

Website Disclosure for NordicNinja

Transparency and disclosure under Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector (“SFDR”)

JB Nordic Ventures Oy (“Nordic Ninja”) makes the following disclosures in accordance with the Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector (“SFDR”).

Sustainability risks policies statement

A 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 investment". In the context of NordicNinja, sustainability risks are risks which, if they were to crystallise, would cause a material negative impact on the value of the portfolios of the NordicNinja’s funds.

Managing sustainability risks

Consideration of sustainability risks is part of the investment decision-making and risk management processes of NordicNinja relating to the funds it manages. Before any investment decisions are made on behalf of any funds that NordicNinja manages, NordicNinja (or its delegated portfolio manager) will identify the material risks associated with each such proposed investment; these will include any relevant and material sustainability risks. These risks form part of the overall investment proposal submitted to the investment committee. The investment committee will assess the identified risks alongside other relevant factors set out in the proposal and will approve the investment proposal. If NordicNinja has delegated portfolio management in relation to the relevant fund to a delegated portfolio manager, the portfolio manager will then review the proposal and determine if it is suitable for the fund, in which case the portfolio manager will authorise the investment opportunity on behalf of the fund. The assessment of sustainability risks is led by the relevant deal teams, and in certain instances, third-party providers with expertise in specific sustainability risks.

The investment decision making process is part of NordicNinja’s wider policies and procedures on the integration of sustainability risks in its decision making process in relation to its funds generally. Further information on this is set out in NordicNinja’s ESG Policy available on the website.

No consideration of sustainability adverse impacts

NordicNinja does not currently consider the principal adverse impacts of its investment decisions on sustainability factors as set out under Article 11 (1) of the European Union Sustainable Finance Disclosure Regulation 2019/2088 (“SFDR”) as the relevant supplemental framework and required information to assess such impacts have not been finalized yet. We will evaluate and update our position accordingly when the regulatory technical standards outlining the content and definition of such impacts have been finalised. In the meantime, NordicNinja will instead continue to produce an annual ESG report and may provide fund-specific ESG and sustainability reporting on the qualitative and quantitative ESG and sustainability performance of underlying investments, as appropriate.

Article 10(1) Disclosures

NordicNinja Fund II (“Fund II”) makes the following disclosures in accordance with Article 10(1) and Articles 33 to 44 of SFDR.

For the purposes of Article 8(1) of SFDR, NordicNinja Fund II considers that it is a financial product which promotes, among other characteristics, environmental characteristics.

Environmental Characteristics

While Fund II does not have sustainable investment as its objective, the relevant characteristics promoted by the Fund consist of reducing greenhouse gas emissions and carbon footprint, and transitioning to renewable energy.

Investment Strategy

NordicNinja Fund II’s investment strategy involves investing in early-stage deep-tech companies. Typical focus stage: Series A-B, Typical investment region: Europe.

Monitoring of environmental or social characteristics

NordicNinja Fund II will leverage external ESG reporting service providers to collect data from portfolio companies, and monitoring their performance.

Designated reference benchmark

NordicNinja Fund II has not subscribed to a relevant designated reference benchmark as we are not aware of any relevant benchmarks available for our strategy. We will keep evaluating this on an annual basis.

How the Environmental Characteristics Are Met

NordicNinja continuously monitors the characteristics of the Fund. Portfolio companies report on the agreed metrics to the Fund, which aggregates and reports onward to the Fund’s Limited Partners.

NordicNinja Fund II (or its delegated portfolio manager) wants the companies it invests in to be genuinely focussed on giving back to all the stakeholders including own employees, customers, suppliers, shareholders, the environment and the wider world at large. For us, ESG is not just a screening process. We take an active interest in how the portfolio companies manage ESG issues and actively encourage, support and stretch them to strive for the very best ESG standards.

Good Governance

Fund II aims to make investments in companies which follow good governance practices including ensuring compliance with anti-bribery and anti-corruption regulations, practicing non-discrimination policy, maintaining highest code of ethics and business conduct, and complying with data privacy and protection. In cases where the above don’t exist, then deal team will help the portfolio companies build it up from scratch. For every portfolio company/opportunity, the NordicNinja deal team will go through a standardized set of questions as part of the due diligence process. In addition, since each potential investment is different in its sector, business model and execution, the deal team may add additional ESG criteria to the check-list guided by the Sustainability Accounting Standards Board Principles (SASB). The results of this process are recorded in the investment memo, so that the Investment Committee can confirm that ESG-related issues have been explicitly assessed and ensure they are considered when making the investment decision.

Methodologies Used to Assess, Measure and Monitor the Environmental Characteristics

The environmental characteristics described above are expected to be assessed, measured and monitored throughout the investment decision-making process and investment lifecycle of the Fund. To assess, measure and monitor the environmental characteristics of the Fund, an ESG diagnostic is sent to each portfolio company annually to collect and assess data on greenhouse gas emissions, footprint, consumption of renewable energy and exposure to fossil fuel sector.

Integrating ESG within our remuneration framework

Remuneration for NordicNinja's staff is based on an annual appraisal process which considers a variety of factors but includes the extent to which staff members promote the firm's guiding principles and adhere to the firm's policies (including this ESG Policy). A significant portion of overall remuneration for senior staff members is also linked to the long-term performance of the NordicNinja funds. We consider this approach, which aligns the interest of staff members with those of our limited partners, to be appropriate to promote a culture of reducing long-term ESG risks within our portfolio and creating long term value and financial performance for our funds and other stakeholders.

NordicNinja sustainability officer

For more information please contact our sustainability officer Mr. Shinichi Nikkuni.