

SFDR disclosure

The regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector (SFDR) is implemented into Norwegian law through the Norwegian Law "Lov om offentliggjøring av bærekraftsinformasjon i finanssektoren og et rammeverk for bærekraftige investeringer". SFDR sets out disclosure and reporting obligations for alternative investment fund managers.

This disclosure is applicable for Viking Venture AS and any internal managed alternative investment funds established by Viking Venture AS (in the following referred to as "Viking Venture" or "we").

Sustainability Risk

Pursuant to SFDR Viking Ventures is required to disclose the manner in which sustainability risks are integrated into the investment decision-making process. Sustainability risk means an environmental, social or governance event or condition that, if it occurs, could cause an actual or potential material negative impact on the value of the investments made by Viking Venture.

Consideration of sustainability risks is integrated into Viking Venture's decision-making process. Before investment decisions are made, the investment team will review and assess potential sustainability risks during the pre-deal screening and the due diligence process. If we consider the sustainability risk to be too high, or if the companies are not willing to address underlying sustainability risk, we will not make new or further investments in such companies.

[We will also include monitoring of sustainability risk on an ongoing basis throughout the lifecycle of the investment, including during ownership and prior to exit. Within our portfolios we seek opportunities to improve identified sustainability risks to reduce the vulnerabilities and improve the potential of portfolio companies.]

No consideration of Principal Adverse Impact

Viking Venture does not consider any adverse impact of its investment decisions on sustainability factors, as we consider our existing policies and procedures to be appropriate, proportional, and tailored to the investment strategies of the funds. Viking Venture's investment strategies are aimed to invest in software companies. Such companies in general have a low adverse sustainability impact from their own activities. Further, we expect significant challenges in obtaining sufficient data quality from potential portfolio companies.

Viking Venture will however keep this position under review and may reevaluate the decision in light of increased data availability or other regulatory or market changes.

Remuneration Policy

Sustainability risk is an integrated part of ensuring long term sustainable value creation and is a natural part of both the investment process and in developing the portfolio companies of funds managed by Viking Venture. The performance evaluation and compensation framework take into account several criteria, including adherence to our due diligence and management procedures that are designed to identify and mitigate the risks inherent in each of our investments, including sustainability risks.