Account for due diligence pursuant to the Transparency Act for the period 1 January to 31 December 2025

26.06.2026

About the Sector Asset Management Group
Sector Asset Management AS (Registration no. 887 139 342) is the parent company of the Sector Asset Management Group. The parent company and its subsidiaries Sector Capital AS (Registration no. 813 391 082), Sector Fund Services AS (Registration no. 988 014 060), SAM Investments AS (Registration no. 931 435 507) and Sector Theta AS (Registration no. 929 278 836) are limited liability companies established in and with operations in Norway (hereinafter collectively referred to as the "Companies").

The Companies provide various types of financial services related to asset management, and are therefore not involved in the production, manufacture or trading of physical products. Most of them are subject to sector-specific rules and are supervised by the Financial Supervisory Authority of Norway. One of them has been established as a holding company for certain foreign investments. The Companies that conduct regulated activities have adopted a comprehensive set of instructions that regulate how the respective Companies and their employees are to behave and comply with applicable laws and regulations.

The majority of the Companies' suppliers and business partners are domiciled in low/moderate risk jurisdictions according to the ITUC Global Rights Index, which have introduced legislation related to human rights and decent working conditions with effective enforcement. The main jurisdictions from which the Companies procure products and services include Norway, Ireland, the United States and the United Kingdom. The Company relies on recognized external sources when assessing geographical risk. Certain jurisdictions where the Company has suppliers, including the United States, may be classified as higher risk under some risk models. In this context, the Company has applied a more nuanced assessment, considering both country risk and supplier-specific factors.

The Company's suppliers in such jurisdictions are predominantly large, regulated financial institutions or service providers subject to extensive regulatory oversight, including requirements related to human rights, working conditions, and business ethics. Based on this, the Company considers the overall risk of adverse impacts on fundamental human rights and decent working conditions to be low.

About the Transparency Act and its requirements
The Transparency Act entered into force on 1 July 2022 and aims to promote Companies' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services. The public must have access to information about how Companies deal with negative consequences for fundamental human rights and decent working conditions. In line with the OECD Guidelines for Multinational Enterprises, the Act imposes a duty of information and a duty to carry out due diligence assessments that must be accounted for in a report that is updated and published at least annually by 30 June.

General guidelines and procedures for working with due diligence in the Sector Asset Management Group
The Companies in the Sector Asset Management Group respect fundamental human rights and decent working conditions and require employees of the Companies to do the same. It is the Companies' Board of directors and general managers who have overall responsibility for regular review of risk assessments. The CEO reports to the Board of directors of the respective regulated

Companies on a quarterly basis. The Board reviews and takes the reports into account. The Company prepares an annual report on behalf of the Group in accordance with the Transparency Act, which is reviewed and approved by the Board. Fundamental human rights and decent working conditions must always be considered in the Companies' operations.

Companies shall also seek to avoid creating or contributing to a negative impact on fundamental human rights and decent working conditions through their supply chains or business partners. Special rules and guidelines regarding employees' duty to respect fundamental human rights and decent working conditions have been drawn up, and which the Companies' employees must comply with the *Instruction on respect Human Rights and Decent Working Conditions.*

The Companies have established a documented supplier due diligence process covering onboarding and ongoing monitoring of the suppliers and their services. The process addresses risks related to fundamental human rights and decent working conditions, including transparency and ESG considerations. Contractual provisions are reviewed and the suppliers are risk-classified to support ongoing periodic reviews of relevant suppliers. Reviews focus on changes in the supplier or services, identification of incidents, and compliance with agreed standards.

In line with the Transparency Act, our Companies annually monitor all regular suppliers and business contacts and conduct regular, risk-based due diligence assessments in line with the OECD Guidelines with respect to risks related to responsible business, fundamental human rights, employment, the environment and climate, and anti-corruption. The assessments consider geography, sector, type of supplier, and nature of the business relationship. They are based on information from survey responses from suppliers, guidelines prepared by the business partner and other publicly available sources. The risks, which can be assessed as low, medium or high, are prioritised based on severity and likelihood, with particular emphasis on potentially severe impacts.

