

Prospectus Verdipapirfondet Holberg Triton

1. Information about the management company

Name:	Holberg Fondsforvaltning AS
Registered office:	Nygårdsgaten 95 NO-5008 Bergen 982 076 218
Organisation no.:	29 May 2000
Formation date:	4 September 2000
Authorisation date:	NOK 4 000 000
Share capital:	Kistefos AS (100%)
Shareholders:	
Chairman of the Board:	Bengt Arve Rem (CEO, Kistefos AS) Midtveien 2, 1464 Fjellhamar, Norway
Board members:	Jens Henrik Munthe-Kaas (Investment Manager, Kistefos AS) Odins gate 27, 0266 Oslo, Norway
	Steinar Hauge (Client relationship manager, Holberg) Råtun 73, 5239 Rådal, Norway
Board members elected by unit holders:	Tone Jørgensen Solbakken Øvre Kalfarli 40, 5022 Bergen, Norway
	Lise Falch-Monsen Flyen 45, 5259 Hjellosestad, Norway
Deputy Board members:	Andrea Moen Mjåtveit (Portfolio Manager, Holberg) Hopsåsen 58, 5221 Nesttun, Norway
	Mads Helmich Pedersen (Investment Manager, Kistefos AS), Løvenskiolds gate 16, 0260 Oslo, Norway
Deputy Board members elected by unit holders:	Anne Grethe Bull Øvrevik Johannessen Ole Brinchsvei 7, 5232 Paradis, Norway
	Board remuneration equalled NOK 491.667 in 2025.
Managing Director:	Magny Øvrebø Skipavika 133, 5218 Nordstrøno, Norway
	The managing director receives a fixed salary of NOK 2. 575.000 plus a performance-related bonus.
Custodian:	DNB Bank ASA Dronning Eufemiasgate 30, NO-0191 Oslo Org. no.: 910 851 006
	Main activity: Banking and other financial services.
Financial Auditor:	Ernst & Young AS Thormøhlens gate 53 D, NO-5006 Bergen. Org. no.: 976 389 387
Internal Auditor:	Deloitte AS Dronning Eufemias gate 14, NO-0191 Oslo Org.no.: 980 211 282
Closing of accounts:	31 December
Other funds:	Holberg Fondsforvaltning manages the following funds registered in Norway and under supervision by the Financial Supervisory Authority of Norway:
	Holberg Likviditet Holberg Obligasjon Norden Holberg Kreditt Holberg Kreditt Fokus Holberg OMF Holberg Norge Holberg Norden Holberg Global Holberg Global Valutasikret Holberg Vekstmarkeder Holberg Triton

Outsourcing

Holberg has entered into outsourcing agreements with the following companies for the specified service areas:

Company	Servicearea
Centevo AB	Portfolio management system and operation, unitholder register and relevant services
Verdipapirsentralen ASA	Tax reporting for share savings account, unitholder register and relevant services
Advania Norge AS	IT- services
Deloitte AS	Internal audit

Holberg has also entered into agreements on outsourcing of sale and marketing of funds to fund distributors.

2. Information about Verdipapirfondet Holberg Triton

Holberg Triton is classified as a sector fund.

Overall objective:

The purpose of the Fund is to provide the unit holders with the best possible return through an actively managed equity portfolio of companies whose main business is directed towards marine resources in the global market.

The Fund does not have a benchmark index.

Investment strategy:

The Fund shall invest in equities issued by companies whose main business is directed towards marine resources. The Fund is globally managed.

The Fund does currently not use derivatives. The Fund's return will be affected by the currency exchange rate fluctuations between Norwegian kroner and currencies the Fund has exposure towards.

The Fund does currently not lend financial instruments.

The Fund is a UCITS fund that complies with the investment rules in the Norwegian Securities Funds Act Chapter 6.

Portfolio Manager: Jann Molnes

Fund inception date: 27 February 2015

Historical return:

For updated information about the Fund's historical return, please refer to the Fund's Key Investor Information Document.

Historical returns are no guarantee for future returns. Future returns will depend on market developments, the fund manager's skill, the Fund's risk profile, management fees, subscription and redemption fees and other costs charged to the Fund. The return may become negative as a result of negative price developments. The Fund's performance may vary considerably over the course of a year. Gains or losses for each unit holder will therefore depend on the exact timing of the subscription and redemption of units.

Risk:

Investment in equity funds will always entail certain risks. The risk refers to fluctuations in the Fund's net asset value over time. A long-term investment horizon will reduce the risk. Holberg seek to manage the risks by keeping a well-diversified portfolio of companies whose main business is directed towards marine resources and their geographical distribution as well as through the number of holdings.

For updated information related to risk, please refer to the Fund's Key Investor Information Document.

Costs:

There are currently no costs associated with subscription and redemption of fund units.

The management company charges the Fund's share classes with a fixed daily fee based on the Fund's assets under management each day, in accordance with the Articles of Association §§ 5 and 7. The management fee is the management company's income from management of the fund. The management fee is calculated daily and charged monthly.

Share class A

Fixed management fee amounts to 2.00 % p.a.

Share class B

The management fee amounts to 1.50 % p.a.

Share class C

The management fee amounts to 1.25 % p.a.

Share class N

Fixed management fee amounts to 1.00 % p.a.

Additionally, the Fund may be charged with transaction costs related to the Fund's investments, taxes imposed on the Fund, interest on borrowings and extraordinary expenses necessary to protect the interests of unit holders.

3. Taxation

The information provided below does not constitute tax advice. Existing and potential unit holders should consult their own tax advisers in respect of taxation of their investments in Holberg. Tax regulations are constantly under development and will be subject to changes in the future.

