Sustainability-related disclosures



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Innhold

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Sustainability-related disclosures for each financial product

In accordance with the Sustainable Finance Disclosure Regulation (SFDR), Holberg shall publish the information referred to in Article 10(1) of Regulation (EU) 2019/2088 in a separate section titled "Sustainability-related disclosures" for each financial product.

This document provides sustainability-related disclosures for all Holberg's funds.

1. Holberg Global

a) Summary

Holberg is an active fund manager and the fund's objective is to create the highest possible long-term risk adjusted return compared to the fund's investment universe. The portfolio manager seeks to invest in companies with a focus on long-term value creation based on a sustainable business model.

Sustainability is integrated into the fund's investment process where we try to understand whether companies are run in line with common environmental, ethical and social norms. Sustainability is integrated through:

1. Holberg's proprietary ESG model, Tellus
2. Exclusion lists and monitoring
3. Active ownership

The portfolio manager shall be hands on and use all available information to understand each business model of the portfolio companies, including which risk factors and opportunities that may affect the company's management, operations, and value creation. The limited number of companies in each portfolio allows us to gain a deep understanding of the companies and monitor them closely over time.

The fund promotes a wide range of environmental and social characteristics through the integration of Holberg's proprietary ESG model, exclusion lists, and active ownership. We use sustainability indicators from our proprietary sustainability model, Tellus, to assess the achievement of the environmental and social characteristics promoted by the fund.

This document provides a description of the fund's sustainability-related characteristics. More information can be found in the fund's prospectus and on Holberg's website.

b) No sustainable investment objective

This financial product promotes environmental and/or social characteristics but does not have a sustainable investment objective.

The fund is not committed to make any sustainable investments.

c) Environmental or social characteristics of the financial product

Sustainability is integrated into the fund's investment process where we try to understand whether companies are run in line with common environmental, ethical and social norms. The fund promotes a wide range of environmental and social characteristics through the integration of Holberg's proprietary ESG model, exclusion lists, and active ownership.

We seek to promote sustainability through documentation of our investment decisions. With concentrated portfolios we are able to assess each company and its management's approach to long-term sustainable development. Access to reliable data can be deficient, and the perception of sustainability and which ESG criteria each company meet varies.

Holberg wishes to contribute to building knowledge by being an active participant in the debate about how sustainability can improve risk assessments and investment decisions. This will be executed through internal activities (meetings with clients, seminars, etc.), as well as participation and contribution in external forums. Also, we will seek to highlight the topic through our communication with clients and presence in the media.

d) Investment strategy

Holberg is an active fund manager and the fund's objective is to create the highest possible long-term risk adjusted return compared to the fund's investment universe. The portfolio manager seeks to invest in companies with a focus on long-term value creation based on a sustainable business model.

The binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by the fund are:

1. Holberg's proprietary ESG model, Tellus
2. Exclusion lists and monitoring
3. Active ownership

Holberg has developed the Tellus model, which is our proprietary analysis tool for ESG and sustainability and contains common quality requirements for the portfolio companies. This integration gives us a broader understanding of the companies and potential risks. A sustainability related event may affect one single company directly or may have a wider impact on an industry, geographic area, or country, which can affect bigger parts of the portfolio. Integrating sustainability risks into the portfolio construction contributes to create the desired risk adjusted return. Tellus is our fact-based method for systematizing sustainability risks and analyses, and it is an efficient tool to monitor each investment over time.

We also apply a set of exclusions to the portfolio, which is based on the Government Pension Fund Global's guidelines. I addition to this, we have chosen to exclude gambling and pornography from our investment universe. We want our portfolio companies to operate in line with international norms, including UN Global Compact.

We practice active ownership to encourage the companies to improve. As an active fund manager with concentrated portfolios, we have an investment philosophy that is founded on close follow-up of the companies we are invested in. We have dialogs with the company management and vote on general meetings to contribute to transparency for the shareholders. Holberg's voting guidelines and an overview of what we have voted for or against on general meetings is available on our webpage.

The portfolio manager shall be hands on and use all available information to understand each business model of the portfolio companies, including which risk factors that may affect the company's management, operations, and value creation. Leadership trust and clear focus on shareholders are key prerequisites for good corporate governance and these two elements are central in Holberg's research process.

The portfolio manager makes assessments of the portfolio companies' governance practices using Holberg's proprietary sustainability analysis model, Tellus. The following sustainability

indicators are used to measure the attainment of *good governance* practices in the companies the fund invests in:

- Is the board independent of the company's management?
- Are the board incentives long-term and in line with the shareholders' interests?
- Are the board members elected individually?
- The portfolio manager’s assessment of the composition of the board in respect to operation and strategy.
- The portfolio manager’s assessment of the composition of the board in regard to sustainability.
- The portfolio manager’s assessment of the composition of the board in respect to diversity (gender, age, ethnicity).
- Does the management have an ESG-linked bonus scheme?
- Are the management incentives long-term and in line with the shareholders' interests?
- The portfolio manager’s assessment of the size of compensation for managers in absolute terms.
- The portfolio manager’s assessment of the size of compensation to management in relation to the company size.
- Is there one share class in the company?
- The portfolio manager’s assessment of the power balance between share classes, principal owners and minorities.
- Do shareholders usually support the board's proposals on the annual general meeting?
- Are there any anti-takeover mechanisms?

Holberg's guidelines for sustainability and responsible investments, as well as Holberg's guidelines for the use of voting rights, are publicly available on Holberg's website.

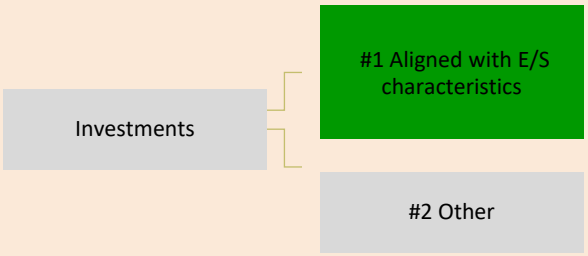
The following sustainability indicators are used to measure the attainment of the *social characteristics* promoted by this financial product:

- The portfolio manager’s assessment of the company's equal pay policy.
- The portfolio manager’s assessment of the company's performance on gender equality and diversity.
- The portfolio manager’s assessment of the company's workforce stability.
- The portfolio manager’s assessment of the quality of the company's HSE reporting.
- The portfolio manager’s assessment of the company's wage policy.
- The portfolio manager’s assessment of the company's guidelines in relation to the right to unionization.
- The portfolio manager’s assessment of the company's insurance and pension schemes.
- The portfolio manager’s assessment of the overall guidelines for monitoring SRI in the company's and the supplier's value chains.
- Has the company been involved in controversies involving local or national authorities?

e) Proportion of investments

The Fund shall invest in equities listed on exchanges or regulated markets worldwide. The Fund will invest primarily in well-developed markets.

All of the fund's investments are aligned with the environmental or social characteristics which are defined as the binding elements of the investment strategy.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The fund does not use derivatives to attain the environmental or social characteristics promoted by the financial product.

The fund has not defined a minimum percentage of sustainable investments with an environmental objective that are aligned with the EU Taxonomy.

The fund has not defined a minimum share of investments in transitional and enabling activities.

The fund has not defined a minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy.

The fund has not defined a minimum share of socially sustainable investments.

f) Monitoring of environmental or social characteristics

Tellus is our fact-based method for systematizing sustainability risk and analysis, and an effective way to monitor each individual investment over time. The model consists of approximately 90 quantitative data fields and 40 qualitative questions and checkpoints at the company level within each of the E, S, and G categories. The assessments are carried out by the portfolio manager, based on their knowledge and analysis of the company. A score is calculated at both the company and fund level based on the qualitative assessments.

Quantitative data from external sources, the manager's assessments, and the score are documented and stored in a database in the data warehouse. Summary reports at the company and fund level are also available in PowerBI. The database structure allows tracking of companies' progress over time and enables us to verify whether the companies succeed in achieving their objectives. Targeted analysis at the company level should enable us to manage and understand risks related to sustainability factors. Company analyses are conducted at the time of investment, and the portfolios are reviewed at least annually.

With regard to our exclusion criteria, our risk department ensures that none of the funds are invested in companies that violate these criteria. Our funds are screened by Sustainalytics'

online database for “Global Standard Screening” every three months to ensure compliance with global norms such as the UN Global Compact.In terms of active ownership and voting, we aim to vote at all general meetings. An overview of our voting at general meetings is available on the website.

g) Methodologies

To measure the attainment of each of the environmental or social characteristics promoted by the fund, we use sustainability indicators defined in our proprietary sustainability model, Tellus. For each sustainability indicator we score each portfolio company from 1 to 5. These scores can also be aggregated on fund level.

The following sustainability indicators are used to measure the attainment of the *environmental characteristics* promoted by this fund:

- Does the company have a climate policy?
- Does the company report direct emissions (Scope 1)?
- Does the company report indirect emissions (Scope 2)?
- Does the company have a strategy to reduce their environmental footprint?
- Is the company endorsing the Paris agreement?
- Does the company link their climate goals towards the UN sustainability goals?
- Does to company report to Carbon Disclosure Project (CDP)?
- The portfolio manager’s assessment of the quality of the company's reporting on environmental issues.
- The portfolio manager’s assessment of the company's emissions.
- The portfolio manager’s assessment of the company's emissions compared to peers.
- The portfolio manager’s assessment of the company's implementation of environmental measures.
- The portfolio manager’s assessment of the company's strategy for circular economy.

The following sustainability indicators are used to measure the attainment of the *social characteristics* promoted by this financial product:

- The portfolio manager’s assessment of the company's equal pay policy.
- The portfolio manager’s assessment of the company's performance on gender equality and diversity.
- The portfolio manager’s assessment of the company's workforce stability.
- The portfolio manager’s assessment of the quality of the company's HSE reporting.
- The portfolio manager’s assessment of the company's wage policy.
- The portfolio manager’s assessment of the company's guidelines in relation to the right to unionization.
- The portfolio manager’s assessment of the company's insurance and pension schemes.
- The portfolio manager’s assessment of the overall guidelines for monitoring SRI in the company's and the supplier's value chains.
- Has the company been involved in controversies involving local or national authorities?

Company analyses in Tellus are conducted at the time of investment, and the portfolios are reviewed at least annually. This enables tracking of companies' progress over time and allows us to verify whether the companies succeed in achieving their objectives.

h) Data sources and processing

The portfolio managers are actively engaged and leverage available information to gain a deep understanding of companies' business models, including the risks and opportunities that impact their governance, operations, and value creation. The limited number of companies in each portfolio allows the managers to thoroughly analyze and monitor them over time.

Sources used to gather information include company presentations and reports, meetings with management and other stakeholders, as well as data from Bloomberg, Sustainalytics, and research firms.

In Tellus, we collect quantitative data from Bloomberg across the E, S, and G categories. Portfolio managers perform qualitative assessments based on all available information, including the quantitative data from Bloomberg. These assessments are compared to those from previous years for quality assurance and serve as a basis for ongoing company monitoring.

To produce our annual statement on the principal adverse impacts of investment decisions on sustainability factors, we use data from Sustainalytics. We have integrated this data into Tellus to cross-check it against companies' own reported figures and to increase coverage when data from Sustainalytics is not available.

To screen our funds for compliance with the UN Global Compact, we use Sustainalytics' online database for "Global Standard Screening." Additionally, each portfolio manager independently assesses whether portfolio companies adhere to international norms.

Holberg casts votes at annual general meetings and extraordinary general meetings through the ISS voting platform, but all decisions are made by Holberg.

In general, Holberg does not use estimated data in its sustainability reports, ensuring that the reports are based on actual, collected data.

i) Limitations to methodologies and data

There are certain limitations in the methods used to measure the achievement of the environmental or social characteristics promoted by the fund. For example, the models and analytical tools employed may rely on assumptions and estimates that may not fully capture all the nuances of environmental or social impacts. Additionally, applying these methods consistently across different funds, sectors, or geographical regions can be challenging due to varying standards and practices.

In Tellus, we have defined what a score of 1-5 represents for various ESG factors, reducing the scope for subjective assessments by portfolio managers. This also improves comparability over time, as the definitions remain consistent. The portfolio managers analyze and assess all companies in each portfolio, ensuring good traceability, reviewing data reported by companies, using their own knowledge of the companies, and validating these assessments with external sources.

The data sources used to measure environmental or social characteristics may have limitations regarding availability, completeness, and accuracy. For example, there is significant uncertainty related to companies' Scope 3 emissions due to variable data quality, estimates, and completeness. Data may be self-reported by companies, leading to inconsistencies. Comparisons can also be challenging if the data is not based on the same methodology. Furthermore, there may be gaps in data coverage for certain metrics or for companies operating in regions with less stringent reporting requirements. The introduction of the EU's Corporate Sustainability Reporting Directive (CSRD) is expected to address some of these challenges by establishing a common framework for sustainability reporting by companies subject to the directive.

In Tellus, data from external sources is compared to companies' own reported information to cross-check accuracy. When data from different providers is inconsistent, we conduct additional internal research and analysis of the company and potential issues. If gaps in the data are identified, the portfolio manager may initiate dialogue to gather more information.

The availability of reliable, consistent, and comprehensive sustainability data remains one of the biggest challenges in sustainability reporting, but the demand for more and better sustainability data is growing, partly driven by new regulations. Despite the limitations in methodology and data, Holberg has measures in place to ensure that the environmental and social characteristics promoted by the funds are not significantly affected. In addition to quantitative data, portfolio managers conduct many qualitative analyses. We work to improve data quality through cross-referencing multiple data sources and making comparisons across companies. The framework surrounding Tellus is also regularly reviewed and updated.

j) Due diligence

Holberg conducts due diligence assessments for all companies in the fund to ensure that sustainability risks and opportunities are properly considered in investment decisions. These assessments take a comprehensive approach to integrating sustainability and responsibility into the investment process. Portfolio managers evaluate environmental, social, and governance (ESG) factors to ensure that investments align with our guidelines.

Holberg uses internal controls to ensure the reliability of the assessment process. This includes applying consistent assessment criteria through the Tellus system, which guarantees a uniform ESG review across all our mandates. Additionally, we perform quarterly screenings of our portfolios against Sustainalytics' database for "Global Standard Screening" to monitor compliance with the UN Global Compact. The Risk and Compliance team monitors the portfolios for alignment with the Norwegian Council on Ethics' exclusion list and addresses potential breaches of our guidelines.

Alongside our internal processes and controls, Holberg's internal auditor focuses on sustainability regulations, helping ensure compliance and continuously improving our processes.

k) Engagement policies

Holberg practices active ownership to influence companies towards improvement. As an active manager with concentrated portfolios, our investment philosophy is based on close follow-up

with the companies in which we invest. Dialogue with management and voting at general meetings are two key tools we use to ensure transparency for our unit holders.

Holberg is an active manager that invests long-term in a concentrated number of portfolio companies per fund. A key principle of our investments is that the business models of portfolio companies must be sustainable over the long term. We also require a high level of confidence in the management's ability to deliver results and protect the interests of shareholders and other stakeholders.

As an active owner and manager, we aim to participate in all general meetings of our portfolio companies. Holberg exercises voting rights with the goal of acting in the best interest of the unit holders of each relevant fund, seeking to provide the highest possible long-term risk-adjusted returns. Through our voting, Holberg seeks to influence underlying companies in the right strategic, business, and sustainability directions. Voting is conducted via ISS's voting platform, either electronically or by proxy with instructions to the chairperson or another representative. Where appropriate, Holberg may form alliances with other voting shareholders to achieve desired objectives.

To ensure effective and responsible use of voting rights, Holberg regularly monitors portfolio companies and builds relationships through meetings and dialogue with management. Portfolio managers aim to ensure that the companies' boards and management teams function effectively and that they have a clear understanding of the companies' business strategies, risk management, environmental and social responsibility, corporate governance, compliance, performance, and capital allocation.

Given our investment philosophy, where we invest in well-managed companies, we usually agree with the board's recommendations in most general meeting matters. However, situations may arise where we disagree with the board's proposals. In such cases, we will vote in line with our own assessment. Holberg may also collaborate with other investors on issues where collective engagement is beneficial in achieving desired outcomes. If a significant disagreement persists on a key issue, we will reassess our investment in the company to safeguard the interests of our unit holders.

Holberg's voting guidelines and an overview of our voting activities at general meetings are available on our website.

l) Designated reference benchmark

No index has been designated as a reference benchmark for attaining the environmental or social characteristics promoted by the fund.

2. Holberg Vekstmarkeder

a) Summary

Holberg is an active fund manager and the fund's objective is to create the highest possible long-term risk adjusted return compared to the fund's investment universe. The portfolio manager seeks to invest in companies with a focus on long-term value creation based on a sustainable business model.

Sustainability is integrated into the fund's investment process where we try to understand whether companies are run in line with common environmental, ethical and social norms. Sustainability is integrated through:

1. Holberg's proprietary ESG model, Tellus
2. Exclusion lists and monitoring
3. Active ownership

The portfolio manager shall be hands on and use all available information to understand each business model of the portfolio companies, including which risk factors and opportunities that may affect the company's management, operations, and value creation. The limited number of companies in each portfolio allows us to gain a deep understanding of the companies and monitor them closely over time.

The fund promotes a wide range of environmental and social characteristics through the integration of Holberg's proprietary ESG model, exclusion lists, and active ownership. We use sustainability indicators from our proprietary sustainability model, Tellus, to assess the achievement of the environmental and social characteristics promoted by the fund.

This document provides a description of the fund's sustainability-related characteristics. More information can be found in the fund's prospectus and on Holberg's website.

b) No sustainable investment objective

This financial product promotes environmental and/or social characteristics but does not have a sustainable investment objective.

The fund is not committed to make any sustainable investments.

c) Environmental or social characteristics of the financial product

Sustainability is integrated into the fund's investment process where we try to understand whether companies are run in line with common environmental, ethical and social norms. The fund promotes a wide range of environmental and social characteristics through the integration of Holberg's proprietary ESG model, exclusion lists, and active ownership.

We seek to promote sustainability through documentation of our investment decisions. With concentrated portfolios we are able to assess each company and its management's approach to long-term sustainable development. Access to reliable data can be deficient, and the perception of sustainability and which ESG criteria each company meet varies.

Holberg wishes to contribute to building knowledge by being an active participant in the debate about how sustainability can improve risk assessments and investment decisions. This will be executed through internal activities (meetings with clients, seminars, etc.), as well as participation and contribution in external forums. Also, we will seek to highlight the topic through our communication with clients and presence in the media.

d) Investment strategy

Holberg is an active fund manager and the fund's objective is to create the highest possible long-term risk adjusted return compared to the fund's investment universe. The portfolio manager seeks to invest in companies with a focus on long-term value creation based on a sustainable business model.

The binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by the fund are:

1. Holberg's proprietary ESG model, Tellus
2. Exclusion lists and monitoring
3. Active ownership

Holberg has developed the Tellus model, which is our proprietary analysis tool for ESG and sustainability and contains common quality requirements for the portfolio companies. This integration gives us a broader understanding of the companies and potential risks. A sustainability related event may affect one single company directly or may have a wider impact on an industry, geographic area, or country, which can affect bigger parts of the portfolio. Integrating sustainability risks into the portfolio construction contributes to create the desired risk adjusted return. Tellus is our fact-based method for systematizing sustainability risks and analyses, and it is an efficient tool to monitor each investment over time.

We also apply a set of exclusions to the portfolio, which is based on the Government Pension Fund Global's guidelines. I addition to this, we have chosen to exclude gambling and pornography from our investment universe. We want our portfolio companies to operate in line with international norms, including UN Global Compact.

We practice active ownership to encourage the companies to improve. As an active fund manager with concentrated portfolios, we have an investment philosophy that is founded on close follow-up of the companies we are invested in. We have dialogs with the company management and vote on general meetings to contribute to transparency for the shareholders. Holberg's voting guidelines and an overview of what we have voted for or against on general meetings is available on our webpage.

