Instruction on Shareholder Engagement

Last updated and adopted: 20.05.2026

Internal rules and regulations laid down pursuant to:

- Sections 4-1a and 4-7 of the AIFM Act
- Sections 3-5 and 3-6 and of the AIFM Regulation
- Sections 8-1a and 8-8 of the Securities Funds Act
- Sections 8-5 and 8-6 of the Securities Funds Regulation
- Shareholder Rights Directive II (SRD II)

Responsible: Chief Executive Officer

General and scope

This instruction is adopted on the basis of Norwegian rules transposing the second Shareholder Rights Directive (SRD II). SRD II imposes transparency and disclosure obligations on institutional investors and asset managers.

By virtue of its authorisation from the FSAN, the Company is considered an asset manager for the purpose of SRD II.

This instruction applies to the Company to the extent it provides discretionary portfolio management services with respect to shares admitted to trading on a regulated market that is registered in or operating in the EEA.

The Company manages UCITS and Alternative Investment Funds that may hold shares admitted to trading on a regulated market that is registered in or operating in the EEA. However, portfolio management for such collective investment schemes are delegated to other asset managers. Further, the Company also manages Alternative Investment Funds where it retains the portfolio management function. These funds do not hold shares admitted to trading on a regulated market that is registered in or operating in the EEA. The Company does not have a more detailed Instruction on Shareholder Engagement on the basis of the above.