Responsible Investment and Sustainability Risk Integration Policy

Norselab Credit Management AS

Background

Norselab Credit Management's corporate mission is to offer professional investors opportunities to reach their financial objectives by providing access to a diversified offering of investment strategies that unlock value primarily across Nordic credit markets.

We believe that identifying and managing material environmental, social, and governance factors is necessary to deliver long-term risk-adjusted returns for our clients, and we integrate them in investment strategies, client solutions, and organization. This includes investment analyses and decisions, investment advice, risk management, product governance, and client suitability assessment.

1. Purpose

The purpose of this policy is to ensure transparency and predictability for clients, regulators and other stakeholders regarding Norselab Credit Management's approach to responsible investments and integration of sustainability risks into its financial product offerings. The goal is to deliver outperforming financial returns while applying the principles and guidelines set out in this policy.

2. Roles and Responsibilities

- The Board adopts the policy.
- The Managing Director is the owner of the policy and ultimately responsible for its application.
- The Head of ESG and Sustainability is responsible for creating awareness and understanding of the policy among employees and stakeholders, and proposing revisions to the policy as deemed necessary.

3. Scope

This policy applies to Norselab Credit Management's investment activities and is operationalized through methods and processes adapted to each financial product.

4. Responsible Investment Practices

Our approach to responsible investments is guided by international standards, goals and norms, including:

- UN Principles for Responsible Investment (PRI)
- OECD Guidelines for Multinational Enterprises
- UN Global Compact, hereunder the international conventions and principles on which it is based (The UN Universal Declaration of Human Rights, ILO's core conventions, The Rio Declaration on Environment and Development, The UN

Convention against Corruption, The UN Guiding Principles on Business and Human Rights).

Investments managed by the Norselab Credit Management that have a sustainable objective use the UN Sustainable Development Goals as a strategic prism to assess positive and negative contributions to sustainable development.

This approach is implemented through three main levers detailed below: Exclusions, systematic ESG integration, and active stewardship.

4.1 Exclusions

Norselab Credit Management strives, to the best of its ability, to uncover severe or systematic norm violations, and refrains from investing in companies where there is unacceptable risk related to breaches of international norms, as well as companies with significant involvement in high-risk controversial products.

4.1.1 Norms-based exclusions:

The Investment Manager excludes companies from its investment universe where there is unacceptable risk that the company actively contributes to or is responsible for:

- Severe or systematic violations of human rights.
- Severe or systematic violations of fundamental labor rights.
- Serious violations of individuals' rights in situations of war or armed conflict.
- Supplying weapons or military materiel where there is significant risk of use in serious breaches of international humanitarian law.
- Severe environmental damage.
- Gross corruption, including systemic bribery or fraud
- Other particularly severe violations of basic ethical or responsible business standards.

4.1.2 Product-based exclusions:

The Investment Manager does not invest in companies that:

- Develop or produce controversial weapons and their key components. Such controversial weapons include biological and chemical weapons, anti-personnel mines, cluster munitions, and other weapons that violate fundamental humanitarian principles.

- Extract coal or oil sands for energy production, or produce coal-based power, as a significant share of revenue.
- Produce tobacco or cannabis for recreational use.
- Produce pornography.

4.1.3 Implementation Principles

- Application of exclusions may vary between strategies. For example, applicable revenue thresholds for exclusions can vary from fund to fund and are set out in the relevant annex to each fund's supplement.
- Assessments are risk-based and forward-looking. Where breaches are historical or remediable, we may take into account remediation, restructuring, or transition.
- Where appropriate, the Manager may seek engagement or allow time-bound remediation before exclusion.
- Final decisions consider the severity, persistence, and company response to identified issues.

4.2 Systematic ESG integration

We incorporate ESG considerations into our investment analysis and decision-making processes across all financial products. Such risk and opportunity analysis may consider both financially material factors and the effects of investments on society and/or the environment, depending on the product's sustainability profile and applicable SFDR category.

4.3 Active Stewardship

Our goal is to influence corporate behavior toward more sustainable business practices.

Norselab Credit Management commits to using its influence and engagement with companies to promote responsible and sustainable practices, and contribute to value creation.

4.4 Reporting

Transparency is essential to the operationalization of this policy. The Investment Manager reports externally in line with legal requirements and sound practices for responsible investments.

5. Sustainability Risk Integration Guidelines

5.1 Regulatory compliance

Our ESG integration approach complies with relevant provisions of the EU Sustainable Finance Disclosure Regulation. Norselab Credit Management fulfills the information disclosure requirements for sustainability risk integration at entity and product level (Sustainable Finance Disclosure Regulation - SFDR).

