

SFDR DISCLOSURE: BLUEFRONT CAPITAL I AS

Website disclosure for Bluefront Capital I AS pursuant to the Sustainable Finance Disclosure Regulation (Regulation (EU) 2019/2088, the “SFDR”) Article 10 for financial products referred in SFDR Article 8 (1).

A. Summary
<p>Bluefront Capital I AS (the Fund) invests to make the seafood value chain more sustainable. Through managing the Fund’s investments, our vision is to impact the future of the blue economy. Our mission is to invest to impact the seafood value chain to accelerate the supply of healthy and sustainable seafood. Our business idea is to create the world’s leading impact seafood investor supporting companies with capital and knowledge to help grow the world’s access to sustainable seafood.</p> <p>Through its investments, the Fund promotes environmental and social characteristics, but does not have as its objective a sustainable investment. The Fund is expected to, but does not commit to, partially invest in sustainable investments. This is due to, inter alia, the targeted sector of the Fund and that the Fund, through its investments, will seek to make the seafood value chain more sustainable.</p> <p>Prior to reporting any investments as sustainable investments, Bluefront will assess the no significant harm-criteria by taking into account and assessing each investment against the indicators for adverse impacts on sustainability factors.</p> <p>All investments made by the Fund are expected to be aligned with the environmental and social characteristics promoted by the Fund. The United Nation’s Sustainable Development Goals (the SDGs) are incorporated into the Fund’s mandate. The investments of the Fund will contribute to one or more SDGs. Bluefront has identified four focus areas within the SDGs: 1) No hunger, 2) Innovation and Infrastructure, 3) Climate action and 4) Life below water.</p> <p>Bluefront has established an ESG framework based on the Principles of Responsible Investment (PRI). The ESG framework provides for mandatory consideration of ESG risks and opportunities during the life-cycle of an investment, from deal sourcing to exit, in which Bluefront will identify any issues or concerns relating to ESG as well as assess whether the investment is aligned with the Fund’s investment mandate.</p> <p>To ensure the investment process and ESG assessments are tailored to the specific risks and opportunities in the aquaculture segment, Bluefront uses the Collier Fairr Protein Producer Index and the top 10 ESG and sustainability risks in the aquaculture segment as the starting point for assessing ESG and sustainability risks and opportunities for potential investments. In turn, this assessment forms the basis for an ESG strategy that is set for each portfolio company with specific sustainability targets and KPI’s.</p> <p>The ESG strategy, based on the PRI, also includes monitoring of portfolio companies. Through active engagement and reporting on KPI’s from portfolio companies, Bluefront will monitor and measure the attainment of the environmental and social characteristics promoted by the Fund. Bluefront</p>

will ensure that each of our portfolio companies implement relevant ESG KPI's into its annual reporting. Bluefront will support each company in developing and implementing such measures.

Bluefront will annually present an ESG report summarizing the annual results and achieved effect. Bluefront will report on the proportion of sustainable investments, if any, to investors of the Fund in the periodic reports. Such reporting will also include proportion of investments that are environmentally sustainable investments pursuant to the Taxonomy in accordance with Article 6 in the Taxonomy.

B. No sustainable investment objective

The Fund promotes environmental and social characteristics, but does not have as its objective a sustainable investment. The Fund is expected to, but does not commit to, partially invest in sustainable investments.

All investments of the Fund are expected to be aligned with the environmental and social characteristics promoted by the Fund, in accordance with the binding investment strategy of the Fund. Thus, the planned asset allocation for the Fund is to use 100% of the investments to attain the environmental and social characteristics promoted by the Fund.

The Fund is expected to partially make investments that are sustainable investments pursuant to the definition in Article 2 (17) in the SFDR. This is due to, inter alia, the targeted sector of the Fund and that the Fund, through its investments, will seek to make the seafood value chain more sustainable. However, the Fund has not committed to making any sustainable investments. Bluefront will report on the proportion of sustainable investments, if any, to investors of the Fund in the periodic reports. Such reporting will also include proportion of investments that are environmentally sustainable investments pursuant to the Taxonomy in accordance with Article 6 in the Taxonomy.