The portfolio manager shall be hands on and use all available information to understand each business model of the portfolio companies, including which risk factors that may affect the company's management, operations, and value creation. Leadership trust and clear focus on shareholders are key prerequisites for good corporate governance and these two elements are central in Holberg's research process.

The portfolio manager makes assessments of the portfolio companies' governance practices using Holberg's proprietary sustainability analysis model, Tellus. The following sustainability

indicators are used to measure the attainment of *good governance* practices in the companies the fund invests in:

- Is the board independent of the company's management?
- Are the board incentives long-term and in line with the shareholders' interests?
- Are the board members elected individually?
- The portfolio manager’s assessment of the composition of the board in respect to operation and strategy.
- The portfolio manager’s assessment of the composition of the board in regard to sustainability.
- The portfolio manager’s assessment of the composition of the board in respect to diversity (gender, age, ethnicity).
- Does the management have an ESG-linked bonus scheme?
- Are the management incentives long-term and in line with the shareholders' interests?
- The portfolio manager’s assessment of the size of compensation for managers in absolute terms.
- The portfolio manager’s assessment of the size of compensation to management in relation to the company size.
- Is there one share class in the company?
- The portfolio manager’s assessment of the power balance between share classes, principal owners and minorities.
- Do shareholders usually support the board's proposals on the annual general meeting?
- Are there any anti-takeover mechanisms?

Holberg's guidelines for sustainability and responsible investments, as well as Holberg's guidelines for the use of voting rights, are publicly available on Holberg's website.

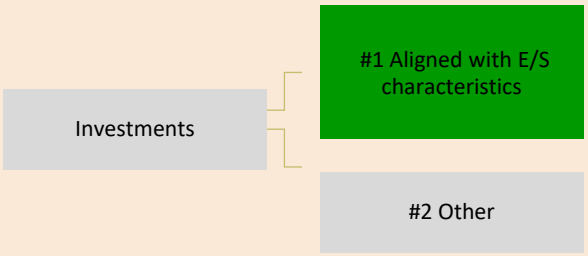
The following sustainability indicators are used to measure the attainment of the *social characteristics* promoted by this financial product:

- The portfolio manager’s assessment of the company's equal pay policy.
- The portfolio manager’s assessment of the company's performance on gender equality and diversity.
- The portfolio manager’s assessment of the company's workforce stability.
- The portfolio manager’s assessment of the quality of the company's HSE reporting.
- The portfolio manager’s assessment of the company's wage policy.
- The portfolio manager’s assessment of the company's guidelines in relation to the right to unionization.
- The portfolio manager’s assessment of the company's insurance and pension schemes.
- The portfolio manager’s assessment of the overall guidelines for monitoring SRI in the company's and the supplier's value chains.
- Has the company been involved in controversies involving local or national authorities?

e) Proportion of investments

The fund invests mainly in companies that are listed in or have significant exposure to emerging markets.

All of the fund's investments are aligned with the environmental or social characteristics which are defined as the binding elements of the investment strategy.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The fund does not use derivatives to attain the environmental or social characteristics promoted by the financial product.

The fund has not defined a minimum percentage of sustainable investments with an environmental objective that are aligned with the EU Taxonomy.

The fund has not defined a minimum share of investments in transitional and enabling activities.

The fund has not defined a minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy.

The fund has not defined a minimum share of socially sustainable investments.

f) Monitoring of environmental or social characteristics

Tellus is our fact-based method for systematizing sustainability risk and analysis, and an effective way to monitor each individual investment over time. The model consists of approximately 90 quantitative data fields and 40 qualitative questions and checkpoints at the company level within each of the E, S, and G categories. The assessments are carried out by the portfolio manager, based on their knowledge and analysis of the company. A score is calculated at both the company and fund level based on the qualitative assessments.

Quantitative data from external sources, the manager's assessments, and the score are documented and stored in a database in the data warehouse. Summary reports at the company and fund level are also available in PowerBI. The database structure allows tracking of companies' progress over time and enables us to verify whether the companies succeed in achieving their objectives. Targeted analysis at the company level should enable us to manage and understand risks related to sustainability factors. Company analyses are conducted at the time of investment, and the portfolios are reviewed at least annually.

With regard to our exclusion criteria, our risk department ensures that none of the funds are invested in companies that violate these criteria. Our funds are screened by Sustainalytics'

online database for “Global Standard Screening” every three months to ensure compliance with global norms such as the UN Global Compact.In terms of active ownership and voting, we aim to vote at all general meetings. An overview of our voting at general meetings is available on the website.

g) Methodologies

To measure the attainment of each of the environmental or social characteristics promoted by the fund, we use sustainability indicators defined in our proprietary sustainability model, Tellus. For each sustainability indicator we score each portfolio company from 1 to 5. These scores can also be aggregated on fund level.

The following sustainability indicators are used to measure the attainment of the *environmental characteristics* promoted by this fund:

- Does the company have a climate policy?
- Does the company report direct emissions (Scope 1)?
- Does the company report indirect emissions (Scope 2)?
- Does the company have a strategy to reduce their environmental footprint?
- Is the company endorsing the Paris agreement?
- Does the company link their climate goals towards the UN sustainability goals?
- Does to company report to Carbon Disclosure Project (CDP)?
- The portfolio manager’s assessment of the quality of the company's reporting on environmental issues.
- The portfolio manager’s assessment of the company's emissions.
- The portfolio manager’s assessment of the company's emissions compared to peers.
- The portfolio manager’s assessment of the company's implementation of environmental measures.
- The portfolio manager’s assessment of the company's strategy for circular economy.

The following sustainability indicators are used to measure the attainment of the *social characteristics* promoted by this financial product:

- The portfolio manager’s assessment of the company's equal pay policy.
- The portfolio manager’s assessment of the company's performance on gender equality and diversity.
- The portfolio manager’s assessment of the company's workforce stability.
- The portfolio manager’s assessment of the quality of the company's HSE reporting.
- The portfolio manager’s assessment of the company's wage policy.
- The portfolio manager’s assessment of the company's guidelines in relation to the right to unionization.
- The portfolio manager’s assessment of the company's insurance and pension schemes.
- The portfolio manager’s assessment of the overall guidelines for monitoring SRI in the company's and the supplier's value chains.
- Has the company been involved in controversies involving local or national authorities?

Company analyses in Tellus are conducted at the time of investment, and the portfolios are reviewed at least annually. This enables tracking of companies' progress over time and allows us to verify whether the companies succeed in achieving their objectives.

h) Data sources and processing

The portfolio managers are actively engaged and leverage available information to gain a deep understanding of companies' business models, including the risks and opportunities that impact their governance, operations, and value creation. The limited number of companies in each portfolio allows the managers to thoroughly analyze and monitor them over time.

Sources used to gather information include company presentations and reports, meetings with management and other stakeholders, as well as data from Bloomberg, Sustainalytics, and research firms.

In Tellus, we collect quantitative data from Bloomberg across the E, S, and G categories. Portfolio managers perform qualitative assessments based on all available information, including the quantitative data from Bloomberg. These assessments are compared to those from previous years for quality assurance and serve as a basis for ongoing company monitoring.

To produce our annual statement on the principal adverse impacts of investment decisions on sustainability factors, we use data from Sustainalytics. We have integrated this data into Tellus to cross-check it against companies' own reported figures and to increase coverage when data from Sustainalytics is not available.

To screen our funds for compliance with the UN Global Compact, we use Sustainalytics' online database for "Global Standard Screening." Additionally, each portfolio manager independently assesses whether portfolio companies adhere to international norms.

Holberg casts votes at annual general meetings and extraordinary general meetings through the ISS voting platform, but all decisions are made by Holberg.

In general, Holberg does not use estimated data in its sustainability reports, ensuring that the reports are based on actual, collected data.

i) Limitations to methodologies and data

There are certain limitations in the methods used to measure the achievement of the environmental or social characteristics promoted by the fund. For example, the models and analytical tools employed may rely on assumptions and estimates that may not fully capture all the nuances of environmental or social impacts. Additionally, applying these methods consistently across different funds, sectors, or geographical regions can be challenging due to varying standards and practices.

In Tellus, we have defined what a score of 1-5 represents for various ESG factors, reducing the scope for subjective assessments by portfolio managers. This also improves comparability over time, as the definitions remain consistent. The portfolio managers analyze and assess all companies in each portfolio, ensuring good traceability, reviewing data reported by companies, using their own knowledge of the companies, and validating these assessments with external sources.

The data sources used to measure environmental or social characteristics may have limitations regarding availability, completeness, and accuracy. For example, there is significant uncertainty related to companies' Scope 3 emissions due to variable data quality, estimates, and completeness. Data may be self-reported by companies, leading to inconsistencies. Comparisons can also be challenging if the data is not based on the same methodology. Furthermore, there may be gaps in data coverage for certain metrics or for companies operating in regions with less stringent reporting requirements. The introduction of the EU's Corporate Sustainability Reporting Directive (CSRD) is expected to address some of these challenges by establishing a common framework for sustainability reporting by companies subject to the directive.

In Tellus, data from external sources is compared to companies' own reported information to cross-check accuracy. When data from different providers is inconsistent, we conduct additional internal research and analysis of the company and potential issues. If gaps in the data are identified, the portfolio manager may initiate dialogue to gather more information.

The availability of reliable, consistent, and comprehensive sustainability data remains one of the biggest challenges in sustainability reporting, but the demand for more and better sustainability data is growing, partly driven by new regulations. Despite the limitations in methodology and data, Holberg has measures in place to ensure that the environmental and social characteristics promoted by the funds are not significantly affected. In addition to quantitative data, portfolio managers conduct many qualitative analyses. We work to improve data quality through cross-referencing multiple data sources and making comparisons across companies. The framework surrounding Tellus is also regularly reviewed and updated.

j) Due diligence

Holberg conducts due diligence assessments for all companies in the fund to ensure that sustainability risks and opportunities are properly considered in investment decisions. These assessments take a comprehensive approach to integrating sustainability and responsibility into the investment process. Portfolio managers evaluate environmental, social, and governance (ESG) factors to ensure that investments align with our guidelines.

Holberg uses internal controls to ensure the reliability of the assessment process. This includes applying consistent assessment criteria through the Tellus system, which guarantees a uniform ESG review across all our mandates. Additionally, we perform quarterly screenings of our portfolios against Sustainalytics' database for "Global Standard Screening" to monitor compliance with the UN Global Compact. The Risk and Compliance team monitors the portfolios for alignment with the Norwegian Council on Ethics' exclusion list and addresses potential breaches of our guidelines.

Alongside our internal processes and controls, Holberg's internal auditor focuses on sustainability regulations, helping ensure compliance and continuously improving our processes.

k) Engagement policies

Holberg practices active ownership to influence companies towards improvement. As an active manager with concentrated portfolios, our investment philosophy is based on close follow-up

with the companies in which we invest. Dialogue with management and voting at general meetings are two key tools we use to ensure transparency for our unit holders.

Holberg is an active manager that invests long-term in a concentrated number of portfolio companies per fund. A key principle of our investments is that the business models of portfolio companies must be sustainable over the long term. We also require a high level of confidence in the management's ability to deliver results and protect the interests of shareholders and other stakeholders.

As an active owner and manager, we aim to participate in all general meetings of our portfolio companies. Holberg exercises voting rights with the goal of acting in the best interest of the unit holders of each relevant fund, seeking to provide the highest possible long-term risk-adjusted returns. Through our voting, Holberg seeks to influence underlying companies in the right strategic, business, and sustainability directions. Voting is conducted via ISS's voting platform, either electronically or by proxy with instructions to the chairperson or another representative. Where appropriate, Holberg may form alliances with other voting shareholders to achieve desired objectives.

To ensure effective and responsible use of voting rights, Holberg regularly monitors portfolio companies and builds relationships through meetings and dialogue with management. Portfolio managers aim to ensure that the companies' boards and management teams function effectively and that they have a clear understanding of the companies' business strategies, risk management, environmental and social responsibility, corporate governance, compliance, performance, and capital allocation.

Given our investment philosophy, where we invest in well-managed companies, we usually agree with the board's recommendations in most general meeting matters. However, situations may arise where we disagree with the board's proposals. In such cases, we will vote in line with our own assessment. Holberg may also collaborate with other investors on issues where collective engagement is beneficial in achieving desired outcomes. If a significant disagreement persists on a key issue, we will reassess our investment in the company to safeguard the interests of our unit holders.

Holberg's voting guidelines and an overview of our voting activities at general meetings are available on our website.

l) Designated reference benchmark

No index has been designated as a reference benchmark for attaining the environmental or social characteristics promoted by the fund.

3. Holberg Triton

a) Summary

Holberg is an active fund manager and the fund's objective is to create the highest possible long-term risk adjusted return compared to the fund's investment universe. The portfolio manager seeks to invest in companies with a focus on long-term value creation based on a sustainable business model.

Sustainability is integrated into the fund's investment process where we try to understand whether companies are run in line with common environmental, ethical and social norms. Sustainability is integrated through:

1. Holberg's proprietary ESG model, Tellus
2. Exclusion lists and monitoring
3. Active ownership

The portfolio manager shall be hands on and use all available information to understand each business model of the portfolio companies, including which risk factors and opportunities that may affect the company's management, operations, and value creation. The limited number of companies in each portfolio allows us to gain a deep understanding of the companies and monitor them closely over time.

The fund promotes a wide range of environmental and social characteristics through the integration of Holberg's proprietary ESG model, exclusion lists, and active ownership. We use sustainability indicators from our proprietary sustainability model, Tellus, to assess the achievement of the environmental and social characteristics promoted by the fund.

This document provides a description of the fund's sustainability-related characteristics. More information can be found in the fund's prospectus and on Holberg's website.

b) No sustainable investment objective

This financial product promotes environmental and/or social characteristics but does not have a sustainable investment objective.

The fund is not committed to make any sustainable investments.

c) Environmental or social characteristics of the financial product

Sustainability is integrated into the fund's investment process where we try to understand whether companies are run in line with common environmental, ethical and social norms. The fund promotes a wide range of environmental and social characteristics through the integration of Holberg's proprietary ESG model, exclusion lists, and active ownership.

We seek to promote sustainability through documentation of our investment decisions. With concentrated portfolios we are able to assess each company and its management's approach to long-term sustainable development. Access to reliable data can be deficient, and the perception of sustainability and which ESG criteria each company meet varies.

Holberg wishes to contribute to building knowledge by being an active participant in the debate about how sustainability can improve risk assessments and investment decisions. This will be executed through internal activities (meetings with clients, seminars, etc.), as well as participation and contribution in external forums. Also, we will seek to highlight the topic through our communication with clients and presence in the media.

d) Investment strategy

Holberg is an active fund manager and the fund's objective is to create the highest possible long-term risk adjusted return compared to the fund's investment universe. The portfolio manager seeks to invest in companies with a focus on long-term value creation based on a sustainable business model.

The binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by the fund are:

1. Holberg's proprietary ESG model, Tellus
2. Exclusion lists and monitoring
3. Active ownership

Holberg has developed the Tellus model, which is our proprietary analysis tool for ESG and sustainability and contains common quality requirements for the portfolio companies. This integration gives us a broader understanding of the companies and potential risks. A sustainability related event may affect one single company directly or may have a wider impact on an industry, geographic area, or country, which can affect bigger parts of the portfolio. Integrating sustainability risks into the portfolio construction contributes to create the desired risk adjusted return. Tellus is our fact-based method for systematizing sustainability risks and analyses, and it is an efficient tool to monitor each investment over time.

We also apply a set of exclusions to the portfolio, which is based on the Government Pension Fund Global's guidelines. I addition to this, we have chosen to exclude gambling and pornography from our investment universe. We want our portfolio companies to operate in line with international norms, including UN Global Compact.

We practice active ownership to encourage the companies to improve. As an active fund manager with concentrated portfolios, we have an investment philosophy that is founded on close follow-up of the companies we are invested in. We have dialogs with the company management and vote on general meetings to contribute to transparency for the shareholders. Holberg's voting guidelines and an overview of what we have voted for or against on general meetings is available on our webpage.

The portfolio manager shall be hands on and use all available information to understand each business model of the portfolio companies, including which risk factors that may affect the company's management, operations, and value creation. Leadership trust and clear focus on shareholders are key prerequisites for good corporate governance and these two elements are central in Holberg's research process.

The portfolio manager makes assessments of the portfolio companies' governance practices using Holberg's proprietary sustainability analysis model, Tellus. The following sustainability

indicators are used to measure the attainment of *good governance* practices in the companies the fund invests in:

- Is the board independent of the company's management?
- Are the board incentives long-term and in line with the shareholders' interests?
- Are the board members elected individually?
- The portfolio manager’s assessment of the composition of the board in respect to operation and strategy.
- The portfolio manager’s assessment of the composition of the board in regard to sustainability.
- The portfolio manager’s assessment of the composition of the board in respect to diversity (gender, age, ethnicity).
- Does the management have an ESG-linked bonus scheme?
- Are the management incentives long-term and in line with the shareholders' interests?
- The portfolio manager’s assessment of the size of compensation for managers in absolute terms.
- The portfolio manager’s assessment of the size of compensation to management in relation to the company size.
- Is there one share class in the company?
- The portfolio manager’s assessment of the power balance between share classes, principal owners and minorities.
- Do shareholders usually support the board's proposals on the annual general meeting?
- Are there any anti-takeover mechanisms?

Holberg's guidelines for sustainability and responsible investments, as well as Holberg's guidelines for the use of voting rights, are publicly available on Holberg's website.

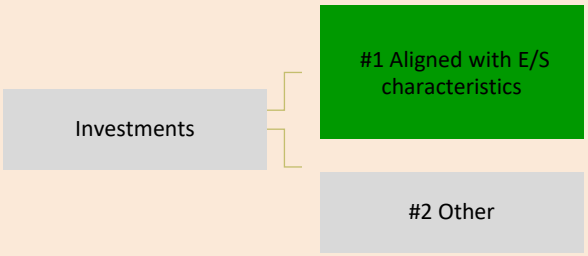
The following sustainability indicators are used to measure the attainment of the *social characteristics* promoted by this financial product:

- The portfolio manager’s assessment of the company's equal pay policy.
- The portfolio manager’s assessment of the company's performance on gender equality and diversity.
- The portfolio manager’s assessment of the company's workforce stability.
- The portfolio manager’s assessment of the quality of the company's HSE reporting.
- The portfolio manager’s assessment of the company's wage policy.
- The portfolio manager’s assessment of the company's guidelines in relation to the right to unionization.
- The portfolio manager’s assessment of the company's insurance and pension schemes.
- The portfolio manager’s assessment of the overall guidelines for monitoring SRI in the company's and the supplier's value chains.
- Has the company been involved in controversies involving local or national authorities?

e) Proportion of investments

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

All of the fund's investments are aligned with the environmental or social characteristics which are defined as the binding elements of the investment strategy.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The fund does not use derivatives to attain the environmental or social characteristics promoted by the financial product.

The fund has not defined a minimum percentage of sustainable investments with an environmental objective that are aligned with the EU Taxonomy.

The fund has not defined a minimum share of investments in transitional and enabling activities.

The fund has not defined a minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy.

The fund has not defined a minimum share of socially sustainable investments.

f) Monitoring of environmental or social characteristics

Tellus is our fact-based method for systematizing sustainability risk and analysis, and an effective way to monitor each individual investment over time. The model consists of approximately 90 quantitative data fields and 40 qualitative questions and checkpoints at the company level within each of the E, S, and G categories. The assessments are carried out by the portfolio manager, based on their knowledge and analysis of the company. A score is calculated at both the company and fund level based on the qualitative assessments.

Quantitative data from external sources, the manager's assessments, and the score are documented and stored in a database in the data warehouse. Summary reports at the company and fund level are also available in PowerBI. The database structure allows tracking of companies' progress over time and enables us to verify whether the companies succeed in achieving their objectives. Targeted analysis at the company level should enable us to manage and understand risks related to sustainability factors. Company analyses are conducted at the time of investment, and the portfolios are reviewed at least annually.

