

SUSTAINABILITY-RELATED DISCLOSURES



DNB PE S.C.A. SICAV-RAIF

Compartment: DNB PE XI (the "Fund")

Product name: **DNB PE XI**

Legal entity identifier: 213800B1PH88BAE7F125

Does this financial product have a sustainable investment objective?

☐ Yes

☐ It will make a minimum of **sustainable investments with an environmental objective: __%**

☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy

☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

☐ It will make a minimum of **sustainable investments with a social objective: __%**

☒ No

☐ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it had a proportion of __% of sustainable investments

☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy

☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

☐ with a social objective

☒ It promotes E/S characteristics, but **will not make any sustainable investments**



A. Summary

DNB PE XI is an alternative investment fund that promotes environmental and social characteristics but does not commit to make any sustainable investments.

DNB PE XI is a fund-of-fund that shall seek to invest in around 10 PE funds, both sector specific funds and so-called generalist funds, with a primary focus on investment opportunities with a main geographic focus within Western Europe and/or North America.

DNB PE XI will strive to invest in responsible PE fund managers who consider ESG factors in its investment decisions and during its active ownership. DNB Asset Management Private Equity (DAM PE) has established an ESG assessment framework (DAM PE's Standard for Responsible Investment Managers) that is applied as a tool to evaluate the level of ESG integration on each PE fund manager, prior to investment. In addition, each portfolio company is screened based on a comprehensive ESG search on a third-party platform with pre-defined screening criteria.

Systematic monitoring and reporting mechanisms are employed to track each investments' performance on the indicators used to measure the attainment of environmental and social characteristics promoted by DNB PE XI. All investments are continuously monitored by DAM PE through weekly screening, direct engagement on ESG, and reporting from the PE funds. Data will be collected, processed, and assessed internally by DAM PE's employees as part of the investment decision and/or follow-up of the investment.

Translations of this summary can be found in Appendix 1.



B. No sustainable investment objective

This financial product promotes environmental or social characteristics, but does not have as its objective sustainable investment.

B.1. How does this financial product take into account principal adverse impacts on sustainability factors?

Not applicable.

B.2. Are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?

Not applicable.



C. Environmental or social characteristics of the financial product

C.1. What are the environmental or social characteristics promoted by this financial product?

DNB PE XI promotes environmental and social (E/S) characteristics by investing in line with the DNB Group Instruction for Responsible Investments (Group Instructions). DNB PE XI promotes an overall responsible approach to ESG and sustainability throughout its investment activities, and in particular, DNB PE XI does not invest in companies that derive a large part of their income from the extraction of oil sands and/or thermal coal or base a large part of their business on thermal coal, or companies with exposure to controversial weapons. Further, DNB PE XI excludes companies that produce cannabis for recreational use, tobacco or pornography.

The environmental and social characteristics promoted by DNB PE XI can be summarised as follow:

- Responsible PE fund managers: DNB PE XI will strive to invest with responsible PE fund managers who consider ESG factors in its investment decisions and during its active ownership, as well as fostering a culture of transparency and accountability on ESG factors.
- Environmental characteristics which include reduction of GHG emissions
- Social characteristics which include labour rights, human rights, public health, inclusive employment, community engagement and supply chain responsibility

DNB PE XI does not use a benchmark that is aligned with the environmental and social characteristics promoted by the fund.

C.2. What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

The fund does not commit to a minimum share of sustainable investments.

C.3. How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?

Not applicable.



D. Investment strategy

D.1. What investment strategy does this financial product follow and how is the strategy implemented in the investment process on a continuous basis?

DNB PE XI shall seek to invest in around 10 PE funds by making primary investments with an opening to do opportunistic secondary investments. DNB PE XI will primarily focus on investment opportunities with a main geographic focus within Western Europe and/or North America. DNB PE XI may invest in all types of PE funds, both sector specific funds and so-called generalist funds.

The following investment restrictions apply to DNB PE XI:

- no more than 25% of the aggregate commitments may be invested in one single PE fund;
- DNB PE XI shall not own more than 10% of one single PE fund; and
- DNB PE XI shall have investments in a minimum of 5 PE Funds at expiry of the investment period.

