Integration of Sustainability Risks (SFDR Article 3)

As of December 2025

Article 3 of the SFDR requires financial market participants to disclose how sustainability risks are integrated into investment decision-making.

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.

Sector Fund Services AS (the Company) is an alternative investment fund manager authorized to perform such services as defined in the Alternative Investment Fund Managers Act (the AIFM Act) section 2-2(1) and section 2-2(3), and a Management company for securities funds as defined in Act on Securities Funds § 2-1 (1).

This document seeks to give a short summary of our process for integrating sustainability risk.

The Company's business objective is the management of alternative investment funds and securities funds, as well as the provision of back-office, administrative, and other supporting services to the respective companies within the Sector Asset Management Group. The Company does not make or exercise discretion over investment decisions, portfolio construction, or ongoing investment management. All investment decisions are made by investment managers that have been delegated to this responsibility under an investment Management Agreement (IMA), who may manage Article 6 and/or Article 8 funds with their own ESG policies.

Within this context, the Company considers sustainability risks as part of its risk management, oversight, and governance activities, where relevant and to the extent such risks may have a material impact on the value of investments managed by the delegated Investment Managers. ESG-related factors may be considered in operational monitoring, reporting, and supporting research, without being systematically integrated into investment decisions.

The Company recognizes that ESG considerations may impact the long-term sustainability of company performance and therefore the potential to create long-term value. While the Company itself does not determine how ESG factors are weighted in investment decisions, it supports the respective investment managers in identifying, monitoring, and reporting ESG-related risks and opportunities as part of their own investment processes.

The Company engages with the respective investment managers and, where relevant, investee companies to support accountability and compliance with applicable legal, regulatory, and governance standards. Such engagement forms part of the Company's broader risk management and stewardship activities and does not constitute the pursuit of a sustainable investment objective.

The Company also encourages improvements in ESG reporting standards and practices across the investment industry and supports initiatives aimed at strengthening ESG governance, data quality, and transparency, without implying the promotion of environmental or social characteristics.

The Company periodically reviews this approach and may reassess its policies as regulatory guidance, ESG disclosure practices, reporting standards, and data availability evolve.