For the Fund

The fund must recognize 1 percent of dividends received as income. The fund's management costs are deducted from the income. Any positive taxable profit is taxed at the applicable tax rate for ordinary income. Losses can be carried forward for a maximum of 5 years.

Mutual funds are exempt from wealth tax.

Other taxation is borne by the unitholder

The Fund does not distribute dividends.

Investors liable to taxation in Norway:

Private investors (physical persons)

Realized gains on disposal of equity fund units are considered to be ordinary income. The realized gain minus a standard deduction of the risk-free rate is taxed at 37.84 %. Realized losses are deductible at the same rate in ordinary income. Equity fund units are included in the basis for wealth tax with 80 % of the market value of the equity fund units as of 31 December.

Corporate investors (legal entities)

Companies that are covered by the exemption method are not liable to pay tax for gains acquired from the disposal of equity fund units. There is no deduction entitlement for similar losses. Net loss is not deductible in the fiscal year and cannot be carried forward to subsequent years.

Investors liable to taxation in other countries than Norway:

Investors liable to taxation in other countries than Norway should examine the applicable tax rules in the respective countries.

Reporting of tax information

Mutual funds and fund management companies are required to report information on the financial accounts of unit holders and beneficial owners to the Norwegian Tax Administration. If the unit holders are tax resident or domiciled in states other than Norway, the Norwegian Tax Administration will forward the information to the respective states in accordance with the rules in FATCA (Foreign Account Tax Compliance Act), CRS (Common Reporting Standard) and bilateral tax agreements. The unit holders receive a copy of what is reported via realization statements and annual statements at the end of the year.

4. Nature and character of the unit

Each unit holder has an ideal part of the fund corresponding to the unit holder's share of the total fund units issued. Each unit in a mutual fund give an equal right in the fund. A unit holder is not entitled to demand division or dissolution of the Fund. A management company is responsible for running the fund and for taking all decisions concerning the Fund's dispositions. Beyond their investment, unit holders are not liable for the Fund's obligations. Unit holders are entitled to have their units redeemed in cash, cf. the Norwegian Securities Funds Act.

The unitholder registry is maintained by the management company in a system delivered by Centevo AB, Rådhusgata 4, 0151. The fund units are registered in the name of the unit holder. Fund units subscribed through an authorized nominee are entered in the nominee's name in the unit holder register. The nominee maintains its own sub-register of units for its clients.

The nominal value of each fund unit is NOK 100. The units are not admitted for official listing in a regulated market.

Subject to the approval of the Financial Supervisory Authority of Norway, a management company can transfer the management of the fund to another management company or terminate the fund.

Transfer of the fund to another fund management company will follow the provisions on changes to the articles of association, cf. the Norwegian Act on Securities Funds § 4-14. The unit holders will be informed of the transfer and the rationale for the transfer well in advance of the completion of the transfer and in accordance with any requirements from the Norwegian Financial Supervisory Authority.

In the event of termination of the fund, the unit holders will be informed of the rationale for the termination, the consequences for each unit holder, costs, and the planned date for the completion of the termination and the planned payment date of the settlement to the unit holders, cf. the Norwegian Act on Securities Funds § 5-7.

5. Calculation of Net Asset Value per unit

Valuation of the net asset value per unit (NAV) pr. share class is based on market values. When calculating the Fund's assets (AUM) the basis shall be the market values of securities and bank deposits, the value of the Fund's liquid assets and other receivables, and the value of income accrued but not due, with the deduction of debt and expenses accrued but not due, including latent tax liability. The management company makes a discretionary valuation based on objective and consistent grounds for securities where no market value is available. Valuation of the fund will not be performed on business days where a significant part of the portfolio is subject to a closed stock exchange.

Holberg has established procedures for swing pricing in order to prevent losses for existing unit holders due to subscriptions and redemptions made by other unit holders of the Fund. The NAV is adjusted by a swing factor on days when the Fund has had net subscriptions or redemptions in excess of a predetermined proportion of the fund's total assets. The threshold for adjustment of the NAV is set at the level at which net subscriptions or redemptions are expected to result in the Fund having to make adjustments to the portfolio incurring transactions costs. If the Fund has had net subscriptions above this threshold, NAV is adjusted up. If the fund has had net redemptions above this threshold, NAV is adjusted down. The swing factor is based on average historical costs and is evaluated regularly. The procedures are set up according to the industry standard set by the Norwegian Mutual Fund Association for subscription and redemption. Read more about the industry standard for subscription and redemption of fund units on www.vff.no.

6. Mutual fund units

Up to 10% of the Fund's assets may be invested in mutual fund units.

7. Articles of Association for Verdipapirfondet Holberg Triton

§ 1 Name of the securities Fund and management company

Verdipapirfondet Holberg Triton is managed by the management company Holberg Fondsforvaltning AS. The Fund is authorized in Norway and is regulated by the Financial Supervisory Authority of Norway (Finanstilsynet). The Fund is regulated by the Norwegian Act. No. 44 of 25 November 2011 on securities funds (hereinafter referred to as "the Norwegian Securities Funds Act").

§ 2 UCITS-fund

The Fund is a UCITS-fund which complies with the investment rules in Chapter 6 of the Norwegian Securities Funds Act and the provisions governing subscription and redemption of the Norwegian Securities Funds Act § 4-9 first subsection and § 4-12 first subsection.

The fund has share classes which are described in more detail in § 7 of the articles of association.