Integration of environmental, social and governance risk factors into the investment decision making process forms part of our fiduciary duty towards customers and stakeholders. As a responsible investor with a long-term view, we

aim to provide high, long-term returns, at an acceptable level of risk. DAM PE, as portfolio manager of DNB PE XI, will strive to invest with responsible PE fund managers who consider ESG factors in its investment decisions and during its active ownership. A sustainability risk assessment is performed on PE fund manager level prior to making a fund investment.

D.2. What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

DAM PE will seek to attain the environmental and social characteristics promoted by investing in responsible PE fund managers who consider ESG factors in its investment decisions and during its active ownership, and further, by applying the following binding elements in the investment strategy:

- Each PE fund manager will be evaluated against DAM PE's Standard for Responsible Investment Managers.
- DNB PE XI will not invest in companies that derive 30 percent or more of their income from oil sands extraction, as well as mining companies and power producers that themselves, or consolidated with entities they control, derive 30 percent or more of their income from thermal coal¹, or base 30 percent or more of its business on thermal coal.
- DNB PE XI shall not invest in companies with exposure to controversial weapons.
- DNB PE XI excludes companies that produce pornography, tobacco or cannabis for recreational use.

To ensure compliance with the Group Instruction and the binding elements mentioned above, DAM PE performs (i) an ESG assessment on each PE fund manager prior to investment, (ii) screen each portfolio company prior to investment, and (iii) monitors the portfolio throughout the ownership through weekly screening, direct engagement with the PE fund managers and review of received reports from the PE funds. In addition, DAM PE will seek to enter into a bilateral side letter agreement with each PE fund manager, requesting them to endorse the binding elements related to the Group Instruction.

¹ In addition, companies with an annual extraction of more than 20 million tonnes of thermal coal or power capacity of more than 10,000 MW from (combustion of) thermal coal may be excluded from the investment universe or placed under observation. Exceptions can be made for companies that are considered to be in transition, based on forward-looking assessments of the companies, including any plans that will change the level of extraction of or power capacity linked to thermal coal and/or reduce the share of income or business linked to oil sands or thermal coal and/or increase the share of income or business linked to renewable energy sources.

D.3. What is the policy to assess good governance practices of the investee companies?

As DNB PE XI will be a limited partner in PE fund vehicles, DAM PE will not be able to exercise direct influence through ownership rights on the underlying portfolio of assets of a PE fund, and will therefore need to rely on the PE fund manager and its management of active ownership across its portfolio of assets. It is therefore of high importance to assess and be comfortable with each PE fund manager's good governance practices prior to investment. This assessment is performed for each PE fund manager as part of DAM PE's ESG assessment framework. If during such assessment a PE fund manager is deemed to not have good governance practices in place, DAM PE will abstain from making the investment.

Post-investment, all portfolio companies are screened on a weekly basis for alerts through a global news and data platform to follow up potential risks and incidents that may point towards the PE fund manager and/or its portfolio companies not following good governance practices. Any such identified material risks or incidents will be followed up by DAM PE, and if deemed appropriate, DAM PE will on behalf of DNB PE XI seek to sell its ownership stake in such PE fund if such risk or incident is not remedied.

D.4. Is there a commitment to reduce by a minimum rate the scope of investments considered prior to the application of the strategy? (Including an indication of the rate)

Not applicable.

E.5. Does this financial product consider principal adverse impacts on sustainability factors?

