

Sustainability related disclosures

Article 8 products (“promotes environmental or social characteristics”)

For each such product the following information shall be published in the following order and with all of the following sections titled:

(a) **Summary**

Spintop IV is an early-stage technology venture capital firm that invests in companies with a positive impact on sustainability. While we promote environmental and social considerations, we do not pursue a specific environmental objective under the Taxonomy Regulation, which is why Taxonomy-alignment reporting does not apply to us. As a result, we have chosen to label Spintop as an **Article 8 “light green”** fund.

The environmental and social characteristics promoted by Spintop IV are aligned with the 3 of the 17 SDGs set out by the UN, which are **gender equality, decent work and economic growth, and climate action**. We use a set of sustainability indicators that are compared to various benchmarks to measure each characteristic, aiming to contribute to a more sustainable and equitable future.

Spintop IV seeks to invest in early-stage technology companies that can have a significant positive impact on sustainability, with all portfolio companies required to live up to certain sustainability standards and to demonstrate and report measurable impact on sustainability matters that are most relevant to the portfolio company’s business activities. The foundation of our sustainability work is **Spintop’s Sustainability Policy**, which is an integrated part of the agreement with all investors in Spintop III and Spintop IV, and a fundamental governance policy that the Spintop organization adheres to.

While Spintop does not have a specific focus on environmental objectives, we are committed to investing in sustainable, environmentally friendly activities that align with our ESG criteria and values. We conduct ESG due diligence and evaluate sustainability factors in our investment decisions, actively seeking out opportunities to invest in companies that demonstrate a commitment to sustainability and have a positive impact on the environment and society.

To ensure compliance with our sustainability policies and investment decisions, Spintop IV has internal control mechanisms in place that allow us to assess the effectiveness of the sustainability policies and investment decisions. Our investment professionals regularly review and evaluate the E/S characteristics of the portfolio companies to ensure they continue to meet their sustainability criteria, and we work closely with the portfolio companies to promote transparency and accountability. Additionally, we engage with independent third-party assessors to validate our sustainability performance and ensure that our investment decisions are aligned with our commitment to sustainability.

*Spintop IV är en riskkapitalfirma som investerar i nordiska mjukvarubolag i tidiga skeden som har positiv påverkan på hållbarhet. Även om vi tar hänsyn till miljö och sociala kriterier investerar vi inte aktivt i hållbara företag som strävar efter specifika miljömål enligt EU:s taxonomi. Därav har vi valt att definiera Spintop som en **Article 8 “light-green”** fond.*

*De miljö- och sociala krav som främjas av Spintop fokuserar på 3 utav de 17 huvudsakliga SDG-målen som fastställts av FN, vilka inkluderar **jämställdhet, anständiga arbetsvillkor och ekonomisk tillväxt** samt*

bekämpa klimatförändringen. Vi använder en uppsättning hållbarhetsindikatorer som jämförs med olika referenspunkter för att mäta varje egenskap, med syftet att bidra till en mer hållbar och rättvis framtid.

Spintop IV ämnar investera i tidiga teknikbolag som har potentialen att skapa positiv påverkan på hållbarhet, där samtliga portföljbolag måste leva upp till särskilda hållbarhetsstandards och demonstrera samt rapportera en mätbar påverkan på hållbarhetsaspekter som är relevanta till deras verksamheter. Grunden för vårt hållbarhetsarbete är **Spintop's Sustainability Policy** och är en integrerad del av avtalet med alla investerare i Spintop III och IV, men även en grundläggande policy som Spintop's organisation följer.

Trots att Spintop IV inte har ett specifikt hållbarhetsfokus så är vi hängivna till att investera i hållbara och klimatvänliga aktiviteter som går i linje med våra ESG-kriterier och värderingar. Vi genomför ESG analyser och evaluerar hållbarhetsfaktorer i våra investeringsbeslut, och söker aktivt upp investeringsmöjligheter i företag som påvisar hållbarhetsengagemang och har en positiv påverkan på miljön och samhället.

