

Environmental and/or social characteristics

Sustainable investment

means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?



Yes



No



It will make a minimum of **sustainable investments with an environmental objective**: ___%



in economic activities that qualify as environmentally sustainable under the EU Taxonomy



in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy



It will make a minimum of **sustainable investments with a social objective**: ___%



It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ___% of sustainable investments



with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy



with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy



with a social objective



It promotes E/S characteristics, but **will not make any sustainable investments**



What environmental and/or social characteristics are promoted by this financial product?

VIA equity Fund C K/S (the "**Fund**") promotes social characteristics but does not have sustainable investments as its objective. The Fund has not designated any indexes as reference benchmarks.

Social characteristics promoted by the Fund's investments are:

- **Promotion of diversity and inclusion:** VIA equity a/s (the "**Manager**") is committed to promote diversity by aiming to have 40% of the independent

board members in the Fund's portfolio companies being of the underrepresented gender.

- **Promotion of improved working environment and employee engagement:** The Manager is committed to promote employee engagement by strengthening the mental and emotional connection of employees with their job, their teams, and their organization in each of the portfolio companies. The Manager is committed to collect employee satisfaction surveys minimum every second year and aim to set individual targets to improve on the employee satisfaction between such surveys.
- **Absence and work-related injuries:** The Manager is committed to measure health related absence and work-related injuries once a year and to work with the Fund's portfolio companies to reduce those numbers over time or to reach a stable development at a low level suitable for the individual portfolio companies.

The Fund does not promote environmental characteristics. The investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.

- ***What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?***
- **Promotion of diversity and inclusion:** Each year the companies will provide the number and gender of the independent board members. Based on this information the percentage of the underrepresented gender will be calculated across the Fund's portfolio companies.

The aim is to reach 40% of the independent board members across the Fund's portfolio companies being of the underrepresented gender.

- **Promotion of improved working environment and employee engagement:** Every second year the companies will perform employee satisfaction surveys including KPIs/scores. The surveys will be customized for each individual portfolio company i.e. no standard method is used across the portfolio companies.
- **Absence and work-related injuries:** Each year the companies will provide the sickness absence during the year expressed as the total amount of days where FTEs (full time employees) have not been able to work due to sickness expressed as a percentage. The aim is to reduce the sickness absence percentage or reach a stable low level as suitable for the individual portfolio.

In addition, the companies will report on the number of work-related injuries during the financial year (defined as a physical injury sustained on

the job by an employee leading to a loss of at least one day off work). The aim is reduce the number of injuries to zero.

- **What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?**

Not applicable, as the Fund does not intend to make sustainable investments.

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

- **How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?**

Not applicable, as the Fund does not intend to make sustainable investments.

— *How have the indicators for adverse impacts on sustainability factors been taken into account?*

Not applicable.

— *How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:*

Not applicable.

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



Does this financial product consider principal adverse impacts on sustainability factors?

- ✘ Yes, the Manager considers principal adverse impacts on sustainability factors in relation to the Fund, i.e. how the Fund's activities affect environmental, social

and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

The Manager considers principal adverse impacts on sustainability factors by assessing whether investments take this into account, and the Manager has an active focus on reducing any negative impacts on the sustainability factors.

Principal adverse impacts which could cause the Manager to not invest, if identified during the Manager's ESG due diligence, could be (among others):

- Companies with a pattern of denying human and labour rights.
- Companies with a pattern of non-compliance with local regulations such as tax regulations and/or general business regulations.
- Companies that produce weapons, tobacco, pornography or coal.
- Companies that have unacceptable exposure to countries, persons, or entities on the UN sanctions list.
- Companies that do not comply with environmental regulations.
- Companies involved with bribery and corruption.

All potential and existing investments in the Fund's portfolio are assessed against these indicators on an on-going basis to ensure no significant harm is done. For potential investments, after the Manager's identification of the relevant principal adverse impacts on sustainability factors, it is then assessed whether the investment should be made. If principal adverse impacts on sustainability factors are identified for an existing investment, it is assessed whether there is a way to reduce the adverse impacts on the sustainability factors or if appropriate measures should be taken to consider a divestment of the investment.

Information on the Fund's principal adverse impacts on sustainability factors will also be made available in the Fund's annual report prepared by the Manager.

No



What investment strategy does this financial product follow?

The Fund's mission is to acquire, develop, improve, and sell private companies in order to generate a return for its investors. The Fund focuses on active ownership to promote the long-term value creation of the Fund's investments. As part of exercising the different rights as a shareholder the Fund is, through the management company, represented at portfolio companies' general meetings and in the portfolio companies' Boards of Directors as active board members.

The Fund invests in (i) portfolio companies conducting business within the areas of e-commerce, information technology and telecommunication in a broad sense (including content and services); and (ii) service- or technology-based portfolio companies whose products to a substantial degree feature electronic components

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

or software, IT hardware, nanotechnology, communication structure, battery/battery-substitution, energy technics or environmental elements.

- ***What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?***

As mentioned above, the Fund's mission is to acquire, develop, improve and sell private companies in order to generate a return for the Fund's investors. A part of this process includes a dedicated focus on ESG (and sustainability in general) in order to analyze, mitigate and reduce potential sustainability/ESG related risks, which if these occurred, could cause an actual or potential material negative impact on the value of the investment.

Hence, the Fund seeks to conduct investments in a responsible manner taking into account best practices of corporate governance, corporate social responsibility as well as environmental and social responsibility in the i) investment process, ii) during the Fund's ownership as well as iii) in the internal and external communication and reporting with the Fund's stakeholders.

