

Sustainability-related disclosures Nordea Private Markets SCSp-RAIF



1 January 2024

Transparency of the promotion of environmental or social characteristics and of sustainable investments

This document includes information relating to environmental and social characteristics of financial products and information relating to sustainable investments, in accordance with article 10 of the Sustainable Finance Disclosure Regulation (SFDR)¹.

Product name: Nordea Private Markets SCSp-RAIF - NPE Co-Investment Fund I

Legal entity identifier: N/A

Summary

The fund promotes certain environmental and/or social characteristics. It does not have as its objective sustainable investment. While this fund does not commit to invest in a minimum proportion of sustainable investment, it may make such investments.

Specific sustainability indicators will be used to measure the attainment of the environmental and/or social characteristics of the fund in accordance with specific methodologies described below. The asset allocation of the fund is presented in the form of a chart that holds a specification of the percentage of investments expected to be aligned with the environmental and/or social characteristics of the fund.

The fund's Investment Manager is Nordea Investment Management AB.

Due diligence on underlying investments is used to ensure that the fund is invested in accordance with the environmental and/or social characteristics promoted.

¹ Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector

Résumé

Ce fonds promeut certaines caractéristiques environnementales et/ou sociales. Il n'a pas un objectif d'investissement durable. Bien que ce fonds ne s'engage pas à investir dans une proportion minimale d'investissements durables, il peut réaliser de tels investissements.

Des indicateurs de durabilité spécifiques seront utilisés afin de mesurer la réalisation des caractéristiques environnementales et/ou sociales du fonds conformément aux méthodologies décrites ci-après. La répartition d'actifs du fonds est présentée sous la forme d'un graphique contenant une spécification du pourcentage d'investissements qui devraient être alignés aux caractéristiques environnementales et/ou sociales du fonds.

Le gestionnaire de placement du produit financier est Nordea Investment Management AB.

Des mesures de due diligence rigoureuses sont appliquées aux investissements sous-jacents et utilisées pour garantir que le fonds est investi conformément aux caractéristiques environnementales et/ou sociales promues .

No sustainable investment objective

Does this financial product have a sustainable investment objective?¶

Yes¶ No¶

<p><input type="checkbox"/> It will make a minimum of sustainable investments with an environmental objective: _____ → _____ %¶</p> <ul style="list-style-type: none"> <input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy¶ <input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy¶ <p><input type="checkbox"/> It will make a minimum of sustainable investments with a social objective: _____ → _____ %¶</p>	<p><input type="checkbox"/> 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¶</p> <ul style="list-style-type: none"> <input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy¶ <input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy¶ <input type="checkbox"/> with a social objective¶ <p><input checked="" type="checkbox"/> It promotes E/S characteristics, but will not make any sustainable investments¶</p>
---	---

This financial product promotes environmental or social (“E/S”) characteristics, but does not have sustainable investment as its objective. The financial product will not have a commitment to a minimum proportion of sustainable investments, as illustrated above.

Environmental or social characteristics of the financial product

The E/S characteristics of this financial product will apply to new Portfolio Investments and include:

ESG due diligence and proprietary assessment The Portfolio Investment Manager integrates environmental and social considerations and ensures good governance as part of the due diligence process of each Portfolio Investments. The assessment creates transparency and comparability over time.

Sector- and value-based exclusions

For each new Portfolio investment, a set of ESG-safeguards are embedded in the contractual framework for the Portfolio Investments, restricting the investment universe through e.g. sector and/or value-based exclusions thereby restricting investments in companies with significant exposure to certain activities deemed to be detrimental to the environment or the society at large.

NAM's Paris-Aligned Fossil Fuel policy

Exposure to fossil fuel companies is governed by the Sub-Fund's adherence to NAM's Paris-Aligned Fossil Fuel Policy which limits investments in companies that have exposure to fossil fuels unless they have a credible transition strategy.

Investment strategy

Description of the investment strategy used to meet the environmental or social characteristics of the financial product

The Sub-Fund invests in individual companies and private equity continuation funds. By nature of the asset class, all Portfolio investments are illiquid and primarily entered into on a forward-looking basis. Geographic emphasis of the investments will primarily be in Northern & Continental Europe and the United States. On an opportunistic basis, Emerging Markets and Asia can be considered.

