

Principal adverse sustainability impacts statement

(Erklæring om investeringsbeslutningers vigtigste negative indvirkninger på bæredygtighedsfaktorer)

Financial market participant: Fenja Capital Partners A/S

LEI: 984500775C97739F1E49

Danish Business Registration number: 37089362

Summary

Fenja Capital Partners A/S (hereafter "**Fenja Capital**") manages the two investment funds Fenja Capital I A/S and Fenja Capital II A/S. Fenja Capital considers principal adverse impacts of its investment decisions on sustainability factors. The present statement is the consolidated statement on principal adverse impacts on sustainability factors of Fenja Capital.

This statement on principal adverse impacts on sustainability factors covers the reference period from 1 January to 31 December 2023.

Fenja Capital has a sustainability policy and incorporates sustainability into its investment decisions, drawing inspiration from the UN Global Compact to the benefit of investors, partners, and society as a whole. This is implemented through a due diligence process, which excludes specific sectors, geographies, and other areas in which Fenja Capital chooses not to invest.

Fenja Capital primarily invests in small and medium-sized companies. This may result in limitations in data availability, and data collection for the PAI statement has been conducted to the best of our ability.

Sammenfatning

Fenja Capital Partners A/S (herefter "**Fenja Capital**") forvalter de to investeringsfonde Fenja Capital I A/S og Fenja Capital II A/S. Fenja Capital tager hensyn til de væsentligste negative indvirkninger af sine investeringsbeslutninger på bæredygtighedsfaktorer. Denne erklæring er den konsoliderede erklæring om de væsentligste negative indvirkninger på bæredygtighedsfaktorer fra Fenja Capital.

Denne erklæring om de vigtigste negative indvirkninger på bæredygtighedsfaktorer omfatter referenceperioden fra den 1. januar til 31. december 2023.

Fenja Capital har en politik for bæredygtighed og inddrager bæredygtighed i investeringsbeslutningerne med inspiration fra FN Global Compact til gavn for investorer, samarbejdspartnere og samfundet som et hele. Dette sker via en due diligence proces, hvorved der ekskluderes specifikke sektorer, geografier, og øvrige forhold som Fenja Capital ikke ønsker at investere i.

Fenja Capital investerer hovedsageligt i små- og mellemstore selskaber. Det betyder, at der kan være begrænsninger i det tilgængelige datamateriale, og dataindsamlingen til PAI erklæringen er blevet udført efter bedste evne.

Description of the principal adverse impacts on sustainability factors

Indicators applicable to investments in investee companies

Adverse sustainability indicator	Metric	Impact 2023	Impact 2022	Explanation	Actions taken, and actions planned and targets set for the next reference period
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CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS

Greenhouse gas emissions	1. GHG emissions	Scope 1 GHG emissions	498 tCO ₂ e	707 tCO ₂ e	The GHG emissions are affected by single investments with relatively high GHG emissions. This is the primary explanation for	N/A
		Scope 2 GHG emissions	529 tCO ₂ e	776 tCO ₂ e		
		Scope 3 GHG emissions	752 tCO ₂ e	7.063 tCO ₂ e		
		Total GHG emissions	1.775 tCO ₂ e	8.538 tCO ₂ e		

					the variation between 2022 and 2023	
	2. Carbon footprint	Carbon footprint	38 tCO ₂ e/mEUR	141 tCO ₂ e/mEUR	The carbon footprint is affected by single investments with a relatively high carbon footprint. This is the primary explanation for the variation between 2022 and 2023	N/A
	3. GHG intensity of investee companies	GHG intensity of investee companies	199 tCO ₂ e/mEUR	227 tCO ₂ e/mEUR	N/A	N/A
	4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	0%	0%	No investee companies have been active in the fossil fuel sector in neither 2022 nor in 2023	N/A
	5. Share of non-renewable energy consumption and production	Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a	0%	0%	Data availability is limited and the numbers are based on 0-10 observations per period	N/A

		percentage of total energy sources				
	6. Energy consumption intensity per high impact climate sector	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector	0 GWh/mEUR	0 GWh/mEUR	Data availability is limited and the numbers are based on 0-10 observations per period	N/A
Biodiversity	7. Activities negatively affecting biodiversity-sensitive areas	Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas	0%	0%	No investee companies have been reported as being located in or near to biodiversity-sensitive areas in neither 2022 nor in 2023	N/A
Water	8. Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	0 t/mEUR	0 t/mEUR	No emissions to water generated by investee companies were reported in neither 2022 nor in 2023	N/A
Waste	9. Hazardous waste and radioactive waste ratio	Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average	0 t/mEUR	0 t/mEUR	No hazardous waste and radioactive waste generated by investee companies were reported in	N/A