§ 3 Rules for the investment of the Fund's assets

3.1 The Fund's investment area and risk profile

The Fund is classified as an equity fund according to the Norwegian Fund and Asset Management Association, and invests primarily in shares issued by companies worldwide, whose main business is directed towards marine resources. The fund's investment mandate is further described in the prospectus. The Fund is normally characterised by a high fluctuation risk (volatility). The risk profile is specified further in the Fund's Key Investor Information Document.

3.2 General information about the investment area

The Fund's assets may be invested in the following financial instruments and / or deposited in credit institutions:

Transferable securities	<input checked="" type="checkbox"/> yes	<input type="checkbox"/> no
Mutual fund units	<input checked="" type="checkbox"/> yes	<input type="checkbox"/> no
Money market instruments	<input checked="" type="checkbox"/> yes	<input type="checkbox"/> no
Derivatives	<input checked="" type="checkbox"/> yes	<input type="checkbox"/> no
Deposit in credit institution	<input type="checkbox"/> yes	<input checked="" type="checkbox"/> no

Regardless of the investment options in this section, the Fund may hold liquid assets.

The Fund's investments in mutual fund units shall, together with its other investments, be in accordance with these Articles of Association.

Investment in other mutual funds constitutes not more than 10 % of the Fund's assets:

yes no

Securities funds in which investment is placed may themselves invest a maximum of 10 % of the Fund's assets in securities fund units:
 yes no

The Fund's assets may be invested in money market instruments normally traded on the monetary market, which are liquid and can be valued at any time:
 yes no

The Fund may use the following derivative instruments: options, futures and swaps. The basis for the derivatives shall be financial instruments as mentioned above in Section 3.2, first paragraph, indexes with financial instruments as defined in Section 3.2, first paragraph or interest rates, currencies or exchange rates.

Expected risk and expected return of the Fund's underlying securities portfolio shall remain unchanged as a result of the derivative investments.

3.3 Liquidity requirement

The Fund's assets may be invested in financial instruments which:

- are admitted to official exchange listing or traded on a regulated market in an EEA Member State, including a Norwegian regulated market as defined in Directive 2014/65/EU Article 4 (1) (21) and the Securities Trading Act § 2-7 (4).
 yes no
- are traded on another regulated market which operates regularly and is open to the public in a state that is party to the EEA agreement.
 yes no
- are admitted to official listing on a stock exchange in a country outside the EEA or which are traded in such a country on another regulated market which operates regularly and is open to the public.
 yes no

Any stock exchange and regulated market in the world is eligible. Investments are made in well-developed markets and emerging markets.

- are newly issued, if the issue is conditional upon an application being made for admission to trading on a stock exchange or market as ticked in items 1 to 3 above. Listing shall take place within one year of the expiry of the subscription period.
 yes no

The Fund's assets may be invested in money market instruments traded on another market than specified in paragraphs 1-3 above, if the issue or the issuer of the instruments is regulated in order to protect investors and savings, and the instrument is subject to the Norwegian Securities Funds Act § 6-5 second subsection.

The Fund's asset may be invested in derivatives traded on another market than specified in paragraphs 1-4 above.

Up to 10 % of the Fund's assets may be invested in financial instruments other than those mentioned in this section.

3.4 Investment restrictions – the Fund's assets

The Fund's portfolio of financial instruments shall be of a composition that provides a suitable spread of the risk of loss.

The Fund's investments shall at all times comply with the investment restrictions in the Norwegian Securities Funds Act § 6-6 and § 6-7 first and second subsection.

3.5 Investment restrictions – ownership interest with issuers

The Fund's investments shall at all times comply with the investment restrictions of the Norwegian Securities Funds Act § 6-9.

3.6 Techniques for efficient portfolio management

The fund may, in accordance with the Norwegian Securities Funds Act § 6-11 and the Securities Fund Regulations § 6-8 use techniques to achieve efficient portfolio management. The techniques are described in the fund's prospectus.

§ 4 Management by the Fund of capital gains and dividends

Capital gains shall be reinvested in the Fund.
 Dividends are not distributed to unit holders.

§ 5 Costs

The management fee is the management company's income for the management of the Fund. The basis for the calculation of the management fee is the Fund's current value. When calculating the Fund's assets (AUM) the basis shall be the market values of securities and bank deposits, the value of the Fund's liquid assets and other receivables, and the value of income accrued but not due, with the deduction of debt and expenses accrued but not due, including latent tax liability.

In addition to the management fee, the following costs may also be covered by the Fund:

- transaction costs of the Fund's investments,
- payment of any taxes imposed on the Fund,
- interest on borrowings as referred to in § 6-10 of the Norwegian Securities Funds Act, and
- extraordinary costs necessary to protect the interests of unit holders, cf. § 4-6 second subsection of the Norwegian Securities Funds Act.

The management company may charge one or more of the Fund's share classes a fixed management fee. The fixed management fee is calculated daily and charged monthly.

The management fee is allocated equally to each unit within each share class of the Fund.

The size of the management fees are stated in § 7 of the Articles of Association.

All remuneration from sub-funds shall accrue to the Fund.

§ 6 Subscription and redemption of units

The Fund is normally open for subscription 5 times a week.
 The Fund is normally open for redemption 5 days a week.

A subscription fee of up to 1 % of the subscription amount may be charged for subscription of units.

A redemption fee of up to 0.3 % of the redemption amount may be charged for the redemption of units.

The board of the management company can decide that the subscription costs shall increase by up to 10 percent of the subscription amount. Any such increase shall accrue to the Fund. The board may adopt such increased subscription costs for a certain period with the possibility of extension or abbreviation following a board decision. Further details will be published in the fund's prospectus.

