Website Disclosure

Pursuant to Article 10(1) of Regulation *(EU) 2019/2088*

Product name: Climentum Capital Fund II K/S (referred to as "the Fund")

Legal entity identifier: Business Registration Number (CVR) 45449025

The Fund invests in early-stage companies (referred to as "Company" or "Companies") that provide low-carbon solutions to the highest-emitting industries.

Summary

The Fund invests in climate technology Companies from Seed to Series B. The geographic focus is Europe, with a primary focus on the Nordics and DACH.

The sustainable investment objective of the Fund is to reduce carbon emissions. The Companies in the Fund contribute to this objective by delivering solutions that are less carbon-intensive than the leading incumbent solutions, resulting in "avoided emissions". The target of the Fund is to achieve annual avoided emissions of at least 1 million tonnes of CO2 equivalents at portfolio level by the time the Fund ends (earliest 2036 and latest 2039).

The Fund pursues alignment with the Paris Agreement. When the primary economic activities of a target Company are Taxonomy Eligible, the Fund requires the Company to be on track to meeting the relevant Substantial Contribution requirements. When the economic activities are not Taxonomy Eligible, the Fund has developed the following three substantial contribution criteria of which a given Company must meet at least one: (1) The Company's solution delivers at least 50% lower carbon emissions vs. the leading incumbent solution; (2) The Company's solution has the potential to deliver >100 thousand tonnes of CO2e avoided emissions by 2036 (earliest possible year for the Fund to end); (3) The Company's solution has the potential to deliver >100 million tonnes of CO2e avoided emissions at full scale.

The sustainability indicator used to measure the attainment of the sustainable investment objective is "avoided emissions": greenhouse gas emissions avoidance in tonnes of CO2 equivalents. Avoided emissions (also referred to as "Scope 4") are calculated via life cycle assessment (LCA), in accordance with the European Commission Recommendation 2013/179/EU(96) and leading standards, including ISO 14040 and 14044, GHG Protocol, and Project Frame. Avoided emissions are the difference between the life cycle emissions from the Company's solution(s) compared to leading incumbent solution(s) available to achieve the same user benefit. To estimate the expected and potential annual avoided emissions of a Company (CO_2e/year), the anticipated annual sales (units) is multiplied by the unit impact (CO_2/unit).

The Fund's strategy is implemented throughout the investment process to deliver on the sustainable investment objective. This includes targeted sourcing efforts, screening for impact potential, comprehensive impact due diligence efforts, and active ownership to support Companies on their sustainability journey.

The Fund is committed to ensuring that its Companies do not cause significant harm to environmental or social objectives in the pursuit of its carbon emissions reduction objective. To this end, the Fund requires Companies to comply with its *Exclusions Policy*, *Good Governance Policy*, and (do-no-significant-harm) *DNSH Thresholds*, all of which are available at www.climentum.com. These aspects are covered in the

impact due diligence process, are included in shareholders agreements, and are monitored during the ownership phase.

The *Good Governance Policy* includes a requirement for all companies to commit to implement a set of minimum safeguards to monitor compliance with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights (UNGPs).

As part of the reporting requirements, the Fund collects and monitors data on all mandatory Principal Adverse Impact (PAI) indicators plus two additional indicators: (2.4) Companies without carbon emission reduction initiatives; and (3.1) Investments in companies without workplace accident prevention policies.

The Fund considers engagement with its Companies as a critical lever for enhancing the positive impact of its Companies as well as avoiding significant adverse impacts. The Fund engages with its Companies based on the principles of continuous engagement and capacity building, active Board engagement, cooperation, and management of conflicts of interests. For engagement activities that are conducted in response to a significant controversy and/or identification of a potential or confirmed significant adverse impact, Companies will be given the opportunity and support to address the issue(s) in question within a set and reasonable timeframe. In case of insufficient progress from a Company or repeated violations, the matter will escalate and will, in the worst case, result in the Fund pursuing a sale of its stake in the Company.