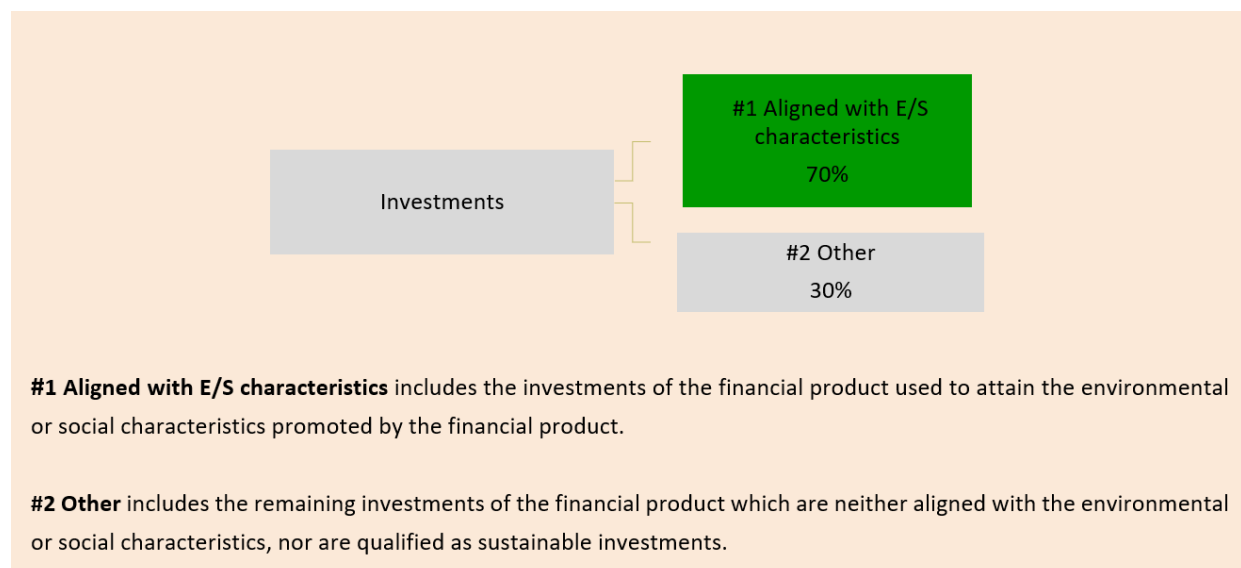
- ☐ Yes
☒ No



E. Proportion of investments

E.1. What is the planned asset allocation for this financial product?

DNB PE XI aims to have a minimum proportion of 70% of DNB PE XI's net asset value (NAV) to be used to attain the environmental or social characteristics promoted by DNB PE XI. The rest of the fund may be invested in investments whereof the PE fund manager has been determined as not meeting the expectations set out in DAM PE's Standard for Responsible Investment Managers.



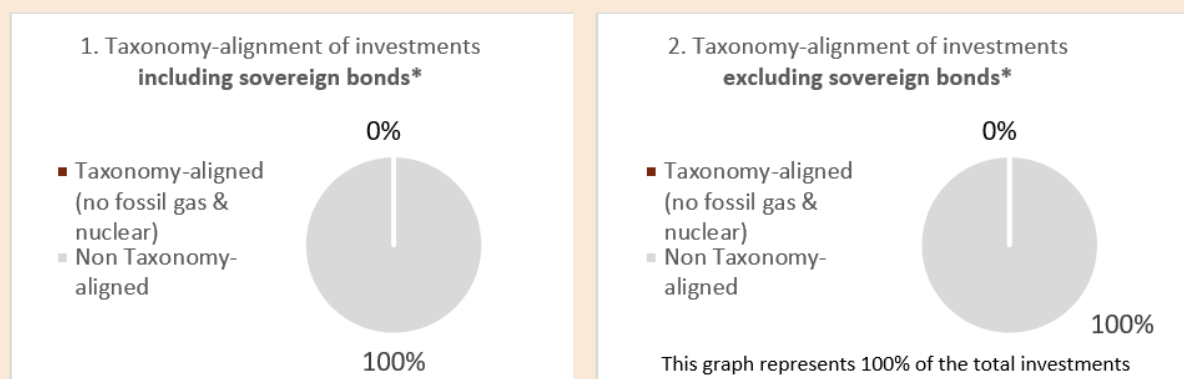
E.2. How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

Not applicable.

E.3. What is the minimum share of investments with an environmental objective aligned with the EU Taxonomy? (including what methodology is used for the calculation of the alignment with the EU Taxonomy and why; and what the minimum share of transitional and enabling activities)

While DNB PE XI promotes environmental and social characteristics within the meaning of Article 8 of the SFDR, it does not commit to a minimum share of investments with an environmental objective aligned with the EU Taxonomy, including in transitional and enabling activities. Thus, it is expected that 0% of DNB PE XI's investments will be aligned with the EU taxonomy.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

E.4. What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

DNB PE XI does not commit to a minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy.

