



RITRANSPARENCY REPORT 2017

Accent Equity Partners AB





About this report

The PRI Reporting Framework is a key step in the journey towards building a common language and industry standard for reporting responsible investment (RI) activities. This RI Transparency Report is one of the key outputs of this Framework. Its primary objective is to enable signatory transparency on RI activities and facilitate dialogue between investors and their clients, beneficiaries and other stakeholders. A copy of this report will be publicly disclosed for all reporting signatories on the PRI website, ensuring accountability of the PRI Initiative and its signatories.

This report is an export of the individual Signatory organisation's response to the PRI during the 2016 reporting cycle. It includes their responses to mandatory indicators, as well as responses to voluntary indicators the signatory has agreed to make public. The information is presented exactly as it was reported. Where an indicator offers a response option that is multiple-choice, all options that were available to the signatory to select are presented in this report. Presenting the information exactly as reported is a result of signatory feedback which suggested the PRI not summarise the information. As a result, the reports can be extensive. However, to help easily locate information, there is a **Principles index** which highlights where the information can be found and summarises the indicators that signatories complete and disclose.

Understanding the Principles Index

The Principles Index summarises the response status for the individual indicators and modules and shows how these relate to the six <u>Principles for Responsible Investment</u>. It can be used by stakeholders as an 'at-a-glance' summary of reported information and to identify particular themes or areas of interest.

Indicators can refer to one or more Principles. Some indicators are not specific to any Principle. These are highlighted in the 'General' column. When multiple Principles are covered across numerous indicators, in order to avoid repetition, only the main Principle covered is highlighted.

All indicators within a module are presented below. The status of indicators is shown with the following symbols:

Symbol	Status
✓	The signatory has completed all mandatory parts of this indicator
Ø	The signatory has completed some parts of this indicator
&	This indicator was not relevant for this signatory
-	The signatory did not complete any part of this indicator
Ъ	The signatory has flagged this indicator for internal review

Within the table, indicators marked in blue are mandatory to complete. Indicators marked in grey are voluntary to complete.



Principles Index

Organisational Overview								Principle				
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6			
OO 01	Signatory category and services	✓	Public							✓		
OO 02	Headquarters and operational countries	✓	Public							✓		
OO 03	Subsidiaries that are separate PRI signatories	✓	Public							✓		
OO 04	Reporting year and AUM	✓	Public							✓		
OO 05	Breakdown of AUM by asset class	~	Asset mix disclosed in OO 06							√		
OO 06	How would you like to disclose your asset class mix	✓	Public							✓		
OO 07	Fixed income AUM breakdown	8	n/a							✓		
OO 08	Segregated mandates or pooled funds	8	n/a							✓		
OO 09	Breakdown of AUM by market	✓	Public							✓		
OO 10	RI activities for listed equities	✓	Public							✓		
00 11	RI activities in other asset classes	✓	Public							✓		
OO 12	Modules and sections required to complete	✓	n/a							✓		
OO End	Module confirmation page	✓	-									

Strategy and Governance							Principle			General
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6	
SG 01	RI policy and coverage	✓	Public							✓
SG 02	Publicly available RI policy or guidance documents	✓	Public						✓	
SG 03	Conflicts of interest	✓	Public							✓
SG 04		✓	Private							✓
SG 05	RI goals and objectives	✓	Public							✓
SG 06	Main goals/objectives this year	✓	Private							✓
SG 07	RI roles and responsibilities	✓	Public							✓
SG 08	RI in performance management, reward and/or personal development	✓	Private							✓
SG 09	Collaborative organisations / initiatives	✓	Public				✓	✓		
SG 10	Promoting RI independently	✓	Public				✓			
SG 11	Dialogue with public policy makers or standard setters	✓	Private				✓	✓	✓	
SG 12	ESG issues in strategic asset allocation	✓	Public	✓						
SG 13	Long term investment risks and opportunity	✓	Private	~						
SG 14	Allocation of assets to environmental and social themed areas	✓	Private	✓						
SG 15	ESG issues for internally managed assets not reported in framework	✓	Public							✓
SG 16	ESG issues for externally managed assets not reported in framework	8	n/a							✓
SG 17	Innovative features of approach to RI	✓	Private							✓
SG End	Module confirmation page	✓	-							