With regard to our exclusion criteria, our risk department ensures that none of the funds are invested in companies that violate these criteria. Our funds are screened by Sustainalytics'

online database for “Global Standard Screening” every three months to ensure compliance with global norms such as the UN Global Compact.In terms of active ownership and voting, we aim to vote at all general meetings. An overview of our voting at general meetings is available on the website.

g) Methodologies

To measure the attainment of each of the environmental or social characteristics promoted by the fund, we use sustainability indicators defined in our proprietary sustainability model, Tellus. For each sustainability indicator we score each portfolio company from 1 to 5. These scores can also be aggregated on fund level.

The following sustainability indicators are used to measure the attainment of the *environmental characteristics* promoted by this fund:

- Does the company have a climate policy?
- Does the company report direct emissions (Scope 1)?
- Does the company report indirect emissions (Scope 2)?
- Does the company have a strategy to reduce their environmental footprint?
- Is the company endorsing the Paris agreement?
- Does the company link their climate goals towards the UN sustainability goals?
- Does to company report to Carbon Disclosure Project (CDP)?
- The portfolio manager’s assessment of the quality of the company's reporting on environmental issues.
- The portfolio manager’s assessment of the company's emissions.
- The portfolio manager’s assessment of the company's emissions compared to peers.
- The portfolio manager’s assessment of the company's implementation of environmental measures.
- The portfolio manager’s assessment of the company's strategy for circular economy.

The following sustainability indicators are used to measure the attainment of the *social characteristics* promoted by this financial product:

- The portfolio manager’s assessment of the company's equal pay policy.
- The portfolio manager’s assessment of the company's performance on gender equality and diversity.
- The portfolio manager’s assessment of the company's workforce stability.
- The portfolio manager’s assessment of the quality of the company's HSE reporting.
- The portfolio manager’s assessment of the company's wage policy.
- The portfolio manager’s assessment of the company's guidelines in relation to the right to unionization.
- The portfolio manager’s assessment of the company's insurance and pension schemes.
- The portfolio manager’s assessment of the overall guidelines for monitoring SRI in the company's and the supplier's value chains.
- Has the company been involved in controversies involving local or national authorities?

Company analyses in Tellus are conducted at the time of investment, and the portfolios are reviewed at least annually. This enables tracking of companies' progress over time and allows us to verify whether the companies succeed in achieving their objectives.

h) Data sources and processing

The portfolio managers are actively engaged and leverage available information to gain a deep understanding of companies' business models, including the risks and opportunities that impact their governance, operations, and value creation. The limited number of companies in each portfolio allows the managers to thoroughly analyze and monitor them over time.

Sources used to gather information include company presentations and reports, meetings with management and other stakeholders, as well as data from Bloomberg, Sustainalytics, and research firms.

In Tellus, we collect quantitative data from Bloomberg across the E, S, and G categories. Portfolio managers perform qualitative assessments based on all available information, including the quantitative data from Bloomberg. These assessments are compared to those from previous years for quality assurance and serve as a basis for ongoing company monitoring.

To produce our annual statement on the principal adverse impacts of investment decisions on sustainability factors, we use data from Sustainalytics. We have integrated this data into Tellus to cross-check it against companies' own reported figures and to increase coverage when data from Sustainalytics is not available.

To screen our funds for compliance with the UN Global Compact, we use Sustainalytics' online database for "Global Standard Screening." Additionally, each portfolio manager independently assesses whether portfolio companies adhere to international norms.

Holberg casts votes at annual general meetings and extraordinary general meetings through the ISS voting platform, but all decisions are made by Holberg.

In general, Holberg does not use estimated data in its sustainability reports, ensuring that the reports are based on actual, collected data.

i) Limitations to methodologies and data

There are certain limitations in the methods used to measure the achievement of the environmental or social characteristics promoted by the fund. For example, the models and analytical tools employed may rely on assumptions and estimates that may not fully capture all the nuances of environmental or social impacts. Additionally, applying these methods consistently across different funds, sectors, or geographical regions can be challenging due to varying standards and practices.

In Tellus, we have defined what a score of 1-5 represents for various ESG factors, reducing the scope for subjective assessments by portfolio managers. This also improves comparability over time, as the definitions remain consistent. The portfolio managers analyze and assess all companies in each portfolio, ensuring good traceability, reviewing data reported by companies, using their own knowledge of the companies, and validating these assessments with external sources.

The data sources used to measure environmental or social characteristics may have limitations regarding availability, completeness, and accuracy. For example, there is significant uncertainty related to companies' Scope 3 emissions due to variable data quality, estimates, and completeness. Data may be self-reported by companies, leading to inconsistencies. Comparisons can also be challenging if the data is not based on the same methodology. Furthermore, there may be gaps in data coverage for certain metrics or for companies operating in regions with less stringent reporting requirements. The introduction of the EU's Corporate Sustainability Reporting Directive (CSRD) is expected to address some of these challenges by establishing a common framework for sustainability reporting by companies subject to the directive.

In Tellus, data from external sources is compared to companies' own reported information to cross-check accuracy. When data from different providers is inconsistent, we conduct additional internal research and analysis of the company and potential issues. If gaps in the data are identified, the portfolio manager may initiate dialogue to gather more information.

The availability of reliable, consistent, and comprehensive sustainability data remains one of the biggest challenges in sustainability reporting, but the demand for more and better sustainability data is growing, partly driven by new regulations. Despite the limitations in methodology and data, Holberg has measures in place to ensure that the environmental and social characteristics promoted by the funds are not significantly affected. In addition to quantitative data, portfolio managers conduct many qualitative analyses. We work to improve data quality through cross-referencing multiple data sources and making comparisons across companies. The framework surrounding Tellus is also regularly reviewed and updated.

j) Due diligence

Holberg conducts due diligence assessments for all companies in the fund to ensure that sustainability risks and opportunities are properly considered in investment decisions. These assessments take a comprehensive approach to integrating sustainability and responsibility into the investment process. Portfolio managers evaluate environmental, social, and governance (ESG) factors to ensure that investments align with our guidelines.

Holberg uses internal controls to ensure the reliability of the assessment process. This includes applying consistent assessment criteria through the Tellus system, which guarantees a uniform ESG review across all our mandates. Additionally, we perform quarterly screenings of our portfolios against Sustainalytics' database for "Global Standard Screening" to monitor compliance with the UN Global Compact. The Risk and Compliance team monitors the portfolios for alignment with the Norwegian Council on Ethics' exclusion list and addresses potential breaches of our guidelines.

Alongside our internal processes and controls, Holberg's internal auditor focuses on sustainability regulations, helping ensure compliance and continuously improving our processes.

k) Engagement policies

Holberg practices active ownership to influence companies towards improvement. As an active manager with concentrated portfolios, our investment philosophy is based on close follow-up

with the companies in which we invest. Dialogue with management and voting at general meetings are two key tools we use to ensure transparency for our unit holders.

Holberg is an active manager that invests long-term in a concentrated number of portfolio companies per fund. A key principle of our investments is that the business models of portfolio companies must be sustainable over the long term. We also require a high level of confidence in the management's ability to deliver results and protect the interests of shareholders and other stakeholders.

As an active owner and manager, we aim to participate in all general meetings of our portfolio companies. Holberg exercises voting rights with the goal of acting in the best interest of the unit holders of each relevant fund, seeking to provide the highest possible long-term risk-adjusted returns. Through our voting, Holberg seeks to influence underlying companies in the right strategic, business, and sustainability directions. Voting is conducted via ISS's voting platform, either electronically or by proxy with instructions to the chairperson or another representative. Where appropriate, Holberg may form alliances with other voting shareholders to achieve desired objectives.

To ensure effective and responsible use of voting rights, Holberg regularly monitors portfolio companies and builds relationships through meetings and dialogue with management. Portfolio managers aim to ensure that the companies' boards and management teams function effectively and that they have a clear understanding of the companies' business strategies, risk management, environmental and social responsibility, corporate governance, compliance, performance, and capital allocation.

Given our investment philosophy, where we invest in well-managed companies, we usually agree with the board's recommendations in most general meeting matters. However, situations may arise where we disagree with the board's proposals. In such cases, we will vote in line with our own assessment. Holberg may also collaborate with other investors on issues where collective engagement is beneficial in achieving desired outcomes. If a significant disagreement persists on a key issue, we will reassess our investment in the company to safeguard the interests of our unit holders.

Holberg's voting guidelines and an overview of our voting activities at general meetings are available on our website.

l) Designated reference benchmark

No index has been designated as a reference benchmark for attaining the environmental or social characteristics promoted by the fund.

4. Holberg Norden

a) Summary

Holberg is an active fund manager and the fund's objective is to create the highest possible long-term risk adjusted return compared to the fund's investment universe. The portfolio manager seeks to invest in companies with a focus on long-term value creation based on a sustainable business model.

Sustainability is integrated into the fund's investment process where we try to understand whether companies are run in line with common environmental, ethical and social norms. Sustainability is integrated through:

1. Holberg's proprietary ESG model, Tellus
2. Exclusion lists and monitoring
3. Active ownership

The portfolio manager shall be hands on and use all available information to understand each business model of the portfolio companies, including which risk factors and opportunities that may affect the company's management, operations, and value creation. The limited number of companies in each portfolio allows us to gain a deep understanding of the companies and monitor them closely over time.

The fund promotes a wide range of environmental and social characteristics through the integration of Holberg's proprietary ESG model, exclusion lists, and active ownership. We use sustainability indicators from our proprietary sustainability model, Tellus, to assess the achievement of the environmental and social characteristics promoted by the fund.

This document provides a description of the fund's sustainability-related characteristics. More information can be found in the fund's prospectus and on Holberg's website.

b) No sustainable investment objective

This financial product promotes environmental and/or social characteristics but does not have a sustainable investment objective.

The fund is not committed to make any sustainable investments.

c) Environmental or social characteristics of the financial product

Sustainability is integrated into the fund's investment process where we try to understand whether companies are run in line with common environmental, ethical and social norms. The fund promotes a wide range of environmental and social characteristics through the integration of Holberg's proprietary ESG model, exclusion lists, and active ownership.

We seek to promote sustainability through documentation of our investment decisions. With concentrated portfolios we are able to assess each company and its management's approach to long-term sustainable development. Access to reliable data can be deficient, and the perception of sustainability and which ESG criteria each company meet varies.

Holberg wishes to contribute to building knowledge by being an active participant in the debate about how sustainability can improve risk assessments and investment decisions. This will be executed through internal activities (meetings with clients, seminars, etc.), as well as participation and contribution in external forums. Also, we will seek to highlight the topic through our communication with clients and presence in the media.

d) Investment strategy

Holberg is an active fund manager and the fund's objective is to create the highest possible long-term risk adjusted return compared to the fund's investment universe. The portfolio manager seeks to invest in companies with a focus on long-term value creation based on a sustainable business model.

The binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by the fund are:

1. Holberg's proprietary ESG model, Tellus
2. Exclusion lists and monitoring
3. Active ownership

Holberg has developed the Tellus model, which is our proprietary analysis tool for ESG and sustainability and contains common quality requirements for the portfolio companies. This integration gives us a broader understanding of the companies and potential risks. A sustainability related event may affect one single company directly or may have a wider impact on an industry, geographic area, or country, which can affect bigger parts of the portfolio. Integrating sustainability risks into the portfolio construction contributes to create the desired risk adjusted return. Tellus is our fact-based method for systematizing sustainability risks and analyses, and it is an efficient tool to monitor each investment over time.

We also apply a set of exclusions to the portfolio, which is based on the Government Pension Fund Global's guidelines. I addition to this, we have chosen to exclude gambling and pornography from our investment universe. We want our portfolio companies to operate in line with international norms, including UN Global Compact.

We practice active ownership to encourage the companies to improve. As an active fund manager with concentrated portfolios, we have an investment philosophy that is founded on close follow-up of the companies we are invested in. We have dialogs with the company management and vote on general meetings to contribute to transparency for the shareholders. Holberg's voting guidelines and an overview of what we have voted for or against on general meetings is available on our webpage.

The portfolio manager shall be hands on and use all available information to understand each business model of the portfolio companies, including which risk factors that may affect the company's management, operations, and value creation. Leadership trust and clear focus on shareholders are key prerequisites for good corporate governance and these two elements are central in Holberg's research process.

The portfolio manager makes assessments of the portfolio companies' governance practices using Holberg's proprietary sustainability analysis model, Tellus. The following sustainability

indicators are used to measure the attainment of *good governance* practices in the companies the fund invests in:

- Is the board independent of the company's management?
- Are the board incentives long-term and in line with the shareholders' interests?
- Are the board members elected individually?
- The portfolio manager’s assessment of the composition of the board in respect to operation and strategy.
- The portfolio manager’s assessment of the composition of the board in regard to sustainability.
- The portfolio manager’s assessment of the composition of the board in respect to diversity (gender, age, ethnicity).
- Does the management have an ESG-linked bonus scheme?
- Are the management incentives long-term and in line with the shareholders' interests?
- The portfolio manager’s assessment of the size of compensation for managers in absolute terms.
- The portfolio manager’s assessment of the size of compensation to management in relation to the company size.
- Is there one share class in the company?
- The portfolio manager’s assessment of the power balance between share classes, principal owners and minorities.
- Do shareholders usually support the board's proposals on the annual general meeting?
- Are there any anti-takeover mechanisms?

Holberg's guidelines for sustainability and responsible investments, as well as Holberg's guidelines for the use of voting rights, are publicly available on Holberg's website.

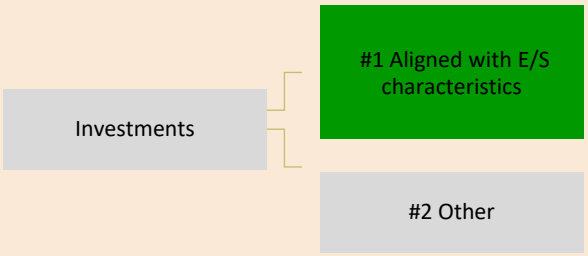
The following sustainability indicators are used to measure the attainment of the *social characteristics* promoted by this financial product:

- The portfolio manager’s assessment of the company's equal pay policy.
- The portfolio manager’s assessment of the company's performance on gender equality and diversity.
- The portfolio manager’s assessment of the company's workforce stability.
- The portfolio manager’s assessment of the quality of the company's HSE reporting.
- The portfolio manager’s assessment of the company's wage policy.
- The portfolio manager’s assessment of the company's guidelines in relation to the right to unionization.
- The portfolio manager’s assessment of the company's insurance and pension schemes.
- The portfolio manager’s assessment of the overall guidelines for monitoring SRI in the company's and the supplier's value chains.
- Has the company been involved in controversies involving local or national authorities?

e) Proportion of investments

The fund invests in shares listed on the Nordic stock exchanges or regulated markets.

All of the fund's investments are aligned with the environmental or social characteristics which are defined as the binding elements of the investment strategy.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The fund does not use derivatives to attain the environmental or social characteristics promoted by the financial product.

The fund has not defined a minimum percentage of sustainable investments with an environmental objective that are aligned with the EU Taxonomy.

The fund has not defined a minimum share of investments in transitional and enabling activities.

The fund has not defined a minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy.

The fund has not defined a minimum share of socially sustainable investments.

f) Monitoring of environmental or social characteristics

Tellus is our fact-based method for systematizing sustainability risk and analysis, and an effective way to monitor each individual investment over time. The model consists of approximately 90 quantitative data fields and 40 qualitative questions and checkpoints at the company level within each of the E, S, and G categories. The assessments are carried out by the portfolio manager, based on their knowledge and analysis of the company. A score is calculated at both the company and fund level based on the qualitative assessments.

Quantitative data from external sources, the manager's assessments, and the score are documented and stored in a database in the data warehouse. Summary reports at the company and fund level are also available in PowerBI. The database structure allows tracking of companies' progress over time and enables us to verify whether the companies succeed in achieving their objectives. Targeted analysis at the company level should enable us to manage and understand risks related to sustainability factors. Company analyses are conducted at the time of investment, and the portfolios are reviewed at least annually.

With regard to our exclusion criteria, our risk department ensures that none of the funds are invested in companies that violate these criteria. Our funds are screened by Sustainalytics'

online database for “Global Standard Screening” every three months to ensure compliance with global norms such as the UN Global Compact.In terms of active ownership and voting, we aim to vote at all general meetings. An overview of our voting at general meetings is available on the website.

g) Methodologies

To measure the attainment of each of the environmental or social characteristics promoted by the fund, we use sustainability indicators defined in our proprietary sustainability model, Tellus. For each sustainability indicator we score each portfolio company from 1 to 5. These scores can also be aggregated on fund level.

The following sustainability indicators are used to measure the attainment of the *environmental characteristics* promoted by this fund:

- Does the company have a climate policy?
- Does the company report direct emissions (Scope 1)?
- Does the company report indirect emissions (Scope 2)?
- Does the company have a strategy to reduce their environmental footprint?
- Is the company endorsing the Paris agreement?
- Does the company link their climate goals towards the UN sustainability goals?
- Does to company report to Carbon Disclosure Project (CDP)?
- The portfolio manager’s assessment of the quality of the company's reporting on environmental issues.
- The portfolio manager’s assessment of the company's emissions.
- The portfolio manager’s assessment of the company's emissions compared to peers.
- The portfolio manager’s assessment of the company's implementation of environmental measures.
- The portfolio manager’s assessment of the company's strategy for circular economy.

The following sustainability indicators are used to measure the attainment of the *social characteristics* promoted by this financial product:

- The portfolio manager’s assessment of the company's equal pay policy.
- The portfolio manager’s assessment of the company's performance on gender equality and diversity.
- The portfolio manager’s assessment of the company's workforce stability.
- The portfolio manager’s assessment of the quality of the company's HSE reporting.
- The portfolio manager’s assessment of the company's wage policy.
- The portfolio manager’s assessment of the company's guidelines in relation to the right to unionization.
- The portfolio manager’s assessment of the company's insurance and pension schemes.
- The portfolio manager’s assessment of the overall guidelines for monitoring SRI in the company's and the supplier's value chains.
- Has the company been involved in controversies involving local or national authorities?

Company analyses in Tellus are conducted at the time of investment, and the portfolios are reviewed at least annually. This enables tracking of companies' progress over time and allows us to verify whether the companies succeed in achieving their objectives.

h) Data sources and processing

The portfolio managers are actively engaged and leverage available information to gain a deep understanding of companies' business models, including the risks and opportunities that impact their governance, operations, and value creation. The limited number of companies in each portfolio allows the managers to thoroughly analyze and monitor them over time.

Sources used to gather information include company presentations and reports, meetings with management and other stakeholders, as well as data from Bloomberg, Sustainalytics, and research firms.

In Tellus, we collect quantitative data from Bloomberg across the E, S, and G categories. Portfolio managers perform qualitative assessments based on all available information, including the quantitative data from Bloomberg. These assessments are compared to those from previous years for quality assurance and serve as a basis for ongoing company monitoring.

To produce our annual statement on the principal adverse impacts of investment decisions on sustainability factors, we use data from Sustainalytics. We have integrated this data into Tellus to cross-check it against companies' own reported figures and to increase coverage when data from Sustainalytics is not available.

To screen our funds for compliance with the UN Global Compact, we use Sustainalytics' online database for "Global Standard Screening." Additionally, each portfolio manager independently assesses whether portfolio companies adhere to international norms.

Holberg casts votes at annual general meetings and extraordinary general meetings through the ISS voting platform, but all decisions are made by Holberg.

In general, Holberg does not use estimated data in its sustainability reports, ensuring that the reports are based on actual, collected data.

i) Limitations to methodologies and data

There are certain limitations in the methods used to measure the achievement of the environmental or social characteristics promoted by the fund. For example, the models and analytical tools employed may rely on assumptions and estimates that may not fully capture all the nuances of environmental or social impacts. Additionally, applying these methods consistently across different funds, sectors, or geographical regions can be challenging due to varying standards and practices.