E.5. What is the minimum share of sustainable investments with a social objective?

The fund does not commit to a minimum share of socially sustainable investments.

E.6. What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?

The category "#2 Other" will include investments whereof the PE fund manager has been determined as not meeting DAM PE's Standard for Responsible Investment Managers. However, all investments will meet the investment restrictions on coal, oil sand, controversial weapons, tobacco and cannabis that are further explained above. In addition, all investments must meet DAM PE's minimum governance expectations as is verified through the due diligence procedures explained above. The category "#2 Other" includes cash and derivatives. Cash and derivatives may be included for liquidity and hedging purposes.



F. Monitoring of environmental or social characteristics

F.1. What sustainability indicators are used to measure the attainment of the environmental or social characteristics promoted by this financial product?

The indicators used to measure DNB PE XI's attainment of environmental and social characteristics for PE fund managers include:

- Percentage of PE fund managers that are signatories to UN PRI.
- Percentage of PE fund managers that meet DAM PE's Standard for Responsible Investment Managers

The indicators used to measure DNB PE XI's attainment of environmental and social characteristics for PE fund managers' underlying portfolio companies include:

- Percentage of the DNB PE XI's NAV in companies that derive a large part of their income from the extraction of oil sands and/or thermal coal or base a large part of their business on thermal coal
- Percentage of the DNB PE XI's NAV in companies with exposure to controversial weapons
- Percentage of the DNB PE XI's NAV in companies that produce cannabis for recreational use
- Percentage of the DNB PE XI's NAV in companies that produce tobacco
- Percentage of the DNB PE XI's NAV in companies that produce pornography.

F.2. How are the environmental or social characteristics and the sustainability indicators monitored throughout the lifecycle of the financial product and the related internal/external control mechanism?

Systematic monitoring and reporting mechanisms are employed to track each investments' performance on the indicators used to measure the attainment of environmental and social characteristics promoted by DNB PE XI. All investments are continuously monitored by DAM PE through screening tools, direct engagement on ESG, and reporting from the PE funds. All underlying portfolio companies are screened on a weekly basis for alerts through a global news and data platform. Reports comprising all alerts are received and reviewed on a weekly basis, and through this screening, DAM PE aims to uncover any material ESG incidents, breaches of international norms and standards and/or breaches of the exclusion criteria.

DAM PE will also directly engage with the PE fund managers on a frequent basis, including follow-ups on ESG topics as well as monitoring ESG reporting if any when received.

If DAM PE considers that the actual or potential impact of sustainability risks on the value of the investment to be unacceptable, at the earliest opportunity, DAM PE may choose to sell its ownership stake in such investment.



G. Methodologies

G.1. What is the methodology to measure the attainment of the environmental or social characteristics promoted by the financial product using the sustainability indicators?

The attainment of the environmental and social characteristics promoted by DNB PE XI are measured by systematic monitoring and reporting mechanisms that are employed to track each investments' performance on the indicators outlined above.



H. Data sources and processing

H.1. What are the data sources used to attain each of the environmental or social characteristics including the measures taken to ensure data quality, how data is processed and the proportion of data that is estimated?

DAM PE will mainly collect data directly from the PE fund managers as well as publicly available information. The information received from the PE fund managers about the fund's investment strategy and the underlying portfolio companies, including the quality of such information, is processed and assessed internally by DAM PE's employees as part of the investment decision and/or follow-up of the investment. DAM PE will also monitor the portfolio throughout

the ownership through weekly screening, direct engagement with the PE fund managers and review of received reports from the PE funds. DAM PE does not expect to use estimated data.



I. Limitations to methodologies and data

I.1. What are the limitations to the methodologies and data sources? (Including how such limitations do not affect the attainment of the environmental or social characteristics and the actions taken to address such limitations)

Certain limitations may exist in the methodologies and data due to insufficient or low-quality information. The primary limitation in DAM PE's methodology and use of data is that DNB PE XI, as a fund-of-funds, relies on receiving information from the PE fund managers, and that the information reported from the PE fund managers is accurate and sufficient. Potential limitations are addressed through ESG due diligence, during which the PE fund manager's ESG policy, strategy, and approach to data collection and reporting are evaluated. Moreover, DAM PE will interact with the PE fund managers concerning data availability, data quality, and reporting as deemed suitable.

