



Date of last revision: May 2023

MOMENTUM VENTURE MANAGEMENT AS

ENTITY-LEVEL SUSTAINABILITY-RELATED DISCLOSURES

FOR MOMENTUM'S WEBSITE

EU regulation 2019/2088 on sustainability-related disclosures in the financial services sector ("SFDR") entered into force on 10 March 2021, aiming to provide greater transparency on the sustainability of financial products. The team behind Momentum Venture Management AS ("Momentum") happily supports this, and we hereby disclose our information related to Momentum as a financial market participant.

Integration of sustainability risks into investment decision process

Momentum views sustainability risks as an integral part of our due diligence processes and tracked through our holding period. Our Responsible Investment Policy, which can be provided upon request, provides further details.

Principle adverse sustainability impact statement

At this stage, Momentum does not take into consideration principal adverse impacts ("PAIs") in the manner set out in article 4 of SFDR of its investment decisions on sustainability factors.

Momentum applies its Responsible Investment Policy to its daily work and have relevant procedures at the product level (please see Sustainability-related product disclosures for Momentum II AS that can be found at our web pages). This means that we will pay attention to the portfolio's potential adverse impacts on the environment and society. Such impacts could include GHG emissions, diversity issues, employee matters, respect for human rights, anti-corruption, etc.

The reason for not committing to considering PAIs at the entity level is that we invest in young and small companies with limited resources to retrieve and quality assure all the data required to create the annual adverse sustainability impacts statement as defined by the SFDR. We will rather select some relevant PAIs and support the investee companies in the data collection and reporting of these.

Remuneration Policy

Momentum Venture Management's remuneration policy promotes effective risk management and asset management in accordance with the investment mandates for the

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funds that are managed at all times. The remuneration policy shall be in accordance with the company's and the funds' business strategy, overall goals, risk tolerance and long-term interests. The remuneration policy, and in particular concerning the variable part of the remuneration, shall not encourage risk-taking that is incompatible with the risk profile, the mandate or other founding documents for funds under management.

The integration of sustainability risks is part of the total risk assessment of the investments for funds under management and is hence included in all risk references in the remuneration policy. Importantly, the remuneration policy does not encourage excessive risk-taking with respect to sustainability risks and the variable component is linked to risk-adjusted performance and not just short-term goals.