Direct – Private Equity								Principle				
Indicator	Short description	Status	Disclosure	1	2	3	4	5	6			
PE 01	Breakdown of investments by strategy	✓	Private							✓		
PE 02	Typical level of ownership	✓	Private							✓		
PE 03	Description of approach to RI	✓	Private	✓					✓			
PE 04	Investment guidelines and RI	✓	Public		✓							
PE 05	Fund placement documents and RI	✓	Public	✓			✓		✓			
PE 06	Formal commitments to RI	✓	Private				✓					
PE 07	Incorporating ESG issues when selecting investments	✓	Public	✓								
PE 08	Types of ESG information considered in investment selection	✓	Public	✓		✓						
PE 09	Encouraging improvements in investees	✓	Private	✓	✓							
PE 10	ESG issues impact in selection process	✓	Private	✓								
PE 11	Proportion of companies monitored on their ESG performance	✓	Public		✓							
PE 12	Proportion of portfolio companies with sustainability policy	8	n/a		✓							
PE 13	Actions taken by portfolio companies to incorporate ESG issues into operations	8	n/a		✓							
PE 14	Type and frequency of reports received from portfolio companies	8	n/a		✓	✓						
PE 15	Disclosure of ESG issues in pre-exit	✓	Private		✓							
PE 16	ESG issues affected financial/ESG performance	✓	Private	~	✓							
PE 17	Examples of ESG issues that affected your PE investments	✓	Private	✓	✓							
PE 18	Disclosure of ESG information to public and clients/beneficiaries	✓	Public						✓			
PE 19	Approach to disclosing ESG incidents	✓	Private						✓			
PE End	Module confirmation page	✓	-									

Accent Equity Partners AB

Reported Information

Public version

Organisational Overview

PRI disclaimer

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	Basic Inforn	nation									
00 01	Mand	latory	Public	Gateway/Peering	General						
	00 01.1	Select the services you offer.									
	☑ Fund management										
		% of assets under managem	ent (AUM) in range	s							
	○ <10	%									
	○ 10-	50%									
		%									
	☐ Fund of f	unds, manager of managers, sub-ac	dvised products								
	☐ Other, sp	pecify									
	□ Executio	n and advisory services									
	00 01.2	Additional information. [Optional]	•		-						

Accent Equity Partners AB is an investment advisor to Fund Managers focused on the Nordic lower mid-market and is not itself a Fund Manager. Assets under management, asset class and reporting about portfolio companies relate to the assets and companies managed by the Fund Managers to which Accent Equity Partners AB acts as investment advisor.

OO 02	Mai	ndatory	Public	Peering	General						
00	02.1	Select the location of your organisa	tion's headquarters	s.							
Sw	Sweden										
00	02.2	Indicate the number of countries in	which you have off	ices (including your headquarters	s).						
	l										
02	2-5										
0	6-10										
0:	-10										
00	02.3	Indicate the approximate number of	f staff in your organ	isation in full-time equivalents (F	TE).						
		FTE									
18											

General

Public

Descriptive

Mandatory

OO 03

OO 03.1

Indicate whether you have subsidiaries within your organisation that are also PRI signatories in their own right.

O Yes

No

OO 04 Mandatory Public Gateway/Peering General

OO 04.1 Indicate the year end date for your reporting year.

31/12/2016

00 04.2

Indicate your total AUM at the end of your reporting year, excluding subsidiaries you have chosen not to report on.

	trillions	billions	millions	thousands	hundreds
Total AUM			653	771	014
Currency	EUR				
Assets in USD			699	668	033

OO 06 Mandatory Public Descriptive General

New selection options have been added to this indicator. Please review your prefilled responses carefully.

as percentage breakdown

• as broad ranges

OO 06.1

Internally managed (%) Externally managed (%) <10% 0 Listed equity Fixed income 0 0 Private equity 0 >50% 0 0 Property Infrastructure 0 0 Commodities 0 0 0 Hedge funds 0

How you would like to disclose your asset class mix.



Forestry	0	0
Farmland	0	0
Inclusive finance	0	0
Cash	0	0
Other (1), specify	0	0
Other (2), specify	0	0

OO 06.2 Publish our asset class mix as per attached image [Optional].

