

Sustainable investment objective

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852 establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



Did this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input checked="" type="radio"/> <input checked="" type="checkbox"/> Yes	<input checked="" type="radio"/> <input type="radio"/> <input type="checkbox"/> No
<input checked="" type="checkbox"/> It made sustainable investments with an environmental objective: 24,23%* <ul style="list-style-type: none"> <input checked="" type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy <input checked="" type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy 	<input type="checkbox"/> It promoted Environmental/Social (E/S) characteristics and while it did not have as its objective a sustainable investment, it had a proportion of ___% of sustainable investments <ul style="list-style-type: none"> <input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> with a social objective
<input checked="" type="checkbox"/> It made sustainable investments with a social objective: 29,68%*	<input type="checkbox"/> It promoted E/S characteristics, but did not make any sustainable investments

* This represents 24,23% of total assets. Total assets include physical holdings, cash and cash equivalents.

To what extent was the sustainable investment objective of this financial product met?

The objective of Norselab Meaningful Impact High Yield (“the fund”) is to achieve an attractive level of total return (income plus capital appreciation) from the high yield fixed income market through investment in issuers that generate a net positive contribution, through their core products and services, to the UN Sustainable Development Goals (SDGs).

The fund launched on November 30th, 2022. For the reference period December 1st – December 31st 2022, all issuers in the fund have undergone the fund’s structured and rigorous initial assessment process:

- **Initial assessment:**
 - Issuers contributed at a substantial and concrete level to at least one SDG at the target level through their core products or services. This was ensured by mapping the issuer's top five products or services (by revenue) against the SDGs at the target level. Both negative and positive contributions were mapped. Issuers with products or services that had a negative contribution to one or more of the SDGs at the target level were either (i) excluded directly if accompanied by other exclusion criteria, or (ii) underwent due diligence based on the Investment Manager's fundamental research method, described below.
 - The SDG net impact score of the issuer was evaluated based on data modeled by the Upright project, an impact data provider (please see "Upright notice" below).
 - ESG risks were assessed.
 - Issuers that did not comply with the principles of the UN Global Compact or operate in industries with lasting negative impacts on the SDGs were excluded, including those with ties to controversial, civilian, conventional, or nuclear weapons, ties to tobacco, ties to casino & gambling, and large revenues from alcohol, coal, oil sands, oil & production.
 - In rare cases, the Investment Manager conducted due diligence on issuers driving significant positive change in industries that are not excluded, but that have large negative impacts. In such cases, the issuer had to show significant avoided or mitigating efforts of its potential negative impacts.
- **Due diligence:**
 - The due diligence based on the fundamental research method is two-fold. It consists of a product-level and an issuer-level assessment based on peer-reviewed and industry research.
 - These issuers were also screened based on the Principal Adverse Impact (PAI) indicators and good governance practices (issuers' management structures, employee relations, remuneration policies, and tax compliance), and they were assessed for alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

Issuer in the fund at the end of the reference period	SDG target(s)	Exclusion criteria	SDG-based net impact score	Significant ESG risks
Issuer A	7.a, 13.2	Pass	+79%	No
Issuer B	11.3, 12.6	Pass	+22%	No
Issuer C	8.3, 9.3, 12.6, 13.3	Pass	+19%	No
Issuer D	9.3, 9.1	Pass	+43%	No
Issuer E	9.1	Pass	+31%	No
Issuer F	4.3	Pass	+96%	No
Issuer G	9.1	Pass	+50%	No
Issuer H	8.2	Pass	+88%	No
Issuer I	7.2, 2.4, 9.1	Pass	+57%	No
Issuer J	9.3, 8.3, 7.a, 9.1	Pass	+71%	No
Issuer K	2.2, 3.4	Pass	+46%	No
Issuer L	7.2, 13.2, 7.1, 12.4	Pass	+83%	No
Issuer M	7.3, 9.4, 11.3, 7.a	Pass	+63%	No
Issuer N	8.2	Pass	+90%	No
Issuer O	3.d, 3.b, 8.2	Pass	+94%	No
Issuer P	8.2, 8.10	Pass	+50%	No