No significant harm to the sustainable investment objective

The Fund is committed to ensuring that its Companies do not cause significant harm to environmental or social objectives in the pursuit of its carbon emissions reduction objective. To this end, the Fund requires Companies to comply with:

1. *Exclusion Policy*: The Fund has an extensive Exclusion Policy (available at www.climentum.com), covering issues such as significant negative environmental or social impacts, illegal activities, oil & gas extraction, human cloning, controversial weapons, tobacco, alcohol, gambling, predatory lending, etc. The Fund will not invest in companies in violation of this policy. Portfolio companies may not enter into activities in violation of this policy.
2. *Good Governance Policy*: The Fund has a Good Governance Policy (available at www.climentum.com). Fund Investments are required to be in compliance with this policy at all times.
3. *DNSH thresholds*: The Fund has determined do-no-significant-harm thresholds (available at www.climentum.com). Fund Investments may not cross these thresholds at any time. The Fund incorporates DNSH considerations into its due diligence process and shareholder agreements, as well as in its ongoing monitoring of the Company's performance.

The DNSH thresholds and supporting indicators are appropriate to the asset class and type of investments made. The criteria are derived from the EU Taxonomy thresholds for environmental harm and Minimum Safeguards aimed at avoiding harm on social and governance factors, while the supporting indicators include, but are not limited to, a selection of the mandatory and voluntary Principal Adverse Impact (PAI) indicators under the SFDR.

Specifically regarding PAI, the Fund collects and monitors data on all mandatory PAI indicators plus two additional indicators:

- 2.4: Companies without carbon emission reduction initiatives
- 3.1: Investments in companies without workplace accident prevention policies

At the point of investment, all Companies are required to commit to implement a set of Minimum Safeguards to monitor compliance with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights (UNGPs). These are reflected in the Good Governance Policy, which is based on the recommendations from the EU Platform on Sustainable Finance on Minimum Safeguards. As such, the Fund's requirements to Investments have been tailored to fit micro-enterprises and SMEs, which means that requirements for policies and controls will increase as the company progresses in maturity and size. All Investments are required to report adherence to these requirements at least once per year.

Company compliance with the Exclusion Policy, Good Governance Policy, and DNSH Thresholds is monitored throughout the ownership cycle via the Fund's annual reporting and regular meetings with the Board of Directors. In cases of violations and/or critical gaps in ensuring adequate processes and compliance mechanisms, the Fund will immediately engage with the Company to take appropriate action.

Sustainable investment objective of the financial product

The sustainable investment objective of the Fund is to reduce carbon emissions. The Companies in the Fund contribute to this objective by delivering solutions that are less carbon-intensive than the leading incumbent solutions, resulting in "avoided emissions".

While there are no relevant reference benchmarks (incl. no EU Climate Transition Benchmark or EU Paris-Aligned Benchmark) available that can be applied to the Fund, reference solutions are determined for each individual Company to assess the avoided emissions potential in a consistent manner.

The target of the Fund is to achieve annual avoided emissions of at least 1 million tonnes of CO2 equivalents at portfolio level by the time the Fund ends (earliest 2036 and latest 2039). This number refers to the total impact of the portfolio of Companies without adjusting for ownership share. For a portfolio Company to qualify towards the target, at least two of the following criteria must be met:

- The Fund must have invested at least €1 million into the Company
- The Fund has held at least 5% ownership of the Company
- The Fund has maintained its investment in the Company for at least 18 months

The Fund pursues alignment with the Paris Agreement. When the primary economic activities of a target Company are Taxonomy Eligible, the Fund requires the Company to be on track to meeting the relevant Substantial Contribution requirements. When the economic activities are not Taxonomy Eligible, the Fund has developed the following three substantial contribution criteria of which a given Company must meet at least one:

1. The Company's solution delivers at least 50% lower carbon emissions vs. the leading incumbent solution
2. The Company's solution has the potential to deliver >100 thousand tonnes of CO2e avoided emissions by 2036 (earliest possible year for the Fund to end)
3. The Company's solution has the potential to deliver >100 million tonnes of CO2e avoided emissions at full scale

Investment strategy

The Fund invests in climate technology Companies from Seed to Series B. The geographic focus is Europe, with a primary focus on the Nordics and DACH. Areas of focus are energy security, supply chain stability, and industrial efficiency.