The ESG characteristics of the Sub-Fund are a combination of due diligence of the individual companies and sector and value based exclusions of companies based on NAM's Responsible Investment Policy's standards.

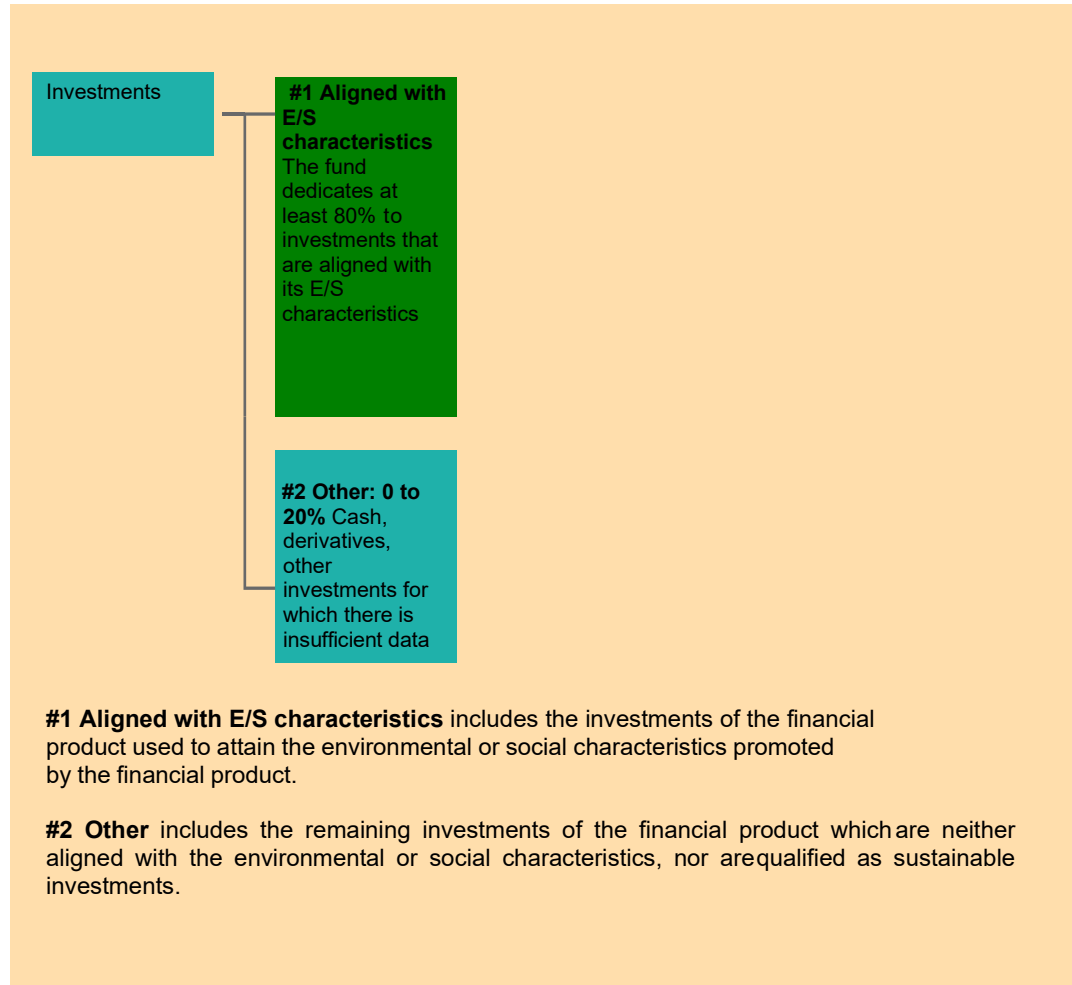
More information on the general investment policy of the Sub-Fund can be found in the Investment Objective, Strategy and Policy section of Annex I the offering document.

