Disclosure pursuant to the Sustainable Finance Disclosure Regulation (Regulation (EU) 2019/2088) Article 3

Bluefront Equity is a pure play seafood private equity firm and invests across the seafood value chain in the future of the blue economy. By executing on our investment strategy, we seek to make the seafood value chain more sustainable. Sustainability risks are an integral part of our investment decision-making process.

Bluefront has implemented an ESG and impact framework based on the UN Principles for Responsible Investment and the United Nation's Sustainable Development Goals. Through the ESG and impact framework, sustainability risks are made an integral part of our decision-making process. Sustainability risks means an environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of the investment.

The ESG and impact framework facilitates for identifying and handling of sustainability risks for each investment and the portfolio as a whole, aimed at generating positive economic impact for the portfolio company, Bluefront and the investors.

As a private equity manager focussed on only one industry, namely seafood, we have tailored our ESG and impact framework to the specific risks and opportunities within the seafood industry. Bluefront uses the Coller Fairr Protein Producer Index and the top 10 sustainability risks in the aquaculture segment, as identified by Coller Fairr, as the starting point for assessing sustainability risks and opportunities for potential investments.

The top 10 sustainability risks identified for the aquaculture segment are:

Environmental	**Social**	**Governance**
• Greenhouse gas emissions • Effluents • Habitat destruction and biodiversity loss • Fish feed supply • Disease management	• Labour conditions • Fish welfare • Community resistance • Antibiotic use	• Transparency and food fraud

These risks form the basis for Bluefront's approach to sustainability risk in its investment decision-making process.

Pre-investment, the investment committee of Bluefront is presented with assessments of potential sustainability risks in three stages. Firstly, a materiality assessment is performed by the deal team in the deal sourcing phase for each potential investment in line with the UN Principles for Responsible Investment (UN PRI). Secondly, if an investment opportunity is pursued, a holistic assessment of risks and opportunities is performed by an ESG and impact consultant. Thirdly, prior to the final investment decision being made, an ESG and impact consultant prepares a final risk assessment in collaboration with the deal team and the compliance function.

The due diligence process related to sustainability risk includes an assessment of compliance with legal requirements related to ESG and sustainability, including environmental permits and licenses, compliance with labour laws and tax compliance. During the due diligence process, Bluefront is particularly cautious of any issues and concerns around, inter alia, the following risks:

(a) Potential lawsuits towards the target or key people working in the target;

(b) Issues with corruption and fraud;

(c) Tax and vat issues;

(d) ESG issues; and

(e) Management incentives and background checks on management.

In addition, each potential investment will be required to return a comprehensive ESG Questionnaire completed by the CEO or chairman of the company. The ESG Questionnaire covers a variety of sustainability indicators, including environmental, social and employee matters, respect for human rights, and anti-corruption and anti-bribery matters. Based on the responses to the ESG Questionnaire, Bluefront will assess how the potential investment is exposed to and handles sustainability risk.

Any adverse findings or non-compliance that is identified during the due diligence will be presented and discussed in the investment committee throughout the three stages described above. If the due diligence has revealed unmanageable sustainability 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 and impact strategy and subsequent engagement and follow-up with the company with the aim of identifying, mitigating and handling sustainability risk during Bluefront's ownership period.

Version	**Date**	**Scope**
1	20 August 2021	First publication of disclosure
2	March 2023	Minor updates in text and inclusion of ESG consultant
3	February 2024	Minor updates in text