

Owner: CEO	Sustainability and Responsibility Policy
Approved by: Nysnø Board	
Approval date: 17.12.2025	

Sustainability and Responsibility Policy for Nysnø Climate Investments

1. Objective and purpose

Nysnø Climate Investments (Nysnø) invests in new technologies expanding from development to commercial roll-out. Investments into funds and companies shall contribute to reduced greenhouse gas emissions, directly and/or indirectly. The key objective of the investments is to achieve the highest possible return on investments aligned with sustainable and responsible business conduct.

This Sustainability and Responsibility Policy describes how Nysnø assesses funds' and companies' existing and planned work in sustainability, responsible business conduct and risk management. This Policy also describes how Nysnø manages liquid assets and runs own operations with the lowest possible risk for negative harm to people, the environment and society.

2. Ownership and Accountability

The Nysnø Board of Directors approves the Sustainability and Responsibility Policy, and the Policy is reviewed as needed. The Chief Executive Officer is the owner of the Policy and responsible for implementation.

The Chief Investment Officers are responsible for ensuring that the policy is followed in all investment analysis, due diligence, decision gates and through active ownership.

Investment Managers and the deal team are responsible for analysing material risks regarding environmental, social and governance issues, climate risks and climate impact to the Investment Committee.

3. Key principles for sustainability and responsibility

This Sustainability and Responsibility Policy follows key international guiding principles and objectives:

- The OECD Guidelines for Multinational Enterprises¹
- The UN Global Compact (UNGP)²

¹ [The OECD Guidelines for Multinational Enterprises](#) (OECD)

² [UN Global Compact \(UNGP\)](#)

- ILOs Conventions and Recommendations³
- UN Sustainable Development Goals (SDG)⁴
- UN Principles on Responsible Investments (PRI)⁵

Nysnø expects that companies and fund managers follow OECDs guidelines for Multinational Enterprises, The Principles of the ILO Convention, and the UN Global Compact of 10 Principles for Business Conduct. Nysnø also expects that companies and funds do not obstruct or prevent achieving the UN Goals for Sustainable Development.

4. Company Investments

Deal flow

Nysnø continuously assesses companies with technology and services that reduce greenhouse gas emissions. From the start Nysnø assesses the climate impact of a successful company scaling. The guiding principle is that the company has a leading position in a future low- and zero emissions society through directly or indirectly reducing greenhouse gas emissions.

Nysnø also assesses topics within environmental, social issues and governance, such as diversity and equity in the management team, risk for environmental harm, existing shareholders, owners and board composition.

Nysnø also cross checks the activities and suppliers of a company with our list of prohibited investments to avoid that companies are exposed to excluded activities.

Due Diligence

In line with the principles of double materiality, Nysnø analyses material risk for change and impacts that society means for the company, as well as the risk the company can have on people, the environment and society. To ensure that Nysnø conducts an analysis on available information the company answers a set of questions covering:

- Company guidelines for sustainability and responsibility, including ownership, routines, and reporting.
- Material risk within environmental, social issues and governance, including climate risk.
- Impact on the environment, including risk for significant harm and company emissions (Scope 1 – 3)
- Diversity, equity and inclusion, such as gender balance in the company and board and gender pay gap
- Risks in the companies supply chain and company routines to assess suppliers
- Routines and procedures for anti-corruption, cybersecurity, and data protection
- Exposure to or any involvement in activities on our list of prohibited activities
- Compliance with existing and future laws that govern environmental and social issues.
- Any other aspects or risks that the deal team deems relevant.

³ [Conventions and Recommendations \(ILO\)](#)

⁴ [Sustainable Development Goals \(UN\)](#)

⁵ [UN Principles for Responsible Investment \(PRI\)](#)

Investment Decision

The Investment Committee decides if the deal team will continue to work on due diligence and negotiate terms for an investment.

The Investment manager and deal team shall present to the Investment Committee information and analysis showing material risks within environmental, social and governance issues. The analysis shall include identified areas of improvement to be followed up through further dialogue and formalised in legal documents.

The Investment manager and deal team shall include an estimate of the potential for reduced greenhouse gas emissions as the company scales. The analysis is aligned with best practice and included in the investment memo to the investment committee.