The strategy is implemented in the investment process in the following way to ensure delivery on the sustainable investment objective:

- ***Sourcing***: The Fund sources investment opportunities via multiple channels, including personal networks, investors in the Fund, upstream investment funds, past & potential co-investors, as well as via LinkedIn and the Fund's website. The Fund communicates clearly to all stakeholders and on all channels that the Fund is solely focused on investments with significant climate change mitigation potential.
- ***Screening***: For an investment opportunity to proceed to the due diligence phase, it must 1) have a clear value proposition for climate change mitigation, 2) not have any apparent significant principal adverse impacts, and 3) not violate the Fund's Exclusions Policy (available at www.climentum.com).
- ***Due diligence***: In the due diligence phase the Fund 1) conducts an initial life-cycle analysis (LCA) to quantify the climate change mitigation potential of the Company, 2) conducts a double materiality assessment, including principal adverse impacts and do-no-significant-harm criteria (both available at www.climentum.com), 3) conducts a good governance assessment (performance and gaps) against the Fund's Good Governance Policy (available at www.climentum.com), and 4) conducts an assessment of Taxonomy Eligibility and Alignment. Insofar as the findings are positive and the investment opportunity is pursued, this process leads to the development of 1) an agreed sustainability action plan (SAP), which outlines concrete actions for the Company to take in year one of Fund ownership and 2) an agreed reporting framework (what the Company is required to report on to the Fund, and when).
- ***Ownership***: Once a Company is in the portfolio, the Fund engages with the Company to support in executing on the agreed sustainability action plan (SAP) and also report as agreed to the Fund. In the event that a sustainability issue arises (e.g. violation of the Fund's Good Governance Policy or DNSH thresholds), the Fund engages with the Company to take corrective action. Repeated failure to take action as needed will result in the Fund pursuing a sale of its stake in the Company.

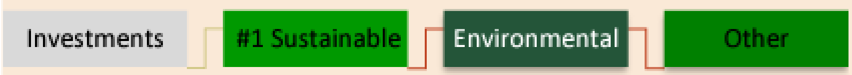
The Fund has committed to ensuring good governance practices among its Companies and this engagement has been solidified through a formalized Good Governance Policy. This Policy includes the following topics:

- Sound board & management structures
- Employee relations
- Remuneration of staff
- Tax compliance

The Fund's Good Governance Policy is available at www.climentum.com. It is the responsibility of the Company to ensure adherence to the Good Governance Policy at all times and address critical gaps. If required, the Fund will support Companies with implementation of the Policy, including access to resources and experts. In addition, the Fund will, at least on an annual basis, require Companies to provide an update on progress against the Good Governance Policy, including any critical gaps.

Proportion of investments

As indicated in the illustration below, all Companies (100%) in the Fund must meet the sustainable investment objective.



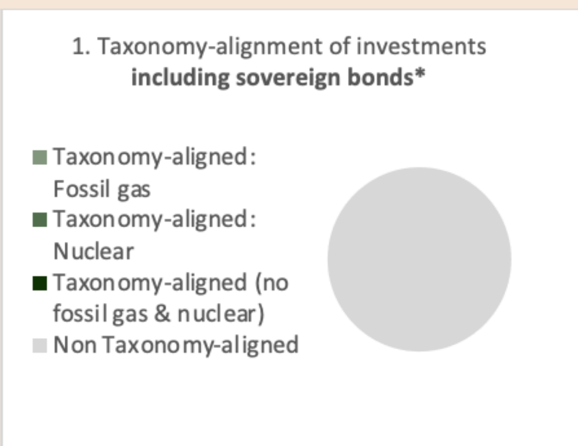
#1 Sustainable covers sustainable investments with environmental or social objectives.