If DAM PE identifies material lack of data for its reporting obligations, DAM PE will engage in dialogue with the PE fund manager. It is not expected that the aforementioned limitations related to methodology or data sources will hinder the attainment of the environmental and social characteristics promoted by DNB PE XI.



J. Due diligence

J.1. What is the due diligence carried out on the underlying assets and what are the internal and external controls in place?

DAM PE will strive to invest with responsible PE fund managers who consider ESG factors in its investment decisions and during its active ownership. DAM PE has established an ESG assessment framework (DAM PE's Standard for Responsible Investment Managers) together with the DNB Asset Management Responsible Investment Team (DAM RI Team) that is applied as a tool to evaluate the level of ESG integration. The ESG assessment framework is built on the ILPA ESG assessment framework and adapted to DAM PE's integration of ESG. The framework includes components that are viewed as important for the decision-making process for DAM PE, including:

- i. Sound ESG approach & policies, and contractual commitments to ESG,
- ii. Having good governance practices in place
- iii. Transparency to investors, including ESG reporting
- iv. ESG integration in the investment process
- v. Sanctions screening procedures in place

In addition, each portfolio company is screened based on a comprehensive ESG search on a third-party platform with pre-defined screening criteria. The searches are standard for all investments and have been built up over time by DAM PE together with the DAM RI Team. Through this screening, DAM PE aims to identify any material ESG risks and/or breaches of DNB PE XI's exclusion criteria.



K. Engagement policies

K.1. Is engagement part of the environmental or social investment strategy?

- ☒ Yes
☐ No

K.2. If so, what are the engagement policies? (Including any management procedures applicable to sustainability-related controversies in investee companies)

As a fund-of-fund investor, DAM PE's ability to engage directly with the underlying portfolio investments is limited. However, DMA PE will directly engage with the PE fund managers on a frequent basis, including follow-ups on ESG topics. Ad-hoc, incident-based dialogue will occur to address reported or identified material ESG issues. DAM PE monitors ESG reporting received from the PE fund managers, of which all identified material ESG-related incidents and/or breaches of DAM PE's exclusion criteria will be addressed and followed-up in close collaboration with the DAM RI Team. If DAM PE considers that the actual or potential impact of sustainability risks on the value of the investment to be unacceptable, at the earliest opportunity, DAM PE may choose to sell DNB PE XI's ownership stake in such investment.



L. Reference benchmark

L.1. Has a reference benchmark been designated for the purpose of attaining these characteristics promoted by the financial product?