The Fund may use swing pricing. Please refer to the prospectus for further details.

§ 7 Unit classes

The fund's portfolio of assets shall be divided into the following share classes:

Share class	Currency	Minimum initial subscription amount	Management fee
A	NOK	1 000	Up to 2.00 % p.a.
B	NOK	3 000 000	Up to 1.50 % p.a.
C	NOK	10.000.000	Up to 1,25% p.a.
N	NOK	1 000	Up to 1.20 % p.a.

Management fee

The management company may charge one or more of the Fund's share classes with a fixed management fee.

The management fee is allocated equally to each unit within each share class of the Fund. The fixed management fee is calculated daily and charged monthly.

The total management fee for the Fund and any sub-funds accounts for at most 2.00 % p.a. in share class A, 1.50 % p.a. in share class B and 1.20 % p.a. in share class N.

Characteristics of the different share classes:

Share class A
 Fixed management fee is charged with a maximum of 2.00 % p.a.

Share class B
 Fixed management fee is charged with a maximum of 1.50 % p.a.

Share class C
 Fixed management fee is charged with a maximum of 1.25 % p.a.

Share class N
 Share class N is open for unit holders subscribing through distributor who, through an agreement with the management company, do not receive remuneration from the management company.

Fixed management fee is charged with a maximum of 1.20 % p.a.

Minimum subscription value

The net cost of each unit holder's total subscriptions and redemptions in the share class will be calculated on the last day of business in the first and third quarter of the year.

If the net cost or the market value of a unit holder's holding at the time of calculation, meets the minimum subscription value of a share class with a lower management fee, the holding will be transferred to this share class.

In the event that the net cost of a unit holder's holding at the time of calculation does not meet the minimum subscription value of the current share class, the holding can be transferred to a similar share class in which the net cost or the market value of the holding meets the minimum subscription value.

Transfer of holdings from one share class to another shall be registered on the same day as the calculation has taken place, and the unit holder shall be notified as soon as possible.

In the event that the unit holder does not comply with the requirements of share class N, the management company may transfer the holding from share class N to another share class where the unit holder's holding meets the minimum subscription value.

8. Other matters

The Fund has marketing permission in Norway and Sweden. This prospectus is only directed at investors in jurisdictions where the Fund is approved for marketing. The Fund may not be distributed to investors who are under American jurisdiction, including investors who are resident in the USA or liable to taxation in the USA.

9. Subscriptions and redemptions

Requests for subscription and redemption must be made in writing to the management company: Holberg Fondsforvaltning AS Nygårdsgaten 95, NO-5008 Bergen (org. no. 982 076 218). E-mail: post@holberg.no

Subscription applications must be received by 12:00 noon (Norwegian time) and the subscription amount has to be credited the fund's bank account the same day in order to be assigned the unit price of the next business day.

Proof of identity and any necessary customer due diligence must be completed before subscriptions can be carried out.

Share class	Minimum initial subscription amount
A	NOK 1.000
B	NOK 3.000.000
C	NOK 10.000.000
N	NOK 1.000*)
	*) Open for unitholders subscribing through distributors who, through an agreement with the management company, do not receive remuneration from the management company.

The minimum subscription amount is NOK 300 for monthly saving-plans.

Unit holders are entitled to have their units redeemed in cash. Redemption requests must be submitted to the management company. Redemption requests must be made in writing or electronically.

Redemption requests must be received by 12:00 noon on current date, in order for the redemption to receive the unit price of the next business day.

The management company shall execute redemption as soon as possible and no later than 2 weeks following receipt of request.

Requests to switch to/from Holberg Triton and Holberg Vekstmarkeder must be received by the management company by 12:00 noon on current date, in order to receive the unit price of the next business day. Requests to switch to/from other funds must be received by the management company by 12:00 noon on current date, in order to receive the unit price of the same business day.

Fund switches to Holberg Kreditt Fokus receive the same price date in both funds, corresponding to the first possible Subscription day in Holberg Kreditt Fokus, which is the last bank day each month. Fund switches must be received by the management company within the cut-off applicable to the fund in which units are to be redeemed.

Trading in fund units on the Share Savings Account (ASK):

When subscribing or redeeming units in equity funds on the ASK – account, the actual NAV-date for the trades may differ from the information stated above. Fund switches within the ASK - account will be treated as a subscription and a redemption. This means that the unitholder will not be exposed to the relevant fund's return during the settlement period.

In the event of stock exchange closure, or other extraordinary circumstances, and in special instances where it is justified to protect unit holders' interests, the management company may, with the consent of the Financial Supervisory Authority of Norway, either wholly or partially suspend the value assessment and payment of redemption claims. When assessing whether such measures are to be implemented, the management company will place particular emphasis on consideration of equal treatment of the fund's unit holders.

If called for in the interests of the unit holders or the public, the Financial Supervisory Authority of Norway may order the management company to suspend the right of redemption wholly or partially.

In Sweden, subscription and redemption may be effected through selected distributors which are registered managers (nominees) in Holberg Fondsforvaltning AS' register of unit holders. Holberg Fondsforvaltning AS is responsible for ensuring that orders received are processed in accordance with current procedures. The distributor shall without undue delay remit the client's payments directly to the Fund's account on subscription.

Redemption orders are to be effected in accordance with current cut-off times. All payments made are effected through the Fund's custodian DNB Bank ASA to the distributor, and the distributor shall without undue delay transfer the proceeds of redemption to the client's bank account. It will normally take 2-3 working days from completion of the redemption process until the proceeds are credited to the client's bank account.