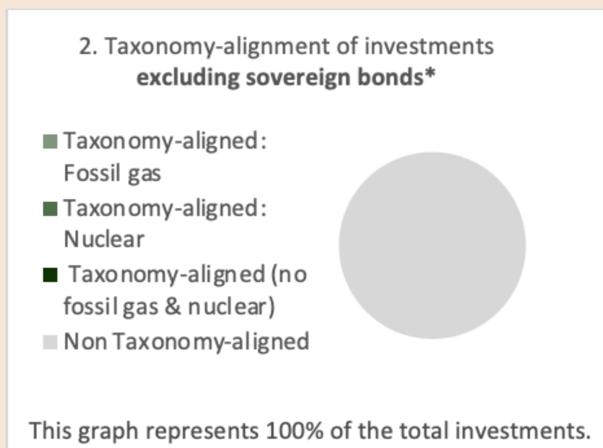
#2 Not sustainable includes investments which do not qualify as sustainable investments.

The Fund will not use derivatives, will not invest in sovereign bonds, and will not invest in fossil fuels (incl. gas).

The Fund may invest in nuclear energy related activities. Any Companies in nuclear related activities will be required to comply with the EU Taxonomy before any nuclear energy is produced.

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.*

As indicated in the illustration above, the minimum extent of sustainable investments with an environmental objective aligned with the EU taxonomy is 0% for the Fund. This reflects the early-stage nature of the Companies in the Fund. At the point of investment (e.g. Seed stage), Companies are seldom mature enough to meet the full requirements of the Taxonomy. At the Seed and Series A stages of a Company's life cycle, it is highly unlikely to be able to meet the technical requirements for Taxonomy Alignment, even if it has a product/solution that enables significant GHG emissions reductions. Also, the Taxonomy has yet to cover all relevant economic activities. As such, there are points at which the Fund might have 0%

Taxonomy Alignment, including in the early days of the Fund, where it might only have a handful of still-immature portfolio Companies.

When the economic activities of Companies are Taxonomy Eligible, the Fund supports the Companies in becoming Taxonomy Aligned as they grow.

The Fund does not have a social impact objective, so the minimum share of sustainable investments with a social objective is 0%.

Monitoring of sustainable investment objective

The sustainable investment objectives are monitored throughout the lifetime of the investments.

To ensure pursuit of the sustainable investment objective, the Fund requires Companies to comply with:

- ***Exclusion Policy***: The Fund has an extensive Exclusion Policy (available at www.climentum.com). The Fund will not invest in companies in violation of this policy. Portfolio Companies may not enter into activities in violation of this policy.
- ***Good Governance Policy***: The Fund has a Good Governance Policy (available at www.climentum.com). Companies are required to be in compliance with this policy at all times.
- ***DNSH thresholds***: The Fund has determined do-no-significant-harm thresholds (available at www.climentum.com). Companies may not cross these thresholds at any time.
- ***Substantial contribution***: The Fund pursues alignment with the Paris Agreement. When the primary economic activities of a Company are Taxonomy Eligible, the Fund requires that it is on track to meeting the relevant Substantial Contribution requirements. When the economic activities are not Taxonomy Eligible, the Fund has developed the following three substantial contribution criteria of which Companies must meet at least one: (a) The solution delivers at least 50% lower carbon emissions vs. the leading incumbent solution; (b) The solution has the potential to deliver >100 thousand tonnes of CO2e avoided emissions by 2036 (earliest possible year for the Fund to end); (c) The solution has the potential to deliver >100 million tonnes of CO2e avoided emissions at full scale.

Company performance against these elements is initially assessed in the due diligence phase. During the ownership phase Companies are required to immediately report any violations to the Fund. Performance is monitored via board participation and annual reporting. Data from the Companies is subject to checks.

In the event that a Company violates any of these elements during the holding period, the Fund will seek to immediately remedy the situation or ultimately move to sell its stake in the Company.