Issuer Q	3.d, 8.2	Pass	+93%	No
Issuer R	2.1, 9.4	Pass	+14%	No
Issuer S	9.3, 8.3, 9.1, 3.c	Pass	+82%	No

Upright Notice

This report contains impact-related and sustainability-related indicators that are based on data produced by Upright Oy (Upright). Due to the limited availability of underlying information and the nature of the indicators, the produced information intrinsically includes some inaccuracy. Upright continuously seeks to improve the accuracy of its indicators by using the best available information and the best available statistical methods for integrating information from different sources. Upright does not warrant the accuracy of the information, and shall not be liable for any direct or indirect damages related to the information it provides. The information in this report is reproduced by permission from Upright, and may not be redistributed without permission from Upright.

● **How did the sustainability indicators perform?**

The fund reports on the following indicators:

- % contributing to the SDGs
- Aggregated SDG-based net impact based on data modeled by the Upright project, an impact data provider (please see “Upright notice” above)
- % Taxonomy-aligned based on data modeled by the Upright project, an impact data provider (please see “Upright notice” above)
- % impact-generating (as defined by Norselab’s proprietary impact framework)
- % impact-aligned (as defined by Norselab’s proprietary impact framework)

At the end of the reference period, the indicators were:

% contributing to the SDGs	100,00%
Aggregated SDG-based net impact	+57%
% Taxonomy-aligned*	12,62%
% impact-generating	6,45%
% impact-aligned	93,55%

All indicators are weighted based on the **market value of the physical holdings of the fund only (cash and cash equivalents excluded)** at the end of the reference period.

For this reference period, all issuers that have undergone the initial assessment but not the due diligence were automatically designated “impact-aligned”. The Investment Manager aims to improve this scoring approach and issuers may in the future change from “impact-aligned” to “impact-generating” if they meet the criteria we at any given time have set to define an issuer as “impact generating”. Issuers may also move between the designations if there are significant changes to the issuer’s products or services.

*Based on the EU Taxonomy’s first delegated act on sustainable activities for climate change adaptation and mitigation objectives.

● **...and compared to previous periods?**

N/A. There is no previous Annex IV periodic disclosure for this fund.

Sustainability indicators measure how the sustainable objectives of this financial product are attained.

How did the sustainable investments not cause significant harm to any sustainable investment objective?

Through the structured and rigorous initial assessment process described above, issuers were assessed against several factors to ensure that the issuers included in the investment universe did not cause significant harm to the sustainable investment objective. Specifically, the Investment Manager assessed the following factors:

Do no significant harm factor	Performance during the reference period
No significant negative impact on any of the SDGs	The products or services of the issuers did not have a substantial or concrete negative impact on any of the SDGs at a target level. For issuers that underwent due diligence, the Investment Manager documented such issuer’s significant positive contributions compared to industry peers, as well as the issuer’s mitigated or avoided negative impacts from its products or services.
No significant adverse impacts according to the PAI indicators	Where data was available, the PAI indicators of issuers that underwent due diligence were evaluated against industry peers.
No issues with good governance practices	Good governance practices (including employee relations, management structure, tax compliance and remuneration) of issuers that underwent due diligence were evaluated. No issues were identified compared to industry peers.
No other significant environmental or human rights issues	Issuers that did not comply with the principles of the UN Global Compact or that operate in industries with significant and lasting negative impacts on the SDGs were excluded. This includes those with ties to controversial, civilian, conventional, or nuclear weapons, ties to tobacco, ties to casino & gambling, and large revenues from alcohol, coal, oil sands, oil & production. In rare cases, the Investment Manager conducted due diligence on issuers driving significant positive change in industries that are not excluded, but that have large negative impacts. In such cases, the issuer had to show significant avoided or mitigating efforts of its potential negative impacts.

How were the indicators for adverse impacts on sustainability factors taken into account?

