ANNEX IV

Template periodic disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Product name: Momentum II AS **Legal entity identifier:** Momentum Venture Management AS

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Environmental and/or social characteristics

Did this financial product have a sustainable investment objective?

☐ **Yes**	☒ **No**
☐ It made **sustainable investments with an environmental objective:** ___%	☐ It **promoted Environmental/Social (E/S) characteristics** and while it did not have as its objective a sustainable investment, it had a proportion of ___% of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ with a social objective
☐ It made **sustainable investments with a social objective:** ___%	☒ It promoted E/S characteristics, but **did not make any sustainable investments**

Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.

To what extent were the environmental and/or social characteristics promoted by this financial product met?

During the reporting period, Momentum II AS promoted environmental characteristics by supporting technology development that contributes to any of the six environmental objectives defined in the EU Taxonomy Regulation. These include:

1. Climate change mitigation
2. Climate change adaptation
3. Sustainable use and protection of water and marine resources
4. Transition to a circular economy
5. Pollution prevention and control

6. Protection and restoration of biodiversity and ecosystems

The fund did not require full alignment with the EU Taxonomy criteria. Instead, it assessed contributions in a broader sense, focusing on the potential of the investee companies' technologies to advance these objectives, even if they were not formally Taxonomy-aligned.

- ***How did the sustainability indicators perform?***

The fund used a qualitative evaluation framework to assess the performance of sustainability indicators. The following table summarizes the contributions of each portfolio company, and shows that all investees promoted environmental characteristics:

Company	1. Climate change mitigation	2. Climate change adaptation	3. Sustainable use and protection of water and marine resources	4. Circular economy transition	5. Pollution prevention and control	6. Biodiversity and ecosystem protection and restoration
	Sequestered CO_2 through managed grazing	Climate-resilient agriculture, limiting damage of e.g. floods			Less fertilizers and pesticides through managed grazing	Improved soil health through managed grazing
	Reduced GHG emissions through electrification of boats				Less water pollution and noise pollution because of 100% electrification	
	Lower-CO_2 chargers and more EVs faster					
	Reduced emissions through quicker build-out of PV					
		Increased climate risk understanding, mitigating actions				
	Reduced emissions from avoided use of diesel boats				More efficient food production at sea, reduced env. footprint	Reduced noise and disturbance of fish due to avoided flushing of pens
	More efficient build-out of renewable energy sources in the ocean	Development of sustainable and climate-resilient cities				
	Reduced emissions from enabling long-term renewable energy storage					
	Permanent storage of biogenic CO_2					

- ***…and compared to previous periods?***

This result is equal the the results in 2022 and 2023, in the sense that all portfolio companies promote environmental characteristics.

- ***What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?***

The fund did not make any sustainable investments in 2024. This is a change results from previous Annex IV reports, being a direct consequence of a change in methodology. We have previously reported 100% sustainable investments, explaining that the SFDR leaves a lot of room to managers of financial products to measure whether an investment is "sustainable" or not, and that our interpretation of this might change over time. This is how our interpretation and methodology has changed: For 2022 and 2023 we screened the portfolio for EU taxonomy alignment and conluded that a portion of the portolio was aligned and therefore automatically "sustainable investments". In addition, we used a qualitative framework for proving contribution to an environmental objective, and we used PAI indicators to prove "do no significant harm". For 2024 we have simplified our ESG and impact reporting, to optimize for maximum impact, putting less strain on our portfolio companies in terms of reporting, leaving more time to scale their businesses. As the taxonomy and SFDR frameworks are not tailored to start-ups with small organizations, we believe this is the right decision at this point. Without taxonomy screening and without PAIs to conduct the "do no significant harm" assessment, we cannot state that our investments are "sustainable" by the definition of the SFDR. Therefore, we this year report 0% sustainable investments.

It is crucial to point out that the portfolio is not less sustainable or impact-oriented than it was before. We stay fully committed to investing in companies contributing to solving environmental challenges.

How did this financial product consider principal adverse impacts on sustainability factors?

Momentum II AS has **not committed** to considering principal adverse impacts (PAIs) of investment decisions on sustainability factors in accordance with Article 7 of the SFDR. As such, PAI consideration is not a structured or binding part of the fund's pre-investment process.