In Tellus, we have defined what a score of 1-5 represents for various ESG factors, reducing the scope for subjective assessments by portfolio managers. This also improves comparability over time, as the definitions remain consistent. The portfolio managers analyze and assess all companies in each portfolio, ensuring good traceability, reviewing data reported by companies, using their own knowledge of the companies, and validating these assessments with external sources.

The data sources used to measure environmental or social characteristics may have limitations regarding availability, completeness, and accuracy. For example, there is significant uncertainty related to companies' Scope 3 emissions due to variable data quality, estimates, and completeness. Data may be self-reported by companies, leading to inconsistencies. Comparisons can also be challenging if the data is not based on the same methodology. Furthermore, there may be gaps in data coverage for certain metrics or for companies operating in regions with less stringent reporting requirements. The introduction of the EU's Corporate Sustainability Reporting Directive (CSRD) is expected to address some of these challenges by establishing a common framework for sustainability reporting by companies subject to the directive.

In Tellus, data from external sources is compared to companies' own reported information to cross-check accuracy. When data from different providers is inconsistent, we conduct additional internal research and analysis of the company and potential issues. If gaps in the data are identified, the portfolio manager may initiate dialogue to gather more information.

The availability of reliable, consistent, and comprehensive sustainability data remains one of the biggest challenges in sustainability reporting, but the demand for more and better sustainability data is growing, partly driven by new regulations. Despite the limitations in methodology and data, Holberg has measures in place to ensure that the environmental and social characteristics promoted by the funds are not significantly affected. In addition to quantitative data, portfolio managers conduct many qualitative analyses. We work to improve data quality through cross-referencing multiple data sources and making comparisons across companies. The framework surrounding Tellus is also regularly reviewed and updated.

j) Due diligence

Holberg conducts due diligence assessments for all companies in the fund to ensure that sustainability risks and opportunities are properly considered in investment decisions. These assessments take a comprehensive approach to integrating sustainability and responsibility into the investment process. Portfolio managers evaluate environmental, social, and governance (ESG) factors to ensure that investments align with our guidelines.

Holberg uses internal controls to ensure the reliability of the assessment process. This includes applying consistent assessment criteria through the Tellus system, which guarantees a uniform ESG review across all our mandates. Additionally, we perform quarterly screenings of our portfolios against Sustainalytics' database for "Global Standard Screening" to monitor compliance with the UN Global Compact. The Risk and Compliance team monitors the portfolios for alignment with the Norwegian Council on Ethics' exclusion list and addresses potential breaches of our guidelines.

Alongside our internal processes and controls, Holberg's internal auditor focuses on sustainability regulations, helping ensure compliance and continuously improving our processes.

k) Engagement policies

Holberg practices active ownership to influence companies towards improvement. As an active manager with concentrated portfolios, our investment philosophy is based on close follow-up

with the companies in which we invest. Dialogue with management and voting at general meetings are two key tools we use to ensure transparency for our unit holders.

Holberg is an active manager that invests long-term in a concentrated number of portfolio companies per fund. A key principle of our investments is that the business models of portfolio companies must be sustainable over the long term. We also require a high level of confidence in the management's ability to deliver results and protect the interests of shareholders and other stakeholders.

As an active owner and manager, we aim to participate in all general meetings of our portfolio companies. Holberg exercises voting rights with the goal of acting in the best interest of the unit holders of each relevant fund, seeking to provide the highest possible long-term risk-adjusted returns. Through our voting, Holberg seeks to influence underlying companies in the right strategic, business, and sustainability directions. Voting is conducted via ISS's voting platform, either electronically or by proxy with instructions to the chairperson or another representative. Where appropriate, Holberg may form alliances with other voting shareholders to achieve desired objectives.

To ensure effective and responsible use of voting rights, Holberg regularly monitors portfolio companies and builds relationships through meetings and dialogue with management. Portfolio managers aim to ensure that the companies' boards and management teams function effectively and that they have a clear understanding of the companies' business strategies, risk management, environmental and social responsibility, corporate governance, compliance, performance, and capital allocation.

Given our investment philosophy, where we invest in well-managed companies, we usually agree with the board's recommendations in most general meeting matters. However, situations may arise where we disagree with the board's proposals. In such cases, we will vote in line with our own assessment. Holberg may also collaborate with other investors on issues where collective engagement is beneficial in achieving desired outcomes. If a significant disagreement persists on a key issue, we will reassess our investment in the company to safeguard the interests of our unit holders.

Holberg's voting guidelines and an overview of our voting activities at general meetings are available on our website.

l) Designated reference benchmark

No index has been designated as a reference benchmark for attaining the environmental or social characteristics promoted by the fund.

5. Holberg Norge

a) Summary

Holberg is an active fund manager and the fund's objective is to create the highest possible long-term risk adjusted return compared to the fund's investment universe. The portfolio manager seeks to invest in companies with a focus on long-term value creation based on a sustainable business model.

Sustainability is integrated into the fund's investment process where we try to understand whether companies are run in line with common environmental, ethical and social norms. Sustainability is integrated through:

1. Holberg's proprietary ESG model, Tellus
2. Exclusion lists and monitoring
3. Active ownership

The portfolio manager shall be hands on and use all available information to understand each business model of the portfolio companies, including which risk factors and opportunities that may affect the company's management, operations, and value creation. The limited number of companies in each portfolio allows us to gain a deep understanding of the companies and monitor them closely over time.

The fund promotes a wide range of environmental and social characteristics through the integration of Holberg's proprietary ESG model, exclusion lists, and active ownership. We use sustainability indicators from our proprietary sustainability model, Tellus, to assess the achievement of the environmental and social characteristics promoted by the fund.

This document provides a description of the fund's sustainability-related characteristics. More information can be found in the fund's prospectus and on Holberg's website.

b) No sustainable investment objective

This financial product promotes environmental and/or social characteristics but does not have a sustainable investment objective.

The fund is not committed to make any sustainable investments.

c) Environmental or social characteristics of the financial product

Sustainability is integrated into the fund's investment process where we try to understand whether companies are run in line with common environmental, ethical and social norms. The fund promotes a wide range of environmental and social characteristics through the integration of Holberg's proprietary ESG model, exclusion lists, and active ownership.

We seek to promote sustainability through documentation of our investment decisions. With concentrated portfolios we are able to assess each company and its management's approach to long-term sustainable development. Access to reliable data can be deficient, and the perception of sustainability and which ESG criteria each company meet varies.

Holberg wishes to contribute to building knowledge by being an active participant in the debate about how sustainability can improve risk assessments and investment decisions. This will be executed through internal activities (meetings with clients, seminars, etc.), as well as participation and contribution in external forums. Also, we will seek to highlight the topic through our communication with clients and presence in the media.

d) Investment strategy

Holberg is an active fund manager and the fund's objective is to create the highest possible long-term risk adjusted return compared to the fund's investment universe. The portfolio manager seeks to invest in companies with a focus on long-term value creation based on a sustainable business model.

The binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by the fund are:

1. Holberg's proprietary ESG model, Tellus
2. Exclusion lists and monitoring
3. Active ownership

Holberg has developed the Tellus model, which is our proprietary analysis tool for ESG and sustainability and contains common quality requirements for the portfolio companies. This integration gives us a broader understanding of the companies and potential risks. A sustainability related event may affect one single company directly or may have a wider impact on an industry, geographic area, or country, which can affect bigger parts of the portfolio. Integrating sustainability risks into the portfolio construction contributes to create the desired risk adjusted return. Tellus is our fact-based method for systematizing sustainability risks and analyses, and it is an efficient tool to monitor each investment over time.

We also apply a set of exclusions to the portfolio, which is based on the Government Pension Fund Global's guidelines. I addition to this, we have chosen to exclude gambling and pornography from our investment universe. We want our portfolio companies to operate in line with international norms, including UN Global Compact.

We practice active ownership to encourage the companies to improve. As an active fund manager with concentrated portfolios, we have an investment philosophy that is founded on close follow-up of the companies we are invested in. We have dialogs with the company management and vote on general meetings to contribute to transparency for the shareholders. Holberg's voting guidelines and an overview of what we have voted for or against on general meetings is available on our webpage.

The portfolio manager shall be hands on and use all available information to understand each business model of the portfolio companies, including which risk factors that may affect the company's management, operations, and value creation. Leadership trust and clear focus on shareholders are key prerequisites for good corporate governance and these two elements are central in Holberg's research process.

The portfolio manager makes assessments of the portfolio companies' governance practices using Holberg's proprietary sustainability analysis model, Tellus. The following sustainability

indicators are used to measure the attainment of *good governance* practices in the companies the fund invests in:

- Is the board independent of the company's management?
- Are the board incentives long-term and in line with the shareholders' interests?
- Are the board members elected individually?
- The portfolio manager’s assessment of the composition of the board in respect to operation and strategy.
- The portfolio manager’s assessment of the composition of the board in regard to sustainability.
- The portfolio manager’s assessment of the composition of the board in respect to diversity (gender, age, ethnicity).
- Does the management have an ESG-linked bonus scheme?
- Are the management incentives long-term and in line with the shareholders' interests?
- The portfolio manager’s assessment of the size of compensation for managers in absolute terms.
- The portfolio manager’s assessment of the size of compensation to management in relation to the company size.
- Is there one share class in the company?
- The portfolio manager’s assessment of the power balance between share classes, principal owners and minorities.
- Do shareholders usually support the board's proposals on the annual general meeting?
- Are there any anti-takeover mechanisms?

Holberg's guidelines for sustainability and responsible investments, as well as Holberg's guidelines for the use of voting rights, are publicly available on Holberg's website.

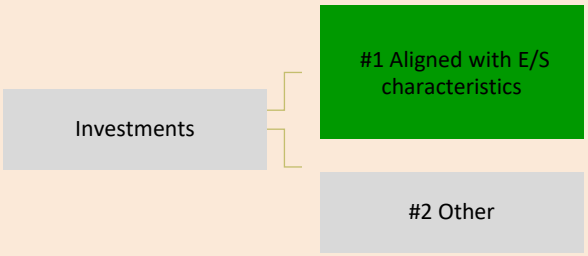
The following sustainability indicators are used to measure the attainment of the *social characteristics* promoted by this financial product:

- The portfolio manager’s assessment of the company's equal pay policy.
- The portfolio manager’s assessment of the company's performance on gender equality and diversity.
- The portfolio manager’s assessment of the company's workforce stability.
- The portfolio manager’s assessment of the quality of the company's HSE reporting.
- The portfolio manager’s assessment of the company's wage policy.
- The portfolio manager’s assessment of the company's guidelines in relation to the right to unionization.
- The portfolio manager’s assessment of the company's insurance and pension schemes.
- The portfolio manager’s assessment of the overall guidelines for monitoring SRI in the company's and the supplier's value chains.
- Has the company been involved in controversies involving local or national authorities?

e) Proportion of investments

The fund invests in shares listed on Norwegian stock exchanges or regulated markets.

All of the fund's investments are aligned with the environmental or social characteristics which are defined as the binding elements of the investment strategy.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The fund does not use derivatives to attain the environmental or social characteristics promoted by the financial product.

The fund has not defined a minimum percentage of sustainable investments with an environmental objective that are aligned with the EU Taxonomy.

The fund has not defined a minimum share of investments in transitional and enabling activities.

The fund has not defined a minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy.

The fund has not defined a minimum share of socially sustainable investments.

f) Monitoring of environmental or social characteristics

Tellus is our fact-based method for systematizing sustainability risk and analysis, and an effective way to monitor each individual investment over time. The model consists of approximately 90 quantitative data fields and 40 qualitative questions and checkpoints at the company level within each of the E, S, and G categories. The assessments are carried out by the portfolio manager, based on their knowledge and analysis of the company. A score is calculated at both the company and fund level based on the qualitative assessments.

Quantitative data from external sources, the manager's assessments, and the score are documented and stored in a database in the data warehouse. Summary reports at the company and fund level are also available in PowerBI. The database structure allows tracking of companies' progress over time and enables us to verify whether the companies succeed in achieving their objectives. Targeted analysis at the company level should enable us to manage and understand risks related to sustainability factors. Company analyses are conducted at the time of investment, and the portfolios are reviewed at least annually.

With regard to our exclusion criteria, our risk department ensures that none of the funds are invested in companies that violate these criteria. Our funds are screened by Sustainalytics'

online database for “Global Standard Screening” every three months to ensure compliance with global norms such as the UN Global Compact.In terms of active ownership and voting, we aim to vote at all general meetings. An overview of our voting at general meetings is available on the website.

g) Methodologies

To measure the attainment of each of the environmental or social characteristics promoted by the fund, we use sustainability indicators defined in our proprietary sustainability model, Tellus. For each sustainability indicator we score each portfolio company from 1 to 5. These scores can also be aggregated on fund level.

The following sustainability indicators are used to measure the attainment of the *environmental characteristics* promoted by this fund:

- Does the company have a climate policy?
- Does the company report direct emissions (Scope 1)?
- Does the company report indirect emissions (Scope 2)?
- Does the company have a strategy to reduce their environmental footprint?
- Is the company endorsing the Paris agreement?
- Does the company link their climate goals towards the UN sustainability goals?
- Does to company report to Carbon Disclosure Project (CDP)?
- The portfolio manager’s assessment of the quality of the company's reporting on environmental issues.
- The portfolio manager’s assessment of the company's emissions.
- The portfolio manager’s assessment of the company's emissions compared to peers.
- The portfolio manager’s assessment of the company's implementation of environmental measures.
- The portfolio manager’s assessment of the company's strategy for circular economy.

The following sustainability indicators are used to measure the attainment of the *social characteristics* promoted by this financial product:

- The portfolio manager’s assessment of the company's equal pay policy.
- The portfolio manager’s assessment of the company's performance on gender equality and diversity.
- The portfolio manager’s assessment of the company's workforce stability.
- The portfolio manager’s assessment of the quality of the company's HSE reporting.
- The portfolio manager’s assessment of the company's wage policy.
- The portfolio manager’s assessment of the company's guidelines in relation to the right to unionization.
- The portfolio manager’s assessment of the company's insurance and pension schemes.
- The portfolio manager’s assessment of the overall guidelines for monitoring SRI in the company's and the supplier's value chains.
- Has the company been involved in controversies involving local or national authorities?

Company analyses in Tellus are conducted at the time of investment, and the portfolios are reviewed at least annually. This enables tracking of companies' progress over time and allows us to verify whether the companies succeed in achieving their objectives.

h) Data sources and processing

The portfolio managers are actively engaged and leverage available information to gain a deep understanding of companies' business models, including the risks and opportunities that impact their governance, operations, and value creation. The limited number of companies in each portfolio allows the managers to thoroughly analyze and monitor them over time.

Sources used to gather information include company presentations and reports, meetings with management and other stakeholders, as well as data from Bloomberg, Sustainalytics, and research firms.

In Tellus, we collect quantitative data from Bloomberg across the E, S, and G categories. Portfolio managers perform qualitative assessments based on all available information, including the quantitative data from Bloomberg. These assessments are compared to those from previous years for quality assurance and serve as a basis for ongoing company monitoring.

To produce our annual statement on the principal adverse impacts of investment decisions on sustainability factors, we use data from Sustainalytics. We have integrated this data into Tellus to cross-check it against companies' own reported figures and to increase coverage when data from Sustainalytics is not available.

To screen our funds for compliance with the UN Global Compact, we use Sustainalytics' online database for "Global Standard Screening." Additionally, each portfolio manager independently assesses whether portfolio companies adhere to international norms.

Holberg casts votes at annual general meetings and extraordinary general meetings through the ISS voting platform, but all decisions are made by Holberg.

In general, Holberg does not use estimated data in its sustainability reports, ensuring that the reports are based on actual, collected data.

i) Limitations to methodologies and data

There are certain limitations in the methods used to measure the achievement of the environmental or social characteristics promoted by the fund. For example, the models and analytical tools employed may rely on assumptions and estimates that may not fully capture all the nuances of environmental or social impacts. Additionally, applying these methods consistently across different funds, sectors, or geographical regions can be challenging due to varying standards and practices.

In Tellus, we have defined what a score of 1-5 represents for various ESG factors, reducing the scope for subjective assessments by portfolio managers. This also improves comparability over time, as the definitions remain consistent. The portfolio managers analyze and assess all companies in each portfolio, ensuring good traceability, reviewing data reported by companies, using their own knowledge of the companies, and validating these assessments with external sources.

The data sources used to measure environmental or social characteristics may have limitations regarding availability, completeness, and accuracy. For example, there is significant uncertainty related to companies' Scope 3 emissions due to variable data quality, estimates, and completeness. Data may be self-reported by companies, leading to inconsistencies. Comparisons can also be challenging if the data is not based on the same methodology. Furthermore, there may be gaps in data coverage for certain metrics or for companies operating in regions with less stringent reporting requirements. The introduction of the EU's Corporate Sustainability Reporting Directive (CSRD) is expected to address some of these challenges by establishing a common framework for sustainability reporting by companies subject to the directive.

In Tellus, data from external sources is compared to companies' own reported information to cross-check accuracy. When data from different providers is inconsistent, we conduct additional internal research and analysis of the company and potential issues. If gaps in the data are identified, the portfolio manager may initiate dialogue to gather more information.

The availability of reliable, consistent, and comprehensive sustainability data remains one of the biggest challenges in sustainability reporting, but the demand for more and better sustainability data is growing, partly driven by new regulations. Despite the limitations in methodology and data, Holberg has measures in place to ensure that the environmental and social characteristics promoted by the funds are not significantly affected. In addition to quantitative data, portfolio managers conduct many qualitative analyses. We work to improve data quality through cross-referencing multiple data sources and making comparisons across companies. The framework surrounding Tellus is also regularly reviewed and updated.

j) Due diligence

Holberg conducts due diligence assessments for all companies in the fund to ensure that sustainability risks and opportunities are properly considered in investment decisions. These assessments take a comprehensive approach to integrating sustainability and responsibility into the investment process. Portfolio managers evaluate environmental, social, and governance (ESG) factors to ensure that investments align with our guidelines.

Holberg uses internal controls to ensure the reliability of the assessment process. This includes applying consistent assessment criteria through the Tellus system, which guarantees a uniform ESG review across all our mandates. Additionally, we perform quarterly screenings of our portfolios against Sustainalytics' database for "Global Standard Screening" to monitor compliance with the UN Global Compact. The Risk and Compliance team monitors the portfolios for alignment with the Norwegian Council on Ethics' exclusion list and addresses potential breaches of our guidelines.

Alongside our internal processes and controls, Holberg's internal auditor focuses on sustainability regulations, helping ensure compliance and continuously improving our processes.

k) Engagement policies

Holberg practices active ownership to influence companies towards improvement. As an active manager with concentrated portfolios, our investment philosophy is based on close follow-up

with the companies in which we invest. Dialogue with management and voting at general meetings are two key tools we use to ensure transparency for our unit holders.

Holberg is an active manager that invests long-term in a concentrated number of portfolio companies per fund. A key principle of our investments is that the business models of portfolio companies must be sustainable over the long term. We also require a high level of confidence in the management's ability to deliver results and protect the interests of shareholders and other stakeholders.

As an active owner and manager, we aim to participate in all general meetings of our portfolio companies. Holberg exercises voting rights with the goal of acting in the best interest of the unit holders of each relevant fund, seeking to provide the highest possible long-term risk-adjusted returns. Through our voting, Holberg seeks to influence underlying companies in the right strategic, business, and sustainability directions. Voting is conducted via ISS's voting platform, either electronically or by proxy with instructions to the chairperson or another representative. Where appropriate, Holberg may form alliances with other voting shareholders to achieve desired objectives.

To ensure effective and responsible use of voting rights, Holberg regularly monitors portfolio companies and builds relationships through meetings and dialogue with management. Portfolio managers aim to ensure that the companies' boards and management teams function effectively and that they have a clear understanding of the companies' business strategies, risk management, environmental and social responsibility, corporate governance, compliance, performance, and capital allocation.