					neither 2022 nor in 2023	
INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS						
Social and employee matters	10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	0%	0%	No investee companies were reported to have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises in neither 2022 nor in 2023	N/A
	11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance /complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	77%	100%	Measured on the basis of the UNGC Compliance Policies Score with a treshold of 50%. Data availability is limited and the numbers are based on 0-10 observations per period. The value is a result of our investments in small- and	N/A

					medium sized companies where data is either not applicable or where the majority of companies do not have policies in place to monitor their compliance with the the UNGC principles or OECD Guidelines for Multinational Enterprises	
	12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	N/A	N/A	Data is not available	N/A
	13. Board gender diversity	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members	27%	27%	Data availability is limited and the numbers are based on 0-10 observations per period.	N/A
	14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and	Share of investments in investee companies involved in the manufacture or selling of controversial weapons	0%	0%	No investee companies were reported to have been involved in the manufacture or selling of	N/A

	biological weapons)				controversial weapons in neither 2022 nor in 2023	
Indicators applicable to investments in sovereigns and supranationals						
Adverse sustainability indicator		Metric	Impact 2023	Impact 2022	Explanation	Actions taken, and actions planned and targets set for the next reference period
Environmental	15. GHG intensity	GHG intensity of investee countries	N/A	N/A	N/A	N/A
Social	16. Investee countries subject to social violations	Number of investee countries subject to social violations (absolute number and relative number divided by all investee countries), as referred to in international treaties and conventions, United Nations principles and, where applicable, national law	N/A	N/A	N/A	N/A
Indicators applicable to investments in real estate assets						
Adverse sustainability indicator		Metric	Impact 2023	Impact 2022	Explanation	Actions taken, and

						actions planned and targets set for the next reference period
Fossil fuels	17. Exposure to fossil fuels through real estate assets	Share of investments in real estate assets involved in the extraction, storage, transport or manufacture of fossil fuels	N/A	N/A	N/A	N/A
Energy efficiency	18. Exposure to energy-inefficient real estate assets	Share of investments in energy-inefficient real estate assets	N/A	N/A	N/A	N/A
Other indicators for principal adverse impacts on sustainability factors						
No other indicators for principal adverse impacts on sustainability factors are considered and tracked on an ongoing basis.						
Description of policies to identify and prioritise principal adverse impacts on sustainability factors						
<u>Policies:</u>						
	Policy	Approved by	Last approval data			
	Sustainability Policy	Board of Directors	27/05/2024			
	Investment Policy	Board of Directors	27/05/2024			

Governance:

The Board of Directors is responsible for establishing adequate policies and procedures and Management is responsible for implementing them. The policies shall be reviewed at least once a year by the Board of Directors.

PAI selection:

When assessing potential new investments a due diligence process is performed. This due diligence process screens the company for several criteria. Amongst other the process screens for:

- a) Whether the company is listed in countries subject to sanctions or trade blockades adopted by the UN or the EU and ratified by Denmark
- b) Whether the company are deemed to knowingly violate the principles of the UN Global Compact (UNGC)
- c) Whether the company performs activities that are part of Fenja Capital's exclusion list

As of the last update to the Policy, the negative list is as follows:

- Illegal activities
- Activities that contravene UN conventions, such as the manufacture and storage of convention-violating weapons or activities with a negative impact on human rights conventions
- Activities that unduly and significantly burden the environment and biodiversity, such as Arctic drilling for fossil fuel production, bottom trawling in fishing, and companies whose primary business activities are based on coal.
- Activities that have a destructive impact on local communities or people and cannot be mitigated
- Tobacco industry
- Human cloning
- Pornography

Methodology limitations:

Fenja Capital primarily invests in small and medium-sized companies. This may result in limitations in the available data, and data collection for the PAI statement has been conducted to the best of our ability. ESG data is collected from external data providers such as Bloomberg.

When data is not available, figures are not extrapolated unless this is specifically stated in the explanation for the specific adverse sustainability indicator in table 1.

Engagement policies

Not relevant

References to international standards

Fenja Capital seeks to ensure that it adheres to responsible business conduct codes and internationally recognised standards such as the UN Global Compact.

Historical comparison

Version	Published	Changes
1	November 2024	First statement published