

H.E. António Guterres
Secretary General
United Nations
New York, NY 10017
USA

Bergen, 29.10.2020

UN Global Compact – Communication on Progress

Letter of Commitment from Argentum's Chief Executive Officer

Dear Mr. Secretary General,

I am pleased to confirm that Argentum Asset Management pledges its continued support for the ten principles of the Global Compact with respect to human rights, labor, environment and anti-corruption.

We are also proud to submit Argentum's eighth Communication on Progress since Argentum adhered to the Global Compact in 2012. Argentum has followed the principles of the Global Compact for several years, with the principles placed at the core of Argentum's investment decisions.

The private equity industry is continuously improving its focus on ESG and transparency. Argentum strives to be a driving force for these efforts, both in our own investment processes and through collaboration with other members of the industry.

Argentum and the UN Global Compact

This Communication on Progress accounts for Argentum's activities during 2019 towards ESG and sustainability. It captures our contribution as a committed signatory to the UN Global Compact.

The Global Compact's ten universally accepted principles in the areas of human rights, labor, environment and anti-corruption and its approach to corporate sustainability are placed at the core of Argentum's investment decisions. As stated in Argentum's ethical guidelines: "The values which form the basis of Argentum's activities shall be in accordance with the principles set out in the UN's Global Compact."

It is important for Argentum as an investor in private equity funds that managers and funds are also conversant with the principles and base their activities on them. This is

Argentum's aim in its monitoring and dialogue with managers and included in the legal framework when Argentum makes new investments.

Argentum's Investment Process

Argentum has developed separate ESG requirements for the investment process, making this an integral part of decision-making and monitoring of managers in the portfolio.

The ESG-related assessments form part of the legislative agreements when investing in new funds. Argentum has established a standard agreement in the form of a side letter, which all fund managers must endorse in one form or another, prior to committing to a new fund. This includes acceptance that:

- Argentum's investment activities are based on the principles of the UN Global Compact
- They have received Argentum's ethical guidelines and are urged by Argentum to develop similar guidelines
- They will evaluate the social, environmental and ethical consequences of current and future investments

The managers also commit to annually report on ESG-related work to Argentum.

ESG is also an inherent part of the investment process within secondary and co-investments. Within secondary investments, the manager's approach to ESG is reviewed, including ESG policies, investment restrictions, investment strategy, reporting procedures and the current portfolio. Within co-investments, where Argentum invests in companies alongside the funds, an overall ESG-based assessment based on the UN Global Compact's main areas is conducted prior to the investment.

Investment Monitoring

In 2019, Argentum asked the managers questions related to the work they carry out prior to making new investments, and how they follow up their portfolio companies after the investments have been made. In addition to a modified version of the questions from the previous year, covering policies and guidelines, anti-corruption, ESG-reporting and value creation related to ESG, the managers were also asked specific questions regarding climate risk and opportunities, data security the EU taxonomy for sustainable activities and the Task Force on Climate-Related Financial Disclosures (TCFD). Argentum also questioned the managers if they considered the UN Sustainable Development Goals in their ESG work and, if so, which Sustainable Development Goals that were most relevant to them and their activities.

Argentum also conducted an evaluation of the portfolio, with managers being asked to answer questions about the different portfolio companies, and to say whether they consider the underlying portfolio companies to have a high, medium or low risk in respect of the main areas of the UN Global Compact. The managers were also asked to report CO²-emissions for the underlying companies in the portfolio.

Argentum's Business Operations


Argentum annually reports on a selection of indicators from the UN Global Reporting Initiative (GRI) that are relevant to the company and its activities.

Argentum work continuously with Norwegian and international investors on how to further develop work related to ESG and is engaged in regular dialogue with investors and managers on these topics. Argentum is also a signatory of the UNIFEM and UN Global Compact initiative the Women's Empowerment Principles.

With this communication, we express our intent to advance the Global Compact principles within our sphere of influence. We are committed to making Global Compact and its principles part of the strategy, culture and day-to-day operations of our company and investment activities and engage in collaborative projects which advance the broader development goals of the United Nations, particularly the Sustainable Development Goals.

Argentum Asset Management will make a clear statement of this to our stakeholders and the general public. We recognize that a key requirement for participation in the Global Compact is the annual submission of a Communication on Progress (COP), which describes our company's efforts to implement the ten principles. We support public accountability and transparency, and therefore commit to report on progress annually according to the Global Compact COP policy.

Sincerely Yours,

A handwritten signature in blue ink, appearing to read 'N.E. Høegh-Krohn', with a stylized flourish at the end.

Mr. Nils E. Joachim Høegh-Krohn,

CEO, Argentum Asset Management