Given our investment philosophy, where we invest in well-managed companies, we usually agree with the board's recommendations in most general meeting matters. However, situations may arise where we disagree with the board's proposals. In such cases, we will vote in line with our own assessment. Holberg may also collaborate with other investors on issues where collective engagement is beneficial in achieving desired outcomes. If a significant disagreement persists on a key issue, we will reassess our investment in the company to safeguard the interests of our unit holders.

Holberg's voting guidelines and an overview of our voting activities at general meetings are available on our website.

l) Designated reference benchmark

No index has been designated as a reference benchmark for attaining the environmental or social characteristics promoted by the fund.

6. Holberg Kreditt

a) Summary

Holberg is an active fund manager and the fund's objective is to create the highest possible long-term risk adjusted return compared to the fund's investment universe. The portfolio manager seeks to invest in companies with a focus on long-term value creation based on a sustainable business model.

Sustainability is integrated into the fund's investment process where we try to understand whether companies are run in line with common environmental, ethical and social norms. Sustainability is integrated through:

1. Holberg's proprietary ESG model, Tellus
2. Exclusion lists and monitoring
3. Active ownership

The portfolio manager shall be hands on and use all available information to understand each business model of the portfolio companies, including which risk factors and opportunities that may affect the company's management, operations, and value creation. The limited number of companies in each portfolio allows us to gain a deep understanding of the companies and monitor them closely over time.

The fund promotes a wide range of environmental and social characteristics through the integration of Holberg's proprietary ESG model, exclusion lists, and active ownership. We use sustainability indicators from our proprietary sustainability model, Tellus, to assess the achievement of the environmental and social characteristics promoted by the fund.

This document provides a description of the fund's sustainability-related characteristics. More information can be found in the fund's prospectus and on Holberg's website.

b) No sustainable investment objective

This financial product promotes environmental and/or social characteristics but does not have a sustainable investment objective.

The fund is not committed to make any sustainable investments.

c) Environmental or social characteristics of the financial product

Sustainability is integrated into the fund's investment process where we try to understand whether companies are run in line with common environmental, ethical and social norms. The fund promotes a wide range of environmental and social characteristics through the integration of Holberg's proprietary ESG model, exclusion lists, and active ownership.

We seek to promote sustainability through documentation of our investment decisions. With concentrated portfolios we are able to assess each company and its management's approach to long-term sustainable development. Access to reliable data can be deficient, and the perception of sustainability and which ESG criteria each company meet varies.

Holberg wishes to contribute to building knowledge by being an active participant in the debate about how sustainability can improve risk assessments and investment decisions. This will be executed through internal activities (meetings with clients, seminars, etc.), as well as participation and contribution in external forums. Also, we will seek to highlight the topic through our communication with clients and presence in the media.

d) Investment strategy

Holberg is an active fund manager and the fund's objective is to create the highest possible long-term risk adjusted return compared to the fund's investment universe. The portfolio manager seeks to invest in companies with a focus on long-term value creation based on a sustainable business model.

The binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by the fund are:

a) Holberg's proprietary ESG model, Tellus
b) Exclusion lists and monitoring
c) Active ownership

Holberg has developed the Tellus model, which is our proprietary analysis tool for ESG and sustainability and contains common quality requirements for the portfolio companies. This integration gives us a broader understanding of the companies and potential risks. A sustainability related event may affect one single company directly or may have a wider impact on an industry, geographic area, or country, which can affect bigger parts of the portfolio. Integrating sustainability risks into the portfolio construction contributes to create the desired risk adjusted return. Tellus is our fact-based method for systematizing sustainability risks and analyses, and it is an efficient tool to monitor each investment over time.

We also apply a set of exclusions to the portfolio, which is based on the Government Pension Fund Global's guidelines. I addition to this, we have chosen to exclude gambling and pornography from our investment universe. We want our portfolio companies to operate in line with international norms, including UN Global Compact.

We practice active ownership to encourage the companies to improve. As an active fund manager with concentrated portfolios, we have an investment philosophy that is founded on close follow-up of the companies we are invested in. We have dialogs with the company management and vote at bondholder meetings to contribute to transparency for the shareholders. Holberg's voting guidelines is available on our webpage.

The portfolio manager shall be hands on and use all available information to understand each business model of the portfolio companies, including which risk factors that may affect the company's management, operations, and value creation. Leadership trust and clear focus on shareholders are key prerequisites for good corporate governance and these two elements are central in Holberg's research process.

The portfolio manager makes assessments of the portfolio companies' governance practices using Holberg's proprietary sustainability analysis model, Tellus. The following sustainability indicators are used to measure the attainment of good governance practices in the companies the fund invests in:

- Is the board independent of the company's management?
- Are the board incentives long-term and in line with the shareholders' interests?
- Are the board members elected individually?
- The portfolio manager’s assessment of the composition of the board in respect to operation and strategy.
- The portfolio manager’s assessment of the composition of the board in regard to sustainability.
- The portfolio manager’s assessment of the composition of the board in respect to diversity (gender, age, ethnicity).
- Does the management have an ESG-linked bonus scheme?
- Are the management incentives long-term and in line with the shareholders' interests?
- The portfolio manager’s assessment of the size of compensation for managers in absolute terms.
- The portfolio manager’s assessment of the size of compensation to management in relation to the company size.
- Is there one share class in the company?
- The portfolio manager’s assessment of the power balance between share classes, principal owners and minorities.
- Do shareholders usually support the board's proposals on the annual general meeting?
- Are there any anti-takeover mechanisms?

Holberg's guidelines for sustainability and responsible investments, as well as Holberg's guidelines for the use of voting rights, are publicly available on Holberg's website.

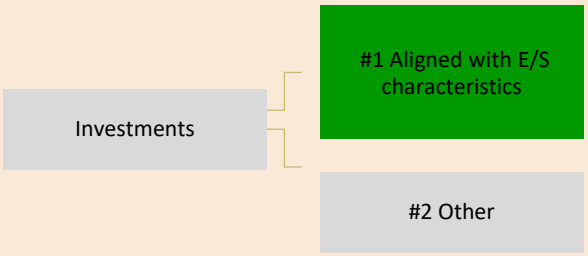
The following sustainability indicators are used to measure the attainment of the *social characteristics* promoted by this financial product:

- The portfolio manager’s assessment of the company's equal pay policy.
- The portfolio manager’s assessment of the company's performance on gender equality and diversity.
- The portfolio manager’s assessment of the company's workforce stability.
- The portfolio manager’s assessment of the quality of the company's HSE reporting.
- The portfolio manager’s assessment of the company's wage policy.
- The portfolio manager’s assessment of the company's guidelines in relation to the right to unionization.
- The portfolio manager’s assessment of the company's insurance and pension schemes.
- The portfolio manager’s assessment of the overall guidelines for monitoring SRI in the company's and the supplier's value chains.
- Has the company been involved in controversies involving local or national authorities?

e) Proportion of investments

The fund shall invest in bank deposits and fixed income securities. The fund shall invest mainly in the Nordic region.

All of the fund's investments are aligned with the environmental or social characteristics which are defined as the binding elements of the investment strategy.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The fund does not use derivatives to attain the environmental or social characteristics promoted by the financial product.

The fund has not defined a minimum percentage of sustainable investments with an environmental objective that are aligned with the EU Taxonomy.

The fund has not defined a minimum share of investments in transitional and enabling activities.

The fund has not defined a minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy.

The fund has not defined a minimum share of socially sustainable investments.

f) Monitoring of environmental or social characteristics

Tellus is our fact-based method for systematizing sustainability risk and analysis, and an effective way to monitor each individual investment over time. The model consists of approximately 90 quantitative data fields and 40 qualitative questions and checkpoints at the company level within each of the E, S, and G categories. The assessments are carried out by the portfolio manager, based on their knowledge and analysis of the company. A score is calculated at both the company and fund level based on the qualitative assessments.

Quantitative data from external sources, the manager's assessments, and the score are documented and stored in a database in the data warehouse. Summary reports at the company and fund level are also available in PowerBI. The database structure allows tracking of companies' progress over time and enables us to verify whether the companies succeed in achieving their objectives. Targeted analysis at the company level should enable us to manage and understand risks related to sustainability factors. Company analyses are conducted at the time of investment, and the portfolios are reviewed at least annually.

With regard to our exclusion criteria, our risk department ensures that none of the funds are invested in companies that violate these criteria. Our funds are screened by Sustainalytics'

online database for “Global Standard Screening” every three months to ensure compliance with global norms such as the UN Global Compact.In terms of active ownership and voting, we aim to vote at all bondholder meetings.

g) Methodologies

To measure the attainment of each of the environmental or social characteristics promoted by the fund, we use sustainability indicators defined in our proprietary sustainability model, Tellus. For each sustainability indicator we score each portfolio company from 1 to 5. These scores can also be aggregated on fund level.

The following sustainability indicators are used to measure the attainment of the *environmental characteristics* promoted by this fund:

- Does the company have a climate policy?
- Does the company report direct emissions (Scope 1)?
- Does the company report indirect emissions (Scope 2)?
- Does the company have a strategy to reduce their environmental footprint?
- Is the company endorsing the Paris agreement?
- Does the company link their climate goals towards the UN sustainability goals?
- Does to company report to Carbon Disclosure Project (CDP)?
- The portfolio manager’s assessment of the quality of the company's reporting on environmental issues.
- The portfolio manager’s assessment of the company's emissions.
- The portfolio manager’s assessment of the company's emissions compared to peers.
- The portfolio manager’s assessment of the company's implementation of environmental measures.
- The portfolio manager’s assessment of the company's strategy for circular economy.

The following sustainability indicators are used to measure the attainment of the *social characteristics* promoted by this financial product:

- The portfolio manager’s assessment of the company's equal pay policy.
- The portfolio manager’s assessment of the company's performance on gender equality and diversity.
- The portfolio manager’s assessment of the company's workforce stability.
- The portfolio manager’s assessment of the quality of the company's HSE reporting.
- The portfolio manager’s assessment of the company's wage policy.
- The portfolio manager’s assessment of the company's guidelines in relation to the right to unionization.
- The portfolio manager’s assessment of the company's insurance and pension schemes.
- The portfolio manager’s assessment of the overall guidelines for monitoring SRI in the company's and the supplier's value chains.
- Has the company been involved in controversies involving local or national authorities?

Company analyses in Tellus are conducted at the time of investment, and the portfolios are reviewed at least annually. This enables tracking of companies' progress over time and allows us to verify whether the companies succeed in achieving their objectives.

h) Data sources and processing

The portfolio managers are actively engaged and leverage available information to gain a deep understanding of companies' business models, including the risks and opportunities that impact their governance, operations, and value creation. The limited number of companies in each portfolio allows the managers to thoroughly analyze and monitor them over time.

Sources used to gather information include company presentations and reports, meetings with management and other stakeholders, as well as data from Bloomberg, Sustainalytics, and research firms.

In Tellus, we collect quantitative data from Bloomberg across the E, S, and G categories. Portfolio managers perform qualitative assessments based on all available information, including the quantitative data from Bloomberg. These assessments are compared to those from previous years for quality assurance and serve as a basis for ongoing company monitoring.

To produce our annual statement on the principal adverse impacts of investment decisions on sustainability factors, we use data from Sustainalytics. We have integrated this data into Tellus to cross-check it against companies' own reported figures and to increase coverage when data from Sustainalytics is not available.

To screen our funds for compliance with the UN Global Compact, we use Sustainalytics' online database for "Global Standard Screening." Additionally, each portfolio manager independently assesses whether portfolio companies adhere to international norms.

In general, Holberg does not use estimated data in its sustainability reports, ensuring that the reports are based on actual, collected data.

i) Limitations to methodologies and data

There are certain limitations in the methods used to measure the achievement of the environmental or social characteristics promoted by the fund. For example, the models and analytical tools employed may rely on assumptions and estimates that may not fully capture all the nuances of environmental or social impacts. Additionally, applying these methods consistently across different funds, sectors, or geographical regions can be challenging due to varying standards and practices.

In Tellus, we have defined what a score of 1-5 represents for various ESG factors, reducing the scope for subjective assessments by portfolio managers. This also improves comparability over time, as the definitions remain consistent. The portfolio managers analyze and assess all companies in each portfolio, ensuring good traceability, reviewing data reported by companies, using their own knowledge of the companies, and validating these assessments with external sources.

The data sources used to measure environmental or social characteristics may have limitations regarding availability, completeness, and accuracy. For example, there is significant uncertainty related to companies' Scope 3 emissions due to variable data quality, estimates,

and completeness. Data may be self-reported by companies, leading to inconsistencies. Comparisons can also be challenging if the data is not based on the same methodology. Furthermore, there may be gaps in data coverage for certain metrics or for companies operating in regions with less stringent reporting requirements. The introduction of the EU's Corporate Sustainability Reporting Directive (CSRD) is expected to address some of these challenges by establishing a common framework for sustainability reporting by companies subject to the directive.

In Tellus, data from external sources is compared to companies' own reported information to cross-check accuracy. When data from different providers is inconsistent, we conduct additional internal research and analysis of the company and potential issues. If gaps in the data are identified, the portfolio manager may initiate dialogue to gather more information.

The availability of reliable, consistent, and comprehensive sustainability data remains one of the biggest challenges in sustainability reporting, but the demand for more and better sustainability data is growing, partly driven by new regulations. Despite the limitations in methodology and data, Holberg has measures in place to ensure that the environmental and social characteristics promoted by the funds are not significantly affected. In addition to quantitative data, portfolio managers conduct many qualitative analyses. We work to improve data quality through cross-referencing multiple data sources and making comparisons across companies. The framework surrounding Tellus is also regularly reviewed and updated.

j) Due diligence

Holberg conducts due diligence assessments for all companies in the fund to ensure that sustainability risks and opportunities are properly considered in investment decisions. These assessments take a comprehensive approach to integrating sustainability and responsibility into the investment process. Portfolio managers evaluate environmental, social, and governance (ESG) factors to ensure that investments align with our guidelines.

Holberg uses internal controls to ensure the reliability of the assessment process. This includes applying consistent assessment criteria through the Tellus system, which guarantees a uniform ESG review across all our mandates. Additionally, we perform quarterly screenings of our portfolios against Sustainalytics' database for "Global Standard Screening" to monitor compliance with the UN Global Compact. The Risk and Compliance team monitors the portfolios for alignment with the Norwegian Council on Ethics' exclusion list and addresses potential breaches of our guidelines.

Alongside our internal processes and controls, Holberg's internal auditor focuses on sustainability regulations, helping ensure compliance and continuously improving our processes.

k) Engagement policies

Holberg practices active ownership to influence companies towards improvement. As an active manager with concentrated portfolios, our investment philosophy is based on close follow-up with the companies in which we invest. Dialogue with management and voting at bondholder meetings are two key tools we use to ensure transparency for our unit holders.

Holberg is an active manager that invests long-term in a concentrated number of portfolio companies per fund. A key principle of our investments is that the business models of portfolio companies must be sustainable over the long term. We also require a high level of confidence in the management's ability to deliver results and protect the interests of shareholders and other stakeholders.

Holberg seeks to influence underlying companies in the right strategic, business, and sustainability directions. Where appropriate, Holberg may form alliances with other voting bondholders to achieve desired objectives.

To ensure effective and responsible use of voting rights, Holberg regularly monitors portfolio companies and builds relationships through meetings and dialogue with management. Portfolio managers aim to ensure that the companies' boards and management teams function effectively and that they have a clear understanding of the companies' business strategies, risk management, environmental and social responsibility, corporate governance, compliance, performance, and capital allocation.

Given our investment philosophy, where we invest in well-managed companies, we usually agree with the board's recommendations in most bondholder meeting matters. However, situations may arise where we disagree with the board's proposals. In such cases, we will vote in line with our own assessment. Holberg may also collaborate with other investors on issues where collective engagement is beneficial in achieving desired outcomes. If a significant disagreement persists on a key issue, we will reassess our investment in the company to safeguard the interests of our unit holders.

Holberg's voting guidelines are available on our website.

l) Designated reference benchmark

No index has been designated as a reference benchmark for attaining the environmental or social characteristics promoted by the fund.

7. Holberg Kreditt Fokus

a) Summary

Holberg is an active fund manager and the fund's objective is to create the highest possible long-term risk adjusted return compared to the fund's investment universe. The portfolio manager seeks to invest in companies with a focus on long-term value creation based on a sustainable business model.

Sustainability is integrated into the fund's investment process where we try to understand whether companies are run in line with common environmental, ethical and social norms. Sustainability is integrated through:

1. Holberg's proprietary ESG model, Tellus
2. Exclusion lists and monitoring
3. Active ownership

The portfolio manager shall be hands on and use all available information to understand each business model of the portfolio companies, including which risk factors and opportunities that may affect the company's management, operations, and value creation. The limited number of companies in each portfolio allows us to gain a deep understanding of the companies and monitor them closely over time.

The fund promotes a wide range of environmental and social characteristics through the integration of Holberg's proprietary ESG model, exclusion lists, and active ownership. We use sustainability indicators from our proprietary sustainability model, Tellus, to assess the achievement of the environmental and social characteristics promoted by the fund.

This document provides a description of the fund's sustainability-related characteristics. More information can be found in the fund's prospectus and on Holberg's website.

b) No sustainable investment objective

This financial product promotes environmental and/or social characteristics but does not have a sustainable investment objective.

The fund is not committed to make any sustainable investments.

c) Environmental or social characteristics of the financial product

Sustainability is integrated into the fund's investment process where we try to understand whether companies are run in line with common environmental, ethical and social norms. The fund promotes a wide range of environmental and social characteristics through the integration of Holberg's proprietary ESG model, exclusion lists, and active ownership.

We seek to promote sustainability through documentation of our investment decisions. With concentrated portfolios we are able to assess each company and its management's approach to long-term sustainable development. Access to reliable data can be deficient, and the perception of sustainability and which ESG criteria each company meet varies.

Holberg wishes to contribute to building knowledge by being an active participant in the debate about how sustainability can improve risk assessments and investment decisions. This will be executed through internal activities (meetings with clients, seminars, etc.), as well as participation and contribution in external forums. Also, we will seek to highlight the topic through our communication with clients and presence in the media.

d) Investment strategy

Holberg is an active fund manager and the fund's objective is to create the highest possible long-term risk adjusted return compared to the fund's investment universe. The portfolio manager seeks to invest in companies with a focus on long-term value creation based on a sustainable business model.

The binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by the fund are:

1. Holberg's proprietary ESG model, Tellus
2. Exclusion lists and monitoring
3. Active ownership

Holberg has developed the Tellus model, which is our proprietary analysis tool for ESG and sustainability and contains common quality requirements for the portfolio companies. This integration gives us a broader understanding of the companies and potential risks. A sustainability related event may affect one single company directly or may have a wider impact on an industry, geographic area, or country, which can affect bigger parts of the portfolio. Integrating sustainability risks into the portfolio construction contributes to create the desired risk adjusted return. Tellus is our fact-based method for systematizing sustainability risks and analyses, and it is an efficient tool to monitor each investment over time.

We also apply a set of exclusions to the portfolio, which is based on the Government Pension Fund Global's guidelines. I addition to this, we have chosen to exclude gambling and pornography from our investment universe. We want our portfolio companies to operate in line with international norms, including UN Global Compact.

We practice active ownership to encourage the companies to improve. As an active fund manager with concentrated portfolios, we have an investment philosophy that is founded on close follow-up of the companies we are invested in. We have dialogs with the company management and vote at bondholder meetings to contribute to transparency for the shareholders. Holberg's voting guidelines is available on our webpage.

The portfolio manager shall be hands on and use all available information to understand each business model of the portfolio companies, including which risk factors that may affect the company's management, operations, and value creation. Leadership trust and clear focus on shareholders are key prerequisites for good corporate governance and these two elements are central in Holberg's research process.