Shareholders agreements

Nysnø can include wording in shareholder agreements and other relevant legal documents to formalise requirements and expectations on:

- Routines to reduce, mitigate and inform on risks within environmental, social and governance aspects.
- Work within diversity, equity and recruiting.
- Measure greenhouse gas emissions from own operations and identifying actions to reduce them
- Report on sustainability and climate impact

The purpose of reporting is to assess the status of the company's work and facilitate dialog and development through our active ownership.

Active ownership

As an active and long-term owner, Nysnø works to create value in the portfolio from sustainable growth. Nysnø follows the Norwegian guidelines of company governance as far as it is suited for unlisted companies⁶.

Nysnø will work together with portfolio companies on how the company can assess and meet material risk and opportunity in environmental, social and governance issues, and where it is appropriate exceed influence on strategy, results, risks, compensation, and company management. Nysnø will also vote at General Meetings to support sustainable and responsible business conduct.

Nysnø assesses the company's work within sustainability and responsibility by assessing the regular reporting from the company. The reporting will as a minimum include status on the company's own guidelines within environmental, social and governance issues, number of employees, salaries, sick leave, and company-wide greenhouse gas emissions.

⁶ [The Norwegian Corporate Governance Board](#)

Nysnø will support and contribute to portfolio companies continuously developing and improving their work on sustainable and responsible and climate impact, and Nysnø will pro-actively ensure that portfolio companies can share experiences as fit.

Nysnø will analyse the potential impact portfolio companies can have on reduced emissions as they scale and work actively together with other investors to develop best practices for forward looking emissions reduction potential.

Exit

Nysnø believes that companies who document a systematic and strategic approach to sustainability and responsibility and show a meaningful contribution to reduced greenhouse gas emissions, are attractive investment opportunities for later-stage investors.

Nysnø will also contribute to the company meeting market expectations within environmental, social and governance issues.

Nysnø aims to support the company to clearly show achieved results within sustainability and responsibility climate impact in an exit process.

4.1. Fund Investments

Deal flow

Nysnø continuously identifies fund opportunities that contribute to reduced greenhouse gas emissions through their investment mandate. Funds that have an investment strategy targeting companies with technology and solutions that are key to a future low- and zero emissions society are prioritized. Nysnø assesses the climate impact based on the fund successfully investing in line with their defined investment strategy, and how the future fund portfolio can contribute to reduced greenhouse gas emissions directly and indirectly.

Nysnø also assesses risk within environmental, social and governance issues for both the Fund Manager and defines investment universe. For Nysnø, it is a requirement that the funds do not plan on investing in activities as defined in the list of prohibited investment activities, or will have activities or exposure to countries that do not follow international guidelines on taxes, or countries that have sanctions placed on them or will be active in countries with a high risk of corruption. Nysnø expects fund managers to follow relevant regulation on anti-corruption and Anti Money Laundering (AML).

Nysnø only invests in funds where the Fund Manager is a signatory of the PRI or other internationally recognized ESG standards or has put in place a satisfactory internal framework that is aligned with best practice.

Due Diligence

Nysnø will conduct an analysis of the Fund managers actual and planned approach to environmental, social and governance issues based on:

- The Fund Managers framework for sustainable and responsible investments, including responsibility, routines and reporting.
- Formal requirements that the Fund Manager is planning to include in an Investment Agreement and Side Letters
- The fund managers approach to
 - assesses environmental, social and governance issues and risks when making an investment decision
 - executes on their ownership strategy to contribute to portfolio company successfully mitigating risks within environmental, social and governance issues
 - portfolio estimates, reporting and use of indicators within environmental, social and governance issues
 - assesses and informs on negative incidents within environment, social issues, and governance issues
 - estimates and reports on greenhouse gas emissions and climate risk in the portfolio
 - works for diversity, equity and inclusion in their own operation and portfolio companies
 - any other issues that the deal team finds relevant.

Investment Decision

The Investment Committee decides if the deal team shall continue to work on due diligence of the fund manager and further legal negotiations of Fund Agreements.

The Investment manager and deal team includes analysis of the material risk within environmental, social and governance issues as an integrated part of the investment memo. The deal team shall assess how the Fund Manager is planning to mitigate and report on material climate risk⁷ for the investment universe.