För att säkerställa efterlevnad av våra hållbarhetspolicyer och investeringsbeslut har Spintop interna kontrollmekanismer på plats som gör att vi kan bedöma effektiviteten av hållbarhetspolicyerna och investeringsbesluten. Vi granskar regelbundet och utvärderar portföljbolagens E/S-kriterier för att säkerställa att de fortsätter att uppfylla sina mål samtidigt som vi samarbetar nära de för att främja öppenhet och ansvarsskyldighet. Dessutom arbetar vi även med oberoende aktörer för att validera vårt hållbarhetsarbete och säkerställa att våra investeringsbeslut går i linje med vårt hållbarhetsåtagande.

(b) No sustainable investment objective

Spintop IV promotes environmental and social considerations but does not pursue an environmental objective under the Taxonomy Regulation which is why Taxonomy-alignment reporting does not apply to Spintop IV (nor Spintop III). Therefore, we have chosen to label Spintop as an Article 8 “light green” fund instead of an Article 8 “mid green” fund.

(c) Environmental or social characteristics of the financial product

The environmental and social characteristics promoted by our financial product are aligned with the SDGs set out by the UN, where Spintop focuses on three SDGs where our portfolio has the biggest impact:

- **Gender equality:** We strive to continuously improve gender equality across all levels of our investments, including employees, managers, and board members. Our commitment to promoting gender equality is reflected in our investment decisions and our efforts to ensure that our portfolio companies have diverse and inclusive workplaces.
- **Decent work and economic growth:** We aim to achieve stable and sustainable economic growth, as well as promote productive employment and decent work for all. This includes investing in companies that prioritize fair labor practices, safe working conditions, and job creation.
- **Climate action:** We are committed to addressing climate change and reducing greenhouse gas emissions through our investments and operations. This involves investing in companies that prioritize environmental sustainability and support the transition to a low-carbon economy.

To measure each characteristic, we use a set of sustainability indicators that are compared to various benchmarks. By aligning our financial product with these important SDGs, we aim to contribute to a more sustainable and equitable future.

(d) **Investment strategy**

Spintop is an early-stage technology venture capital firm. We seek to invest in such early-stage technology companies that can have a significant positive impact on sustainability, as this will be an essential component of long-term success and value creation. All portfolio companies of Spintop are required to live up to certain sustainability standards, across the different aspects of sustainability; and to demonstrate and report measurable impact on sustainability matters that are most relevant to the portfolio company's business activities.

The foundation of our sustainability work is Spintop's **Sustainability Policy**, which is an integrated part of the agreement with all investors in Spintop III. It is a fundamental governance policy that the

Spintop IV emphasizes environmental and social considerations. We collect both qualitative and quantitative data on a quarterly basis from our portfolio companies and ourselves, and we actively collaborate with them to ensure that our investments follow good governance practices. The Sustainability Policy is translated into investment management activities to promote CO2 emissions reduction, diversity, fair and transparent businesses, and the sharing of best practices.

We have also chosen to comply with the UN Principles of Sustainable Investing, and while we are not signatories, we have integrated the guidelines into our investment processes. We also support the EU SFDR and have aligned our portfolio company reporting with recent updates. We closely monitor developments in the field and have decided to follow reporting guidelines for SFDR and the EU Taxonomy. We believe that transparency is essential to driving change, and our reporting serves as a means to prepare our portfolio companies to become the large corporations of the future.

(e) **Proportion of investments**

Spintop is committed to investing in sustainable, environmentally friendly activities that align with our ESG criteria and values. We do not invest in any fossil gas and/or nuclear energy-related activities, as our investment strategy is aligned with our commitment to sustainability and reducing our impact on the environment. By avoiding investments in these areas, we are helping to promote the transition to a low-carbon economy and reducing the risks associated with fossil fuel and nuclear energy.

While we do not have a specific focus on environmental objectives, all of our investments are required to be aligned with the promoted E/S characteristics. We conduct ESG due diligence and evaluate sustainability factors in our investment decisions, and we are committed to considering these factors when selecting our portfolio companies.

(f) **Monitoring of environmental or social characteristics**

To ensure compliance, we have internal control mechanisms in place that allow us to assess the effectiveness of our sustainability policies and investment decisions. Our investment professionals regularly review and evaluate the E/S characteristics of our portfolio companies to ensure they continue to meet our sustainability criteria.

In addition, we work closely with our portfolio companies to promote transparency and accountability. We encourage them to adopt best practices in environmental and social performance and to report on their sustainability initiatives and progress towards their sustainability goals.