The portfolio manager makes assessments of the portfolio companies' governance practices using Holberg's proprietary sustainability analysis model, Tellus. The following sustainability indicators are used to measure the attainment of good governance practices in the companies the fund invests in:

- Is the board independent of the company's management?
- Are the board incentives long-term and in line with the shareholders' interests?
- Are the board members elected individually?
- The portfolio manager’s assessment of the composition of the board in respect to operation and strategy.
- The portfolio manager’s assessment of the composition of the board in regard to sustainability.
- The portfolio manager’s assessment of the composition of the board in respect to diversity (gender, age, ethnicity).
- Does the management have an ESG-linked bonus scheme?
- Are the management incentives long-term and in line with the shareholders' interests?
- The portfolio manager’s assessment of the size of compensation for managers in absolute terms.
- The portfolio manager’s assessment of the size of compensation to management in relation to the company size.
- Is there one share class in the company?
- The portfolio manager’s assessment of the power balance between share classes, principal owners and minorities.
- Do shareholders usually support the board's proposals on the annual general meeting?
- Are there any anti-takeover mechanisms?

Holberg's guidelines for sustainability and responsible investments, as well as Holberg's guidelines for the use of voting rights, are publicly available on Holberg's website.

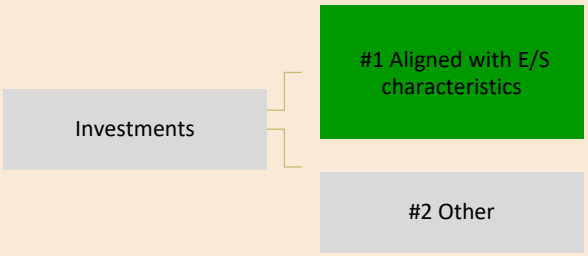
The following sustainability indicators are used to measure the attainment of the *social characteristics* promoted by this financial product:

- The portfolio manager’s assessment of the company's equal pay policy.
- The portfolio manager’s assessment of the company's performance on gender equality and diversity.
- The portfolio manager’s assessment of the company's workforce stability.
- The portfolio manager’s assessment of the quality of the company's HSE reporting.
- The portfolio manager’s assessment of the company's wage policy.
- The portfolio manager’s assessment of the company's guidelines in relation to the right to unionization.
- The portfolio manager’s assessment of the company's insurance and pension schemes.
- The portfolio manager’s assessment of the overall guidelines for monitoring SRI in the company's and the supplier's value chains.
- Has the company been involved in controversies involving local or national authorities?

e) Proportion of investments

The fund shall invest in bank deposits and fixed income securities. The fund shall invest mainly in the Nordic region.

All of the fund's investments are aligned with the environmental or social characteristics which are defined as the binding elements of the investment strategy.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The fund does not use derivatives to attain the environmental or social characteristics promoted by the financial product.

The fund has not defined a minimum percentage of sustainable investments with an environmental objective that are aligned with the EU Taxonomy.

The fund has not defined a minimum share of investments in transitional and enabling activities.

The fund has not defined a minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy.

The fund has not defined a minimum share of socially sustainable investments.

f) Monitoring of environmental or social characteristics

Tellus is our fact-based method for systematizing sustainability risk and analysis, and an effective way to monitor each individual investment over time. The model consists of approximately 90 quantitative data fields and 40 qualitative questions and checkpoints at the company level within each of the E, S, and G categories. The assessments are carried out by the portfolio manager, based on their knowledge and analysis of the company. A score is calculated at both the company and fund level based on the qualitative assessments.

Quantitative data from external sources, the manager's assessments, and the score are documented and stored in a database in the data warehouse. Summary reports at the company and fund level are also available in PowerBI. The database structure allows tracking of companies' progress over time and enables us to verify whether the companies succeed in achieving their objectives. Targeted analysis at the company level should enable us to manage and understand risks related to sustainability factors. Company analyses are conducted at the time of investment, and the portfolios are reviewed at least annually.

With regard to our exclusion criteria, our risk department ensures that none of the funds are invested in companies that violate these criteria. Our funds are screened by Sustainalytics'

online database for “Global Standard Screening” every three months to ensure compliance with global norms such as the UN Global Compact.In terms of active ownership and voting, we aim to vote at all bondholder meetings.

g) Methodologies

To measure the attainment of each of the environmental or social characteristics promoted by the fund, we use sustainability indicators defined in our proprietary sustainability model, Tellus. For each sustainability indicator we score each portfolio company from 1 to 5. These scores can also be aggregated on fund level.

The following sustainability indicators are used to measure the attainment of the *environmental characteristics* promoted by this fund:

- Does the company have a climate policy?
- Does the company report direct emissions (Scope 1)?
- Does the company report indirect emissions (Scope 2)?
- Does the company have a strategy to reduce their environmental footprint?
- Is the company endorsing the Paris agreement?
- Does the company link their climate goals towards the UN sustainability goals?
- Does to company report to Carbon Disclosure Project (CDP)?
- The portfolio manager’s assessment of the quality of the company's reporting on environmental issues.
- The portfolio manager’s assessment of the company's emissions.
- The portfolio manager’s assessment of the company's emissions compared to peers.
- The portfolio manager’s assessment of the company's implementation of environmental measures.
- The portfolio manager’s assessment of the company's strategy for circular economy.

The following sustainability indicators are used to measure the attainment of the *social characteristics* promoted by this financial product:

- The portfolio manager’s assessment of the company's equal pay policy.
- The portfolio manager’s assessment of the company's performance on gender equality and diversity.
- The portfolio manager’s assessment of the company's workforce stability.
- The portfolio manager’s assessment of the quality of the company's HSE reporting.
- The portfolio manager’s assessment of the company's wage policy.
- The portfolio manager’s assessment of the company's guidelines in relation to the right to unionization.
- The portfolio manager’s assessment of the company's insurance and pension schemes.
- The portfolio manager’s assessment of the overall guidelines for monitoring SRI in the company's and the supplier's value chains.
- Has the company been involved in controversies involving local or national authorities?

Company analyses in Tellus are conducted at the time of investment, and the portfolios are reviewed at least annually. This enables tracking of companies' progress over time and allows us to verify whether the companies succeed in achieving their objectives.

h) Data sources and processing

The portfolio managers are actively engaged and leverage available information to gain a deep understanding of companies' business models, including the risks and opportunities that impact their governance, operations, and value creation. The limited number of companies in each portfolio allows the managers to thoroughly analyze and monitor them over time.

Sources used to gather information include company presentations and reports, meetings with management and other stakeholders, as well as data from Bloomberg, Sustainalytics, and research firms.

In Tellus, we collect quantitative data from Bloomberg across the E, S, and G categories. Portfolio managers perform qualitative assessments based on all available information, including the quantitative data from Bloomberg. These assessments are compared to those from previous years for quality assurance and serve as a basis for ongoing company monitoring.

To produce our annual statement on the principal adverse impacts of investment decisions on sustainability factors, we use data from Sustainalytics. We have integrated this data into Tellus to cross-check it against companies' own reported figures and to increase coverage when data from Sustainalytics is not available.

To screen our funds for compliance with the UN Global Compact, we use Sustainalytics' online database for "Global Standard Screening." Additionally, each portfolio manager independently assesses whether portfolio companies adhere to international norms.

In general, Holberg does not use estimated data in its sustainability reports, ensuring that the reports are based on actual, collected data.

i) Limitations to methodologies and data

There are certain limitations in the methods used to measure the achievement of the environmental or social characteristics promoted by the fund. For example, the models and analytical tools employed may rely on assumptions and estimates that may not fully capture all the nuances of environmental or social impacts. Additionally, applying these methods consistently across different funds, sectors, or geographical regions can be challenging due to varying standards and practices.

In Tellus, we have defined what a score of 1-5 represents for various ESG factors, reducing the scope for subjective assessments by portfolio managers. This also improves comparability over time, as the definitions remain consistent. The portfolio managers analyze and assess all companies in each portfolio, ensuring good traceability, reviewing data reported by companies, using their own knowledge of the companies, and validating these assessments with external sources.

The data sources used to measure environmental or social characteristics may have limitations regarding availability, completeness, and accuracy. For example, there is significant uncertainty related to companies' Scope 3 emissions due to variable data quality, estimates,

and completeness. Data may be self-reported by companies, leading to inconsistencies. Comparisons can also be challenging if the data is not based on the same methodology. Furthermore, there may be gaps in data coverage for certain metrics or for companies operating in regions with less stringent reporting requirements. The introduction of the EU's Corporate Sustainability Reporting Directive (CSRD) is expected to address some of these challenges by establishing a common framework for sustainability reporting by companies subject to the directive.

In Tellus, data from external sources is compared to companies' own reported information to cross-check accuracy. When data from different providers is inconsistent, we conduct additional internal research and analysis of the company and potential issues. If gaps in the data are identified, the portfolio manager may initiate dialogue to gather more information.

The availability of reliable, consistent, and comprehensive sustainability data remains one of the biggest challenges in sustainability reporting, but the demand for more and better sustainability data is growing, partly driven by new regulations. Despite the limitations in methodology and data, Holberg has measures in place to ensure that the environmental and social characteristics promoted by the funds are not significantly affected. In addition to quantitative data, portfolio managers conduct many qualitative analyses. We work to improve data quality through cross-referencing multiple data sources and making comparisons across companies. The framework surrounding Tellus is also regularly reviewed and updated.

j) Due diligence

Holberg conducts due diligence assessments for all companies in the fund to ensure that sustainability risks and opportunities are properly considered in investment decisions. These assessments take a comprehensive approach to integrating sustainability and responsibility into the investment process. Portfolio managers evaluate environmental, social, and governance (ESG) factors to ensure that investments align with our guidelines.

Holberg uses internal controls to ensure the reliability of the assessment process. This includes applying consistent assessment criteria through the Tellus system, which guarantees a uniform ESG review across all our mandates. Additionally, we perform quarterly screenings of our portfolios against Sustainalytics' database for "Global Standard Screening" to monitor compliance with the UN Global Compact. The Risk and Compliance team monitors the portfolios for alignment with the Norwegian Council on Ethics' exclusion list and addresses potential breaches of our guidelines.

Alongside our internal processes and controls, Holberg's internal auditor focuses on sustainability regulations, helping ensure compliance and continuously improving our processes.

k) Engagement policies

Holberg practices active ownership to influence companies towards improvement. As an active manager with concentrated portfolios, our investment philosophy is based on close follow-up with the companies in which we invest. Dialogue with management and voting at bondholder meetings are two key tools we use to ensure transparency for our unit holders.

Holberg is an active manager that invests long-term in a concentrated number of portfolio companies per fund. A key principle of our investments is that the business models of portfolio companies must be sustainable over the long term. We also require a high level of confidence in the management's ability to deliver results and protect the interests of shareholders and other stakeholders.

Holberg seeks to influence underlying companies in the right strategic, business, and sustainability directions. Where appropriate, Holberg may form alliances with other voting bondholders to achieve desired objectives.

To ensure effective and responsible use of voting rights, Holberg regularly monitors portfolio companies and builds relationships through meetings and dialogue with management. Portfolio managers aim to ensure that the companies' boards and management teams function effectively and that they have a clear understanding of the companies' business strategies, risk management, environmental and social responsibility, corporate governance, compliance, performance, and capital allocation.

Given our investment philosophy, where we invest in well-managed companies, we usually agree with the board's recommendations in most bondholder meeting matters. However, situations may arise where we disagree with the board's proposals. In such cases, we will vote in line with our own assessment. Holberg may also collaborate with other investors on issues where collective engagement is beneficial in achieving desired outcomes. If a significant disagreement persists on a key issue, we will reassess our investment in the company to safeguard the interests of our unit holders.

Holberg's voting guidelines are available on our website.

l) Designated reference benchmark

No index has been designated as a reference benchmark for attaining the environmental or social characteristics promoted by the fund.

8. Holberg Likviditet

a) Summary

Holberg is an active fund manager and the fund's objective is to create the highest possible long-term risk adjusted return compared to the fund's investment universe. The portfolio manager seeks to invest in companies with a focus on long-term value creation based on a sustainable business model.

Sustainability is integrated into the fund's investment process where we try to understand whether companies are run in line with common environmental, ethical and social norms. Sustainability is integrated through:

1. Holberg's proprietary ESG model, Tellus
2. Exclusion lists and monitoring
3. Active ownership

The portfolio manager shall be hands on and use all available information to understand each business model of the portfolio companies, including which risk factors and opportunities that may affect the company's management, operations, and value creation. The limited number of companies in each portfolio allows us to gain a deep understanding of the companies and monitor them closely over time.

The fund promotes a wide range of environmental and social characteristics through the integration of Holberg's proprietary ESG model, exclusion lists, and active ownership. We use sustainability indicators from our proprietary sustainability model, Tellus, to assess the achievement of the environmental and social characteristics promoted by the fund.

This document provides a description of the fund's sustainability-related characteristics. More information can be found in the fund's prospectus and on Holberg's website.

b) No sustainable investment objective

This financial product promotes environmental and/or social characteristics but does not have a sustainable investment objective.

The fund is not committed to make any sustainable investments.

c) Environmental or social characteristics of the financial product

Sustainability is integrated into the fund's investment process where we try to understand whether companies are run in line with common environmental, ethical and social norms. The fund promotes a wide range of environmental and social characteristics through the integration of Holberg's proprietary ESG model, exclusion lists, and active ownership.

We seek to promote sustainability through documentation of our investment decisions. With concentrated portfolios we are able to assess each company and its management's approach to long-term sustainable development. Access to reliable data can be deficient, and the perception of sustainability and which ESG criteria each company meet varies.

Holberg wishes to contribute to building knowledge by being an active participant in the debate about how sustainability can improve risk assessments and investment decisions. This will be executed through internal activities (meetings with clients, seminars, etc.), as well as participation and contribution in external forums. Also, we will seek to highlight the topic through our communication with clients and presence in the media.

d) Investment strategy

Holberg is an active fund manager and the fund's objective is to create the highest possible long-term risk adjusted return compared to the fund's investment universe. The portfolio manager seeks to invest in companies with a focus on long-term value creation based on a sustainable business model.

The binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by the fund are:

1. Holberg's proprietary ESG model, Tellus
2. Exclusion lists and monitoring
3. Active ownership

Holberg has developed the Tellus model, which is our proprietary analysis tool for ESG and sustainability and contains common quality requirements for the portfolio companies. This integration gives us a broader understanding of the companies and potential risks. A sustainability related event may affect one single company directly or may have a wider impact on an industry, geographic area, or country, which can affect bigger parts of the portfolio. Integrating sustainability risks into the portfolio construction contributes to create the desired risk adjusted return. Tellus is our fact-based method for systematizing sustainability risks and analyses, and it is an efficient tool to monitor each investment over time.

We also apply a set of exclusions to the portfolio, which is based on the Government Pension Fund Global's guidelines. I addition to this, we have chosen to exclude gambling and pornography from our investment universe. We want our portfolio companies to operate in line with international norms, including UN Global Compact.

We practice active ownership to encourage the companies to improve. As an active fund manager with concentrated portfolios, we have an investment philosophy that is founded on close follow-up of the companies we are invested in. We have dialogs with the company management and vote at bondholder meetings to contribute to transparency for the shareholders. Holberg's voting guidelines is available on our webpage.

The portfolio manager shall be hands on and use all available information to understand each business model of the portfolio companies, including which risk factors that may affect the company's management, operations, and value creation. Leadership trust and clear focus on shareholders are key prerequisites for good corporate governance and these two elements are central in Holberg's research process.

The portfolio manager makes assessments of the portfolio companies' governance practices using Holberg's proprietary sustainability analysis model, Tellus. The following sustainability indicators are used to measure the attainment of good governance practices in the companies the fund invests in:

- Is the board independent of the company's management?
- Are the board incentives long-term and in line with the shareholders' interests?
- Are the board members elected individually?
- The portfolio manager’s assessment of the composition of the board in respect to operation and strategy.
- The portfolio manager’s assessment of the composition of the board in regard to sustainability.
- The portfolio manager’s assessment of the composition of the board in respect to diversity (gender, age, ethnicity).
- Does the management have an ESG-linked bonus scheme?
- Are the management incentives long-term and in line with the shareholders' interests?
- The portfolio manager’s assessment of the size of compensation for managers in absolute terms.
- The portfolio manager’s assessment of the size of compensation to management in relation to the company size.
- Is there one share class in the company?
- The portfolio manager’s assessment of the power balance between share classes, principal owners and minorities.
- Do shareholders usually support the board's proposals on the annual general meeting?
- Are there any anti-takeover mechanisms?

Holberg's guidelines for sustainability and responsible investments, as well as Holberg's guidelines for the use of voting rights, are publicly available on Holberg's website.

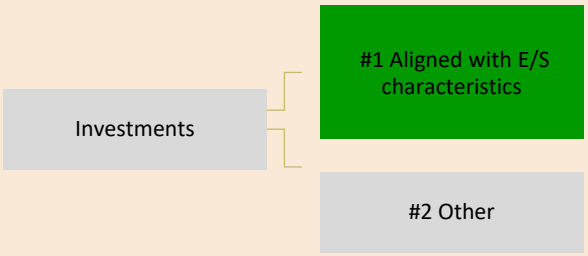
The following sustainability indicators are used to measure the attainment of the *social characteristics* promoted by this financial product:

- The portfolio manager’s assessment of the company's equal pay policy.
- The portfolio manager’s assessment of the company's performance on gender equality and diversity.
- The portfolio manager’s assessment of the company's workforce stability.
- The portfolio manager’s assessment of the quality of the company's HSE reporting.
- The portfolio manager’s assessment of the company's wage policy.
- The portfolio manager’s assessment of the company's guidelines in relation to the right to unionization.
- The portfolio manager’s assessment of the company's insurance and pension schemes.
- The portfolio manager’s assessment of the overall guidelines for monitoring SRI in the company's and the supplier's value chains.
- Has the company been involved in controversies involving local or national authorities?

e) Proportion of investments

The fund shall invest in bank deposits and interest-bearing securities. The fund will only invest in securities denominated in Norwegian kroner (NOK).

All of the fund's investments are aligned with the environmental or social characteristics which are defined as the binding elements of the investment strategy.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The fund does not use derivatives to attain the environmental or social characteristics promoted by the financial product.

The fund has not defined a minimum percentage of sustainable investments with an environmental objective that are aligned with the EU Taxonomy.

The fund has not defined a minimum share of investments in transitional and enabling activities.

The fund has not defined a minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy.

The fund has not defined a minimum share of socially sustainable investments.

f) Monitoring of environmental or social characteristics

Tellus is our fact-based method for systematizing sustainability risk and analysis, and an effective way to monitor each individual investment over time. The model consists of approximately 90 quantitative data fields and 40 qualitative questions and checkpoints at the company level within each of the E, S, and G categories. The assessments are carried out by the portfolio manager, based on their knowledge and analysis of the company. A score is calculated at both the company and fund level based on the qualitative assessments.

Quantitative data from external sources, the manager's assessments, and the score are documented and stored in a database in the data warehouse. Summary reports at the company and fund level are also available in PowerBI. The database structure allows tracking of companies' progress over time and enables us to verify whether the companies succeed in achieving their objectives. Targeted analysis at the company level should enable us to manage and understand risks related to sustainability factors. Company analyses are conducted at the time of investment, and the portfolios are reviewed at least annually.

With regard to our exclusion criteria, our risk department ensures that none of the funds are invested in companies that violate these criteria. Our funds are screened by Sustainalytics'

online database for “Global Standard Screening” every three months to ensure compliance with global norms such as the UN Global Compact.In terms of active ownership and voting, we aim to vote at all bondholder meetings.

g) Methodologies

To measure the attainment of each of the environmental or social characteristics promoted by the fund, we use sustainability indicators defined in our proprietary sustainability model, Tellus. For each sustainability indicator we score each portfolio company from 1 to 5. These scores can also be aggregated on fund level.