Methodologies

The sustainability indicator used to measure the attainment of the sustainable investment objective is “avoided emissions”: greenhouse gas emissions avoidance in tonnes of CO2 equivalents. Avoided emissions (also referred to as “Scope 4”) are calculated via life cycle assessment (LCA), in accordance with the European Commission Recommendation 2013/179/EU(96) and leading standards, including ISO 14040 and 14044, GHG Protocol, and Project Frame. Avoided emissions are the difference between the life cycle emissions from the Company’s solution(s) compared to leading incumbent solution(s) available to achieve the same user benefit. To estimate the expected and potential annual avoided emissions of a Company (CO_2e/year), the anticipated annual sales (units) is multiplied by the unit impact (CO_2/unit).

Avoided emissions are first assessed in the due diligence phase, alongside other sustainability considerations. In the due diligence phase the Fund:

1. Conducts an initial life-cycle analysis (LCA) to quantify the avoided emissions potential of the Company.
2. Conducts a double materiality assessment, including principal adverse impacts and do-no-significant-harm criteria (both available at www.climentum.com).
3. Conducts a good governance assessment (performance and gaps) against the Fund's Good Governance Policy (available at www.climentum.com), and
4. Conducts an assessment of Taxonomy Eligibility and Alignment.

Point (1) is done with support from external LCA consultants and points (2), (3) and (4) are done with support from external ESG consultants.

Insofar as the findings are positive and the investment opportunity is pursued, this process leads to the development of:

1. An agreed sustainability action plan (SAP), which outlines concrete actions for the Company to take in year one of Fund ownership, and
2. An agreed reporting framework (what the Company is required to report on to the Fund, and when)

Once a Company is in the portfolio, the Fund engages with the Company to support in executing on the agreed sustainability action plan (SAP) and also report as agreed to the Fund.

As a fixed element for each SAP, all Companies must document the climate impact of their technologies via a third-party LCA in line with EU Commission Recommendation 2013/179/EU(96) or ISO 14067:2018(97) or ISO 14064-1:2018(98). Companies may use the dynamic "LCA lite" model developed during due diligence as a starting point. This work is to be completed within 12 months of the Company's product being launched in the market.

Related to this, another fixed element for each SAP is that all Companies must implement a methodology for calculating avoided emissions (future potentials and actual reductions) in line with current and emerging accounting protocols for avoided emissions and subject to third party review.

Data sources and processing

To determine progress toward the sustainable investment objective, the Fund primarily relies on data provided by the Companies in the due diligence process as well as during the ownership phase (via board briefings and regular reporting). Specifically for LCA efforts, data relating to reference technologies will be from high-quality databases that meet relevant ISO and GHG Protocol standards.

Data quality is ensured via checks by third party consultants (LCA and ESG specialists).

Data is processed and structured by the Fund across a small number of tracking and reporting frameworks for internal and external use.

Given the early-stage nature of the portfolio Companies, some data will be estimated. This will vary significantly across Companies, but is generally expected to include estimations of scope 3 emissions, where the Fund will adopt best practices in accordance with the GHG Protocol. Estimations are expected to become increasingly precise over the course of the ownership phase.

Limitations to methodologies and data

The primary limitation to assessing progress toward the sustainable investment objective of the Fund is the availability and quality of data from the Companies. The purpose of the impact portion of each due diligence phase, each agreed Sustainability Action Plan, as well as the mandatory annual impact reporting, is to address these limitations and minimize the risk of faulty or misleading data. Each investment is conditional on access to sufficient data and insights in order to conduct the due diligence, and data reported to the Fund is subject to review by third party consultants. Given these measures, the limitations mentioned above will not affect the attainment of the sustainable investment objective.

Due diligence

The Fund conducts a thorough due diligence for each Company, covering a range of areas including impact. For the impact portion of the due diligence phase the Fund:

1. Conducts an initial life-cycle analysis (LCA) to quantify the avoided emissions potential of the Company.
2. Conducts a double materiality assessment, including principal adverse impacts and do-no-significant-harm criteria (both available at www.climentum.com).
3. Conducts a good governance assessment (performance and gaps) against the Fund's Good Governance Policy (available at www.climentum.com), and
4. Conducts an assessment of Taxonomy Eligibility and Alignment.