Reporting of the proportion of sustainable investments, if any, to investors will identify the proportion of investments that qualify as sustainable investments pursuant to the definition and criteria as set out in the SFDR Article 2 (17). This entails that sustainable investments will be investments in economic activities that contribute to an environmental or social objective provided that the investments do not significantly harm any sustainable investment objectives, and provided that the portfolio company follow good governance practices.

Bluefront will assess contribution towards an environmental or social objective against relevant sustainability indicators and parameters tailored to the specific industry and based on materiality assessments.

Prior to reporting any investments as sustainable investments, Bluefront will assess the no significant harm-criteria by taking into account and assessing each investment against the indicators for adverse impacts on sustainability factors. During the due diligence and ESG review of a potential investment, Bluefront will assess principal adverse impacts on environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters by assessing the investment against the indicators included in the Draft Regulatory Technical Standards Annex I, as amended and adopted by the EU Commission. This is done mainly through the ESG Questionnaire that is to be signed and returned by the CEO or chairman of a potential investment. If Bluefront, based on market practice, available benchmarks and Bluefront's sound judgment, considers the investment as doing significant harm to sustainable investment objectives

based on the performance on the sustainability indicators, the investment will not be reported as a sustainable investment.

Bluefront will assess and disclose to investors whether the sustainable investments, if any, are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

C. Environmental or social characteristics of the financial product

Through its investments, the Fund seeks to make the seafood value chain more sustainable. The strategy of the Fund is based on the following main pillars:

- Vision: *Impact the future of the blue economy*
- Mission: *Invest to impact the seafood value chain to accelerate the supply of healthy and sustainable seafood*
- Business idea: *Create the world's leading impact seafood investor supporting companies with capital and knowledge to help grow the world's access to sustainable seafood*

To achieve the objective of making the seafood value chain more sustainable, the Fund will:

- Only invest in the seafood value chain to produce more sustainable seafood to feed a growing population. To do this, it is necessary to grow the seafood production by investing in the value chain and develop new products to make it more accessible for more people
- Invest in alternative and sustainable production methods to increase accessibility and improve sustainable production and tackle sustainability risks such as escapes, sea-lice, emissions to water and emissions from air freight transportation

The Sustainable Development Goals (the “SDGs”) are incorporated into the Fund’s mandate. Specifically, the Fund has identified four focus areas within the SDGs to which the investments made by the Fund will contribute:

	<p>Invest into small/medium sized companies with the aim of increasing production in a sustainable way Ensure that companies the Fund invests in help implement practices that are sustainable and help maintain the ecosystems and adaption to climate change Examples: MSC and ASC</p>
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	<p>Work and invest to be more resource efficient Ensure that companies the Fund invests in help implement practices related to human well-being, operate resources efficiently and adopt clean and environmentally sound technologies Focus on human well-being and work towards best in class environment for employees</p>
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	<p>Reduce the use of fossil fuels and invest in green energy Invest and develop technologies to reduce climate footprint in portfolio companies</p>
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	<p>Ensure that the companies the Fund invests in are preventing and reducing marine pollution and nutrient pollution Investing in new and alternative farming methods Implement relevant sustainable certificates. Examples ASC, MSC</p>
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To ensure the investment process and ESG assessments are tailored to the specific risks and opportunities in the aquaculture segment, Bluefront uses the Collier Fairr Protein Producer Index and the top 10 ESG and sustainability risks in the aquaculture segment, as identified by Collier Fairr, as the starting point for assessing ESG and sustainability risks and opportunities for potential investments. The top 10 ESG risks identified for the aquaculture segment are:

1. Environmental
 - a. Greenhouse gas emissions
 - b. Effluents
 - c. Habitat destruction and biodiversity loss
 - d. Fish feed supply
 - e. Disease management
2. Social
 - a. Labor conditions
 - b. Fish welfare
 - c. Community resistance
 - d. Antibiotic use
3. Governance
 - a. Transparency and food fraud

These ESG risks form the basis for the materiality assessment performed for each individual investment which lays the foundation for the following ESG assessments that are made prior to investment, and the subsequent engagement and follow-up with each portfolio company in accordance with the ESG Strategy after a potential investment is made.

