

## PRINCIPLES FOR SHAREHOLDER ENGAGEMENT

### 1 GENERAL

1.1 Oberon Family Office AB (reg. no. 559167–1424) (the “Company”) is a Swedish investment firm authorised by the Swedish Financial Supervisory Authority to provide, *inter alia*, portfolio management of financial instruments. Pursuant to Chapter 8, section 20 a in the Swedish Securities Market Act (SFS 2007:528) (the “Securities Markets Act”), the Company shall adopt principles for its shareholder engagement when the Company provides portfolio management and invests in shares admitted to trading on a regulated market and issued by a company within the EEA.

1.2 These principles shall describe how the Company:

1. monitors relevant issues concerning companies in which we invest (portfolio companies), including the companies' strategy, financial and non-financial performance and risks, capital structure, social and environmental impact, and corporate governance;
2. engages in dialogue with representatives of portfolio companies;
3. exercises voting rights and other rights associated with shareholdings;
4. collaborates with other shareholders;
5. communicates with relevant stakeholders in portfolio companies; and
6. manages actual and potential conflicts of interest.

Further, according to Chapter 8, Section 20 b of the Securities Market Act, an investment firm shall report annually on how the principles have been applied. Such report shall contain:

1. a general description of the investment firm's voting behaviour in portfolio companies engages in dialogue with representatives of portfolio companies;
2. an explanation of the most important votes; and
3. information on the issues on which the investment firm has used advice or citing recommendations from a voting advisor.

The report shall also indicate how the investment firm has voted at the general meetings of the portfolio companies, unless the votes are insignificant due to the subject matter or the size of the shareholding.

Finally, pursuant to Section 20c, an investment firm may refrain from complying with one or more of the requirements in Sections 20a and 20b if the firm clearly states the reasons for doing so. The principles for shareholder engagement under Section 20a, the annual report under Section 20b and the information under Section 20c shall be made available free of charge on the investment firm's website.

- 1.3 In the light of the foregoing, the Board of Directors of the Company has established these principles for shareholder engagement. The guidelines shall be reviewed and revised by the Board of Directors at least once a year. Amendments to the guidelines shall be approved and adopted by the Board of Directors.

## **2 PRINCIPLES FOR SHAREHOLDER ENGAGEMENT**

- 2.1 The company offers several different discretionary portfolios with varying risk levels and different focuses in terms of, for example, geographical diversification and industries/sectors. Exposure to equities as an asset class can be achieved through various financial instruments such as exchange-traded funds (ETFs or ETNs), UCITS funds, AIF funds (special funds such as hedge funds), and in individual listed companies as well as in non-listed funds and companies.
- 2.2 The Company mainly uses ETFs for equity exposure in the various portfolio mandates where the investment strategy is primarily based on a "Buy & Hold" strategy. In certain mandates with equity exposure, investments are made in individual listed equities. The Company mainly invests for the longer term and often owns less than 0.5% of the capital in a portfolio company and therefore does not exercise voting rights at the portfolio companies' general meetings. In some cases, shares may be traded relatively short-term using technical or statistical/quantitative analysis, where the expected investment horizon in the individual shares may vary from one day to one year depending on the portfolio and strategy.
- 2.3 The Company engages in dialogue with representatives of portfolio companies. In addition to dialogue with representatives of portfolio companies, the Company also engages in dialogue with other shareholders and stakeholders in portfolio companies.
- 2.4 The limited shareholding in the portfolio companies and the lack of direct involvement in the portfolio companies are not considered to give rise to any actual or potential conflicts of interest that need to be taken into account and addressed. Furthermore, the Company maintains an internal no-trade list of listed companies that are considered to constitute a conflict of interest because the Company has a customer, an employee, a contractor or a board member who has or, during the past year, has had a significant holding in or where, without owning significant shares, has or, during the past year, has had operational influence.

## **3 PUBLICATION**

- 3.1 The Company shall annually report on its website how the principles for shareholder engagement have been applied with regard to:
- a general description of the Company's voting behaviour in the portfolio companies,
  - an explanation of the most important votes,
  - information on the issues on which the Company has used advice or voting recommendations from a voting advisor, and

- how the Company has voted at the portfolio companies' general meetings; however, votes that are insignificant due to the subject matter or size of the shareholding need not be reported.

#### **4 ANNUAL REPORT 2025**

- 4.1 The Company mainly invest in exchange traded funds and in some cases listed shares, with a long-term investment strategy and mainly with a share ownership of maximum 0,5% in the portfolio companies. During 2025, the Company has kept its strategy with not exercising any voting rights at the portfolio companies' general meetings and has not used any advice or voting recommendations from a voting advisor. As a consequence, there are no material votes to describe.
- 4.2 The Company keeps an ongoing dialogue with relevant counter parties and portfolio companies, but there has not been any formal exercise of voting rights during 2025.