

## SFDR Article 4 – Entity-Level PAI Statement

*As of December 2025*

### **Non-consideration of principal adverse impacts (PAI) at entity level**

Sector Theta AS (Company) does not currently consider principal adverse impacts (PAI) of investment decisions on sustainability factors at the entity level in accordance with Article 4 of the Sustainable Finance Disclosure Regulation (SFDR).

### **Rationale**

The Company's investment strategy does not promote environmental or social characteristics and is not designed to make sustainable investments as defined in SFDR Articles 8 or 9. In this context, an assessment of PAI at the entity level would not provide meaningful or decision-useful information for investors.

Considering the investment strategy, establishing processes and data infrastructure to enable reliable entity-level PAI measurement would be disproportionate. Therefore, the Company does not currently disclose entity-level PAI metrics.

### **Product - level PAI consideration**

The investment product managed by the Company is classified as Article 6 under the SFDR and does not promote environmental or social characteristics, nor pursue sustainable investment objectives. Accordingly, PAI indicators are not considered at the product level.

### **Review of position**

The Company reviews this approach on a regular basis. As regulatory guidance, ESG disclosure practices, reporting standards, and the availability of product-level PAI data continue to evolve, the Company may reconsider its position regarding the assessment and disclosure of entity-level PAI in the future.