OO 09 Mandatory to Report Voluntary to Disclose Public Peering General

OO 09.1 Indicate the breakdown of your organisation's AUM by market.

	○ 0%
	○ <10%
Davidanad Marketa	O 10-50%
Developed Markets	• >50 %
	⊚ 0%
	○ <10%
Empraina Frontier and Other Markets	O 10-50%
Emerging, Frontier and Other Markets	○ >50 %
Total	100%

Gateway asset class implementation indicators

OO 10 Mandatory Public Gateway General

00 10.1

Select the direct or indirect ESG incorporation activities your organisation implemented for listed equities in the reporting year.

 $\ensuremath{\square}$ We incorporate ESG in our investment decisions on our internally managed assets

☐ We do not incorporate ESG in our directly managed listed equity and/or we do not address ESG incorporation in our external manager selection, appointment and/or monitoring processes.



	00 10	Select the direct or indirect engagement activities your organisation implemented for listed equity in the reporting year.									
	☑ We	☑ We engage with companies on ESG factors via our staff, collaborations or service providers									
	□We	\square We do not engage directly and do not require external managers to engage with companies on ESG factors.									
	00 10	.3	Select the direct or indirect voting a reporting year	ctivities your organ	isation implemented for listed equ	iity in the					
	☑ We	cast o	ur (proxy) votes directly or via dedicat	ted voting providers	S						
	□We	do not	t cast our (proxy) votes directly and do	o not require extern	al managers to vote on our behal	f					
00 1	1	Man	datory	Public	Gateway	General					
	00 11	.1	Select the internally managed asset classes in which you addressed ESG incorporation into your investment decisions and/or your active ownership practices (during the reporting year).								
	✓ Priv	/ate eq	uity								

 $\hfill\square$ None of the above

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Strategy and Governance

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Investment policy

SG 01 Mandatory Public Core Assessed General

New selection options have been added to this indicator. Please review your prefilled responses carefully.

SG 01.1

Indicate if you have an investment policy that covers your responsible investment approach.

Yes

SG 01.2

Indicate the components/types and coverage of your policy.

Select all that apply

Policy components/types	Coverage by AUM
☑ Policy setting out your overall approach	Applicable policies cover all AUM
☑ Formalised guidelines on environmental factors	O Applicable policies cover a majority of AUM
☑ Formalised guidelines on social factors	O Applicable policies cover a minority of AUM
☑ Formalised guidelines on corporate governance factors	
☐ Asset class-specific RI guidelines	
☑ Sector specific RI guidelines	
☑ Screening / exclusions policy	
☐ Engagement policy	
☐ (Proxy) voting policy	
☐ Other, specify (1)	
☐ Other, specify(2)	



	SG 01.4	Indicate what norms you have responsible investment approximate the second seco		lop your investment policy that cove	rs your						
	✓ UN Global Compact Principles										
	☐ UN Guiding Principles on Business and Human Rights										
	☐ Universal Declaration of Human Rights										
	☐ International Bill of Human Rights										
	☐ International Labour Organization Conventions										
	☐ United	Nations Convention Against C	Corruption								
	□ OECD	Guidelines for Multinational En	nterprises								
	\square Other,	specify (1)									
	☐ Other,	specify (2)									
	\square Other,	specify (3)									
	□ None o	of the above									
0	No										
SG 02	Mandatory	/	Public	Core Assessed	PRI 6						
New se	ndic	ate which of your investment p	olicy documents	e review your prefilled responses s (if any) are publicly available. Prov	•						
000	and	an attachment of the documen	t.								
☑ Po	olicy setting ou	t your overall approach									
	ı	JRL/Attachment									
	☑ URL										
		URL									
	http://accen	tequitypartners.se/value-creati	on/investment-a	pproach/responsible-investment/							
	☐ Attachment	(will be made public)									
□ Fo	ormalised guide	elines on environmental factors	3								
□ Fo	ormalised guide	elines on social factors									
□ Fo	ormalised guide	elines on corporate governance	e factors								
□Se	ector specific R	I guidelines									
□ So	creening / exclu	usions policy									
□W	e do not public	sly disclose our investment poli	cy documents								
SG 03	Mandatory	,	Public	Core Assessed	General						



SG 03.1

Indicate if your organisation has a policy on managing potential conflicts of interest in the investment process.

