

Website Product Disclosures

Product name: Incentive Active Value Long Only Fund (the "Fund")

Legal entity identifier: 635400KRIZMC1N3TGN87

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This document provides sustainability-related website disclosures for Incentive Active Value Long Only Fund (the "Fund"), a product categorized as Article 8 under Regulation (EU) 2019/2088 – the Sustainable Finance Disclosure Regulation ("SFDR").

A. Summary

Sustainability is essential to the investment and portfolio management processes and is integrated into the Investment Manager's bottom-up research process. The Fund aims to promote environmental, social, and good governance characteristics through its investment selection process.

The Investment Manager believes that companies with high sustainability standards are better positioned to capitalize on business opportunities arising from an increasing sustainability focus among all stakeholders, including employees, customers, suppliers, the environment, and society at large.

Sustainability issues have a greater influence on a company's risk landscape. Long-term profitability is intrinsically linked to the responsible management of a company's impact on the environment and society. The Investment Manager therefore works actively with portfolio companies to promote good corporate governance on sustainability issues.

The environmental and social characteristics promoted by the Fund include, but not limited to, are:

- Environmental characteristics - environmental and climate impact, carbon emission reduction, water, and waste management.
- Social characteristics - human and labor rights, anti-corruption.

The promotion of environmental and/or social characteristics is integrated into the Fund's sustainability approach by the Investment Manager through the following:

- 1) investment in companies with high sustainability standards which identify and manage their sustainability risks and impact on the environment, society, and people in line with the expectations of society.
- 2) undertaking an assessment of the key sustainability characteristics that are material to the company and industry in which the relevant company operates in using the Investment Manager's proprietary research and analysis.
- 3) engaging with the management of the companies in order to mitigate the risks and improve sustainability performance, to encourage them to align their business

models, set emission reduction targets and disclose the appropriate information regarding material climate risk and opportunities and other sustainability issues; and

- 4) using proxy voting to drive positive change.

B. No sustainable investment objective

This financial product promotes environmental and social characteristics but does not have as its objective sustainable investment.

C. Environmental or social characteristics of the financial product

As part of the investment process, the Investment Manager considers a broad range of material environmental and social characteristics. Sustainability is essential to the investment and portfolio management processes and is integrated into the Investment Manager's bottom-up research process.

The environmental and social characteristics promoted by the Fund include, but are not limited to:

Environmental characteristics:

- Environmental and climate impact – The Investment Manager invests in companies with a responsible approach to the environment. The Investment Manager considers the full environmental impact of a company across the global value chain, even where the impact is very difficult to quantify rather than just the direct environmental footprint of the company.
- Carbon emissions reduction – The Investment Manager supports companies to reduce their carbon emissions. The Investment Manager engages with the management of the companies to encourage them to set emission reduction targets through signing the Science-Based Target initiative, which the Investment Manager believes is a sensible way for corporates to work towards cutting CO2 emissions based on their individual starting points.
- Water and waste management – for relevant sectors, water and waste footprint is considered. Pollution and waste, including both toxic emissions and operational waste at either the company or supply chain level can be disqualifying factors. The Investment Manager supports limiting emissions and waste and assess the company's implementations of environmental measures.

Social characteristics:

- Labour rights – responsible employers that are not involved in forced labour, child labour or discrimination in the workplace. The Investment Manager will consider the track record of investee companies in relation to the treatment of workers and the local community in order to assess their suitability for capital allocation.
- Human rights – avoiding companies implicated with human rights abuses and investing in companies that support and respect international human rights standards.
- Anti-corruption – The Investment Manager does not invest in companies where management have a history of corruption, extortion, or bribery.

D. Investment Strategy

The investment strategies are based on the fundamental research skills, portfolio management skills and risk management of the Investment Manager.

The Fund's portfolio is expected, under normal circumstances, to hold 10 to 20 investments at any given time. The Investment Manager believes that this number of investments will allow for sufficient diversification in the portfolio and at the same time enable the Investment Manager to dedicate a substantial amount of time to each of its investments.

The Investment Manager expects to generate high quality investment leads through a combination of (i) regular screening of European markets for opportunities where there is a substantial gap between market price and estimated intrinsic value, (ii) interaction with its extensive network of business and capital markets contacts across Europe, including management teams, board members, financial advisors, other institutional investors, controlling shareholders and other relevant market participants, and (iii) in depth analysis of specific situations that merits further work following initial assessment.

Investment ideas will be evaluated on the basis of extensive, fundamental value oriented research that includes analysis of business specific factors such as; profitability, financial strength, competitive positioning and growth prospects as well as wider industry dynamics such as; industry structure, nature of competition, relative strength vs. suppliers and customers, concentration level of customers and suppliers, risk of the company's products or services becoming obsolescent and risk of technology shifts.

The Investment Manager expects that the Fund will hold most of its investments over several years and as a result of that, new investments will be initiated relatively infrequently.