Externally, we engage with independent third-party assessors to validate our sustainability performance and ensure that our investment decisions are aligned with our commitment to sustainability.

By monitoring the environmental and social characteristics promoted and using robust control mechanisms, we aim to ensure that our financial products are consistent with our commitment to sustainability and contribute to a more sustainable future.

(g) **Methodologies**

As an investor, we are responsible for addressing the adverse impact of our investments. In our investment decisions, we consider the adverse impacts of investment decisions on sustainability factors as meant in Article 4(1) of the EU Regulation 2019/2088. These factors are addressed based on their type and materiality. This is done according to the following principles:

- In a **screening process**, we exclude companies that do not adhere to our sustainability and investment policies. This means businesses relating to gambling, weapons technology, and narcotics are excluded altogether.
- In our **investment process**, we thoroughly discuss the potential target companies and analyze the impact which constitutes the decision-making foundation. Conclusions are documented in investment files.
- When conducting **due diligence** on a target company we perform a separate ESG due diligence in which we demand the company to fill in our SFDR-based online reporting form. This form is developed together with our sustainability platform company Worldfavor. Companies contributing directly or indirectly to climate change, pollution, biodiversity damage, human rights violations, corruption, or unsatisfactory labor rights are not eligible to become a Spintop investment.

(h) **Data sources and processing**

Spintop is dedicated to ensuring the highest standards of data quality in our financial products that promote environmental and social characteristics. To achieve this, we use portfolio company Worldfavor's software as a tool for data collection. The data collected through the Worldfavor platform is obtained directly from our portfolio companies, who report the information based on their operations and activities. The platform also enables us to benchmark the data against industry standards and track progress over time.

We ensure data quality by implementing robust measures, including data validation and cross-checking, to ensure that the data is accurate and reliable. As a result, we do not estimate any data in our financial products.

Spintop is proud to use the Worldfavor platform as it provides an efficient and effective solution for data collection, processing, and reporting. It enables our portfolio companies to publish sustainability KPIs externally and respond to sustainability audits from other parties.

(i) **Limitations to methodologies and data**

There are no limitations to the methodologies or data sources used in Spintop's financial products promoting environmental and social characteristics. As all the data used is real and accurate, the environmental and social characteristics promoted by our products are met with the highest level of accuracy and reliability.

(j) **Due diligence**

All portfolio companies of Spintop are required to live up to certain sustainability standards, across the different aspects of sustainability; and to demonstrate and report measurable impact on sustainability matters that are most relevant to the portfolio company's business activities.

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(k) **Engagement strategies**

Spintop is convinced that sustainable companies are the future business winners, in addition to the positive impact they have. Hence, we integrate a sustainability mindset in as many as possible of our interactions with our portfolio companies. Spintop will drive a sustainability agenda integrated into the general processes of setting business objectives and financial targets for the portfolio companies:

- Vision, mission, company values, and culture
- Business planning, identification, and target setting of sustainability KPIs that drives value creation, in the same way as other operational and financial KPIs
- Tracking and follow-up as an integrated part of board reporting

Post-investment our portfolio companies are required to quarterly report sustainability, in the same way as mandatory financial reporting. Spintop provides the companies with a written report with general conclusions and peer comparison quarterly based on such reporting. Deviations for a specific portfolio company shall be discussed and where applicable be raised with the board.

Transparency is key as it will by itself drive change.

(l) where an index is designated as a reference benchmark to attain the environmental or social characteristics promoted by the financial product, the “Designated reference benchmark”

We do not designate a specific index as a reference benchmark. Instead, we use a range of benchmarks to assess whether our financial product aligns with the E/S characteristics that it promotes.

By using a diverse range of benchmarks, we are able to consider a broad range of factors when assessing the sustainability of our investments. This approach also allows us to better tailor our investment decisions to the specific needs and goals of our investors.

Our commitment to using multiple benchmarks reflects our dedication to promoting responsible investing practices and ensuring that our financial product aligns with our ESG criteria and values.

The indices being used are:

- **Gender equality:** AP2 Female Representation Index ([source](#))
- **Decent work and economic growth:** Statistics from the Swedish labor market by SCB ([source](#))
- **Climate action:** Benchmarking with Spintop portfolio companies based on revenues & employees