Nasdaq Green Equity Transition Designation

and Nasdaq Green Equity Transition Designation – Private Company

Nasdaq Green Equity Transition Designation

is a voluntary designation for companies listed on our Nordic markets that want to increase visibility around their green business models and strategies.

Nasdaq Green Equity Transition Designation – Private Company

is available for privately owned companies that want to benefit from the designation prior to listing.

Nasdaq Green Equity Transition Designation and Nasdaq Green Equity Transition Designation – Private Company is attainable for companies that have more than 50 percent of its investments allocated to activities considered green. There is no minimum threshold for turnover from activities considered green, but the company’s turnover derived from fossil fuel activities must be less than 50 percent. A qualitative assessment of the company’s alignment with the Nasdaq Green Equity Principles is done by an approved reviewer. The methodology used by the approved reviewer is available on the Nasdaq website.

Who can apply?

Nasdaq Green Equity Transition Designation is available to issuers on Nasdaq Main Markets and First North Growth Markets including the Premier segments in Sweden, Finland, Denmark and Iceland. Additionally, companies in listing process can apply, and once approved will be eligible for the Nasdaq Green Equity Designation from their first day of trading.
Nasdaq Green Equity Transition Designation – Private Company is available for privately owned companies that want to benefit from a designation prior to listing. Privately owned companies with European domicile (EEA, the UK and Switzerland) and 12 months operational and financial history are eligible and can apply for Nasdaq Green Equity Transition Designation – Private Company.

Companies apply based on their most recent audited annual financial report.

**Benefits of a Nasdaq Green Designation**

The designation enables visibility and transparency towards investors looking for sustainable investments.

**Transparency –** Visibility and transparency is leveraged via Nasdaq market data dissemination channels that enables companies to showcase their Nasdaq Green Designation and green KPIs.

- Market data feed: The company's designation is visible in the dissemination of Nasdaq market data to users in the financial market.
- Nasdaq ESG Data Portal: The company's green data is provided in the Nasdaq ESG Data Portal, which is accessible to investors using the service.

**Visibility –** Nasdaq amplifies Nasdaq Green Designation visibility and transparency via our Nasdaq websites.

- Nasdaq Green Designation companies and assessment reports published on Nasdaq global website (for listed and private companies): The company will be visible in the list of Nasdaq Green Designation companies on the Nasdaq global website. The reviewer's assessment report will also be published there.
- Reports published on the Nasdaq Nordic website (for listed companies): The reviewer's assessment report is published on the company's share information page on the Nasdaq Nordic website. Other related material used for the assessment, like the company's sustainability report, may also be found there.
- List of shares at Nasdaq Nordic website (for listed companies): The company will be marked with a green symbol in the list of shares, and an indicator on the company's share information page on the Nasdaq Nordic website.

**Credibility –** Nasdaq Green Equity Principles are based on developments within sustainable finance and market stakeholder feedback, and the assessment done by the approved reviewer provides credibility to the company's green status.

Nasdaq Green Equity Principles: The qualification criteria defined in the Nasdaq Green Equity Principles are for companies to fulfill and for Nasdaq approved reviewers to assess alignment with on an annual basis.

**Communication –** Nasdaq assists the company in leveraging communication via marketing and social media.

- Nasdaq Tower Picture: Nasdaq provides the company with a congratulatory photo from the Nasdaq Tower, celebrating their relevant Nasdaq Green Designation approval.
- Nasdaq Social Media: Nasdaq will post a copy of the Nasdaq Tower picture with a congratulatory message on our social media channels.
- Nasdaq Green Designation badge: Nasdaq will provide the company with a Nasdaq Green Equity Transition Designation or Nasdaq Green Equity Transition Designation – Private Company badge to use in its marketing and communications channels.
Approval Criteria – Nasdaq Green Equity Principles

The requirements for Nasdaq Green Equity Transition Designation and Nasdaq Green Equity Transition Designation – Private Company are specified in the Nasdaq Green Equity Principles published in full on the Nasdaq website. A qualitative assessment of the company's alignment with the Nasdaq Green Equity Principles is done by a reviewer approved by Nasdaq. The main criteria include:

1. More than 50 percent of the company's investments (sum of CAPEX and OPEX) must be allocated to activities considered green.

2. There is no minimum threshold for turnover from activities considered green, but the company's turnover derived from fossil fuel activities must be less than 50 percent.

3. The company must provide information on its relevant environmental targets and KPIs such as science-based targets and climate KPIs in the Paris Agreement.

4. The company must state its alignment with the EU Taxonomy for sustainable activities, including Minimum Safeguards and Do No Significant Harm to other environmental objectives.

5. To maintain the designation, the company must commit to an annual limited assessment by an approved reviewer and make annual updates of key environmental data to be shared in the ESG Data Portal. A full assessment would be required should there be structural or other material changes to the company. Otherwise, a full assessment is only required every third year.