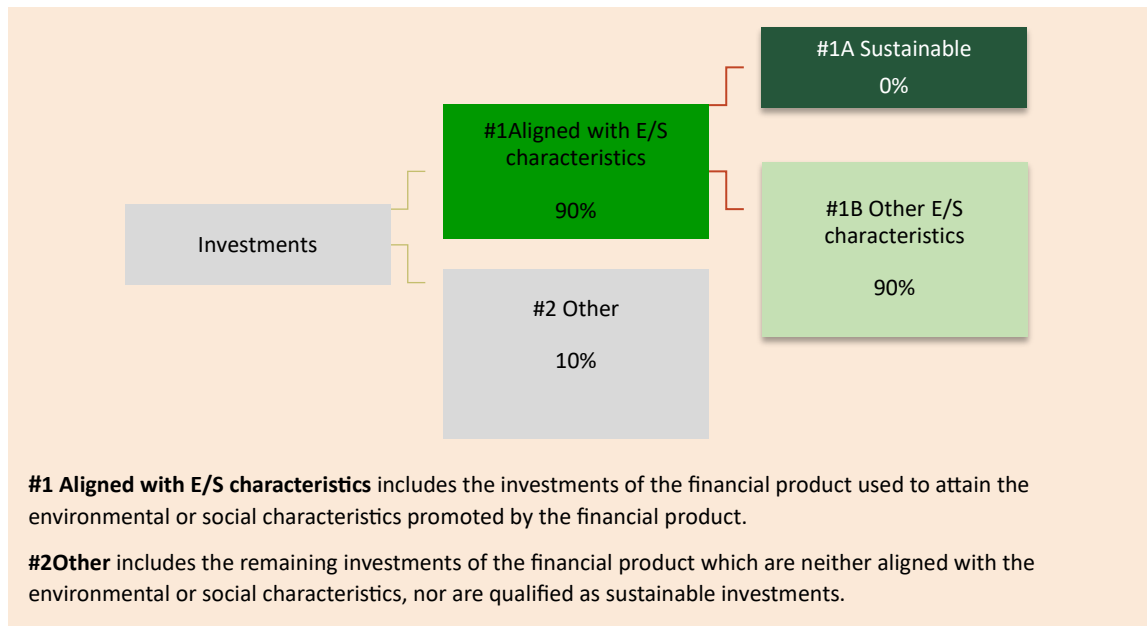
E. Proportion of investments

The Fund aims to hold a minimum of 90% investments that are aligned with the environmental or social characteristics promoted by the Fund. The Fund does not hold sustainable investments.

The Fund aims to hold a maximum of 10% investments that are not aligned with the environmental or social characteristics promoted by the Fund and are not sustainable investments, and which fall into the "Other" section of the Fund (further details of which are set out below).

Please note that while the Investment Manager aims to achieve the asset allocation outlined above, these figures may fluctuate during the investment period and ultimately, as with any investment target, may not be attained.

The exact asset allocation of this Fund will be reported in the Fund's mandatory periodic report SFDR template, for the relevant reference period.



“Other” includes the remaining holdings of the Fund which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments. This “Other” section in the Fund might include (i) certain holdings and (ii) cash and/or cash equivalents, that have been retained for liquidity, hedging and/or cash management purposes.

As noted above, the Fund will be invested in compliance with the Exclusion List, on a continuous basis. The Investment Manager believes that compliance with the Exclusion List prevents investment in companies that breach environmental and/or social minimum standards and ensures that the Fund can successfully promote its environmental and social characteristics. The above steps ensure that robust environmental and social safeguards are in place.

No minimum environmental or social safeguards will be in place in respect of (i) certain holdings and (ii) cash and/or cash equivalents.

F. Monitoring of environmental or social characteristics

As part of the investment process, the Investment Manager uses a range of both quantitative and qualitative sustainability indicators to determine the environmental and social impacts of each investment. The Investment Manager has integrated these indicators into its research, investment decision-making, portfolio construction and trading and compliance processes.

The sustainability indicators being considered by the Investment Manager are:

1. All Principal Adverse Impact (PAI) indicators which are material to the company, specifically GHG emissions, carbon footprint, GHG intensity, waste reduction policies, water policies, environmental disclosures and climate risk and opportunities assessment.

2. Social – Violations of UN Global Compact and OECD Guidelines for Multinational Enterprises, human rights policies and Health and Safety policies, anti-corruption and anti-bribery policies, business ethics policies, employee protection/ whistle blower policies, child labour laws.

G. Methodologies

The fund management is exercised in accordance with Incentive's Sustainability Policy. The Investment Manager will track and report on the performance of the sustainability indicators, namely Principal Adverse Indicators.

These sustainability indicators will be used to measure the attainment of each of the environmental and social characteristics promoted by the Fund.

H. Data source and processing

The Investment Manager draws information on investee companies from publicly available corporate information and company meetings, reports from industry and research organisations, think tanks, legislation, consultants, and academics. The Investment Manager is continuously monitoring and comparing multiple data sources to ensure quality of the information.

Third party research may be used; however, the Investment Manager forms a proprietary view of each analysed company.

I. Limitations to methodologies and data

It is usually very difficult to assign a monetary value or meaningful number to ESG issues and to integrate them into financial models. ESG-related disclosures by companies may be limited, unverified and non-standardized. Many ESG data providers scores reflect only differing disclosure and thus the data is backward looking. The Investment Manager prefers to exercise its own judgment from a holistic analysis of the business and its interaction with the world around it.

J. Due diligence

The Investment Manager shall strive for a high level of due diligence in the selection and on-going monitoring of investments process. The Investment Manager applies pre-trade compliance checks to adhere to the Exclusion List. Additionally, sustainability analysis of each company is integrated into the investment decision process. This process is further described in the Investment Manager's Sustainability Policy. The Investment Manager seeks to verify all information used in the investment process by using multiple sources where such information is available.

K. Engagement policies

Engagement is a fundamental part of the investment process. The Investment Manager intends to engage with the management teams, board members and other stakeholders of its underlying portfolio companies when it believes that such engagement can positively influence any processes aimed at enhancing the value of an investment.

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The Investment Manager votes at General Meetings and makes sure its voting aligns with Sustainability Policy. The Investment manager part-take in nomination committees in the Nordic region whenever there is the opportunity and through this work ensure that the board of directors is optimally composed and constructed.

L. Designated reference benchmark

No reference benchmark has been designated for the Fund.