

Principal Adverse Impacts Statement

June 30, 2023

Statement on principal adverse impacts of investment decisions on sustainability factors

Financial market participant

Gullspång Re:food II Invest AB (559328-3467)

Summary

Gullspång Re:food II Invest AB (559328-3467) considers principal adverse impacts of its investment decisions on sustainability factors. The present statement is the consolidated statement on principal adverse impacts on sustainability factors of Gullspång Re:food II Invest AB (Re:food).

This statement on principal adverse impacts on sustainability factors covers the reference period from 1 January 2022 to 31 December 2022.

The Fund considers principal adverse impacts (PAI) for all its investments. All portfolio companies are evaluated based on environmental and social criteria defined by the Re:food circle. This includes any potential risk for long-term adverse impact at scale and existing mitigation plans. The Fund also considers the mandatory indicators and four voluntary indicators defined by the Sustainable Finance Disclosure Regulation (SFDR). Information on these indicators is collected from the portfolio companies, subject to data availability. As part of the Fund's active ownership practices, support is provided to the portfolio companies in various ways, for instance, in collecting and assessing data related to the PAI indicators to increase data coverage and reduce the adverse impact over time.

This is the first year collecting ESG data for the Fund, and some challenges have been met in relation to the collection of data for the PAI indicators from the portfolio companies. The size of the portfolio companies differs, as does their sustainability maturity. The Fund expects increased data coverage in the coming years.

Description of the principal adverse impacts on sustainability factors

Table 1: Indicators applicable to investments in investee companies

Adverse sustainability Indicator	Metric	Impact [2022]	Impact [2021]	Explanation	Actions taken, actions planned, and targets set for the next reference period
CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS					
Greenhouse gas emissions	1. GhG emissions	Scope 1 GhG emissions	18.65 tCO2e	NA	Given the limited coverage of GHG emissions, the Fund will encourage and support companies to collect and report this data in the
		Scope 2 GhG emissions	31.13 tCO2e	NA	

Adverse sustainability Indicator	Metric	Impact [2022]	Impact [2021]	Explanation	Actions taken, actions planned, and targets set for the next reference period
	Scope 3 GhG emissions	NA	NA	Scope 3 emissions data will be collected for the 1 January 2023 to 31 December 2023 reference period.	upcoming year. Additionally, not all of our portfolio companies produce Scope 1 Greenhouse Gas Emissions due to the nature of their operations.
	Total GhG emissions	49.78 tCO2e	NA		
2. Carbon footprint	Carbon footprint	0.04	NA		
3. GhG intensity of investee companies	GHG intensity of investee companies	0.29	NA		
4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	0%	NA	None of the Fund's investments are exposed to companies active in the fossil fuel sector.	
5.Share of non-renewable energy consumption and production	Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage of total energy sources	56.71%	NA		The Fund will encourage and support companies to identify opportunities for shifting towards renewable energy sources whenever possible and increase data coverage.
6. Energy consumption intensity per high impact climate sector (Energy consumption in GWh per million EUR of revenue of investee companies, per high	Sector A	0.002	NA		
	Sector C	0.119	NA		
	Sector G	0.002	NA		

Adverse sustainability Indicator		Metric	Impact [2022]	Impact [2021]	Explanation	Actions taken, actions planned, and targets set for the next reference period
	impact climate sector)					
Biodiversity	7. Activities negatively affecting biodiversity-sensitive areas	Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas	0%	NA	None of the Fund's portfolio companies have sites/operations located in/near biodiversity-sensitive areas.	
Water	8. Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	0	NA	None of the Fund's portfolio companies produce direct emissions of priority substances as defined in Article 2(30) of Directive 2000/60/EC of the European Parliament and the Council and direct emissions of nitrates, phosphates, and pesticides.	
Waste	9. Hazardous waste and radioactive waste ratio	Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average	0.0000089	NA		The Fund will follow up with the companies on the disposal of this hazardous waste.
INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS						
Social and employee matters	10. Violations of UN Global Compact principles and Organisation for	Share of investments in investee companies that have been involved in violations of the UNGC	0%	NA	None of the portfolio companies violate UN Global Compact/OECD guidelines for multinational	

Adverse sustainability Indicator	Metric	Impact [2022]	Impact [2021]	Explanation	Actions taken, actions planned, and targets set for the next reference period
Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	principles or OECD Guidelines for Multinational Enterprises			companies.	
11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance /complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	99.9%	NA		The Fund will encourage and support its portfolio companies to draft and implement this policy document in the upcoming year.
12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	9.09%	NA		The Fund will encourage and support the companies with the highest unadjusted gender pay gap to understand and address the underlying cause.
13. Board gender diversity	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members	19.45%	NA		The Fund will encourage and support the companies with the lowest Board gender diversity to understand and address the underlying cause.
14. Exposure to controversial weapons (anti-personnel mines,	Share of investments in investee companies involved in the manufacture	0%	NA	None of the Fund's investments are exposed to companies active in the	

Adverse sustainability Indicator	Metric	Impact [2022]	Impact [2021]	Explanation	Actions taken, actions planned, and targets set for the next reference period
	cluster munitions, chemical weapons and biological weapons)	or selling of controversial weapons		controversial weapons sector.	