Information about the fund, including Key Investor Information Document, prospectus with Articles of Association, annual reports etc. shall be accessible to the distributors at all times on the management company's website www.holberg.no. The distributors shall ensure that the information is available to the clients.

10. Announcement of unit value

The unit value shall normally be published 5 times a week. Publication shall be made by the management company or Oslo Stock Exchange.

11. Information on sustainability

For relevant information regarding the sustainability considerations the Fund considers, please refer to the Annex in this document.

12. Information for investors

For further information, please refer to our website www.holberg.no. Here you will find the Key Investor Information Document, annual reports, half-year reports and performance reports in Norwegian. Printed copies can also be ordered free of charge from Holberg.

13. The Board

The Norwegian Securities Funds Act § 2-6 regulates the requirements of the composition and election of the management company's Board of Directors. The Board of Directors shall consist of at least five members.

Unit holders of the funds which the management company manages shall select at least one third of the members of the management company's Board of Directors. The elections take place at unit holder meetings which are convened and conducted in a manner established in the management company's Articles of Association. Board members not elected by the unit holders are to be elected by the management company's general meeting. For both types of Board members, there should be at least half as many deputy Board members.

14. Remuneration policy

Holberg Fondsforvaltning has a remuneration policy that includes a profit-sharing scheme for all employees. The company's remuneration policy is in accordance with the Norwegian Regulations to the Securities Funds Act, Chapter 2, Part XI.

The Board of Directors of Holberg Fondsforvaltning review and adopt the remuneration policy annually. The company's internal auditor reviews the remuneration policy annually. Variable remuneration for employees is calculated based on the company's operating profit (EBIT) and are distributed among the employees according to certain specified qualitative and quantitative criteria. For the company's compliance officer and risk manager, the variable remuneration is independent of the company's earnings and is determined based on a set of qualitative and quantitative criteria. A retention policy applies for the variable remuneration for senior management (the management team), the portfolio managers, the compliance officer and the risk manager. At least 50 % of the variable remuneration is deferred and paid in equal parts over the three subsequent years. The deferred variable remuneration is invested in funds managed by Holberg based on the fund's recommended holding period to align incentives with the fund's unit holders.

15. Amendment of the Fund's Articles of Association

Amendment of the Fund's articles of association are regulated in the Norwegian Securities Funds Act § 4-14. The Fund's Articles of Association may only be amended if the majority of the unit holder-elected members of the management company have voted for the amendments. A decision concerning any amendments shall be obtained from the unit holder meeting. The Financial Supervisory Authority of Norway shall approve the amendments.

16. Amendment of the Fund's prospectus

Material changes to the Fund's prospectus have to be approved by the Board of Directors.

17. The Board's responsibility

This prospectus has been prepared in accordance with the Norwegian Regulations relating to securities funds of 21 December 2011. The Board of Directors of Holberg Fondsforvaltning AS confirm that to the best of their knowledge the information provided corresponds with the factual circumstances, and that there are no omissions which by their nature could cause the content of the prospectus to be understood differently.

Bergen, 27th March 2026
The Board of Directors of Holberg Fondsforvaltning AS

Bengt Arve Rem
(sign.)

Jens Henrik Munthe-Kaas
(sign.)

Steinar Hauge
(sign.)

Lise Falch-Monsen
(sign.)

Tone J. Solbakken
(sign.)

The original Articles of Association and prospectuses were prepared in Norwegian. This is a translated version. In case of discrepancies between the Norwegian and the English text, the Norwegian text shall prevail. The original prospectus is available in Norwegian at www.holberg.no.

Mal for opplysninger som gis før avtaler inngås, for de finansielle produktene nevnt i artikkel 8 nr. 1, 2 og 2a i forordning (EU) 2019/2088 og i artikkel 6 første ledd i forordning (EU) 2020/852

Produktnavn: Holberg Triton

LEI-nummer: 254900FRLWCZAXNIC209

Miljøegenskaper og/eller sosiale egenskaper

Med **bærekraftig investering** menes en investering i en økonomisk aktivitet som bidrar til et miljømål eller et sosialt mål, forutsatt at investeringen ikke gjør betydelig skade på et miljømål eller et sosialt mål, og at foretakene som det er investert i, har god foretaksstyring.

EUs taksonomi er et klassifiseringssystem som er fastsatt i forordning (EU) 2020/852, og som fastsetter en liste over **økonomiske aktiviteter som er miljømessig bærekraftige**. Den nevnte forordningen fastsetter ikke en liste over økonomiske aktiviteter som er sosialt bærekraftige. Bærekraftige investeringer med et miljømål kan være i samsvar med taksonomien eller ikke.

Har dette finansielle produktet et bærekraftig investeringsmål?

Ja

Nei

Det vil foreta et minimum av **bærekraftige investeringer med et miljømål: ___%**

i økonomiske aktiviteter som anses som miljømessig bærekraftige i samsvar med EUs taksonomi

i økonomiske aktiviteter som ikke anses som miljømessig bærekraftige i samsvar med EUs taksonomi

Det vil foreta et minimum av **bærekraftige investeringer med et sosialt mål: ___%**

Det fremmer miljøegenskaper / sosiale egenskaper, og selv om det ikke har bærekraftig investering som mål, vil det ha en minsteandel med bærekraftige investeringer på ___%

med et miljømål i økonomiske aktiviteter som anses som miljømessig bærekraftige i samsvar med EUs taksonomi

med et miljømål i økonomiske aktiviteter som ikke anses som miljømessig bærekraftige i samsvar med EUs taksonomi

med et sosialt mål

Det fremmer miljøegenskaper / sosiale egenskaper, men **vil ikke foreta noen bærekraftige investeringer**



Hvilke miljøegenskaper og/eller sosiale egenskaper fremmes av dette finansielle produktet?

