Product Level Website Disclosures

ICP Technology Fund I

incp.com

Sustainability related disclosures

This document is the product level website disclosure for ICP Technology Fund I managed by ICP Ventures AS made in accordance with the requirements in the European Union's Sustainable Finance Disclosure Regulation (**SFDR**) ((EU) 2019/2088), Regulation 2020/852 (the "**EU Taxonomy**") and the regulatory technical standard ((EU) 2022/1288).

This document includes the disclosures in accordance with:

Article 10 of (EU) 2019/2088: Transparency of the promotion of environmental or social characteristics and of sustainable investments on webpage.

Article 37-49 of (EU) 2022/1288: Website product disclosure for financial products with a sustainable investment objective

Summary

ICP Technology Fund I (the "**Fund**") is managed by ICP Ventures (the "**Fund Manager**"). The Fund has sustainable investments as its objective, more specifically, sustainable investments that contributes to climate change mitigation. The Fund is classified as an article 9 fund, in line with SFDR. To obtain the Fund's investment objective, the Fund Manager will, on behalf of the Fund invest in companies ("**Portfolio Companies**"), developing or providing technologies and solutions with a substantial potential of reducing greenhouse gas emissions. The Fund's investment focus is industrial hardware technologies related to electrification, industry decarbonization, sustainable materials and products, and carbon management.
The Fund takes into account the principal adverse impact indicators ("**PAIs**") in the investment process.

The following indicators are used to measure the attainment of the environmental investment objective:

- Potential[1] avoided GHG emissions at full scale, per Portfolio Company and aggregated for all Portfolio Companies in the Fund (in tCO2e per year)
- Planned[2] avoided GHG emissions in accordance with the business plan, per Portfolio Company and aggregated for all Portfolio Companies in the Fund (in tCO2e per year)

The Fund monitors the environmental objective and uses sustainability indicators to measure the attainment of these objectives over the lifecycle of the Fund. Reporting on the PAIs and the sustainability indicators is required of Portfolio Companies, with assistance from the Fund Manager to ensure comparability. The indicators are monitored at Fund level and assessed against historical performance.
ICP Ventures conducts an assessment of new investment opportunities to understand their potential contribution to climate change mitigation and whether they are likely to cause significant harm to other environmental objectives, including through principle adverse impacts. Where possible ICP Ventures will seek to quantify that contribution. ICP Ventures will also assess investments for social and governance risks.

Data is collected from Portfolio Companies using standardized templates with clear definitions to reduce the risk of errors and inconsistencies.

For investments in early-stage companies, data for sustainability indicators and the PAIs will be limited, and reporting will rely also on estimates. Over the lifetime of the Fund, we will work with

[1] Potential avoided emissions is a term that represents the maximum theoretical climate potential of a technology or solution, based on forward-looking assumptions.
[2] Planned avoided emissions is a term that represents the likely climate potential of a technology or solution, based on a realistic scenario of commercial deployment.

companies to develop and systematically report such data to better manage their sustainability performance.

No significant harm to the sustainable investment objective

The Fund's investments aim at providing technologies and solutions that will contribute to significant reductions in greenhouse gas emissions, without doing any significant harm to other environmental or social objectives.

ICP Ventures assesses companies for potential adverse impacts through three mechanisms: A pre-due diligence screening as part of the initial assessment of potential investment cases, a thorough due diligence as part of the full assessment, and an annual review of existing investments against our stated expectations. Where potential adverse impacts are identified, we will work to mitigate them through active ownership.

To ensure this, ICP Ventures' sustainability assessment of new investment opportunities includes the following:

- The "do no significant harm" criteria set by the SFDR and EU Taxonomy (where appropriate)
- PAI indicators in Annex 1 of the EU Regulation 2022/1288
- PAI 1-14 in Table 1
- PAI 2.4 in Table 2, "Share of investments in companies without carbon emission reduction initiatives"
- PAI 3.1 in Table 3, "Investments in companies without workplace accident prevention policies"

Each indicator is evaluated based on likelihood and impact severity. The results of this assessment are taken into account when making investment decisions and when developing the active ownership plan of the Portfolio Company.