Yes

SG 03.2

Describe your policy on managing potential conflicts of interest in the investment process.

N/A. However all conflicts or potential conflicts, in relation to the funds advised by us, shall be submitted to the Accent Equity funds' advisory committees.

 \bigcirc No

Obje	Objectives and strategies						
SG 05	Mar	ndatory	Public	Gateway/Core Assessed	General		
SG 05	5.1	Indicate if and how frequently your of investment activities.	organisation sets a	nd reviews objectives for its resp	onsible		
○ Qu	arterly	or more frequently					
○ Bia	ınnuall	y					
An	• Annually						
O Les	ss frequ	uently than annually					
○ Ad	O Ad-hoc basis						
○ It is	○ It is not reviewed						
SG 05	5.2	Additional information. [Optional]					

Objectives are set in the beginning of every year and are reviewed on a biannual basis.

Governance and human resources							
SG 07 Ma		Mandatory	Public	Core Assessed	General		
	SG 07		present in your organisati	on and for each, indicate whether the	ney have oversight		



	Roles present in your organ	THOUSEN		
☑ Board	d members or trustees			
☑ (Oversight/accountability for response	onsible investment		
▼	Implementation of responsible inv	vestment		
	No oversight/accountability or imp	plementation responsi	bility for responsible investment	t
☑ Chief	Executive Officer (CEO), Chief In	nvestment Officer (CIC	O), Investment Committee	
☑ (Oversight/accountability for response	onsible investment		
▼	Implementation of responsible inv	vestment		
	No oversight/accountability or imp	plementation responsi	bility for responsible investment	t
☐ Other	r Chief-level staff or head of depa	artment, specify		
☐ Portfo	olio managers			
☐ Invest	stment analysts			
☑ Dedic	cated responsible investment staf	ff		
☑ (Oversight/accountability for response	onsible investment		
▼	Implementation of responsible inv	vestment		
	No oversight/accountability or imp	plementation responsi	bility for responsible investment	t
□ Exterr	nal managers or service provider	rs		
☐ Invest	stor relations			
☐ Other	r role, specify (1)			
☐ Other	r role, specify (2)			
SG 07.3	Indicate the number of dedic	ated responsible inves	stment staff your organisation h	as.
	Number			
2				
Promotin	ng responsible investment			
Ma	andatory	Public	Core Assessed	PRI 4,5
N		dia in Produce Phone	eu .	
new selectio	on options have been added to	this indicator. Pleas	e review your pretilied respoi	nses carefully.
SG 09.1	Select the collaborative orga		ves of which your organisation is	s a member or in

Select all that apply

 $\ensuremath{\,\boxtimes\,}$ Principles for Responsible Investment



Your organisation's role in the initiative during the reporting period (see definitions) ☑ Basic □ Moderate □ Advanced ☐ AFIC – La Commission ESG ☐ Asian Corporate Governance Association ☐ Australian Council of Superannuation Investors ☐ BVCA – Responsible Investment Advisory Board ☐ CDP Climate Change ☐ CDP Forests ☐ CFA Institute Centre for Financial Market Integrity ☐ Code for Responsible Investment in SA (CRISA) ☐ Code for Responsible Finance in the 21st Century ☐ Council of Institutional Investors (CII) ☐ ESG Research Australia

☐ Eumedion ☐ EVCA – Responsible Investment Roundtable ☐ Extractive Industries Transparency Initiative (EITI) ☐ Global Investors Governance Network (GIGN) ☐ Global Impact Investing Network (GIIN) ☐ Global Real Estate Sustainability Benchmark (GRESB) ☐ Green Bond Principles ☐ Institutional Investors Group on Climate Change (IIGCC) ☐ Interfaith Center on Corporate Responsibility (ICCR) ☐ International Corporate Governance Network (ICGN) ☐ Investor Group on Climate Change, Australia/New Zealand (IGCC) ☐ International Integrated Reporting Council (IIRC) ☐ Investor Network on Climate Risk (INCR)/CERES ☐ Local Authority Pension Fund Forum ☐ Principles for Sustainable Insurance ☐ Regional or National Social Investment Forums (e.g. UKSIF, Eurosif, ASRIA, RIAA), specify ☐ Responsible Finance Principles in Inclusive Finance ☐ Shareholder Association for Research and Education (Share) ☐ United Nations Environmental Program Finance Initiative (UNEP FI) ☐ United Nations Global Compact ☑ Other collaborative organisation/initiative, specify