Norselab Credit Management complies with the provisions on integrating sustainability risks into investment due diligence, risk management policies and processes, and governance structures (AIFMD Delegated Regulation 2021/1255 and MIFID Delegated Regulation 2021/1254).

The European Securities Markets Authority (ESMA) has stressed the importance of incorporating sustainability risks in investment and risk processes and internal organization of UCITS and AIFM managers in its 31 May 2021 Supervisory briefing on sustainability risks and disclosures in the area of investment management.

5.2 Sustainability Risk Identification

Our investment Due Diligence and risk management frameworks form the basis for investment teams and the risk management function to identify and evaluate potential risks across the investable universe and the various investment mandates.

The current process for integrating sustainability risk is outlined below. The integration of sustainability risks is, however, an evolving field. Available data, expertise, technology, and tools to identify, measure, and mitigate sustainability risks will likely improve over time. Therefore, we will regularly review and, where relevant, recalibrate our sustainability risk integration processes to ensure they remain fully aligned with these innovations, recognized market practices, regulatory guidelines and frameworks.

5.3 Sustainability Risk Governance and Process

The Investment Manager considers sustainability-related information as an integrated part of its investment process. This notwithstanding, the various mandates and funds may be exposed to sustainability risks from time to time. A sustainability risk is defined in the SFDR as an environmental, social or governance event or condition that could cause an actual or a potential material negative impact on the value of investments. The universe of sustainability events or conditions is very broad, and their relevance, materiality, and impact on investments will depend on several factors. If they materialize, sustainability risks can reduce the value of investments held in funds managed by Norselab Credit Management and could have a material impact on the performance and returns of the respective funds.

5.3.1 Due Diligence

Assessments of sustainability-related risks and, when relevant, opportunities are conducted using a data-driven screening process and/or qualitative assessments and are tailored to the sustainability profile of the financial product. This systematic process for assessing all investment cases offers pre-trade risk mitigation by ensuring that investment processes adhere to the present policy.

The approach to impact and sustainable investments (as defined in SFDR) is described in more detail in the relevant funds' Annexes. In line with regulatory requirements, the Investment Manager publishes the annual disclosures for each fund by June 30 each year.

5.3.2 The Product Governance Committee

The Product Governance Committee (PGC) is a good governance measure for financial products managed by Norselab Credit Management.

The Company's PGC is responsible for approving, *pre-trade*, funds' investment mandates and investment universes, with the objective of ensuring that all investments are consistent with the respective funds' regulatory commitments. PGC is chaired by the Head of Risk, with the Head of ESG and Sustainability and Deputy Head of Compliance as additional members.

Each investment must be deemed in line with the respective fund's mandate and legal offering documents, guidelines and investment restrictions, the present policy, and requirements according to the applicable SFDR categorization.

To ensure sufficient attention to SFDR-relevant issues on a daily and ongoing basis, the PGC has delegated pre-trade approvals to the Head of Risk. A dedicated ESG professional follows a structured screening and/or qualitative assessment method consistent with the respective funds' sustainability commitments and applicable regulations. Issues that are unfit for delegated approval by the Head of Risk shall be escalated to the PGC.

To ensure regular review and oversight, it is proposed that the PGC convene at least quarterly to review, *ex post*, approved investments and potential updates to due diligence methods.

5.3.3 Reporting routines

The Investment Manager has structured routines to ensure compliance with all disclosure requirements.

- Periodic SFDR reporting: the Investment Manager publishes the periodic disclosures for each fund by June 30 every year, based on the annual average of the four quarters of the reporting year.

- PAI statement: When applicable, the PAI statement for each fund is reviewed and updated by June 30 every year.
- Website disclosures: The applicable disclosures for each fund are reviewed and updated annually, as necessary. They are made available by September 30 every year on the Investment Manager's website.

The Investment Manager retains sufficient resources and competence overlap to ensure the continuity of these routines in any event such as sick leave, resignation or other disrupting events.

6. Relevant framework reference documents

Further information in relation to the Investment Manager's approach to sustainable investment may be found on the Investment Manager's website at https://norselab.com/.

- Responsible Investment and Sustainability Risk Integration Policy (present document)
- Remuneration Policy
- Funds' precontractual disclosures
- Funds' website disclosures
- Funds' periodic disclosures

7. Change log

Date	Comments/changes
25.03.2026	First Responsible Investment and Risk Integration Policy adopted by the Board of Directors.