The Sector Asset Management Group has company instructions on sustainability, company ESG policies and fund investment management sustainability policies. The Group believes that sustainability must be managed as a natural and integrated part of the investment process, with a focus on ESG factors that are material to underlying investments. The Companies in the Group have signed the UN Principles for Responsible Investment (UN PRI), which is the foremost international organisation for investor cooperation in the field of responsible investment. As members, Companies undertake to implement and report on how sustainability is integrated into the investment process. Risk assessment for violations of human and labour rights is a growing focus area for PRI. The Sector Asset Management Group is engaged in several working Groups focusing on human rights, including *the PRI Human Rights* and *Social Issues Reference Group*, as well as in *II-HRD-The Investor Initiative on Human Rights Data*.

On occasions where Companies are uncertain about the impact of our business contacts on the outside world, further investigations must be carried out, and the circumstances must be accounted for and documented. If further investigations do not satisfy the safeguarding of the conditions under consideration, it may have consequences for the contractual relationship with the respective Companies in the Sector Asset Management Group. We will largely seek to influence our business partners in order to minimize risk and prevent any breaches. We will strive to ensure this, among other things, by including contractual obligations regarding compliance with legal provisions, requesting them to comply with the duty to provide information about any negative impacts on human rights and decent working conditions, to comply with our Supplier Code of Conduct, etc.

In order to safeguard the fundamental human rights and working conditions of our employees, the Companies in the Sector Asset Management Group have coordination agreements regarding Health, Safety, and Environment (HSE) and whistleblowing pursuant to the Working Environment Act. Employees are encouraged to report non-conformities ~~anonymously~~ via a digital non-conformance system which allows anonymous reporting and supports systematic maintenance of a good working

environment. The Safety Representative, in Sector Fund Services AS is responsible for handling any reported cases and deviations across the Sector Asset Management Group on an ongoing basis. In addition, employees, suppliers and business partners may report other non-conformities, concerns, or suspected breaches through the whistleblowing channel, which is overseen by the Group Compliance Function. All concerns are assessed and handled in accordance with internal procedures, and the Companies are committed to implementing appropriate remedial measures where adverse impacts are identified or where the Companies have contributed to such impacts.

Risk assessment of Sectors' own operations, suppliers and partners

The Companies have not identified potential or actual negative impacts on human rights and decent working conditions in their own operations. The Companies comply with Norwegian laws and regulations that incorporate and reflect human rights and requirements for decent working conditions. The Companies have not identified other factors related to their own operations that indicate a risk that the company is causing or contributing to adverse consequences for human rights and decent working conditions.

The Companies have not identified any potential or actual adverse impacts on human rights and decent labour conditions that are directly related to the Companies' operations, products, or services via their current supply chain or business partners, or any other relationship associated with any suppliers or business partners that indicate a risk of potential or actual adverse impacts. The Companies' suppliers and business partners are recognised organisations domiciled in low/moderate risk jurisdictions and often regulated financial market participants. Contracts entered into with suppliers and business partners are sought to contain common compliance clauses that require the counterparty to comply with applicable laws and regulations. The Companies have not identified other matters related to their management activities that indicate a risk that the respective company causes, contributes to or is directly linked to potential or actual adverse consequences.

The Companies have prepared a Supplier Code of Conduct that is published on the Companies' websites. This Supplier Code of Conduct is distributed to suppliers and business partners as new agreements are to be signed and sets out the Companies' expectations in terms of human rights and decent working conditions.

Furthermore, the Companies seek to include compliance clauses addressing human rights and decent working conditions in contracts entered into with new suppliers and business partners or alternatively seek to ensure compliance by allowing suppliers to specifically confirm that they comply with our Supplier Code of Conduct.

Contact

For questions about this Account and our approach to fundamental human rights and decent working conditions, please contact compliance@sector.no.

Oslo, 26.06.2026

The Board of Directors of Sector Asset Management AS

Knut N. Kjær (Chairperson of the Board)

Dag Erik Rasmussen (Deputy Chairperson of the Board)

Svein R. Høgset (Board director)

Trond Horneland (Board director)

Wollert Hvide (Board director and CEO)