Instruction on Shareholder Engagement

Last updated and adopted: 20.05.2026

Internal rules and regulations laid down pursuant to:

- Sections 9-16a and 10-10a of the Securities Trading Act
- Sections 9-6a and 10-1 of the Securities Trading 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 does not provide discretionary portfolio management services with respect to shares admitted to trading on a regulated market that is registered in or operating in the EEA. Accordingly, the Company does not have a more detailed Instruction on Shareholder Engagement.