Other indicators for principal adverse impacts on sustainability factors

Table 2: Additional climate and other environment-related indicators

Adverse sustainability Indicator	Metric	Impact [2022]	Impact [2021]	Explanation	Actions taken, actions planned, and targets set for the next reference period
Emissions	2-4. Investments in companies without carbon emission reduction initiatives	Share of investments in investee companies without carbon emission reduction initiatives aimed at aligning with the Paris Agreement	89.50%	NA	The Fund will encourage and support the companies without emissions reductions initiatives to adopt such initiatives, if appropriate for the industry and stage of the company

Table 3: Additional indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters

Adverse sustainability Indicator	Metric	Impact [2022]	Impact [2021]	Explanation	Actions taken, actions planned, and targets set for the next reference period
Social and employee matters	3-4. Lack of a supplier code of conduct	Share of investments in investee companies without any supplier code of conduct (against unsafe	41.81%	NA	The Fund will encourage and support the companies without a supplier code of conduct to adopt and implement one

Adverse sustainability Indicator	Metric	Impact [2022]	Impact [2021]	Explanation	Actions taken, actions planned, and targets set for the next reference period
		working conditions, precarious work, child labour and forced labour)			
Human rights	3-9. Lack of a human rights policy	Share of investments in entities without a human rights policy	68.50%	NA	The Fund will encourage and support the companies without a human rights policy to adopt and implement one
	3-10. Lack of due diligence	Share of investments in entities without a due diligence process to identify, prevent, mitigate and address adverse human rights impacts	69.82%	NA	The Fund will encourage and support the companies without a human rights due diligence policy to adopt and implement one

In addition to the Sustainability indicators defined by SFDR and reported above, the Fund also considers the sustainability of each portfolio company in relation to the Re:food circle framework and the overall mission of the Fund. The Re:food circle consists of seven planetary boundaries, as described by Stockholm Resilience Center and the EAT-Lancet Commission, plus four ethical foundations that are sub-goals of the UN Sustainable Development Goals and the Farm Animal Welfare Council's Five Freedoms:

Planetary Boundaries: Greenhouse gas emissions, Cropland use, Water use, Nitrogen application, Phosphorus application, Biodiversity loss, Ocean use

Ethical Foundations: No hunger, Nutritious diets, Decent work, Animal welfare

Every portfolio company contributes meaningfully to reducing the food system's impact on one or more of these Re:food circle areas, thereby contributing to the overall mission of the Fund to transform the global food system so that it meets the needs of all people while operating within our planetary boundaries.

In order to be eligible for investment, a company must also not violate any of the Fund's exclusion criteria, and must also meet Good Governance criteria to ensure that Re:food fulfills the criteria for Minimum Safeguards for SMEs, outlined in Article 18 of the Taxonomy Regulation. Portfolio companies are regularly screened or assessed in relation to the four established topics of human rights, bribery & corruption, taxation, and fair competition. Thus far, no Re:food portfolio companies have been found to be in violation of laws in any of these areas.

Description of policies to identify and prioritise principal adverse impacts on sustainability factors

ESG Policy

The Fund is guided by an ESG Policy that was approved and adopted most recently on February 27, 2023, and that will be reviewed and updated as needed on an annual basis. This policy describes Re:food's commitment to integrating ESG factors in the management of the portfolio, the sustainable objectives of Re:food, and the Re:food investment processes and ownership practices.

It is the responsibility of the COO to enforce and ensure the content, accuracy, and relevance of the Policy. The Investment Managers are responsible for daily operationalizing the policy in managing assets and portfolio companies. In this regard, the Investment Managers shall report their activities and the progress towards implementing the Policy to the COO, who shall report to the CEO and Board.

Selection of Indicators

The food system is a primary driver of numerous negative environmental impacts and social harms, so by investing in innovations solving root cause problems in the system, the Fund accomplishes its mission to create transformative positive impact in one or more areas of the food system. Portfolio companies are categorized into one or more investment themes, that correspond to major shifts or transformations needed to make the food system more sustainable: Healthy Soils, Healthy Diets, Sustainable Supply Chains, and Sustainable Proteins & Fats. The Fund defines a Theory of Change for all new investment opportunities related to these themes and regularly considers the company's continued alignment with that Theory of Change post-investment.