Bærekraft er en integrert del av fondets investeringsprosess der vi prøver å forstå om selskaper drives i tråd med allmenne miljømessige, etiske og sosiale normer. Fondet fremmer et bredt spekter av miljømessige og sosiale egenskaper gjennom integrering av bærekraft i investeringsprosessen, eksklusjon og aktivt eierskap.

Vi søker å fremme bærekraft gjennom hvordan vi dokumenterer våre beslutninger. Konsentrerte porteføljer gjør det lettere å vurdere det enkelte selskapets og ledelsens holdning til langsiktig bærekraftig utvikling. Oppfatningen av hva som er bærekraftig og hvilke selskaper som oppfyller ulike kriterier knyttet til ESG er varierende, og tilgang til pålitelig data er ofte mangelfull.

Holberg ønsker å være en aktiv deltaker og kunnskapsbygger i debatten rundt hvordan bærekraft kan forbedre risikovurderinger og investeringsbeslutninger. Dette vil bli gjort både gjennom egne aktiviteter (kundemøter, seminarer, etc.), samt deltakelse og bidrag i eksterne fora. Vi vil også søke å belyse temaet gjennom vår kundekommunikasjon og tilstedeværelse i media.

Bærekraftsindikatorer måler hvordan de miljøegenskapene eller de sosiale egenskapene som det finansielle produktet fremmer, oppnås.

De viktigste negative konsekvensene er de mest betydelige negative konsekvensene av investeringsbeslutninger for bærekraftsfaktorer på området miljøspørsmål, sosiale spørsmål og personalspørsmål samt spørsmål knyttet til respekt for menneskerettigheter og bekjempelse av korrupsjon og bestikkelser.

● **Hvilke bærekraftsindikatorer brukes til å måle oppnåelsen av hver av de miljøegenskapene eller de sosiale egenskapene som dette finansielle produktet fremmer?**

Vi bruker bærekraftsindikatorer fra vår egenutviklede bærekraftmodell, Tellus. Vi rangerer hvert spørsmål fra 1-5 på selskapsnivå og aggregerer på fondsnivå.

Følgende bærekraftsindikatorer på selskapsnivå brukes til å måle oppnåelsen av de miljøegenskapene som fondet fremmer:

- Har selskapet en klimapolicy?
- Har selskapet rapportering ift. egne miljøutslipp? (Scope 1)
- Har selskapet rapportering ift. indirekte miljøutslipp? (Scope 2)
- Har selskapet en strategi og konkrete planer for å redusere miljøavtrykket?
- Støtter selskapet Parisavtalen og/eller Task Force on Climate-Related Financial Disclosures (TCFD)?
- Har selskapet knyttet sine klimamål opp mot FNs bærekraftsmål?
- Rapporterer selskapet til CDP?
- Porteføljeforvalters vurdering av kvaliteten på selskapets rapportering på miljø.
- Porteføljeforvalters vurdering av selskapets utslipp.
- Porteføljeforvalters vurdering av selskapets utslipp i forhold til andre i samme bransje.
- Porteføljeforvalters vurdering av selskapets måling og gjennomføring av etablerte miljøtiltak.
- Porteføljeforvalters vurdering av selskapets strategi for sirkulær økonomi.

Følgende bærekraftsindikatorer på selskapsnivå brukes til å måle oppnåelsen av de sosiale egenskapene som fondet fremmer:

- Porteføljeforvalters vurdering av selskapets policy for avlønning av ulike nivåer, kjønn og mht. mangfold for øvrig.
- Porteføljeforvalters vurdering av selskapets arbeid ift. likestilling og mangfold.
- Porteføljeforvalters vurdering av selskapets stabilitet i arbeidsstokken.
- Porteføljeforvalters vurdering av kvaliteten på selskapets rapportering på HMS.
- Porteføljeforvalters vurdering av selskapets retningslinjer ift. minstelønn.
- Porteføljeforvalters vurdering av selskapets retningslinjer ift. rett til å organisere seg.
- Porteføljeforvalters vurdering av selskapets ivaretagelse av ansatte mht. sosial sikkerhet (forsikring og pensjonsordninger).
- Porteføljeforvalters vurdering av overordnede retningslinjer og policyer for oppfølging av SRI i egne og leverandørens verdikjeder.
- Har selskapet vært i kontroverser ift. lokale eller nasjonale myndigheter?

● **Hva er målene for de bærekraftige investeringene som det finansielle produktet delvis har til hensikt å foreta, og hvordan bidrar den bærekraftige investeringen til slike mål?**

Ikke relevant.

● **På hvilken måte forårsaker ikke de bærekraftige investeringene, som det finansielle produktet delvis har til hensikt å foreta, noen betydelig skade for noen av de miljømessig eller sosialt bærekraftige investeringsmålene?**

Ikke relevant.

— Hvordan er det tatt hensyn til indikatorene for negative konsekvenser for bærekraftsfaktorer?

Ikke relevant.

— På hvilken måte er de bærekraftige investeringene i samsvar med OECDs retningslinjer for flernasjonale selskaper og FNs veiledende prinsipper for næringsliv og menneskerettigheter? Nærmere opplysninger:

Ikke relevant.



Tar dette finansielle produktet hensyn til de viktigste negative konsekvensene for bærekraftsfaktorer?

