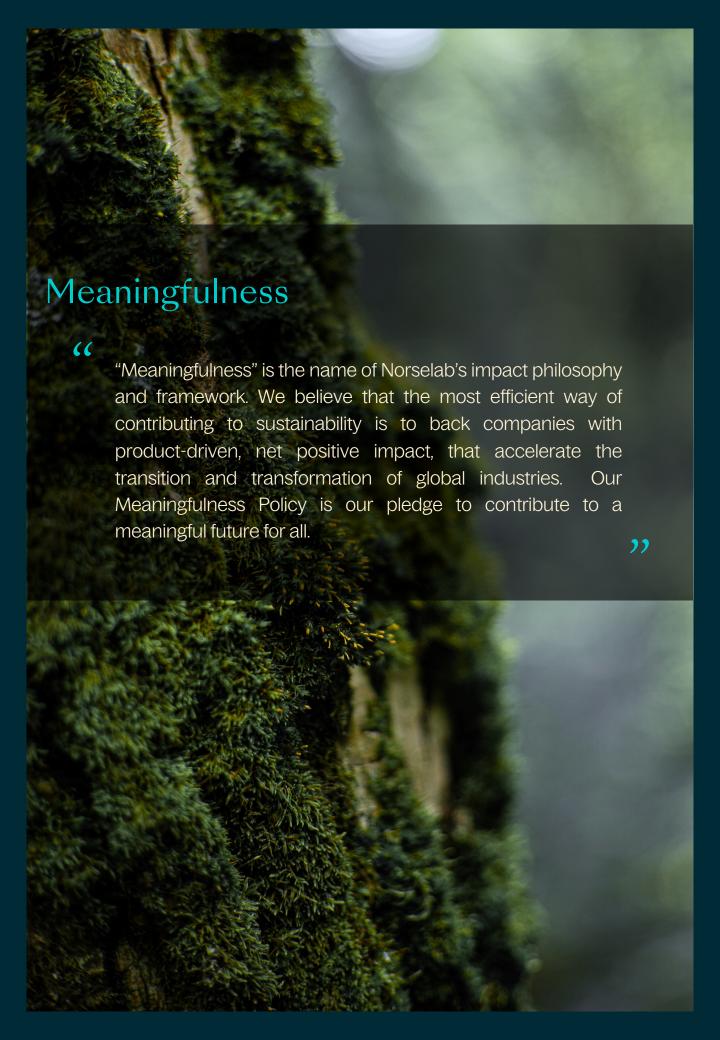
Norselab *

Meaningfulness Policy

4th edition, January 2023





1. Purpose of the Policy

Our Meaningfulness Policy aims to provide transparency, predictability, and accountability for all stakeholders concerning the responsible and sustainable investment practices across all funds and entities linked to Norselab Investment Management AS.



2. Ownership and responsibilities

The CEO of Norselab is ultimately responsible for our compliance with the principles of this policy.

The Chief Impact Officer is responsible for creating awareness and understanding of the Meaningfulness Policy, laying out strategies, processes, and resources to enable

compliance with the policy, as well as ensuring the policy is reviewed and updated at least annually to reflect industry-leading practices.

The Product Governance Committee is responsible for securing that all investment-related processes and -decisions are compliant with the policy.

3. Overarching philosophy

Let's create a meaningful future for all

The commitment to this vision is at the heart of Norselab and every single one of its employees. We share the firm belief that, in our future world, there is no such thing as a successful business without a healthy planet, thriving societies, and prosperity for all living creatures.

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We are not here to mitigate problems; we are here to spark change. In all our dealings, we are driven by "meaningfulness" – our overarching impact philosophy. At Norselab, we invest in net positive companies that contribute to transforming global industries through their core products and services. It's about driving impact that matters.

We define impact as a significant contribution to the achievement of the focus areas set forth in the UN Sustainable Development Goals (SDGs). The SDGs are a globally recognized roadmap for designing a future where economic growth does not compromise the safekeeping of our planet and the well-being of people and societies.

They provide a comprehensive map of risk and opportunity - and thus a solid strategic prism through which we can meaningfully and successfully invest in new, growing, and established businesses.