Invest Europe

☐ CDP Water

	Your organisation's role in the initiative during the reporting year (see definitions)							
	☑ Basic							
	☐ Moderate							
	☐ Advanced							
\checkmark	☑ Other collaborative organisation/initiative, specify							
	Swedish Venture Capital Association							
	Your organisation's role in the initiative during the reporting year (see definitions)							
	☑ Basic							
	☐ Moder	rate						
	☐ Advan	nced						
	Other collabo	rative organisation/initiative, speci	fy					
	Other collabo	rative organisation/initiative, speci	fy					
SG 10	Mandat	orv	Public	Core Assessed	PRI 4			
30 10	Walluat	Ol y	rubiic	Cole Assessed	FIXI 4			
80	3 10.1 In	dicate if your organisation promot	es responsible inve	estment, independently of collabo	rative			
30	in	itiatives.						
•	Yes							
	SG 10.2	Indicate which of the following investment, independently of c		isation has taken to promote resp es.	lonsible			
	☑ Provided or supported education or training programmes for clients, investment managers, broker/dealers, investment consultants, legal advisers or other investment organisations							
	☐ Provid	led financial support for academi	c or industry resea	rch on responsible investment				
		raged better transparency and disent industry	sclosure of respons	ible investment practices across	the			
	☐ Spoke publicly at events and conferences to promote responsible investment							
	□ Wrote	and published in-house research	papers on respons	sible investment				
		raged the adoption of the PRI						
	☐ Wrote articles on responsible investment in the media.							
	☐ Other, specify							
0	○ No							
lm	nplem <u>entatio</u>	on not in other modules						
SG 12	Mandat	ory	Public	Descriptive	PRI 1			

New selection options have been added to this indicator. Please review your prefilled responses carefully.



SG 12.1	Indicate if your organisation executes scenario analysis and/or modelling in which the risk profile of future ESG trends at portfolio level is calculated.				
	$\hfill\square$ We execute scenario analysis which includes factors representing the investment impacts of future environmental trends				
☐ We executrends	\Box We execute scenario analysis which includes factors representing the investment impacts of future social trends				
\Box We execute scenario analysis which includes factors representing the investment impacts of future governance trends					
☐ We execute other scenario analysis, specify					
☑ We do not execute such scenario analysis and/or modelling					
SG 12.2	Indicate if your organisation considers ESG issues in strategic asset allocation and/or allocation of				

- We do the following
 - \square Allocation between asset classes
 - \square Determining fixed income duration
 - $\hfill \square$ Allocation of assets between geographic markets
 - $\hfill \square$ Sector weightings
 - $\ensuremath{\,\boxtimes\,}$ Other, specify

ESG issues are considered in our overall strategy to invest in the Nordics

 \bigcirc We do not consider ESG issues in strategic asset allocation

SG 15	Mandatory	Public	Descriptive	General
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SG 15.1

Describe how you address ESG issues for internally managed assets for which a specific PRI asset class module has yet to be developed or for which you are not required to report because your assets are below the minimum threshold.

Asset Class	Describe what processes are in place and the outputs or outcomes achieved		
Listed equities - ESG incorporation	ESG screening, Risk mapping and implementation, measuring and following up ESG targets		
Listed equities - engagement	ESG targets are monitored via the board		
Listed equity - (proxy) voting	ESG targets are monitored via the board		



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Direct – Private Equity

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Overview

PE 04 Mandatory Public Core Assessed PRI 2

PE 04.1

Indicate if your organisation's investment guidelines for private equity refer to responsible investment.

- Our investment guidelines do refer to responsible investment
- Our investment guidelines do not refer to responsible investment
- O We do not have investment guidelines

Fundraising of private equity funds

PE 05 Mandatory Public Core Assessed PRI 1,4,6

PE 05.1

Indicate if your most recent fund placement documents (private placement memorandums (PPMs) or similar) refer to responsible investment aspects of your organisation.