- ☐ Yes
☒ No

Date	Version	Amendment
May 2025	1	Publication of disclosure

Appendix 1

Language	Summary
Norsk	DNB PE XI er et alternativt investeringsfond som fremmer miljømessige og sosiale egenskaper, men er ikke forpliktet til å gjøre bærekraftige investeringer. DNB PE XI er et fond-i-fond som skal søke å investere i rundt 10 PE-fond, både sektorspesifikke fond og såkalte generalistfond, med hovedfokus på investeringsmuligheter med et geografisk fokus innen Vest-Europa og/eller Nord-Amerika. DNB PE XI vil søke å investere i ansvarlige forvaltere av PE-fond som hensyntar ESG-faktorer i sine investeringsbeslutninger og under sitt aktive eierskap. DNB Asset Management Private Equity (DAM PE) har etablert et ESG-vurderingsrammeverk (DAM PE's standard for ansvarlige investeringsforvaltere) som brukes som et verktøy for å vurdere nivået av ESG-integrasjon hos hver PE-fondsforvalter, før investering. I tillegg blir hvert porteføljeselskap screenet basert på et omfattende ESG-søk på en tredjepartsplattform med forhåndsdefinerte screeningkriterier. Systematiske overvåkings- og rapporteringsmekanismer brukes for å spore hver investerings fremdrift på indikatorene som brukes til å måle oppnåelsen av miljømessige og sosiale egenskaper fremmet av DNB PE XI. Alle investeringer overvåkes kontinuerlig av DAM PE gjennom ukentlig screening, direkte engasjement på ESG, og rapportering fra PE-fondene. Data vil bli samlet inn, behandlet og vurdert internt av DAM PE's ansatte som en del av investeringsbeslutningen og/eller oppfølgingen av investeringen.
Íslenska	DNB PE XI er óhefðbundinn fjárfestingarsjóður sem stuðlar að umhverfislegum og félagslegum eiginleikum en skuldbindur sig ekki til að gera neinar sjálfbærar fjárfestingar. DNB PE XI er sjóðasjóður sem skal leitast við að fjárfesta í um 10 PE-sjóðum, bæði sjóðum sem eru sértækir fyrir atvinnugeira og svokölluðum almennum sjóðum, með megináherslu á fjárfestingartækifæri með áherslu á landsvæði innan Vestur-Evrópu og/eða Norður-Ameríku. DNB PE XI mun leitast við að fjárfesta í ábyrgum PE-sjóðsstjórum sem taka tillit til UFS-þátta í fjárfestingarákvörðunum sínum og meðan á virku eignarhaldi stendur. DNB Asset Management Private Equity (DAM PE) hefur komið á fót UFS-matsramma (Staðall DAM PE fyrir ábyrga fjárfestingastjóra) sem er notaður til að meta umfang UFS-sambættingar hjá hverjum PE-sjóðsstjóra, áður en fjárfesting fer fram. Auk þess er hvert eignarsafnsfélag skimað á grundvelli ítarlegrar UFS-leitar á verkvangi þriðja aðila með fyrirfram skilgreindum skimunarviðmiðum. Kerfisbundin eftirlits- og tilkynningakerfi eru notuð til að fylgjast með afkomu hvernar fjárfestingar á mælikvörðunum sem notaðir eru til að mæla árangur af umhverfislegum og félagslegum einkennum sem DNB PE XI stuðlar að. Allar fjárfestingar eru undir stöðugu eftirliti DAM PE með vikulegri skimun, beinni þátttöku í UFS og skýrslugjöf frá PE-sjóðum. Gögnum verður safnað, unnið úr þeim og þau metin innan fyrirtækisins af starfsmönnum DAM PE sem hluti af fjárfestingarákvörðun og/eða eftirfylgni fjárfestingarinnar.
Svenska	DNB PE XI är en alternativ investeringsfond som främjar miljömässiga och sociala egenskaper, men fonden är inte skyldig att göra hållbara investeringar. DNB PE XI är en fond-i-fond som har som mål att investera i ett tiotal PE-fonder, såväl sektorspecifika fonder som så kallade generalistfonder, med primärt fokus på investeringsmöjligheter med geografiskt fokus inom Västeuropa och/eller Nordamerika. DNB PE XI strävar efter att investera i ansvarsfulla förvaltare av PE-fonder som tar hänsyn till ESG-faktorer i sina investeringsbeslut och i sitt aktiva ägarskap. DNB Asset Management Private Equity (DAM PE) har upprättat ett ramverk för ESG-bedömning (DAM PE:s standard för förvaltare av ansvarsfulla investeringsförvaltare) som används som ett verktyg för att bedöma graden av ESG-integration hos varje PE-fondförvaltare, före investering. Dessutom screenas varje portföljbolag baserat på en omfattande ESG-sökning på en tredjepartsplattform med fördefinierade screeningkriterier.

	Systematiska övervaknings- och rapporteringsmekanismer används för att spåra varje investerings framsteg på de indikatorer som används för att mäta uppnåendegrad när det gäller miljömässiga och sociala egenskaper som främjas av DNB PE XI. Alla investeringar övervakas kontinuerligt av DAM PE genom veckovis screening, direkt engagemang i ESG och rapportering från PE-fonderna. Data kommer att samlas in, bearbetas och utvärderas internt av DAM PE:s medarbetare som en del av investeringsbeslutet och/eller uppföljningen av investeringen.
--	--