Description of the policy to assess good governance practices of the investee companies

Assessment of good governance practices of Portfolio Investments is addressed in various layers of the due diligence process. At the Portfolio Investment level, the adherence to good governance principles are assessed in the due diligence of the policies related to employee relations, staff remuneration, management structures and tax compliance. Adherence to the principles is built into the contractual framework as additional safeguards at the Investment Management level.

Proportion of investments

Illustrated below is the planned asset allocation for the investments of the financial product:



*Investments means the financial product's NAV.

Monitoring of environmental or social characteristics

Description of how the environmental or social characteristics promoted by the financial product and the sustainability indicators used to measure the attainment of each of those environmental or social characteristics promoted by the financial product are monitored throughout the lifecycle of the financial product and the related internal or external control mechanisms.

To measure the attainment of the environmental or social characteristics, the Investment Manager will use proprietary data from the underlying Portfolio Investments;

- Percent of Portfolio Investments with an ESG-policy or specific ESG-targets
- Percent of Portfolio Investments providing ESG-reporting
- Percent of Portfolio Investments supporting a recognized ESG-initiative

Methodologies

Description of the methodologies to measure how the social or environmental characteristics promoted by the financial product are met.

The methodologies that apply to measure how environmental and social characteristics promoted by the financial product are met, are set out here below.

- **NAM Paris Aligned Fossil Fuel Policy**

NAM's Paris-Aligned Fossil Fuel Policy ("**PAFF**"), has been developed with the Paris agreement² in mind. The Policy sets thresholds for companies' exposure to fossil fuel production, distribution and services, which are implemented and monitored as specific exclusions by the Investment Manager. The NAM PAFF policy can be found [here](#).

- **Sector- and value-based exclusions:**

- Exclusions aim at limiting the Portfolio Investment exposure to certain sectors or activities that may be considered to be damaging for the environment and/or the society at large. Sector screenings assess a company's involvement in a specific activity measured by the revenue derived from this activity.

Data sources and processing

(a) What are the data sources used to attain each of the environmental or social characteristics promoted by the financial product?

The Investment Manager uses a range of different data sources primarily provided by the investee companies, to ensure that the financial product is invested in accordance with the environmental and/or social characteristics promoted.

Due to the investment universe of the financial product, data sources are limited and are subject to confidentiality.

(b) What are the measures taken to ensure data quality?

Given the broad range of investments and the fact that data is of confidential nature, the evaluation of the reported data is done as part of the due diligence process. Where relevant, the Investment Manager would seek to verify data if possible.

(c) How are data processed?

As described above, the data used by the Investment Management is primarily expected to be derived from investee companies. The Investment Manager seeks to obtain as much and the most granular company data possible.

(d) What proportion of data is estimated?

Data is not estimated because it will be, in most cases, directly received from investee companies

² The Paris agreement is a legally binding international treaty on climate change. Its goal is to limit global warming, preferably to 1.5 degrees Celsius, compared to pre-industrial levels.

Limitations to methodologies and data

(a) Are there any limitations to the methodologies and data sources used?

Information is mainly based on historical data and may not reflect the future ESG development or risks of the Portfolio Investments.

(b) How do those limitations not affect how the environmental or social characteristics promoted by the financial product are met?

The fact that each Portfolio Investment is assessed individually by the Investment Manager mitigates the data limitations.

Due diligence

Description of the due diligence carried out on the underlying assets of the financial product, including the internal and external controls on that due diligence.

The Investment Manager conducts its financial and ESG due diligence based on proprietary data primarily to be obtained from the investee companies. This results in an initial assessment, which may warrant direct follow-up to clarify any information gaps or outstanding questions.

The final due diligence report includes both the financial analysis and the conducted ESG due diligence.

Engagement policies

Description of the engagement policies implemented where engagement is part of the environmental or social investment strategy, including any management procedures applicable to sustainability-related controversies in investee companies.

. Over time the Investment Manager will monitor Portfolio Investments and engagement on ESG standards.

Designated reference benchmark

Description of whether an index has been designated as a reference benchmark to meet the environmental or social characteristics of the financial product and how such index would be aligned with the environmental or social characteristics of the financial product.

The financial product does not use a reference benchmark.