Point (1) is done with support from external LCA consultants and points (2), (3) and (4) are done with support from external ESG consultants.

Insofar as the findings are positive and the investment opportunity is pursued, this process leads to the development of:

1. An agreed sustainability action plan (SAP), which outlines concrete actions for the Company to take in year one of Fund ownership, and
2. An agreed reporting framework (what the Company is required to report on to the Fund, and when)

Once a Company is in the portfolio, the Fund engages with the Company to support in executing on the agreed sustainability action plan (SAP) and also report as agreed to the Fund.

The impact due diligence process relies on data collection via questionnaires, Q&A with management, as well as independent research.

Engagement policies

The Fund considers engagement with its Companies as a critical lever for enhancing the positive impact of its Companies as well as avoiding significant adverse impacts. Engagement can be conducted either reactively, e.g. as a response to a specific incident that has had an adverse sustainability impact, or proactively to steer Companies towards accelerated positive impact.

The Fund engages with its Companies based on the following principles:

- **Continuous engagement and capacity building**: The Fund discusses sustainability issues with Companies on a regular basis to improve their handling, including disclosure, of such issues. Given the nature of the Companies, the Fund is committed to supporting them with access to experts, tools and resources, helping to gradually increase the capacity of its Companies over time.

- **Board engagement:** In cases where the Fund has a Board seat, the Fund shall use its leverage to continuously deliver on the Fund's climate impact objectives while addressing any principal adverse impacts and/or sustainability risks.
- **Cooperation**: When necessary, and in cases where the Fund does not have a Board seat, the Fund shall cooperate with other shareholders to exert influence over how sustainability issues are considered by the Companies.
- **Management of conflicts of interests**: the Fund identifies, manages and, where necessary, prohibits any action or transaction that could pose a conflict between the Fund and the Company. The Fund strives to manage any conflicts in a manner consistent with the highest standards of integrity.

For engagement activities that are conducted in response to a significant controversy and/or identification of a potential or confirmed significant adverse impact, Companies will be given the opportunity and support to address the issue(s) in question within a set and reasonable timeframe. In case of insufficient progress from a Company or repeated violations, the matter will escalate and will, in the worst case, result in the Fund pursuing a sale of its stake in the Company.

Attainment of the sustainable investment objective

The sustainable investment objective of the Fund is to reduce carbon emissions.

The investments of the Fund contribute to this objective by delivering solutions that are less carbon-intensive than the leading incumbent solutions, resulting in "avoided emissions".

While there are no relevant reference benchmarks (incl. no EU Climate Transition Benchmark or EU Paris-Aligned Benchmark) available that can be applied to the Fund, reference solutions are determined for each individual Company to assess the avoided emissions potential in a consistent manner.

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- The Fund has maintained its investment in the Company for at least 18 months

The Fund pursues alignment with the Paris Agreement. When the primary economic activities of a Company are Taxonomy Eligible, the Fund requires it to be on track to meeting the relevant Substantial Contribution requirements. When the economic activities are not Taxonomy Eligible, the Fund has developed the following three substantial contribution criteria of which Companies must meet at least one:

1. The solution delivers at least 50% lower carbon emissions vs. the leading incumbent solution
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The sustainability indicator used to measure the attainment of the sustainable investment objective is "avoided emissions": greenhouse gas emissions avoidance in tonnes of CO2 equivalents. Avoided emissions (also referred to as "Scope 4") are calculated via life cycle assessment (LCA), in accordance with the European Commission Recommendation 2013/179/EU(96) and leading standards, including ISO 14040 and 14044, GHG Protocol, and Project Frame.

Avoided emissions are the difference between the life cycle emissions from the Company's solution(s) compared to leading incumbent solution(s) available to achieve the same user benefit.

To estimate the expected and potential annual avoided emissions of a Company (CO_2e/year), the anticipated annual sales (units) is multiplied by the unit impact (CO_2/unit).