Moving away from a superficial approach to sustainable investments, we make it our mission to back companies with net positive contributions to the SDGs. We believe in identifying, shaping and backing businesses that are impact native; companies that create more positive impact with every new customer or user. Impact native companies showcase an intrinsic tie between profit and positive impact.

Our watchword is integrity; when we assess potential investments, we systematically apply a multi-lens approach to build the full picture of a company's impacts. Our goal is to provide the best possible foundation for decision-making and create awareness of the entire range of positive and negative impacts of a company. We wish to invest in companies that contribute to creating a meaningful future for all. Only through awareness can we ensure that we live up to this ambition.

As fiduciaries to our clients, we are responsible for advancing their best interest, and we believe that impact native companies are best positioned to create long-term value for our clients and all our stakeholders

We fully recognize our responsibility for contributing to the achievement of a sustainable future for all and the vast opportunities that will arise as we embrace this responsibility.



4. Reference principles

Global frameworks we adhere to

Since 2022, Norselab has been committed to the UN Global Compact corporate responsibility initiative and its principles in the areas of human rights, labor, environment, and anti-corruption.

Principle 1:

Businesses should support and respect the protection of internationally proclaimed human rights

Principle 2:

Make sure that they are not complicit in human rights abuses.

Principle 3:

Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4:

the elimination of all forms of forced and compulsory labour;

Principle 5:

the effective abolition of child labour; and

Principle 6:

the elimination of discrimination in respect of employment and occupation.

Principle 7:

Businesses should support a precautionary approach to environmental challenges;

Principle 8:

undertake initiatives to promote greater environmental responsibility; and

Principle 9:

encourage the development and diffusion of environmentally friendly technologies.

Principle 10:

Businesses should work against corruption in all its forms, including extortion and bribery.

We also subscribe to the UN's Principles on Responsible Investment (PRI):

Principle 1:

We will incorporate ESG issues into investment analysis and decision-making processes.

Principle 2:

We will be active owners and incorporate ESG issues into our ownership policies and practices.

Principle 3:

We will seek appropriate disclosure on ESG issues by the entities in which we invest.

Principle 4:

We will promote acceptance and implementation of the Principles within the investment industry.

Principle 5:

We will work together to enhance our effectiveness in implementing the Principles.

Principle 6:

We will each report on our activities and progress towards implementing the Principles.

WE SUPPORT



Signatory of:





10 Principles for Meaningful Investments

To align with our philosophy and deliver on our commitments, we practice principles for responsible and sustainable investments that go beyond the references mentioned above; we call them principles for meaningful investments. We hereafter set forth the ten principles to which we hold ourselves responsible, and which all stakeholders can expect us to respect and fulfil.

1

The Sustainable Development Goals (SDGs) are our North Star. Through all our dealings, we will strive to create a net positive impact with the SDGs as a strategic framework.

2

We aspire to lead the way in our industry in how impact assessments permeate investment analyses, investment processes, and decisions. Integrity and rigor will be central to our approach, and we will strive for a best-in-class combination of qualitative and quantitative lenses and frameworks in our assessments.

3

We adopt a long-term perspective and will only invest in impact native companies. Positive impact should be at the core of their revenue-generating products or services in such a way that the adoption of their products or services creates positive contributions to the SDGs.

4

We will refrain from investing in companies with a significant negative impact on any of the SDGs.

5

We are active owners and will, whenever possible, work proactively with our portfolios to promote strategies aligned with the SDGs and implement relevant measuring and reporting schemes for impact.

6

We will hold our portfolio companies accountable through their impact metrics just as much as their financial indicators.

7

We expect portfolio companies to comply with all applicable laws and regulations as well as the ethical principles of the UN Global Compact, in addition to the principles set forth in this policy. Should a company willingly breach these principles - or prove unable to comply with these principles - Norselab will as a last resort refrain from continued participation.

8

Through our communications, we will strive to provide market-leading transparency on how we integrate impact considerations into our processes. We will publish a Meaningfulness Report annually, accounting for our impact and our progress in living up to this policy.

9

We will strive to be at the forefront of our industry in adopting best-in-class measuring and reporting tools and routines.

10

We will assiduously promote our approach to meaningful investments in the investment community to increase the acceptance, adoption, and desirability of investments that help advance the SDGs.



