

## **Sector Capital AS - Sustainability Policy**

*(Last amended December 2025)*

### **1. Introduction**

The sustainability of company performance may impact the ability to create long-term value for investors. Therefore, the Sector Asset Management Group (**SAM Group**) considers environmental, social, and governance (**ESG**) integration to be an important instrument to improve the risk-return profile of the investments made by its group companies through their collective investment schemes (investment funds) under management (the **Products**).

Sector Capital AS, a SAM Group company wholly owned by Sector Asset Management AS, does not itself engage in the management of the Products but has distribution agreements with investment managers affiliated with the SAM Group.

The purpose of this paper is to describe the Sustainability Policy (**the Policy**) of Sector Capital AS.

### **2. Definitions**

For the purposes of this Policy, “material” ESG issues are defined as those issues that the relevant SAM Group company, in its sole discretion, determines to have the potential to substantially impact an organization’s ability to create and preserve economic, environmental, and social value for itself and its stakeholders.

### **3. Scope**

The focus is on ESG factors that are material. It is up to the investment managers, analysts, and others involved in the investment research and decision-making process to determine what weight these factors should be given in each case.

It is the intention of Sector Capital AS to meet growing investor demand for sustainable investments as well as investors’ increasing ESG-reporting requirements.

### **4. KYC and client onboarding**

In line with regulatory and investor-related requirements for sustainability assessment, Sector Capital AS has introduced sustainability preferences as a part of our KYC routine when onboarding new clients. Products that do not meet a customer’s sustainability preferences will not be recommended.

### **5. Product Governance and Product Review**

Sector Capital AS is subject to regulations within MiFID II, which imposes a series of product governance rules on firms which manufacture and/or distribute financial instruments under MiFID II. The aim of the product governance rules is to ensure that manufacturers and distributors of investment products act in the client’s best interests during all stages of the life cycle of products. The Board of Directors of Sector Capital AS is responsible for product governance, including the approval and ongoing oversight and evaluation of the Products we distribute. This oversight and evaluation will specifically address sustainability risks in the evaluation of the Products’ target markets.

### **6. Remuneration Policy**

Sector Capital AS’ remuneration policy shall serve to promote sound management and control of Sector Capital AS and its clients’ risks, including sustainability risks, and shall not encourage excessive risk taking on the part of employees (in all aspects of its activities that relate to the services which are subject to public authorization).