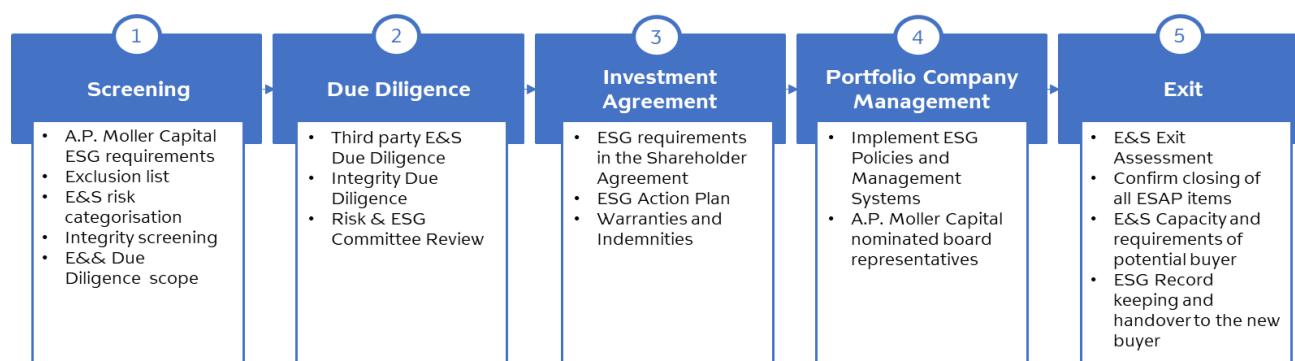


The integration of ESG considerations into the A.P. Moller Capital investment process



Screening: At the early stage in the investment process, it is determined whether the potential investment will be able to meet A.P. Moller Capital ESG requirements. All potential investments are screened against A.P. Moller Capital's sustainable investment framework to determine whether they meet our Art. 9 commitments. All investments are also screened against our exclusion list and assigned an E&S risk category, which provides an indication of the level of E&S risks associated with the investment. The E&S risk category, which is subsequently confirmed during the due diligence process, also provides A.P. Moller Capital with information on the extent of due diligence that is required. To comply with regulations covering anti-money laundering, anti-bribery and anti-corruption measures, sanctions, financial crime and terrorism financing, initial integrity screenings are carried out to identify, as early as possible, any illegal practice by counterparties with whom A.P. Moller Capital will refrain from doing business. The initial screening identifies high risk issues that need to be covered during in-depth Due Diligence (see below).

Due Diligence: After the initial screening, A.P. Moller Capital engages a qualified third party (external E&S consultant) to conduct an ESDD on the investment. The findings of the due diligence process are considered during the Investment Committee, including the extent of any non-alignment with A.P. Moller Capital's ESG requirements, as well as alignment with the IFC PS. The results of the ESDD are also discussed during the Risk and ESG Committee, which provides its comments prior to the Investment Committee. An environmental and social action plan is developed for situations where an investment is not aligned with A.P. Moller Capital's ESG requirements. The plan specifies the action to be taken towards alignment and the deadline by which gaps in this regard will need to be closed. In addition to the ESDD, an Integrity Due Diligence (IDD) is carried out to identify and assess areas of concern in relation to the background of potential investments, including key personnel, as well as any other relationships and activities that could cause reputational or commercial risk to A.P. Moller Capital. Any red flags identified during the initial integrity screening are covered during the IDD.

Investment Agreement: Each investment has an associated shareholder agreement (SHA) that is used to obtain a commitment from the portfolio company on key shareholder matters, including ESG. The SHA requires that our portfolio companies align with APMC's Ethical Policy. Appended to the SHA is the ESAP, which includes the areas for improvement highlighted during the due diligence process.

Portfolio Company Management: To ensure portfolio companies meet the requirements of A.P. Moller Capital's ESG principles throughout the entire period of the investment, all company policies are to be aligned with the A.P. Moller Capital Portfolio Company Governance Manual. In addition, A.P. Moller Capital is committed to the portfolio company meeting IFC PS 1, and certified Environmental and Occupational Health and Safety systems. In collaboration with the investment and ESG teams, the A.P. Moller Capital nominated board representative should ensure ESG actions are appropriately implemented and monitored. A.P. Moller Capital tracks the ESG performance of all its portfolio companies and tracks numerous fund level and regulatory ESG KPIs.

Exit: A.P. Moller Capital conducts an integrity check on potential buyers to ensure the protection of its reputation. During the exit process, information is collected on the positive impact achieved, completion of ESAP, ESG improvements and other documentation (e.g., ESIA, permits, regular reporting).