In addition to considering the company's positive impact on the food system, the Fund also considers its potential adverse impacts and the extent to which it avoids causing significant harm to other environmental and social objectives. The indicators to assess this are the mandatory SFDR Principal Adverse Impact indicators, along with the areas of the Re:food circle. The Fund also considers the Good Governance criteria, and the four voluntary SFDR PAI indicators, both described above. The voluntary indicators were selected because they were determined to be material at the industry level for most or all of the Fund's existing portfolio companies.

Identification and assessment of principal adverse impact

In order to be considered for investment, a portfolio company must first align with one of Re:food's prioritized segments within its investment themes. During the due diligence process, the Investment Team develops a logical Theory of Change for the company that aligns with the Fund's mission. This is informed by a structured assessment process that considers the company's strategy, likelihood of success, and alignment with the areas of the Re:food circle, along with potential adverse impacts and mitigation strategies in relation to the Re:food circle.

During due diligence, the Fund also collects available ESG data from the company. This ESG data includes information about activities in excluded industries, violations of the Good Governance criteria, and the PAI indicators. The Fund considers four aspects from an ESG risk and mitigation perspective: risk, probability,

consequences, and mitigation strategy. Each ESG risk is assessed based on probability, long-term environmental and social impacts, and a qualitative assessment of existing or future mitigation plans. Companies that pass these screens are eligible for investment.

Post-investment, the Fund continues to monitor the company's positive and negative impacts. The companies that the Fund invests in are SMEs, and some are pre-revenue. Therefore their principal adverse impact today is often small. The Fund's priority is to collect information on the principal adverse impacts of the company to support the company in scaling in such a way as to reduce harm in the future. Given the early stage of many of these investments, quantitative information about the severity of these potential adverse impacts and the probability of occurrence may be limited. Therefore the Fund relies on qualitative assessments and estimates when necessary. This naturally increases the margin of error.

Data sources

The primary source of data for the SFDR PAI indicators is the Fund's portfolio companies. The Fund has retained a third-party platform, Sustainlab, to facilitate data collection and processing. Sustainlab and Re:food both apply various measures to control data quality. When a portfolio company is not able to provide primary data on a PAI indicator, the Fund may use estimated data provided by Sustainlab or other third-party data providers. As part of the Fund's active ownership practices, support is provided to the portfolio companies in various ways, for instance, in collecting and assessing data related to the PAI indicators to increase data coverage and reduce the adverse impact over time.

Engagement policies

Re:food is an active owner and an engaged long-term minority shareholder in all its portfolio companies. Due to extensive experience and knowledge of food system transformation and sustainability, the Fund can support its portfolio companies in their ESG progress and integration. Further, Re:food ensures that the portfolio companies operate in a financially, environmentally, and socially responsible manner. With regards to the principal adverse impact indicators, Re:food is in the process of developing an "ESG Roadmap" to support the companies in establishing stage-appropriate measures to reduce adverse impacts and create benefit for key stakeholders. As this is the first reference period over which the Fund has collected PAI data, this section will be updated in subsequent years to describe active engagements in the event that there is no reduction in principal adverse impacts over more than one reference period.

References to international standards

Re:food is committed to proactively assessing governance practices of potential investments and investee companies during the investment holding period. Governance practices of potential investments are assessed during the due diligence process concerning the OECD Guidelines for Multinational Enterprises. Particularly, the due diligence process shall assess governance practices with reference to the following OECD Guidelines sections.

- Human Rights (Section IV)
- Employment and Industrial Relations (Section V)
- Combating Bribery, Bribe Solicitation, and Extortion (Section VII)

- Taxation (Section XI)

Companies are required to alert Re:food of any prior or current convictions for violations related to these four sections, under applicable governing laws. Companies that have been convicted of violations can remain compliant with Re:food's good governance criteria by taking action to ensure that previous violations are not repeated after the violation has occurred. Signs of sufficient action taken can include submitting a new policy to the Board or a public statement describing actions taken to lessen the likelihood of repeat violations, among other possible activities.

Paris Agreement

Re:food believes that its investment strategy is aligned with the goal of net zero greenhouse gas emissions by 2050 or sooner, in line with global efforts to limit warming to 1.5°C, because it builds on the planetary boundary work done by the Stockholm Resilience Center and the EAT-Lancet Commission. The Fund does not invest in companies active in the fossil fuel sector or that will increase the amount of greenhouse gases produced by the food system. Although the Fund has not set a Net Zero target or a carbon emissions reduction initiative, it will be assessing the potential benefit and feasibility of doing so during the second half of 2023.

Historical comparison

To be included starting in 2024.