The following sustainability indicators are used to measure the attainment of the *environmental characteristics* promoted by this fund:

- Does the company have a climate policy?
- Does the company report direct emissions (Scope 1)?
- Does the company report indirect emissions (Scope 2)?
- Does the company have a strategy to reduce their environmental footprint?
- Is the company endorsing the Paris agreement?
- Does the company link their climate goals towards the UN sustainability goals?
- Does to company report to Carbon Disclosure Project (CDP)?
- The portfolio manager’s assessment of the quality of the company's reporting on environmental issues.
- The portfolio manager’s assessment of the company's emissions.
- The portfolio manager’s assessment of the company's emissions compared to peers.
- The portfolio manager’s assessment of the company's implementation of environmental measures.
- The portfolio manager’s assessment of the company's strategy for circular economy.

The following sustainability indicators are used to measure the attainment of the *social characteristics* promoted by this financial product:

- The portfolio manager’s assessment of the company's equal pay policy.
- The portfolio manager’s assessment of the company's performance on gender equality and diversity.
- The portfolio manager’s assessment of the company's workforce stability.
- The portfolio manager’s assessment of the quality of the company's HSE reporting.
- The portfolio manager’s assessment of the company's wage policy.
- The portfolio manager’s assessment of the company's guidelines in relation to the right to unionization.
- The portfolio manager’s assessment of the company's insurance and pension schemes.
- The portfolio manager’s assessment of the overall guidelines for monitoring SRI in the company's and the supplier's value chains.
- Has the company been involved in controversies involving local or national authorities?

The fund's investments in the categories of banks/financial institutions and municipalities/counties consist of issuers with relatively similar economic activities. The sustainability risk, as well as the environmental and social impact associated with these activities, is not considered to differ significantly between issuers within each of these

categories. Furthermore, corporate governance, including business models, management structures, and applicable legal frameworks, is relatively consistent among the issuers within each category. Therefore, we conduct an aggregated assessment of the sustainability indicators in our analysis model, Tellus, for the categories of banks/financial institutions and municipalities/counties.

Company analyses in Tellus are conducted at the time of investment, and the portfolios are reviewed at least annually. This enables tracking of companies' progress over time and allows us to verify whether the companies succeed in achieving their objectives.

h) Data sources and processing

The portfolio managers are actively engaged and leverage available information to gain a deep understanding of companies' business models, including the risks and opportunities that impact their governance, operations, and value creation. The limited number of companies in each portfolio allows the managers to thoroughly analyze and monitor them over time.

Sources used to gather information include company presentations and reports, meetings with management and other stakeholders, as well as data from Bloomberg, Sustainalytics, and research firms.

In Tellus, we collect quantitative data from Bloomberg across the E, S, and G categories. Portfolio managers perform qualitative assessments based on all available information, including the quantitative data from Bloomberg. These assessments are compared to those from previous years for quality assurance and serve as a basis for ongoing company monitoring.

To produce our annual statement on the principal adverse impacts of investment decisions on sustainability factors, we use data from Sustainalytics. We have integrated this data into Tellus to cross-check it against companies' own reported figures and to increase coverage when data from Sustainalytics is not available.

To screen our funds for compliance with the UN Global Compact, we use Sustainalytics' online database for "Global Standard Screening." Additionally, each portfolio manager independently assesses whether portfolio companies adhere to international norms.

In general, Holberg does not use estimated data in its sustainability reports, ensuring that the reports are based on actual, collected data.

i) Limitations to methodologies and data

There are certain limitations in the methods used to measure the achievement of the environmental or social characteristics promoted by the fund. For example, the models and analytical tools employed may rely on assumptions and estimates that may not fully capture all the nuances of environmental or social impacts. Additionally, applying these methods consistently across different funds, sectors, or geographical regions can be challenging due to varying standards and practices.

In Tellus, we have defined what a score of 1-5 represents for various ESG factors, reducing the scope for subjective assessments by portfolio managers. This also improves comparability over time, as the definitions remain consistent. The portfolio managers analyze and assess all companies in each portfolio, ensuring good traceability, reviewing data reported by companies, using their own knowledge of the companies, and validating these assessments with external sources.

The data sources used to measure environmental or social characteristics may have limitations regarding availability, completeness, and accuracy. For example, there is significant uncertainty related to companies' Scope 3 emissions due to variable data quality, estimates, and completeness. Data may be self-reported by companies, leading to inconsistencies. Comparisons can also be challenging if the data is not based on the same methodology. Furthermore, there may be gaps in data coverage for certain metrics or for companies operating in regions with less stringent reporting requirements. The introduction of the EU's Corporate Sustainability Reporting Directive (CSRD) is expected to address some of these challenges by establishing a common framework for sustainability reporting by companies subject to the directive.

In Tellus, data from external sources is compared to companies' own reported information to cross-check accuracy. When data from different providers is inconsistent, we conduct additional internal research and analysis of the company and potential issues. If gaps in the data are identified, the portfolio manager may initiate dialogue to gather more information.

The availability of reliable, consistent, and comprehensive sustainability data remains one of the biggest challenges in sustainability reporting, but the demand for more and better sustainability data is growing, partly driven by new regulations. Despite the limitations in methodology and data, Holberg has measures in place to ensure that the environmental and social characteristics promoted by the funds are not significantly affected. In addition to quantitative data, portfolio managers conduct many qualitative analyses. We work to improve data quality through cross-referencing multiple data sources and making comparisons across companies. The framework surrounding Tellus is also regularly reviewed and updated.

j) Due diligence

Holberg conducts due diligence assessments for all companies in the fund to ensure that sustainability risks and opportunities are properly considered in investment decisions. These assessments take a comprehensive approach to integrating sustainability and responsibility into the investment process. Portfolio managers evaluate environmental, social, and governance (ESG) factors to ensure that investments align with our guidelines.

Holberg uses internal controls to ensure the reliability of the assessment process. This includes applying consistent assessment criteria through the Tellus system, which guarantees a uniform ESG review across all our mandates. Additionally, we perform quarterly screenings of our portfolios against Sustainalytics' database for "Global Standard Screening" to monitor compliance with the UN Global Compact. The Risk and Compliance team monitors the portfolios for alignment with the Norwegian Council on Ethics' exclusion list and addresses potential breaches of our guidelines.

Alongside our internal processes and controls, Holberg's internal auditor focuses on sustainability regulations, helping ensure compliance and continuously improving our processes.

k) Engagement policies

Holberg practices active ownership to influence companies towards improvement. As an active manager with concentrated portfolios, our investment philosophy is based on close follow-up with the companies in which we invest. Dialogue with management and voting at bondholder meetings are two key tools we use to ensure transparency for our unit holders.

Holberg is an active manager that invests long-term in a concentrated number of portfolio companies per fund. A key principle of our investments is that the business models of portfolio companies must be sustainable over the long term. We also require a high level of confidence in the management’s ability to deliver results and protect the interests of shareholders and other stakeholders.

Holberg seeks to influence underlying companies in the right strategic, business, and sustainability directions. Where appropriate, Holberg may form alliances with other voting bondholders to achieve desired objectives.

To ensure effective and responsible use of voting rights, Holberg regularly monitors portfolio companies and builds relationships through meetings and dialogue with management. Portfolio managers aim to ensure that the companies' boards and management teams function effectively and that they have a clear understanding of the companies' business strategies, risk management, environmental and social responsibility, corporate governance, compliance, performance, and capital allocation.

Given our investment philosophy, where we invest in well-managed companies, we usually agree with the board's recommendations in most bondholder meeting matters. However, situations may arise where we disagree with the board's proposals. In such cases, we will vote in line with our own assessment. Holberg may also collaborate with other investors on issues where collective engagement is beneficial in achieving desired outcomes. If a significant disagreement persists on a key issue, we will reassess our investment in the company to safeguard the interests of our unit holders.

Holberg’s voting guidelines are available on our website.

l) Designated reference benchmark

No index has been designated as a reference benchmark for attaining the environmental or social characteristics promoted by the fund.

9. Holberg Obligasjon Norden

a) Summary

Holberg is an active fund manager and the fund's objective is to create the highest possible long-term risk adjusted return compared to the fund's investment universe. The portfolio manager seeks to invest in companies with a focus on long-term value creation based on a sustainable business model.

Sustainability is integrated into the fund's investment process where we try to understand whether companies are run in line with common environmental, ethical and social norms. Sustainability is integrated through:

1. Holberg's proprietary ESG model, Tellus
2. Exclusion lists and monitoring
3. Active ownership

The portfolio manager shall be hands on and use all available information to understand each business model of the portfolio companies, including which risk factors and opportunities that may affect the company's management, operations, and value creation. The limited number of companies in each portfolio allows us to gain a deep understanding of the companies and monitor them closely over time.

The fund promotes a wide range of environmental and social characteristics through the integration of Holberg's proprietary ESG model, exclusion lists, and active ownership. We use sustainability indicators from our proprietary sustainability model, Tellus, to assess the achievement of the environmental and social characteristics promoted by the fund.

This document provides a description of the fund's sustainability-related characteristics. More information can be found in the fund's prospectus and on Holberg's website.

b) No sustainable investment objective

This financial product promotes environmental and/or social characteristics but does not have a sustainable investment objective.

The fund is not committed to make any sustainable investments.

c) Environmental or social characteristics of the financial product

Sustainability is integrated into the fund's investment process where we try to understand whether companies are run in line with common environmental, ethical and social norms. The fund promotes a wide range of environmental and social characteristics through the integration of Holberg's proprietary ESG model, exclusion lists, and active ownership.

We seek to promote sustainability through documentation of our investment decisions. With concentrated portfolios we are able to assess each company and its management's approach to long-term sustainable development. Access to reliable data can be deficient, and the perception of sustainability and which ESG criteria each company meet varies.

Holberg wishes to contribute to building knowledge by being an active participant in the debate about how sustainability can improve risk assessments and investment decisions. This will be executed through internal activities (meetings with clients, seminars, etc.), as well as participation and contribution in external forums. Also, we will seek to highlight the topic through our communication with clients and presence in the media.

d) Investment strategy

Holberg is an active fund manager and the fund's objective is to create the highest possible long-term risk adjusted return compared to the fund's investment universe. The portfolio manager seeks to invest in companies with a focus on long-term value creation based on a sustainable business model.

The binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by the fund are:

1. Holberg's proprietary ESG model, Tellus
2. Exclusion lists and monitoring
3. Active ownership

Holberg has developed the Tellus model, which is our proprietary analysis tool for ESG and sustainability and contains common quality requirements for the portfolio companies. This integration gives us a broader understanding of the companies and potential risks. A sustainability related event may affect one single company directly or may have a wider impact on an industry, geographic area, or country, which can affect bigger parts of the portfolio. Integrating sustainability risks into the portfolio construction contributes to create the desired risk adjusted return. Tellus is our fact-based method for systematizing sustainability risks and analyses, and it is an efficient tool to monitor each investment over time.

We also apply a set of exclusions to the portfolio, which is based on the Government Pension Fund Global's guidelines. I addition to this, we have chosen to exclude gambling and pornography from our investment universe. We want our portfolio companies to operate in line with international norms, including UN Global Compact.

We practice active ownership to encourage the companies to improve. As an active fund manager with concentrated portfolios, we have an investment philosophy that is founded on close follow-up of the companies we are invested in. We have dialogs with the company management and vote at bondholder meetings to contribute to transparency for the shareholders. Holberg's voting guidelines is available on our webpage.

The portfolio manager shall be hands on and use all available information to understand each business model of the portfolio companies, including which risk factors that may affect the company's management, operations, and value creation. Leadership trust and clear focus on shareholders are key prerequisites for good corporate governance and these two elements are central in Holberg's research process.

The portfolio manager makes assessments of the portfolio companies' governance practices using Holberg's proprietary sustainability analysis model, Tellus. The following sustainability indicators are used to measure the attainment of good governance practices in the companies the fund invests in:

- Is the board independent of the company's management?
- Are the board incentives long-term and in line with the shareholders' interests?
- Are the board members elected individually?
- The portfolio manager’s assessment of the composition of the board in respect to operation and strategy.
- The portfolio manager’s assessment of the composition of the board in regard to sustainability.
- The portfolio manager’s assessment of the composition of the board in respect to diversity (gender, age, ethnicity).
- Does the management have an ESG-linked bonus scheme?
- Are the management incentives long-term and in line with the shareholders' interests?
- The portfolio manager’s assessment of the size of compensation for managers in absolute terms.
- The portfolio manager’s assessment of the size of compensation to management in relation to the company size.
- Is there one share class in the company?
- The portfolio manager’s assessment of the power balance between share classes, principal owners and minorities.
- Do shareholders usually support the board's proposals on the annual general meeting?
- Are there any anti-takeover mechanisms?

Holberg's guidelines for sustainability and responsible investments, as well as Holberg's guidelines for the use of voting rights, are publicly available on Holberg's website.

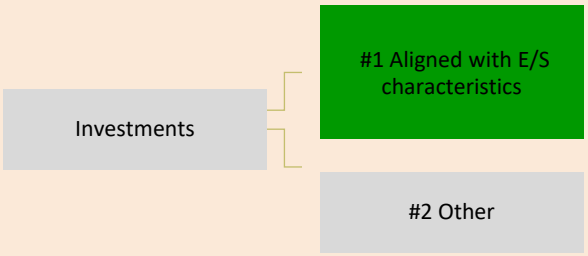
The following sustainability indicators are used to measure the attainment of the *social characteristics* promoted by this financial product:

- The portfolio manager’s assessment of the company's equal pay policy.
- The portfolio manager’s assessment of the company's performance on gender equality and diversity.
- The portfolio manager’s assessment of the company's workforce stability.
- The portfolio manager’s assessment of the quality of the company's HSE reporting.
- The portfolio manager’s assessment of the company's wage policy.
- The portfolio manager’s assessment of the company's guidelines in relation to the right to unionization.
- The portfolio manager’s assessment of the company's insurance and pension schemes.
- The portfolio manager’s assessment of the overall guidelines for monitoring SRI in the company's and the supplier's value chains.
- Has the company been involved in controversies involving local or national authorities?

e) Proportion of investments

The fund shall invest in bank deposits and interest-bearing securities. The fund will primarily invest in the Nordic region.

All of the fund's investments are aligned with the environmental or social characteristics which are defined as the binding elements of the investment strategy.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The fund does not use derivatives to attain the environmental or social characteristics promoted by the financial product.

The fund has not defined a minimum percentage of sustainable investments with an environmental objective that are aligned with the EU Taxonomy.

The fund has not defined a minimum share of investments in transitional and enabling activities.

The fund has not defined a minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy.

The fund has not defined a minimum share of socially sustainable investments.

f) Monitoring of environmental or social characteristics

Tellus is our fact-based method for systematizing sustainability risk and analysis, and an effective way to monitor each individual investment over time. The model consists of approximately 90 quantitative data fields and 40 qualitative questions and checkpoints at the company level within each of the E, S, and G categories. The assessments are carried out by the portfolio manager, based on their knowledge and analysis of the company. A score is calculated at both the company and fund level based on the qualitative assessments.

Quantitative data from external sources, the manager's assessments, and the score are documented and stored in a database in the data warehouse. Summary reports at the company and fund level are also available in PowerBI. The database structure allows tracking of companies' progress over time and enables us to verify whether the companies succeed in achieving their objectives. Targeted analysis at the company level should enable us to manage and understand risks related to sustainability factors. Company analyses are conducted at the time of investment, and the portfolios are reviewed at least annually.

With regard to our exclusion criteria, our risk department ensures that none of the funds are invested in companies that violate these criteria. Our funds are screened by Sustainalytics'

online database for “Global Standard Screening” every three months to ensure compliance with global norms such as the UN Global Compact.In terms of active ownership and voting, we aim to vote at all bondholder meetings.

g) Methodologies

To measure the attainment of each of the environmental or social characteristics promoted by the fund, we use sustainability indicators defined in our proprietary sustainability model, Tellus. For each sustainability indicator we score each portfolio company from 1 to 5. These scores can also be aggregated on fund level.

The following sustainability indicators are used to measure the attainment of the *environmental characteristics* promoted by this fund:

- Does the company have a climate policy?
- Does the company report direct emissions (Scope 1)?
- Does the company report indirect emissions (Scope 2)?
- Does the company have a strategy to reduce their environmental footprint?
- Is the company endorsing the Paris agreement?
- Does the company link their climate goals towards the UN sustainability goals?
- Does to company report to Carbon Disclosure Project (CDP)?
- The portfolio manager’s assessment of the quality of the company's reporting on environmental issues.
- The portfolio manager’s assessment of the company's emissions.
- The portfolio manager’s assessment of the company's emissions compared to peers.
- The portfolio manager’s assessment of the company's implementation of environmental measures.
- The portfolio manager’s assessment of the company's strategy for circular economy.

The following sustainability indicators are used to measure the attainment of the *social characteristics* promoted by this financial product:

- The portfolio manager’s assessment of the company's equal pay policy.
- The portfolio manager’s assessment of the company's performance on gender equality and diversity.
- The portfolio manager’s assessment of the company's workforce stability.
- The portfolio manager’s assessment of the quality of the company's HSE reporting.
- The portfolio manager’s assessment of the company's wage policy.
- The portfolio manager’s assessment of the company's guidelines in relation to the right to unionization.
- The portfolio manager’s assessment of the company's insurance and pension schemes.
- The portfolio manager’s assessment of the overall guidelines for monitoring SRI in the company's and the supplier's value chains.
- Has the company been involved in controversies involving local or national authorities?

The fund's investments in the categories of banks/financial institutions and municipalities/counties consist of issuers with relatively similar economic activities. The sustainability risk, as well as the environmental and social impact associated with these activities, is not considered to differ significantly between issuers within each of these

categories. Furthermore, corporate governance, including business models, management structures, and applicable legal frameworks, is relatively consistent among the issuers within each category. Therefore, we conduct an aggregated assessment of the sustainability indicators in our analysis model, Tellus, for the categories of banks/financial institutions and municipalities/counties.

Company analyses in Tellus are conducted at the time of investment, and the portfolios are reviewed at least annually. This enables tracking of companies' progress over time and allows us to verify whether the companies succeed in achieving their objectives.

h) Data sources and processing

The portfolio managers are actively engaged and leverage available information to gain a deep understanding of companies' business models, including the risks and opportunities that impact their governance, operations, and value creation. The limited number of companies in each portfolio allows the managers to thoroughly analyze and monitor them over time.

Sources used to gather information include company presentations and reports, meetings with management and other stakeholders, as well as data from Bloomberg, Sustainalytics, and research firms.

In Tellus, we collect quantitative data from Bloomberg across the E, S, and G categories. Portfolio managers perform qualitative assessments based on all available information, including the quantitative data from Bloomberg. These assessments are compared to those from previous years for quality assurance and serve as a basis for ongoing company monitoring.

To produce our annual statement on the principal adverse impacts of investment decisions on sustainability factors, we use data from Sustainalytics. We have integrated this data into Tellus to cross-check it against companies' own reported figures and to increase coverage when data from Sustainalytics is not available.

To screen our funds for compliance with the UN Global Compact, we use Sustainalytics' online database for "Global Standard Screening." Additionally, each portfolio manager independently assesses whether portfolio companies adhere to international norms.

In general, Holberg does not use estimated data in its sustainability reports, ensuring that the reports are based on actual, collected data.

i) Limitations to methodologies and data

There are certain limitations in the methods used to measure the achievement of the environmental or social characteristics promoted by the fund. For example, the models and analytical tools employed may rely on assumptions and estimates that may not fully capture all the nuances of environmental or social impacts. Additionally, applying these methods consistently across different funds, sectors, or geographical regions can be challenging due to varying standards and practices.

In Tellus, we have defined what a score of 1-5 represents for various ESG factors, reducing the scope for subjective assessments by portfolio managers. This also improves comparability over time, as the definitions remain consistent. The portfolio managers analyze and assess all companies in each portfolio, ensuring good traceability, reviewing data reported by companies, using their own knowledge of the companies, and validating these assessments with external sources.