Reporting on the PAIs is required for all Portfolio Companies, this includes the mandatory indicators and the voluntary indicators (PAI 2.4, 3.1) required through the entity-level reporting on PAI indicators of the Fund. Annual assessments are performed for the reporting on principal adverse impacts from all Portfolio Companies.

Monitoring of the portfolio companies' adverse impact performance is done by comparing against historical performance on the indicators as well as an evaluation of the development against any potentially defined goals for the specific indicators. Where relevant, the Fund shall respond to any incidents or unintended performance trends exhibited through the reporting on principal adverse impacts from Portfolio Companies. This may include the joint establishment of mitigation and/or management plans for relevant adverse impacts.

Portfolio Companies are expected to follow good governance models and where relevant, adhere to the minimum social safeguards in alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight Fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

Sustainable investment objective

The Fund has a sustainable investment objective, more specifically, an environmental objective of investing in companies contributing to climate change mitigation. The Fund will do this by investing in, and building, early-stage companies developing or providing technologies and solutions with a substantial potential of reducing greenhouse gas emissions in line with the Paris Agreement.

Investment strategy

The Fund invests in early-stage companies providing industrial technology with a substantial greenhouse gas reduction potential at full scale. The investment focus is on core technologies and materials related to electrification, industry decarbonization, sustainable materials and products, and carbon management.

Investments will be made when companies are in the pre-seed, seed or growth stage, with potential follow-on investments to continue to support the Portfolio Companies that delivers on their business plans. ICP Ventures will invest in industrial technology companies that are scientifically proven and where a market inflection point is observed. Majority of the investments will be in the Nordics, with a proportion of total commitments in selected European countries.

In addition, investments by the Fund must not do any significant harm to other environmental or social objectives. Good governance practices, including respect to sound management structures, employee relations, remuneration of staff and tax compliance are considered as a minimum requirement for all Portfolio Companies managed by ICP Ventures. Considering ICP Ventures will make investments in early-stage companies, the size, nature and scale of the Portfolio Companies' activities will be taken into account when assessing governance practices. As part of the active ownership, ICP Ventures will work with the Portfolio Companies to implement and maintain good governance practices when appropriate, as they grow into more mature companies.

ICP Ventures will not invest in companies deriving more than 5 percent of their revenue from:

- Coal mining and production
- Fossil fuel extraction and production
- Gambling activities
- Production of tobacco, alcohol, weapons, and/or adult entertainment

Further, ICP Ventures will not invest in companies associated with severe violations of human rights or other breaches of fundamental ethical principles and norms.

Proportion of investments

The Fund will make 100% sustainable investments with an environmental objective of climate change mitigation. However, the Fund will have some cash or cash equivalent holdings for ancillary liquidity purposes, with the result that a minimum of 95% of the Fund's holdings will be sustainable investments. All exposure is expected to be direct.

The Fund does not have a minimum requirement of investments qualified as sustainable under the EU Taxonomy, but does utilize the EU Taxonomy as a tool and guideline in the asset selection process and in the ongoing development of Portfolio Companies. The Fund will invest in early-stage companies, whereof some may still be in the early research and development ("**R&D**") phase. The EU Taxonomy does not cover early R&D activities. However, ICP Ventures will consider the intended future activities of the Portfolio Companies and make an initial assessment of the EU Taxonomy technical screening criteria to ensure ambition levels are aligned.

The Fund will not make any investments based on social objectives, however some of the investments may have positive social impacts.

