

CORPORATE SOCIAL RESPONSIBILITY POLICY

FOR

AXCEL MANAGEMENT A/S
(THE “MANAGER”)

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1. Background and purpose

- 1.1 This Corporate Social Responsibility (CSR) Policy shall apply to all CSR initiatives and activities at Axcel and Companies owned by an AIF under management by Axcel.
- 1.2 The objective of Axcel's CSR Policy is to establish the principles and guidelines for Axcel and its companies to undertake and fulfil its corporate social responsibility.
- 1.3 Axcel has noted an increasing need from investors and authorities to report on ESG issues, and this is why Axcel has signed the UN's Principles for Responsible Investment (PRI) - a set of guidelines on environmental, social and governance (ESG) issues for professional investors.

2. Definitions

- 2.1 Capitalized words shall have the meaning as described in the list of definitions as approved from time to time by the Board of Directors. References to other policies and procedures are also capitalized.

3. Corporate Social Responsibility

- 3.1 Axcel believes in sustainability, not only in economic terms but also with respect to social and environmental issues. For this reason, Axcel has pledged itself to acting responsibly towards the companies we own and in the way we run our business in general. Axcel will only invest in companies with a sustainable business model. Otherwise the reputation of Axcel and potentially also the value of our investments could be threatened. We therefore conduct an environmental, social and ethical due diligence review of the companies in which we invest.
- 3.2 Axcel and Companies must join the UN Global Compact within one year of ownership. Axcel is thereby supporting the ten principles for responsible business in the areas of human rights, labour, the environment and anti-corruption.
- 3.3 Axcel should consider each acquisition of a Portfolio Company carefully that could place Axcel in a social, ethical or environmental dilemma. This is why Axcel will perform an ESG related due diligence ahead of any new investment.
- 3.4 To ensure that all companies comply to the UN Global Compact, Axcel has established a CSR network with a member from each Portfolio Company. The CSR network should meet at least once a year and Axcel should during the year also maintain a dialogue and with the CSR officers of the companies.
- 3.5 Newly acquired companies have a year to adapt their procedures and sign up to Global Compact.
- 3.6 Axcel has gradually developed CSR policies based on our view of corporate governance, which includes dialogue with stakeholders and transparent communications and reporting.

- 3.7 Axcel expects companies under management to:
- comply with relevant laws, rules and internationally recognised principles
 - consider risks relating to CSR issues and address them proactively
 - be in a position to meet the requirements and expectations of customers and business partners concerning supply chain management and codes of conduct
 - consider future business opportunities and positioning in relation to CSR
 - comply with the DVCA's guidelines on openness and transparency
- 3.8 In addition, Axcel should strive to comply with all relevant rules applying to companies and ourselves. As a member of the Danish Venture Capital and Private Equity Association (DVCA) and the Swedish Private Equity & Venture Capital Association (SVCA), Axcel adheres to both organisations' codes of conduct and valuation principles.
- 4. Reporting on CSR**
- 4.1 Management must ensure that Axcel is able to report on developments in the objectives for CSR at least once a year.
- 4.2 Furthermore, a Communication on Progress report (COP) on the implementation of the United Nations Global Compact is published annually.
- 4.3 The COP report must be made available on Axcel's website and in the Annual Review.
- 5. Reporting of breaches**
- 5.1 Non-adherence to this policy must be reported by any and all employees of the Manager within a reasonable period of time to Management and the Compliance Officer.
- 5.2 In the event, that corrective actions are not taken Management or the Compliance Officer must ensure that the Board of Directors are informed directly.
- 6. Approval**
- 6.1 The present rules of procedure shall be reviewed at least once a year by the Board of Directors.
- 6.2 These rules of procedure were approved by the Board of Directors on 23 May 2016.

7. **Approval history**

Version:	Effective from:	Changes:	Performed by:
1	1 July 2016		Board of Directors