The data sources used to measure environmental or social characteristics may have limitations regarding availability, completeness, and accuracy. For example, there is significant uncertainty related to companies' Scope 3 emissions due to variable data quality, estimates, and completeness. Data may be self-reported by companies, leading to inconsistencies. Comparisons can also be challenging if the data is not based on the same methodology. Furthermore, there may be gaps in data coverage for certain metrics or for companies operating in regions with less stringent reporting requirements. The introduction of the EU's Corporate Sustainability Reporting Directive (CSRD) is expected to address some of these challenges by establishing a common framework for sustainability reporting by companies subject to the directive.

In Tellus, data from external sources is compared to companies' own reported information to cross-check accuracy. When data from different providers is inconsistent, we conduct additional internal research and analysis of the company and potential issues. If gaps in the data are identified, the portfolio manager may initiate dialogue to gather more information.

The availability of reliable, consistent, and comprehensive sustainability data remains one of the biggest challenges in sustainability reporting, but the demand for more and better sustainability data is growing, partly driven by new regulations. Despite the limitations in methodology and data, Holberg has measures in place to ensure that the environmental and social characteristics promoted by the funds are not significantly affected. In addition to quantitative data, portfolio managers conduct many qualitative analyses. We work to improve data quality through cross-referencing multiple data sources and making comparisons across companies. The framework surrounding Tellus is also regularly reviewed and updated.

j) Due diligence

Holberg conducts due diligence assessments for all companies in the fund to ensure that sustainability risks and opportunities are properly considered in investment decisions. These assessments take a comprehensive approach to integrating sustainability and responsibility into the investment process. Portfolio managers evaluate environmental, social, and governance (ESG) factors to ensure that investments align with our guidelines.

Holberg uses internal controls to ensure the reliability of the assessment process. This includes applying consistent assessment criteria through the Tellus system, which guarantees a uniform ESG review across all our mandates. Additionally, we perform quarterly screenings of our portfolios against Sustainalytics' database for "Global Standard Screening" to monitor compliance with the UN Global Compact. The Risk and Compliance team monitors the portfolios for alignment with the Norwegian Council on Ethics' exclusion list and addresses potential breaches of our guidelines.

Alongside our internal processes and controls, Holberg's internal auditor focuses on sustainability regulations, helping ensure compliance and continuously improving our processes.

k) Engagement policies

Holberg practices active ownership to influence companies towards improvement. As an active manager with concentrated portfolios, our investment philosophy is based on close follow-up with the companies in which we invest. Dialogue with management and voting at bondholder meetings are two key tools we use to ensure transparency for our unit holders.

Holberg is an active manager that invests long-term in a concentrated number of portfolio companies per fund. A key principle of our investments is that the business models of portfolio companies must be sustainable over the long term. We also require a high level of confidence in the management’s ability to deliver results and protect the interests of shareholders and other stakeholders.

Holberg seeks to influence underlying companies in the right strategic, business, and sustainability directions. Where appropriate, Holberg may form alliances with other voting bondholders to achieve desired objectives.

To ensure effective and responsible use of voting rights, Holberg regularly monitors portfolio companies and builds relationships through meetings and dialogue with management. Portfolio managers aim to ensure that the companies' boards and management teams function effectively and that they have a clear understanding of the companies' business strategies, risk management, environmental and social responsibility, corporate governance, compliance, performance, and capital allocation.

Given our investment philosophy, where we invest in well-managed companies, we usually agree with the board's recommendations in most bondholder meeting matters. However, situations may arise where we disagree with the board's proposals. In such cases, we will vote in line with our own assessment. Holberg may also collaborate with other investors on issues where collective engagement is beneficial in achieving desired outcomes. If a significant disagreement persists on a key issue, we will reassess our investment in the company to safeguard the interests of our unit holders.

Holberg’s voting guidelines are available on our website.

l) Designated reference benchmark

No index has been designated as a reference benchmark for attaining the environmental or social characteristics promoted by the fund.

10. Holberg OMF

a) Summary

Holberg is an active fund manager and the fund's objective is to create the highest possible long-term risk adjusted return compared to the fund's investment universe. The portfolio manager seeks to invest in companies with a focus on long-term value creation based on a sustainable business model.

Sustainability is integrated into the fund's investment process where we try to understand whether companies are run in line with common environmental, ethical and social norms. Sustainability is integrated through:

1. Holberg's proprietary ESG model, Tellus
2. Exclusion lists and monitoring
3. Active ownership

The portfolio manager shall be hands on and use all available information to understand each business model of the portfolio companies, including which risk factors and opportunities that may affect the company's management, operations, and value creation. The limited number of companies in each portfolio allows us to gain a deep understanding of the companies and monitor them closely over time.

The fund promotes a wide range of environmental and social characteristics through the integration of Holberg's proprietary ESG model, exclusion lists, and active ownership. We use sustainability indicators from our proprietary sustainability model, Tellus, to assess the achievement of the environmental and social characteristics promoted by the fund.

This document provides a description of the fund's sustainability-related characteristics. More information can be found in the fund's prospectus and on Holberg's website.

b) No sustainable investment objective

This financial product promotes environmental and/or social characteristics but does not have a sustainable investment objective.

The fund is not committed to make any sustainable investments.

c) Environmental or social characteristics of the financial product

Sustainability is integrated into the fund's investment process where we try to understand whether companies are run in line with common environmental, ethical and social norms. The fund promotes a wide range of environmental and social characteristics through the integration of Holberg's proprietary ESG model, exclusion lists, and active ownership.

We seek to promote sustainability through documentation of our investment decisions. With concentrated portfolios we are able to assess each company and its management's approach to long-term sustainable development. Access to reliable data can be deficient, and the perception of sustainability and which ESG criteria each company meet varies.

Holberg wishes to contribute to building knowledge by being an active participant in the debate about how sustainability can improve risk assessments and investment decisions. This will be executed through internal activities (meetings with clients, seminars, etc.), as well as participation and contribution in external forums. Also, we will seek to highlight the topic through our communication with clients and presence in the media.

d) Investment strategy

Holberg is an active fund manager and the fund's objective is to create the highest possible long-term risk adjusted return compared to the fund's investment universe. The portfolio manager seeks to invest in companies with a focus on long-term value creation based on a sustainable business model.

The binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by the fund are:

1. Holberg's proprietary ESG model, Tellus
2. Exclusion lists and monitoring
3. Active ownership

Holberg has developed the Tellus model, which is our proprietary analysis tool for ESG and sustainability and contains common quality requirements for the portfolio companies. This integration gives us a broader understanding of the companies and potential risks. A sustainability related event may affect one single company directly or may have a wider impact on an industry, geographic area, or country, which can affect bigger parts of the portfolio. Integrating sustainability risks into the portfolio construction contributes to create the desired risk adjusted return. Tellus is our fact-based method for systematizing sustainability risks and analyses, and it is an efficient tool to monitor each investment over time.

We also apply a set of exclusions to the portfolio, which is based on the Government Pension Fund Global's guidelines. I addition to this, we have chosen to exclude gambling and pornography from our investment universe. We want our portfolio companies to operate in line with international norms, including UN Global Compact.

We practice active ownership to encourage the companies to improve. As an active fund manager with concentrated portfolios, we have an investment philosophy that is founded on close follow-up of the companies we are invested in. We have dialogs with the company management and vote at bondholder meetings to contribute to transparency for the shareholders. Holberg's voting guidelines is available on our webpage.

The portfolio manager shall be hands on and use all available information to understand each business model of the portfolio companies, including which risk factors that may affect the company's management, operations, and value creation. Leadership trust and clear focus on shareholders are key prerequisites for good corporate governance and these two elements are central in Holberg's research process.

The portfolio manager makes assessments of the portfolio companies' governance practices using Holberg's proprietary sustainability analysis model, Tellus. The following sustainability indicators are used to measure the attainment of good governance practices in the companies the fund invests in:

- Is the board independent of the company's management?
- Are the board incentives long-term and in line with the shareholders' interests?
- Are the board members elected individually?
- The portfolio manager’s assessment of the composition of the board in respect to operation and strategy.
- The portfolio manager’s assessment of the composition of the board in regard to sustainability.
- The portfolio manager’s assessment of the composition of the board in respect to diversity (gender, age, ethnicity).
- Does the management have an ESG-linked bonus scheme?
- Are the management incentives long-term and in line with the shareholders' interests?
- The portfolio manager’s assessment of the size of compensation for managers in absolute terms.
- The portfolio manager’s assessment of the size of compensation to management in relation to the company size.
- Is there one share class in the company?
- The portfolio manager’s assessment of the power balance between share classes, principal owners and minorities.
- Do shareholders usually support the board's proposals on the annual general meeting?
- Are there any anti-takeover mechanisms?

Holberg's guidelines for sustainability and responsible investments, as well as Holberg's guidelines for the use of voting rights, are publicly available on Holberg's website.

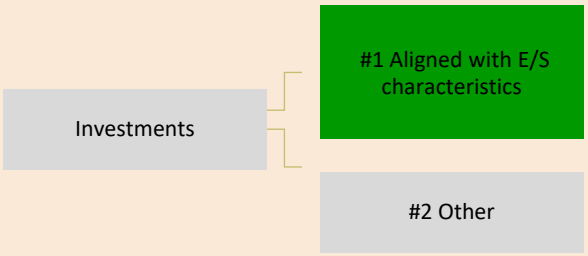
The following sustainability indicators are used to measure the attainment of the *social characteristics* promoted by this financial product:

- The portfolio manager’s assessment of the company's equal pay policy.
- The portfolio manager’s assessment of the company's performance on gender equality and diversity.
- The portfolio manager’s assessment of the company's workforce stability.
- The portfolio manager’s assessment of the quality of the company's HSE reporting.
- The portfolio manager’s assessment of the company's wage policy.
- The portfolio manager’s assessment of the company's guidelines in relation to the right to unionization.
- The portfolio manager’s assessment of the company's insurance and pension schemes.
- The portfolio manager’s assessment of the overall guidelines for monitoring SRI in the company's and the supplier's value chains.
- Has the company been involved in controversies involving local or national authorities?

e) Proportion of investments

The fund shall invest in bank deposits and interest-bearing securities. The fund will only invest in securities denominated in Norwegian kroner (NOK).

All of the fund's investments are aligned with the environmental or social characteristics which are defined as the binding elements of the investment strategy.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The fund does not use derivatives to attain the environmental or social characteristics promoted by the financial product.

The fund has not defined a minimum percentage of sustainable investments with an environmental objective that are aligned with the EU Taxonomy.

The fund has not defined a minimum share of investments in transitional and enabling activities.

The fund has not defined a minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy.

The fund has not defined a minimum share of socially sustainable investments.

f) Monitoring of environmental or social characteristics

Tellus is our fact-based method for systematizing sustainability risk and analysis, and an effective way to monitor each individual investment over time. The model consists of approximately 90 quantitative data fields and 40 qualitative questions and checkpoints at the company level within each of the E, S, and G categories. The assessments are carried out by the portfolio manager, based on their knowledge and analysis of the company. A score is calculated at both the company and fund level based on the qualitative assessments.

Quantitative data from external sources, the manager's assessments, and the score are documented and stored in a database in the data warehouse. Summary reports at the company and fund level are also available in PowerBI. The database structure allows tracking of companies' progress over time and enables us to verify whether the companies succeed in achieving their objectives. Targeted analysis at the company level should enable us to manage and understand risks related to sustainability factors. Company analyses are conducted at the time of investment, and the portfolios are reviewed at least annually.

With regard to our exclusion criteria, our risk department ensures that none of the funds are invested in companies that violate these criteria. Our funds are screened by Sustainalytics'

online database for “Global Standard Screening” every three months to ensure compliance with global norms such as the UN Global Compact.In terms of active ownership and voting, we aim to vote at all bondholder meetings.

g) Methodologies

To measure the attainment of each of the environmental or social characteristics promoted by the fund, we use sustainability indicators defined in our proprietary sustainability model, Tellus. For each sustainability indicator we score each portfolio company from 1 to 5. These scores can also be aggregated on fund level.

The following sustainability indicators are used to measure the attainment of the *environmental characteristics* promoted by this fund:

- Does the company have a climate policy?
- Does the company report direct emissions (Scope 1)?
- Does the company report indirect emissions (Scope 2)?
- Does the company have a strategy to reduce their environmental footprint?
- Is the company endorsing the Paris agreement?
- Does the company link their climate goals towards the UN sustainability goals?
- Does to company report to Carbon Disclosure Project (CDP)?
- The portfolio manager’s assessment of the quality of the company's reporting on environmental issues.
- The portfolio manager’s assessment of the company's emissions.
- The portfolio manager’s assessment of the company's emissions compared to peers.
- The portfolio manager’s assessment of the company's implementation of environmental measures.
- The portfolio manager’s assessment of the company's strategy for circular economy.

The following sustainability indicators are used to measure the attainment of the *social characteristics* promoted by this financial product:

- The portfolio manager’s assessment of the company's equal pay policy.
- The portfolio manager’s assessment of the company's performance on gender equality and diversity.
- The portfolio manager’s assessment of the company's workforce stability.
- The portfolio manager’s assessment of the quality of the company's HSE reporting.
- The portfolio manager’s assessment of the company's wage policy.
- The portfolio manager’s assessment of the company's guidelines in relation to the right to unionization.
- The portfolio manager’s assessment of the company's insurance and pension schemes.
- The portfolio manager’s assessment of the overall guidelines for monitoring SRI in the company's and the supplier's value chains.
- Has the company been involved in controversies involving local or national authorities?

The fund's investments in the categories of banks/financial institutions and municipalities/counties consist of issuers with relatively similar economic activities. The sustainability risk, as well as the environmental and social impact associated with these activities, is not considered to differ significantly between issuers within each of these

categories. Furthermore, corporate governance, including business models, management structures, and applicable legal frameworks, is relatively consistent among the issuers within each category. Therefore, we conduct an aggregated assessment of the sustainability indicators in our analysis model, Tellus, for the categories of banks/financial institutions and municipalities/counties.

Company analyses in Tellus are conducted at the time of investment, and the portfolios are reviewed at least annually. This enables tracking of companies' progress over time and allows us to verify whether the companies succeed in achieving their objectives.

h) Data sources and processing

The portfolio managers are actively engaged and leverage available information to gain a deep understanding of companies' business models, including the risks and opportunities that impact their governance, operations, and value creation. The limited number of companies in each portfolio allows the managers to thoroughly analyze and monitor them over time.

Sources used to gather information include company presentations and reports, meetings with management and other stakeholders, as well as data from Bloomberg, Sustainalytics, and research firms.

In Tellus, we collect quantitative data from Bloomberg across the E, S, and G categories. Portfolio managers perform qualitative assessments based on all available information, including the quantitative data from Bloomberg. These assessments are compared to those from previous years for quality assurance and serve as a basis for ongoing company monitoring.

To produce our annual statement on the principal adverse impacts of investment decisions on sustainability factors, we use data from Sustainalytics. We have integrated this data into Tellus to cross-check it against companies' own reported figures and to increase coverage when data from Sustainalytics is not available.

To screen our funds for compliance with the UN Global Compact, we use Sustainalytics' online database for "Global Standard Screening." Additionally, each portfolio manager independently assesses whether portfolio companies adhere to international norms.

In general, Holberg does not use estimated data in its sustainability reports, ensuring that the reports are based on actual, collected data.

i) Limitations to methodologies and data

There are certain limitations in the methods used to measure the achievement of the environmental or social characteristics promoted by the fund. For example, the models and analytical tools employed may rely on assumptions and estimates that may not fully capture all the nuances of environmental or social impacts. Additionally, applying these methods consistently across different funds, sectors, or geographical regions can be challenging due to varying standards and practices.

In Tellus, we have defined what a score of 1-5 represents for various ESG factors, reducing the scope for subjective assessments by portfolio managers. This also improves comparability over time, as the definitions remain consistent. The portfolio managers analyze and assess all companies in each portfolio, ensuring good traceability, reviewing data reported by companies, using their own knowledge of the companies, and validating these assessments with external sources.

The data sources used to measure environmental or social characteristics may have limitations regarding availability, completeness, and accuracy. For example, there is significant uncertainty related to companies' Scope 3 emissions due to variable data quality, estimates, and completeness. Data may be self-reported by companies, leading to inconsistencies. Comparisons can also be challenging if the data is not based on the same methodology. Furthermore, there may be gaps in data coverage for certain metrics or for companies operating in regions with less stringent reporting requirements. The introduction of the EU's Corporate Sustainability Reporting Directive (CSRD) is expected to address some of these challenges by establishing a common framework for sustainability reporting by companies subject to the directive.

In Tellus, data from external sources is compared to companies' own reported information to cross-check accuracy. When data from different providers is inconsistent, we conduct additional internal research and analysis of the company and potential issues. If gaps in the data are identified, the portfolio manager may initiate dialogue to gather more information.

The availability of reliable, consistent, and comprehensive sustainability data remains one of the biggest challenges in sustainability reporting, but the demand for more and better sustainability data is growing, partly driven by new regulations. Despite the limitations in methodology and data, Holberg has measures in place to ensure that the environmental and social characteristics promoted by the funds are not significantly affected. In addition to quantitative data, portfolio managers conduct many qualitative analyses. We work to improve data quality through cross-referencing multiple data sources and making comparisons across companies. The framework surrounding Tellus is also regularly reviewed and updated.

j) Due diligence

Holberg conducts due diligence assessments for all companies in the fund to ensure that sustainability risks and opportunities are properly considered in investment decisions. These assessments take a comprehensive approach to integrating sustainability and responsibility into the investment process. Portfolio managers evaluate environmental, social, and governance (ESG) factors to ensure that investments align with our guidelines.

Holberg uses internal controls to ensure the reliability of the assessment process. This includes applying consistent assessment criteria through the Tellus system, which guarantees a uniform ESG review across all our mandates. Additionally, we perform quarterly screenings of our portfolios against Sustainalytics' database for "Global Standard Screening" to monitor compliance with the UN Global Compact. The Risk and Compliance team monitors the portfolios for alignment with the Norwegian Council on Ethics' exclusion list and addresses potential breaches of our guidelines.

Alongside our internal processes and controls, Holberg's internal auditor focuses on sustainability regulations, helping ensure compliance and continuously improving our processes.

k) Engagement policies

Holberg practices active ownership to influence companies towards improvement. As an active manager with concentrated portfolios, our investment philosophy is based on close follow-up with the companies in which we invest. Dialogue with management and voting at bondholder meetings are two key tools we use to ensure transparency for our unit holders.

Holberg is an active manager that invests long-term in a concentrated number of portfolio companies per fund. A key principle of our investments is that the business models of portfolio companies must be sustainable over the long term. We also require a high level of confidence in the management’s ability to deliver results and protect the interests of shareholders and other stakeholders.

Holberg seeks to influence underlying companies in the right strategic, business, and sustainability directions. Where appropriate, Holberg may form alliances with other voting bondholders to achieve desired objectives.

To ensure effective and responsible use of voting rights, Holberg regularly monitors portfolio companies and builds relationships through meetings and dialogue with management. Portfolio managers aim to ensure that the companies' boards and management teams function effectively and that they have a clear understanding of the companies' business strategies, risk management, environmental and social responsibility, corporate governance, compliance, performance, and capital allocation.

Given our investment philosophy, where we invest in well-managed companies, we usually agree with the board's recommendations in most bondholder meeting matters. However, situations may arise where we disagree with the board's proposals. In such cases, we will vote in line with our own assessment. Holberg may also collaborate with other investors on issues where collective engagement is beneficial in achieving desired outcomes. If a significant disagreement persists on a key issue, we will reassess our investment in the company to safeguard the interests of our unit holders.

Holberg’s voting guidelines are available on our website.

l) Designated reference benchmark

No index has been designated as a reference benchmark for attaining the environmental or social characteristics promoted by the fund.