The Fund will not invest in companies with significant ESG issues or concerns, unless there is a clear opportunity to raise standards to an acceptable level. Further, the Fund will not invest into a company without having a clear understanding among shareholders and management that ESG targets must be (or already is) implemented into the strategy.

D. Investment strategy

All investments made by the Fund are subject to an investment process including a robust due diligence process in which Bluefront will identify any issues or concerns relating to ESG as well as assess whether the investment is aligned with the Fund's investment mandate.

Bluefront has established an ESG framework based on the Principles of Responsible Investment (PRI). The ESG framework provides for mandatory consideration of ESG risks and opportunities during the life-cycle of an investment, from deal sourcing to exit. The process includes the following overall steps:

1. Deal sourcing - identifying material ESG issues during ESG screening and due diligence based on materiality assessments and focused on predominant risks in the seafood sector
2. Investment decision - material issues in the investment memorandum and negotiation of the investment agreement, developing an ESG strategy for the portfolio company

3. Ownership - managing ESG issues during the onboarding, engagement and monitoring of portfolio company, setting clear ESG targets and incorporating sustainability KPIs into management incentives
4. Exit - Adding value by demonstrating ESG performance and ESG risk management

Bluefront's investment process is based on access to and active engagement with current owners and management of each potential investment. Through this process, the deal team gets a thorough understanding of the culture, organization and governance of the company. Through the due diligence process, the company's management structures, employee relations and remuneration of staff, and tax compliance, will be scrutinized.

If the due diligence has revealed unmanageable governance risks that cannot be resolved or mitigated, Bluefront will abstain from making the investment. Otherwise, the findings from the pre-investment phase will form part of the basis for the ESG strategy, including governance, and subsequent engagement and follow-up with the company.

E. Proportion of investments

All investments of the Fund are expected to be aligned with the environmental and social characteristics promoted by the Fund, in accordance with the binding investment strategy set out in d). Thus, the planned asset allocation for the Fund is to use 100% of the investments to attain the environmental and social characteristics promoted by the Fund.

Refer to Section b) for information on how the indicators for adverse impacts are taken into account and alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

F. Monitoring of environmental and social characteristics

Bluefront has built its methodology for monitoring portfolio companies on the Principles for Responsible Investments (PRI). This includes guidelines for each stage of the investment process to secure proper implementation, including the investment holding period. Bluefront will ensure that each of our portfolio companies implement relevant ESG KPI's into its annual reporting. Bluefront will support each company in developing and implementing such measures.

In addition, during the ownership period, Bluefront will work with the portfolio companies to ensure that the companies establish have policies and procedures (if not already in place) in order to measure and report on the progress on relevant ESG and sustainability KPI's for each company, as well as the indicators for principal adverse impacts.

G. Methodologies for environmental and social characteristics

Bluefront engages actively with the portfolio companies during the investment holding period on their performance on the ESG strategy, including relevant sustainability KPI's tailored to the relevant company. Through active engagement and reporting on KPI's from portfolio companies, Bluefront will monitor and measure the attainment of the environmental and social characteristics promoted by the Fund.

H. Data sources and processing for environmental and social characteristics

Bluefront will ensure that the data collected is accurate. If necessary, Bluefront will use third parties to collect and process data. Typical data sources may be each portfolio company's internal HR-system, (CRM) client information, ERP systems, financial statements, third party verifications and other relevant systems.

I. Limitation to methodologies and data

Bluefront targets small and mid-cap companies. Therefore, the degree of automation and digitalization in the data gathering may be limited. As such, a high degree of manual data collection and processing will probably be necessary. Relevant resources may also be limited based on company size. This may also impact data quality. Bluefront acknowledges the risks involved in manual data collection/processing and the risk related to limited resources and will focus on enhancing data quality.

J. Due diligence

Refer to section d) for an overview on the due diligence on the underlying assets of the Fund.

K. Engagement policies

Bluefront will develop an ESG strategy based on the relevant ESG pillars for each company and put its resources available to secure that the companies get access to relevant ESG competence if this is not already in place. The relevant goals for each portfolio company will be part of management KPI's.

Bluefront will annually present an ESG report summarizing the annual results and achieved effect