However, the fund does integrate ESG considerations into its investment process through the following practices:

- **ESG Questionnaire**: Prior to investment, potential portfolio companies complete a standard ESG questionnaire covering environmental, social, and governance topics. The responses are discussed with the company to establish a shared understanding of ESG maturity and identify areas for improvement.
- **Impact Assessment**: The fund assesses each company's potential positive impact through:
  - A mapping of relevant **Sustainable Development Goals (SDGs)** and sub-targets the company contributes to.
  - A **qualitative impact scoring** framework that evaluates:
    - Direct vs. indirect impact
    - High vs. low contribution
    - Reach (few vs. many)
    - Geography (local vs. global)
    - Time to effect (slow vs. quick)
    - Duration of effect (short vs. lasting)
- **Post-Investment GHG Estimation:** After investment, the fund estimates the GHG emissions of portfolio companies where feasible, to better understand the environmental footprint of the portfolio.

These practices reflect the fund's commitment to responsible investing, even though they do not constitute formal PAI consideration under SFDR.

What were the top investments of this financial product?

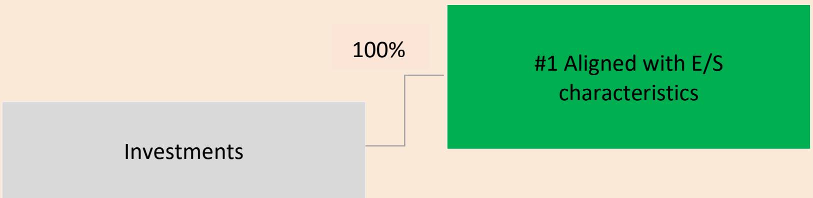
Largest investments	Sector	% Assets	Country
Remora Robotics	Aquaculture	4.7%	Norway
7Analytics	Climate adaptation	2.2%	Norway
Photoncycle	Energy transition	1.8%	Norway
OSC AS	Energy transition	1.8%	Norway

The list includes the investments constituting **the greatest proportion of investments** of the financial product during the reference period which is**:** **2024**

In the table above, only the largest investments made in 2024 are included. These four companies make out ~82% of all the fund's investments made in 2024. "% assets" is calculated as the 2024 investments in each company as a percentage of the fund's AUM of mNOK 381.

What was the proportion of sustainability-related investments?

What was the asset allocation?



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

Asset allocation describes the share of investments in specific assets.

Please note that three of the fund's portfolio companies (Amina Charging AS, Pascal Technologies AS and 7Analytics AS) were classified as aligned with the EU taxonomy when we did the taxonomy screening for 2024. There is no reason to believe that they are no longer aligned, but as we have not done the screening process for 2024, we report 0% sustainable investments to be prudent.

Taxonomy-aligned activities are expressed as a share of:
- **turnover** reflecting the share of revenue from green activities of investee companies.
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

In which economic sectors were the investments made?

The fund's investments in 2024 were made in the following economics sectors: Aquaculture (41% of 2024 investments), Energy transition (32% of 2024 investments), Climate adaptation (17% of 2024 investments), Agriculture (7% of 2024 investments) and Carbon capture and storage (3% of 2024 investments).

To what extent were the sustainable investments with an environmental objective aligned with the EU Taxonomy?

The fund did not make sustainable investments and did not conduct a EU Taxonomy screening.

- **Did the financial product invest in fossil gas and/or nuclear energy related activities complying with the EU Taxonomy[1]?**

  ☐ Yes:

  ☐ In fossil gas ☐ In nuclear energy

  ☐ No

- ***What was the share of investments made in transitional and enabling activities?***

  0%

- ***How did the percentage of investments that were aligned with the EU Taxonomy compare with previous reference periods?***

  The percentage of investments that were aligned with the EU Taxonomy is down from 42-43% in 2023 (42% for OpEx, 43% for CapEx and Turnover) to 0% or n/a in 2023. As previously explained, this is due to a change in methodology and reporting requirements, and not due to a change in investment strategy.

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under Regulation (EU) 2020/852.

[1] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

What actions have been taken to meet the environmental and/or social characteristics during the reference period?

Engagement is a key part of the fund's environmental strategy and is aligned with the broader ESG approach of the fund manager, Momentum Venture Management AS. While the fund typically holds minority positions, it takes an active ownership role through:

- Regular inclusion of ESG topics on the Board of Directors' agenda
- Engagement with management to integrate ESG risks and opportunities into business planning
- Encouraging all portfolio companies to adopt core environmental and social policies
- Requiring companies to define at least one sustainability-related KPI and report ESG metrics quarterly

These practices are consistent with the fund manager's entity-level ESG policies, which are publicly disclosed and applied across all managed funds.