies

Idékapital applies active management as part of its investment strategy for the Fund, and this involves close engagement with the boards and management of portfolio companies, including consulting and advisement on ways to improve internal ESG practices.

The effectiveness of such engagement partly relies on the willingness among board and management members of portfolio companies to improve. Idékapital sees sound ethics principles and good corporate governance as a premise for responsible business practices, and expect boards and management in our portfolio companies to understand the broader environmental and social consequences of their companies' activities, take them into account when setting strategy, analyse risks and report on outcomes.

As mentioned above, Idékapital will also regularly collect data from its portfolio companies in order to measure their activities in accordance with a set of ESG criteria. These scores will be considered in the ongoing engagement and advisement in relation to the portfolio companies.