Monitoring of the sustainable investment objective

In order to meet the sustainable investment objective of the Fund, the following sustainability indicators are used to measure the attainment of the environmental investment objective:

- Potential avoided GHG emissions at full scale, per Portfolio Company and aggregated for all Portfolio Companies in the Fund (in tCO2e per year)
- Planned avoided GHG emissions in accordance with the business plan, per Portfolio Company and aggregated for all Portfolio Companies in the Fund (in tCO2e per year)

The Fund monitors the environmental objective, and the sustainability indicators used to measure the attainment of these characteristics over the lifecycle of the Fund through processes including the following:

- Reporting on lifecycle emissions and emission reduction potential compared to relevant benchmarks. The lifecycle assessment ("**LCA**") is required to be updated regularly according to product development, and the results reported on annually. An emission LCA is conducted by ICP Ventures prior to any new investments.
- Reporting on the sustainability indicators calculated by the Portfolio Company with assistance by the Fund Manager to ensure comparability and methodological cohesiveness. The sustainability indicators are monitored at Fund level with an annual assessment of comparisons against historical performance on the sustainability indicators.
- Reporting on the PAIs is encouraged from all portfolio companies, where appropriate. As a minimum, this includes reporting on the mandatory indicators and the voluntary indicators (PAI 2.4, 3.1) required through the entity-level reporting on adverse impact indicators of the Fund. Annual assessments are performed for the reporting on PAIs from all portfolio companies.

The monitoring activities are subject to internal and external control mechanisms in accordance with ICP Ventures' procedures for internal control.

Methodologies

In order to measure the attainment of the environmental investment objectives of the Fund, the potential greenhouse gas emission reductions of each investment opportunity is assessed and quantified, where possible. This is done by a) conducting an emission LCA of the product or solution, b) comparing the life cycle emissions with a reasonable benchmark and calculating the difference, c) extrapolating this to the market potential of the technology or solution at full scale commercial deployment. This is an internal procedure conducted by ICP Ventures. Furthermore, ICP Ventures requires Portfolio Companies to further quantify their current and potential climate impact through LCA studies on emissions and to update this continuously as more reliable data becomes available. The LCA should be verified by an independent third party when relevant, depending on the maturity of the Portfolio Company.

Other industry-standard methodologies may be used, and the specific chosen methodology will be stated in the reporting of the sustainability indicators.
The methodology used in connection with consideration of the PAIs follows the methodology defined for indicators for principal adverse impacts in Table 1 of Annex I, and the relevant indicators in Tables 2 and 3 of Annex I.

Data sources and processing

To assess the emission reduction potential of an investment opportunity or Portfolio Company the Fund primarily use data from the company combined with peer reviewed studies and scientific evidence. Additionally, ICP Ventures' network of technical advisors and purpose-specific software solutions for data collection will be utilized.

Data is collected from Portfolio Companies using standardized templates with clear definitions to reduce the risk of errors and inconsistencies. In order to ensure data quality, internal and external specialist competencies will assess the indicators, development of the indicators over time and comparing with industry peers, where data is available.

Data is processed internally by the Fund Manager and can be subject to assessments and verifications by external experts. The data will to a certain extent be based on estimates, given that the Fund will invest in early-stage companies, whereas certain companies may not be operational as they are still in the R&D phase.

Limitations to methodologies and data

The methodologies outlined above will provide ICP Ventures with a reasonable impression of the impact opportunities of the Portfolio Companies. For investments in early-stage companies, there will be limitations to data availability. Hence, in the beginning of the ownership period, data required to report on the sustainability indicators and the PAIs may not be possible to obtain.

Portfolio Companies may not have products in operations, meaning that the potential avoided emissions calculation will to a large extent be based on estimates and not data from actual operations.
ICP Ventures will report on these limitations in a transparent manner, and the methodology and the Portfolio Company's part of aggregated calculations will be stated clearly to increase transparency. As the Portfolio Company will mature, the limitations will diminish, as this data is material to the ownership of the Portfolio Companies. Therefore, it is part of ICP Ventures' active ownership principles to implement this over time.

Over the lifetime of the Fund, the attainment of the environmental objective will not be affected by these limitations, as they are not seen as material to providing an accurate impression of the investment opportunity or Portfolio Company.