The deal team will also assess how identified areas of improvement should be followed up in further dialog and formalised in final agreements given a positive investment decision.

Fund Agreements

Nysnø enters into Investment and Fund Agreement with the Fund Manager and ensure legal wording sustainability and responsibility where relevant. This includes ensuring that the Fund Managers operate within our expectations to mitigate risk, conduct responsible business, share information and report on incidents. Nysnø also includes a list of prohibited investments including:

- Activities in a low tax jurisdiction or territories who do not meet the OECD's current minimum criteria for transparency and information exchange for tax purposes
- Companies that are directly or indirectly located in or have substantial part of revenue in a jurisdiction subject to comprehensive sanctions by the EU, UN, or the United States. This also applies to any of its directors, shareholders or key management.

⁷Climate risk includes both physical changes that arise from climate change, as well as transition risk that arises from the transition to the low and zero emissions society.

- Companies that are active in:
 - fossil fuels without carbon capture and use or storage
 - weapons, artillery, ammunition
 - breaches of basic human rights and illegal child labour
 - pornographic products
 - tobacco and hard spirits
 - casinos and gambling
 - recreational cannabis
 - software that enables illegal access to data networks.

Holding

The Fund Manager's regular reporting, annual and sustainability reports ensure that Nysnø is informed on the Fund Managers. When making fund investments, Nysnø expects the manager to vote for the fund's shares.

Nysnø will also establish regular dialogue with the fund managers to share experiences and further develop the work of managing risks within environmental, social, and corporate governance, including measuring the portfolio's contribution to sustainability, reducing greenhouse gas emissions, and working towards promoting diversity, equality, and inclusion within financial and startup environments.

Nysnø may also proactively facilitate experience sharing between fund managers in the portfolio where relevant to contribute to the ongoing development and improvement of their work in sustainability, responsibility, climate impact, and more.

Realization

Fund investments usually have a pre-defined horizon with the possibility of extension. The management and realizations of underlying portfolio companies are regulated in agreements between the fund manager and the fund investors. As a fund investor, Nysnø seeks that the fund, upon realization, documents and reports achieved results within environmental, social, and corporate governance for each individual portfolio company and the fund.

4.2. Co-investors

Nysnø expects responsible and sustainable investment practices from co-investors in both companies and funds. Co-investors are expected to have own frameworks in place that enable them to assess environmental, social and governance issues in their investment activities. Nysnø actively encourages co-investors to become signatories of the UN Principles for Responsible Investments (PRI) or other relevant frameworks.

5. Managing liquid assets

Liquid capital is managed as bank deposits or invested into money market funds. Nysnø aims to place its capital in banks and choose managers of money market funds that provide the highest possible return within sustainable frameworks.

The work on and regulations for sustainability and responsibility in banks and money market funds is currently in development, and Nysnø aims to collaborate with relevant actors to understand and implement new opportunities that arise.

6. Own operations

Our own operations affect the environment mainly through travel activity, office supplies and the office buildings. Nysnø works together with the owner of the building on environmental on energy and waste related issues, offers employees public transport, asks for alternatives to meet in our own canteen and at own events, and encourage employees to choose rail transport and prioritise local suppliers. Nysnø estimates and publishes our annual climate gas emissions (Scope 1 – 3) and estimates avoided emissions from our portfolio (Scope 4). Nysnø also assesses physical climate risks for our operations.

Nysnø does not accept discrimination based on gender, skin colour, religion, nationality, age, or physical and mental health. Nysnø focuses on diversity, equity, and inclusion in organizational development. Nysnø strives for equal representation between genders in the organization and investment teams and aims to communicate broadly and inclusive when recruiting new employees.

7. Transparency and reporting

Nysnø promotes transparency about our business; our guidelines are available online from our webpages and we publish quarterly reports. Nysnø will describe our work to follow the Policy for Responsible and Sustainable Investment in annual reports. We strive to make our approach easy to understand for employees, owners, portfolio companies and society.

Nysnø collaborates closely with relevant financial institutions, organisations and businesses to ensure that our approach follow best practices and new knowledge within sustainability, responsibility and climate impact.