

Responsible Investment Policy

November 2023

Purpose

The purpose of the policy is to outline Segulah's sustainability focus areas and the responsible investment process. The policy is applicable to all Segulah funds as well as the Segulah investment team to safeguard the firm's responsible investment integrity and ambition.

Commitments & Approach

Segulah has been a signatory of UN PRI since 2013 and we are committed to integrating sustainability factors into our investment processes.

We seek to continuously align our responsible investment approach with relevant international conventions and regulations, including UN Global Compact (UNGC), the sustainability objectives set out in the UN Sustainable Development Goals (SDGs) and the EU Sustainable Finance Disclosure Regulation (SFDR). Further, we are committed to complying with applicable laws and regulations in the jurisdictions in which we are present.

Through active ownership Segulah shall support development and profitable growth in the portfolio companies. As active owners we have the responsibility to manage the sustainability impact that we and the portfolio companies' have, to protect and create long-term value for our stakeholders. Portfolio companies are expected to adhere to the same principles and to continuously improve their sustainability performance.

Sustainability Focus Areas

Segulah sets expectations for portfolio companies, in line with our own sustainability commitment, to identify and mitigate material sustainability risks and to find sustainability related opportunities.

Segulah provides training and support to investment professionals and portfolio companies to help them set and achieve relevant sustainability objectives.

Environment

Segulah is aware of the threats posed by issues such as climate change and biodiversity loss and is committed to working to reduce the portfolio companies' negative environmental footprint while contributing to positive activities.

We believe that a company that is aware of its impacts on the climate and environment is better at managing associated risks and is more likely to have a long-term sustainable business model in place.

Segulah expects portfolio companies to set, measure and meet climate and environmental targets including finding ways to lower greenhouse gas emissions, protect biodiversity and to choose sustainable materials when sourcing.

Social

Segulah believes that businesses cannot successfully operate and grow without consideration of social factors. These include healthy and safe working environments, employee well-being, diversity and inclusion as well as respecting internationally recognised human rights. Similarly, good relationships with suppliers, business partners and their employees, lead to better results.

Portfolio companies are expected to conduct their business taking into consideration social factors, including those outlined above.

Segulah expects that our employees and the employees of our portfolio companies act with honesty and transparency, treat others with dignity and respect, take responsibility for their actions and decisions and act with ethical principles in mind.

Governance

Segulah only invests in companies that follow good governance practices, i.e. sound management structures, tax compliance, remuneration and employee relations.

Segulah engages with its portfolio companies and focuses to embed strong corporate governance throughout the businesses. Focus areas include business ethics, legal compliance, whistleblowing systems, anti-corruption, anti-money laundering as well as sustainable supply chain management.

Responsible Investment Process

Screening & Due Diligence

Segulah integrates sustainability considerations into the investment process.

- We do not invest in companies with operations in the war industry, gambling, tobacco or pornography.
- ESG is an integral part of our sourcing, evaluation, and due diligence processes.
- We consider both potential ESG risks and opportunities for value creation, see our [Website Disclosures](#) for further information.

Ownership, Monitoring & Reporting

During the ownership phase Segulah assigns responsibility and ownership of ESG issues to the Board of Directors. Each portfolio company is required to integrate sustainability considerations in their business strategies and value creation plans.

Segulah is monitoring the portfolio companies environmental, social and governance characteristics through annual reporting of [Principle Adverse Impacts \(PAIs\)](#).

Exit

Portfolio companies' processes for managing ESG work is evaluated in preparation for exit.

- We communicate the companies' integrated work with ESG issues in a structured manner in the sales process.
- We evaluate the buyer based on Segulah's basic philosophy of responsible investments and ownership and the principles expressed by the UN PRI.

Further Information

The Segulah Board of Directors is responsible for the implementation of the Responsible Investment Policy. The policy is reviewed annually.

More information in relation to Segulah's approach to Responsible Investing and disclosures related to the SFDR regulation can be found at www.segulah.se.