Due diligence

ICP Ventures will assess how investments can contribute to decarbonization and, where possible, seek to quantify that contribution. ICP Ventures will also assess investments for relevant sustainability risks.
In the pre-screening, ICP Ventures takes a thematic investment approach, focusing solely on technologies and solutions with a substantial potential of reducing greenhouse gas emissions at full scale. Pre-due diligence screenings on sustainability risks and opportunities are part of the initial assessment of all potential investments.

This screening includes a high-level desktop analysis, including a selection of key sustainability questions to assess if there is a substantial environmental contribution potential with no probable significant harm to other environmental objectives, or any obvious social or governance risks.

If an investment opportunity shows substantial emission reduction potential, ICP Ventures will proceed with the investment process and conduct a comprehensive due diligence analysis, including sustainability parameters. The due diligence process builds on the sustainability criteria defined by the SFDR. All investments must show 1) potential for substantial contribution to climate change mitigation, 2) no significant harm to other environmental or social objectives, and 3) no risk of breaching good governance practices or minimum social safeguards. ICP Ventures will also assess each investment using the PAIs.

Where the assessment identifies high or unacceptable sustainability risks, mitigating actions must be identified before determining whether the investment process can proceed. The mitigations are included in the active ownership agenda of the investment opportunity.

The sustainability due diligence analysis must also confirm the investment opportunity is a fit with ICP Ventures' investment strategy targeting developing technologies and solutions with a substantial potential of reducing emissions. Where possible, ICP Ventures will perform an emission life cycle analysis of each investment opportunity and compare it against a reasonable benchmark to understand the net contribution of a technology or solution if it is introduced to society.

Sustainability due diligence results must be approved by the investment committee before it makes the final investment decision on behalf of the Fund.

Engagement policies

Active ownership is a core part of ICP Ventures' venture-building strategy to create value, accelerate growth, and build strong and resilient businesses together with the Portfolio Company and its partners.
A value creation plan is developed for each Portfolio Company at the time of investment. This includes a 3-year sustainability plan based on mitigating, managing, and monitoring the risks identified by the due diligence process. ICP Ventures develops the plan in collaboration with the Portfolio Company. This plan is revised annually to ensure applicability for the Portfolio Company and its stage of development.

The board of directors approve the strategy and business plan, including sustainability, for each Portfolio Company, which is developed in close collaboration with the management team. ICP Ventures aims to engage a chairperson with leadership and relevant industry experience complementary to the Portfolio Company CEO and the ICP Ventures investment team. Where ICP Ventures has majority ownership of a Portfolio Company, ICP Ventures aims to represent the majority of the board and nomination committee and will influence decisions through the board positions as well as regular interaction with the Portfolio Company's management team. ICP Ventures will urge the Portfolio Companies to have a minimum of six board meetings per year or, if fewer, monthly reporting meetings and ad-hoc workshops on strategic considerations with the ICP Ventures team. ICP Ventures will always exercise its voting rights.

ICP Ventures encourages and offers frequent dialogue with the CEO, founder, or management team of the Portfolio Companies to actively contribute as discussion and sparring partners. This relationship supports strategic decisions and corporate and business development activities, including the development, implementation, and integration of sustainability. For minority ownership, meeting frequency will vary by company. For majority ownership, ICP Ventures aims to meet with the Portfolio Company's management team on a weekly basis.

ICP Ventures may invest alongside other investors as a minority investor. In such cases, the aim is to collaborate with the other investors to develop priorities, principles, commitments, implementation plans, and other documentation related to sustainability for the respective venture. For minority investments, ICP Ventures will also seek to have a minimum of one position on the board and one on the nomination committee.

Attainment of the sustainable investment objective

No EU Climate Transition Benchmark or EU Paris-aligned Benchmark is available for the Fund's investment strategy. ICP Ventures has not designated a reference benchmark, given there are no relevant benchmark indices for early-stage companies.

ICP Ventures ensures that the Fund contributes to climate change mitigation by investing in companies with technologies and solutions with a substantial greenhouse gas emission reduction potential.