Ja, fondet tar hensyn til de viktigste negative påvirkningene på bærekraftsfaktorer. Fondet investerer i selskaper med bærekraftige forretningsmodeller og vil blant annet søke å unngå selskaper som utnytter knappe naturressurser og misbruker arbeidskraft. Ved å benytte Tellus-modellen som en integrert del av analyseprosessen, sørger vi for en konsistent gjennomgang av hvert enkelt selskap med hensyn til bærekraft. Fondet vil søke å redusere de viktigste negative påvirkningene på bærekraftsfaktorer over tid og etter hvert som det blir mer pålitelig data tilgjengelig. I henhold til artikkel 11 nr. 2 i forordning (EU) 2019/2088 vil rapporteringen av de viktigste negative påvirkningene på bærekraftsfaktorer fremkomme i fondets årsrapport.

Nei



Hvilken investeringsstrategi følger dette finansielle produktet?

Holberg er en aktiv forvalter med en målsetting om å skape høyest mulig risikostjert avkastning over tid i forhold til fondets investeringsunivers. Porteføljeforvalter søker å investere i selskaper med fokus på langsiktig verdiskapning tuftet på en bærekraftig forretningsmodell.

- **Hvilke bindende elementer i investeringsstrategien benyttes for å velge ut investeringer med henblikk på å oppnå hver av de miljøegenskapene eller de sosiale egenskapene som dette finansielle produktet fremmer?**

Bærekraft integreres gjennom:

1. *Vår egen analysemodell, Tellus*
2. *Eksklusjon og overvåkning*
3. *Aktivt eierskap*

Holberg har utviklet Tellus-modellen, som er vårt eget analyseverktøy for bærekraft, der vi har etablert felles kriterier og krav til kvalitet i selskapene som kan inngå i våre porteføljer. Gjennom denne integrasjonen øker vi vår forståelse for og hensyntar en større del av risikobildet knyttet til våre investeringer. En hendelse relatert til bærekraft kan påvirke en enkelt investering direkte eller kan ha en bredere innvirkning på en bransje, et geografisk område eller et land, som kan påvirke fondets portefølje i sin helhet. Integrering av bærekraftsrisiko i konstruksjonen av porteføljen bidrar til vårt mål om god risikostjert avkastning.

Tellus er vår faktabaserte metode for å systematisere bærekraftsrisiko og analyse, og en effektiv måte å overvåke hver enkelt investering over tid.

Vi benytter også et sett med eksklusjonskriterier som er basert på Statens Pensjonsfond Utland sine retningslinjer. Vi har i tillegg valgt å ekskludere gambling og pornografi fra vårt investeringsunivers. Vi ønsker at våre selskaper opererer i tråd med internasjonale normer, herunder UN Global Compact. Våre aksjefond screenes av Sustainalytics' online database for «Global Standard Screening».

I tillegg utfører vi aktivt eierskap for å påvirke selskapene til forbedring. Som en aktiv forvalter med konsentrerte porteføljer har vi en investeringsfilosofi som er tuftet på tett oppfølging av selskapene vi er investert i. Samtaler med ledelsen og stemmegivning på generalforsamlinger er to av virkemidlene vi kan benytte for å bidra til transparens for våre andelseiere. Holbergs retningslinjer for bruk av stemmerett og oversikt over hva vi stemmer på generalforsamlinger er tilgjengelig på nettsiden.

- **Hvor stor er minsteandelen for å redusere omfanget av de investeringene som ble vurdert før investeringsstrategien ble anvendt?**

Fondet har ikke en forpliktelse om å redusere omfanget av investeringer med en minsteandel.

Investeringsstrategien styrer investeringsbeslutninger basert på faktorer som for eksempel investeringsmål og risikotoleranse.

God foretaksstyring omfatter forsvarlige forvaltningsstrukturer, forholdet til de ansatte, godtgjøring til medarbeidere og overholdelse av skattereglene.

● **Hvilke retningslinjer gjelder for å vurdere god foretaksstyring i de foretakene som det er investert i?**

Porteføljeforvalter skal være tett på og benytte all tilgjengelig informasjon for å forstå porteføljeselskapets forretningsmodell, herunder hvilke risikofaktorer som påvirker selskapets styring, drift og verdiskapning. Ledelsestillit og tydelig aksjonærfokus er sentrale forutsetninger for god foretaksstyring, og er sentrale fokusområder i Holbergs investeringsprosess.

Porteføljeforvalter gjør vurderinger av porteføljeselskapenes styringspraksis ved hjelp av Holbergs egenutviklede analysemodell, Tellus.

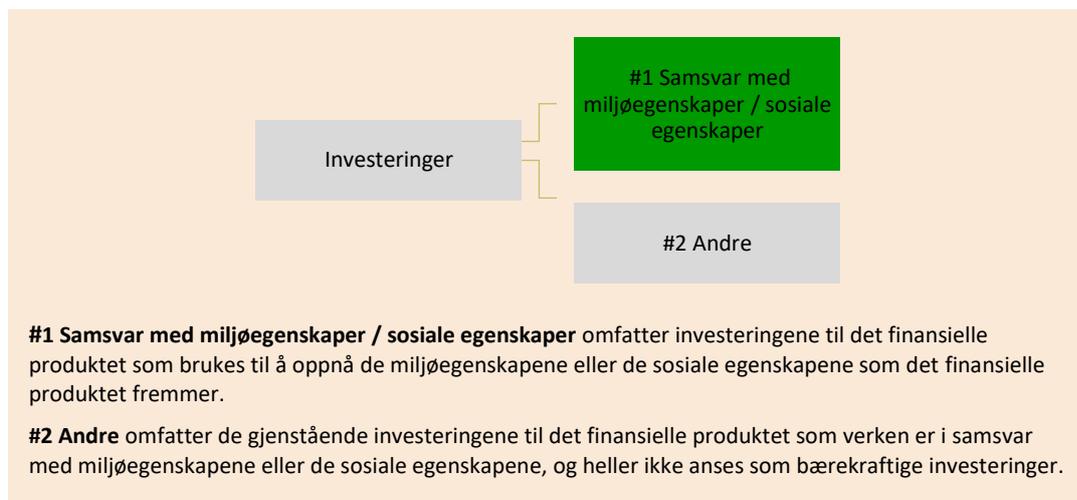


Hvilken fordeling av eiendeler er planlagt for dette finansielle produktet?

