

## Integration of Sustainability Risks (SFDR Article 3)

*As of December 2025*

In accordance with Article 3 of Regulation (EU) 2019/2088 (the Sustainable Finance Disclosure Regulation, “SFDR”), Incentive AS (the Company) describes below its policies on the integration of sustainability risks into its investment decision-making process.

For the purposes of SFDR, sustainability risk refers to an environmental, social or governance (“ESG”) event or condition that, if it were to occur, could cause an actual or potential material negative impact on the value of an investment.

Company integrates sustainability risks as part of its overall investment decision-making and portfolio management processes. Sustainability risks are considered alongside financial and other material risks throughout the investment lifecycle.

As part of the investment analysis and due diligence process, Company assesses relevant ESG factors to identify sustainability risks that may affect the financial performance or risk profile of a potential investment. This assessment includes, where relevant, an evaluation of the company’s governance structure, policies and procedures, management of environmental and social risks, and the company’s ability to identify, measure and manage sustainability-related risks and opportunities.

The identification and assessment of sustainability risks form part of the overall investment evaluation and are considered in connection with investment approval decisions. Where sustainability risks are identified, Company assesses whether such risks are acceptable, can be mitigated, or may affect the investment decision, including the decision not to invest.

Following an investment, sustainability risks are monitored on an ongoing basis as part of Company’s portfolio management activities. Company engages with portfolio companies, where relevant, to promote sound corporate governance and to encourage the identification, management and mitigation of material sustainability risks.

Where sustainability risks increase or are not adequately managed, Company may take appropriate actions, which may include enhanced engagement, reassessment of the investment case, or other measures deemed appropriate in the circumstances.

Further information on sustainability approach can be found in our Sustainability Policy. Product level information is provided in the relevant fund documentation, including prospectuses and supplements, where applicable.