Yes

PE 05.2

Indicate how your fund placement documents (PPMs or similar) refer to the following responsible investment aspects of your organisation:

- ☑ Policy and commitment to responsible investment
- ☑ Approach to ESG issues in pre-investment processes
- ☐ Approach to ESG issues in post-investment processes

PE 05.3

Describe how your organisation refers to responsible investment in fund placement documents (PPMs or similar). [Optional]

Accent Equity Partners AB shall conduct its business in a manner that is socially, environmentally and ethically responsible and abide by frameworks of law and regulation applicable in the respective markets in which it operates. As responsible members of the communities in which the funds operate, Accent Equity Partners AB does not tolerate discrimination on grounds of race, gender, religion, color, nationality or disability and attach great importance to health and safety issues.

Acting and advising investments responsibly ensure that the funds advised by Accent Equity Partners AB, their advisors and portfolio companies gain and hold the trust of all stakeholders to their businesses. Such practices are also the best way to promote the long-term success of the companies in which the funds invest.

Funds advised by Accent Equity Partners AB take several core values and principles into account in their assessment of potential investments and incorporate these in the mission statements and corporate governance practices of their portfolio companies. These core values are based on Accent Equity Partners' Code of Conduct and Responsible Investment Policy.

Accent's core values are:

- Respect for internationally proclaimed human rights principles - Equal opportunity independent of gender or race - Freedom of association and the right to bargain collectively - Working conditions which meet required health and safety standards - Promotion of environmental responsibility - Implementation of anti-corruption guidelines



○ No

O Not applicable as our organisation does not fundraise

Pre-investment (selection)

PE 07 Mandatory Public Gateway PRI 1

PE 07.1

During due-diligence indicate if your organisation typically incorporates ESG issues when selecting private equity investments.

Yes

PE 07.2

Describe your organisation's approach to incorporating ESG issues in private equity investment selection.

Accent Equity Partners AB aims to advise investments in companies that conduct their businesses in a responsible manner. In these investment processes, the funds shall take environmental, ethical and social responsibility issues and standards into consideration in every aspect of the funds' business and investment processes. As a result, the funds advised by Accent Equity Partners AB take a number of core values and principles into account in their assessment of potential investments and incorporate these in the mission statements and corporate governance practices of their portfolio companies.

 \bigcirc No

PE 08 Mandatory Public Core Assessed PRI 1,3

PE 8.1

Indicate what type of ESG information your organisation typically considers during your private equity investment selection process.

- ☑ Raw data from target company
- ☑ Benchmarks against other companies
- ☑ Country level data/benchmarks
- ☑ Reporting standards, industry codes and certifications
- ☑ International initiatives, declarations or standards
- ☑ Engagements with stakeholders (e.g. customers and suppliers)
- ☑ Advice from external resources
- ☐ Other, specify
- ☐ We do not track this information

PE 8.2

Describe how this information is reported to, considered and documented by the Investment Committee or similar.

This is reported to the respective funds' investment committees and is also documented during due diligence process



	Post-investment (monitoring)							
PE 1	1	Mar	ndatory	Public	Gateway/Core Assessed	PRI 2		
	PE 11.1		Indicate whether your organisation incorporates ESG issues in investment monitoring of portfolio companies.					
	○ Yes • No							
	PE 11.4	4	Additional information. [Optional]					

Accent Equity Partners AB has set an objective that all portfolio companies of funds advised by it implement CSR policies within a 12-month period post acquisition. CSR education for key persons in each portfolio company is in process with seven modules from November 2016-June 2017.

Communication **PE 18 Mandatory Public Core Assessed** PRI 6 Indicate whether your organisation proactively discloses ESG information on your private equity PE 18.1 investments. O Disclose publicly Disclose to investor clients (LPs)/beneficiaries only Indicate the type of ESG information that your organisation proactively discloses to your clients PE 18.5 (LPs)/beneficiaries. ☑ ESG information in relation to our pre-investment activities ☑ ESG information in relation to our post-investment monitoring and ownership activities ☐ Information on our portfolio companies' ESG performance ☐ Other, specify Indicate your organisation's typical frequency of disclosing ESG information to your PE 18.6 clients(LPs)/beneficiaries. O Quarterly or more frequently Biannually



Annually

Less frequently than annuallyAd-hoc/when requested, specify

O No proactive disclosure to the public or to clients (LPs)/beneficiaries