In terms of the promoted social characteristics, these characteristics are included as part of the due diligence process when the Fund invests, but except for being committed to the evaluation of these characteristics and certain additional criteria there are no binding elements of the investment strategy in this regard.

Such criteria, which could cause the Manager to not invest, if identified during the Manager's ESG due diligence, could be (among others):

- i. Companies with a pattern of denying human and labour rights.
- ii. Companies with a pattern of non-compliance with local regulations such
- iii. as tax regulations and/or general business regulations.
- iv. Companies that produce weapons, tobacco, pornography or coal.
- v. Companies that do not comply with environmental regulations.
- vi. Companies involved with bribery and corruption.

As such, if any of the above-mentioned criteria is identified during the Manager's ESG due diligence, this could cause the Manager not to invest.

- ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

Not applicable.

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

● ***What is the policy to assess good governance practices of the investee companies?***

The Manager evaluates the governance practices and processes of potential acquisitions and assess whether such processes are aligned with the Manager's policies and standards or, if not deemed sufficient, if such practices and processes can be established by the management teams with support from the Manager following an acquisition. Hence, once a company is acquired by the Fund, the Manager will ensure the establishment of best practices and structured governance processes and continuously assess this with focus on, among others, maturity of internal processes and formalized policies on subjects such as:

- Sustainability.
- Anti-bribery and corruption.
- Human rights.
- Code of conduct (incl. ethical guidelines).
- Cyber security.
- Inclusion and diversity.
- Privacy.
- Sound management structures, employee relations, remuneration of staff and tax compliance.

As a part of the yearly review and evaluation of ESG progress, the Manager has established a set of standard rules, tools and procedures for good corporate governance and transparency. Each portfolio company has to report on the level of adoption and plans to improve on e.g.:

- Rules and procedures for the BoD / Advisory Board.
- CEO & mgmt. instructions / guidelines.
- Ethical guidelines and/or code of conduct.
- Inclusion and diversity policy.
- Environmental policy.
- Whistleblower protection & procedure.
- Evaluation of executive management.
- Evaluation of the BoD.
- Agreements covering executive shareholdings.
- Employment contracts for executives.

- Annual planning schedule – “annual wheel”.
- Transparency in the annual report including:
 - BoD names and activities (board and/or executive positions).
 - Number of employees / FTEs.
 - Sick leave percentage.
 - Retention percentage.
 - Gender ratio.



What is the asset allocation planned for this financial product?

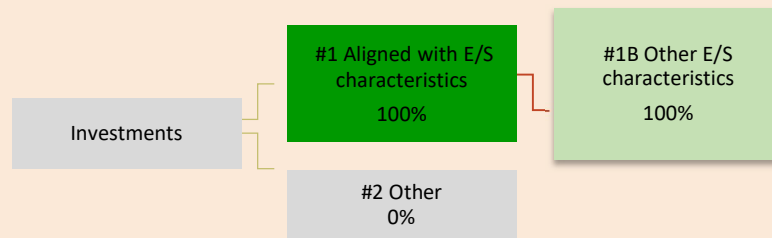
Please see the section "What investment strategy does this financial product follow" as to the types of investments planned for the Fund.

The social characteristics promoted by the Fund is planned to cover 100% of the investments.

Asset allocation describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.


● **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

Not applicable.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

 are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.



To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

Not applicable, as the Fund does not intend to make sustainable investments.

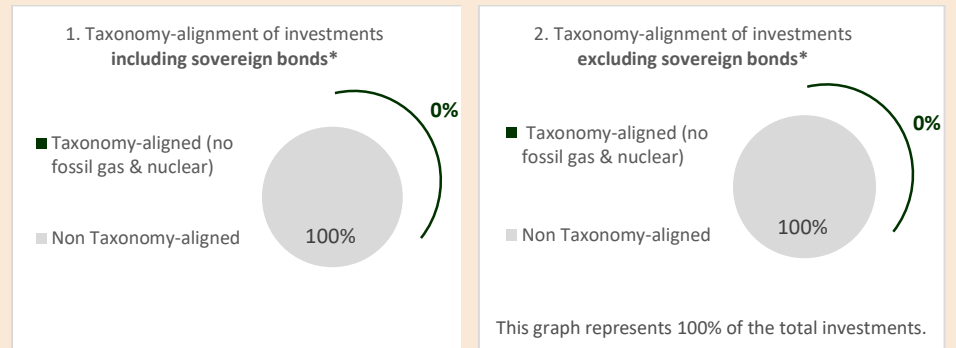
- **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy¹?**

Yes:

In fossil gas In nuclear energy

No

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.*



* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

- **What is the minimum share of investments in transitional and enabling activities?**
Not applicable, as the Fund does not intend to make sustainable investments with an environmental objective.



What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

Not applicable, as the Fund does not intend to make sustainable investments.



What is the minimum share of socially sustainable investments?

Not applicable, as the Fund does not intend to make sustainable investments.

¹ Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

If certain investments made by the Fund should be included in the category “#2 Other”, i.e. if the Fund (against the expectations) in such investments would not be able to promote the above mentioned social characteristics, then besides considering the above-mentioned criteria, there are no minimum environmental or social safeguards for the Fund.



Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

The Fund has not designated a reference benchmark.

- *How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?*

Not applicable.

- *How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?*

Not applicable.

- *How does the designated index differ from a relevant broad market index?*

Not applicable.

- *Where can the methodology used for the calculation of the designated index be found?*

Not applicable.



Where can I find more product specific information online?

More product-specific information can be found on the website subsection “Sustainability related disclosures” on the following [link](#) and more specifically for the Fund on the following [link](#).