Approved Reviewers

A Nasdaq approved reviewer firm will make a qualitative assessment of a company's alignment with the qualification criteria in the Nasdaq Green Equity Principles. The approved reviewer produces an assessment report. The proprietary methodology used by the approved reviewer is made public and is included in the assessment report.

The names and contact details of the Nasdaq approved reviewer firms are published on the Nasdaq website. Approved reviewers can be contacted for further information regarding an assessment and application process. The approved reviewer is chosen directly by the company.

Application Process

Initial Assessment – Full Assessment

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<thead>
<tr>
<th>Reviewer Assessment</th>
<th>Application Form Data Entry</th>
<th>Reviewer Confirmation and Nasdaq Approval</th>
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<tr>
<td>The company engages a Nasdaq approved reviewer to make an assessment for alignment with the Nasdaq Green Equity Principles.</td>
<td>In the digital application form the company enters environmental data to be shared in the Nasdaq ESG Data Portal after approval.</td>
<td>The reviewer enters the digital application form and confirms alignment with the Nasdaq Green Equity Principles.</td>
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<td>The assessment report and other supporting voluntary documents are uploaded in the application form. Company confirms completeness and submits application.</td>
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<td>Nasdaq checks the form for completeness and approves the application.</td>
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The company contacts a Nasdaq approved reviewer for an assessment of the company's alignment with the requirements for Nasdaq Green Equity Transition Designation or Nasdaq Green Equity Transition Designation – Private Company. The reviewer will use its own methodology for its assessment of the company. A list of the approved reviewers and a description of their respective proprietary methodology is available on the Nasdaq website.

The approved reviewer is chosen and engaged by the company. During the assessment and application process, the company populates relevant environmental information that is required for the designation into the Nasdaq ESG Data Portal. At approval this data will be made accessible to investors using the ESG Data Portal.

When the approved reviewer's assessment is ready, the company submits the reviewer's assessment report in the application to Nasdaq, along with any additional relevant voluntary documents, and the populated required environmental information.

The approved reviewer confirms alignment with the Nasdaq Green Equity Principles, the alignment of the information provided for the ESG Data Portal with the environmental information reviewed, and submits the application to Nasdaq. The application process is managed and submitted in the Listing Center application.

Both the approved reviewer's assessment report and the submission to the Nasdaq ESG Data Portal must state if the data has been assured by any other third party. The assurance of the company's non-financial data is not a Nasdaq requirement.

Nasdaq checks that relevant information is submitted and confirmed by the issuer and the approved reviewer. Nasdaq's approval for the Nasdaq Green Equity Transition Designation and Nasdaq Green Equity Transition Designation – Private Company is based on the qualitative assessment by the approved reviewer.

Nasdaq approves the designation and informs the issuer.

**Approval Timeframes**

While the timeline for an assessment and approval process can vary, it generally takes from one to two months.

From submission of all the required materials, a maximum of ten business days is required for the review and approval by Nasdaq. Nasdaq Green Equity Transition Designation and Nasdaq Green Equity Transition Designation – Private Company is valid one year from Nasdaq approval.
The company should contact the reviewer and initiate a renewal assessment process well ahead of time to the end of the one-year approval period.

Three months before expiration a reminder email will be sent by Nasdaq to the company's contact person.

**Annual Renewal**

To uphold the designation, an approved reviewer must conduct an annual limited assessment to at least validate that the company is still aligned with the investments and fossil fuel thresholds, and a review of the information provided for the ESG Data Portal including EU Taxonomy alignment and Do No Significant Harm and Minimum Safeguards criteria. The approved reviewer produces an assessment report that is submitted with the renewal application, and other relevant voluntary documents to Nasdaq.

A full assessment is required every third year. However, if there have been structural or other material changes in the company a full assessment is required.

**Nasdaq Green Equity Transition Designation When Listing**

If a private company that holds Nasdaq Green Equity Transition Designation – Private Company conducts a listing on Nasdaq Nordic markets the company can use the Nasdaq Green Equity Transition Designation badge in their marketing and communication from their first day of trading.

As a main principle no reviewer assessment is required in connection to listing unless specific circumstances exist. The existing assessment report can be used with the reviewer’s addition of a page informing that the company has been listed and uses the Nasdaq Green Equity Transition Designation badge for listed companies.

The company can choose to renew its assessment and submit a renewal application in connection to listing to be able to publicly share an updated Nasdaq Green Equity Transition Designation assessment report from their first day of trading.

**For More Information**

Companies who would like to learn more about the Nasdaq Green Designations should email listings@nasdaq.com, or contact their Nasdaq Relationship Manager, or an approved reviewer as specified on the Nasdaq website.