Fondet skal hovedsakelig investere i aksjer utstedt av selskaper med en vesentlig del av virksomheten rettet mot marine ressurser. Fondet er et globalt forvaltet fond.

Alle fondets investeringer er omfattet av de bindende elementene i investeringsstrategien, som er beskrevet over.

Fordeling av eiendeler beskriver andelen av investeringer i bestemte eiendeler.



● **Hvordan oppnår bruken av derivater de miljøegenskapene eller de sosiale egenskapene som det finansielle produktet fremmer?**

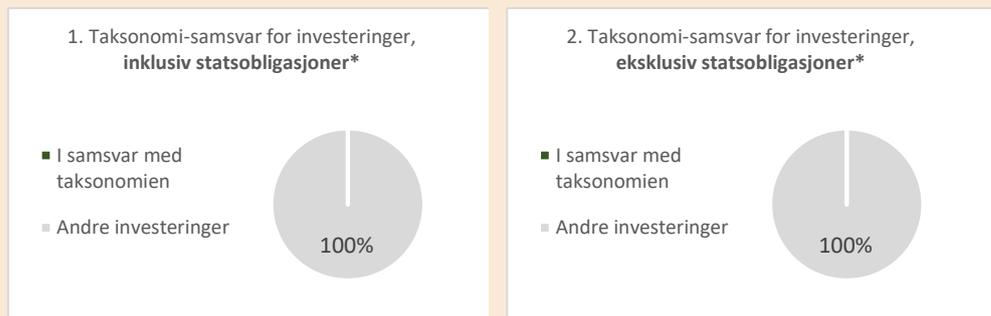
Fondet bruker ikke derivater for å oppnå miljøegenskaper eller sosiale egenskaper.



I hvilket minste omfang er bærekraftige investeringer med et miljømål i samsvar med EUs taksonomi?

Fondet har ikke definert en minsteandel for bærekraftige investeringer med et miljømål i økonomiske aktiviteter som anses som miljømessig bærekraftige i samsvar med EUs taksonomi.

De to diagrammene nedenfor viser med grønt den laveste prosentdelen av investeringer som er i samsvar med EUs taksonomi. Ettersom det ikke finnes noen hensiktsmessig metode for å fastsette taksonomi-samsvaret for statsobligasjoner*, viser det første diagrammet taksonomi-samsvaret for alle investeringene til det finansielle produktet inklusiv statsobligasjoner, mens det andre diagrammet viser taksonomi-samsvaret bare for investeringene til det finansielle produktet eksklusiv statsobligasjoner.



* I disse diagrammene omfatter «statsobligasjoner» alle eksponeringer mot stater

● **Hvilken minsteandel utgjorde investeringer i omstillingsaktiviteter og muliggjørende aktiviteter?**

Fondet har ikke definert en minsteandel for investeringer i omstillingsaktiviteter og muliggjørende aktiviteter.



Hvilken minsteandel utgjorde bærekraftige investeringer med et miljømål som ikke var i samsvar med EUs taksonomi?

Fondet har ikke definert en minsteandel for bærekraftige investeringer med et miljømål i økonomiske aktiviteter som ikke anses som miljømessig bærekraftige i samsvar med EUs taksonomi.



Hvilken minsteandel utgjorde sosialt bærekraftige investeringer?

Fondet har ikke definert en minsteandel for sosialt bærekraftige investeringer.



Hvilke investeringer er tatt med under "#2 Andre", hva er formålet med dem, og finnes det noen miljømessige eller samfunnsmessige minstegarantier?

Investeringer som kan falle under "#2 Annet" er kontantposisjoner som kan være nødvendige for porteføljeforvaltningsformål.



Er en bestemt indeks utpekt som referanseverdi for å avgjøre om dette finansielle produktet er i samsvar med de miljøegenskapene og/eller de sosiale egenskapene som det fremmer?

Det er ikke utpekt en indeks som referanseverdi for å avgjøre om fondet er i samsvar med de miljøegenskapene og/eller de sosiale egenskapene som det fremmer.

● **Hvordan blir det sikret at referanseverdien løpende er i samsvar med hver av de miljøegenskapene eller de sosiale egenskapene som det finansielle produktet fremmer?**

Ikke relevant.

- **Hvordan blir det sikret at investeringsstrategien løpende er i samsvar med indeksens metode?**

Ikke relevant.

- **Hvordan skiller den utpekte indeksen seg fra en relevant bred markedsindeks?**

Ikke relevant.

- **Hvor finnes metoden som brukes til å beregne den utpekte indeksen?**

Ikke relevant.



Hvor finner jeg mer produktspesifikk informasjon på nettet?

Mer produktspesifikk informasjon finner du på dette nettstedet:

<https://www.holberg.no/vaare-fond/holberg-triton-a/>