Through the structured and rigorous initial assessment described above, the Investment Manager has not found any reason to believe that the products or services of issuers in the portfolio have a significant negative impact on any of the SDGs at a target level. Furthermore, issuers operating in industries with a lasting negative impact on SDGs, or that did not comply

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

with the principles of the UN Global Compact, were excluded. These assessments contributed to avoiding issuers that could otherwise significantly harm the PAI indicators.

As described above, the PAI indicators, where data was available, of issuers that underwent due diligence were evaluated against industry peers.

The Investment Manager will publish a PAI statement for the reference period by June 30th. The statement includes an average of the quarterly indicators based on data modeled by a third-party data provider.

Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:

As described above, compliance with the principles of the UN Global Compact was assessed. Issuers that failed to comply with the principles of the UN Global Compact are excluded. UN Global Compact Principle 1 is aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. For issuers that underwent due diligence, the Investment Manager also aimed to identify policies or other documentation from the issuer stating alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, or with the ILO's eight fundamental conventions, or the UN Bill of Human Rights.



How did this financial product consider principal adverse impacts on sustainability factors?

Through the structured and rigorous initial assessment described above, the products or services of issuers in the portfolio did not have a substantial or concrete negative impact on any of the SDGs at a target level. Furthermore, issuers operating in industries with a lasting negative impact on SDGs, or that did not comply with the principles of the UN Global Compact, were excluded. These assessments contributed to avoiding issuers that could otherwise significantly harm the PAI indicators.

As described above, the PAI indicators, where data was available, of issuers that underwent due diligence were evaluated against industry peers.

Because the reference period for the fund was very short (less than a quarter), the Investment Manager did not monitor changes to the PAI indicators. The data on indicators is provided by a third-party data provider.

The Investment Manager will publish a PAI statement for the reference period by June 30th. The statement includes an average of the quarterly indicators based on data modeled by a third-party data provider.



What were the top investments of this financial product?

The list of largest investments has been calculated based on the market value of holdings at the end of the reference period. Because the reference period for the fund was very short (less than a quarter), there is no average across the quarters. The list is based on the total assets in the fund, including physical holdings, cash, and cash equivalents.

The list includes the investments constituting the greatest proportion of investments of the financial product during the reference period which is: December 1st – December 31st

The sector categories are based on the Nomenclature of Economic Activities (NACE) defined in EC Regulation 1893/2006. NACE is the European statistical classification of economic activities used by the EU.

Largest investments	Sector	% Assets	Country
Issuer A	D - Electricity, Gas, Steam & Air Conditioning Supply	5,10 %	Ireland
Issuer B	L - Real Estate Activities	5,04 %	Sweden
Issuer C	K - Financial & Insurance Activities	4,71 %	Sweden
Issuer D	K - Financial & Insurance Activities	4,54 %	Sweden
Issuer E	L - Real Estate Activities	3,86 %	Norway
Issuer F	M - Professional, Scientific & Technical Activities	3,20 %	Sweden
Issuer G	L - Real Estate Activities	3,04 %	Norway
Issuer H	J - Information & Communication	2,94 %	Norway
Issuer I	C - Manufacturing	2,90 %	Norway
Issuer J	K - Financial & Insurance Activities	2,87 %	Sweden
Issuer K	C - Manufacturing	2,76 %	Sweden
Issuer L	K - Financial & Insurance Activities	2,15 %	Norway
Issuer M	L - Real Estate Activities	2,13 %	Finland
Issuer N	K - Financial & Insurance Activities	2,03 %	Sweden
Issuer O	J - Information & Communication	2,02 %	Norway
Issuer P	J - Information & Communication	1,72 %	Sweden
Issuer Q	J - Information & Communication	1,35 %	Norway
Issuer R	C - Manufacturing	1,32 %	Spain
Issuer S	K - Financial & Insurance Activities	0,21 %	Sweden
Cash & cash equivalents		46,10%	

What was the proportion of sustainability-related investments?

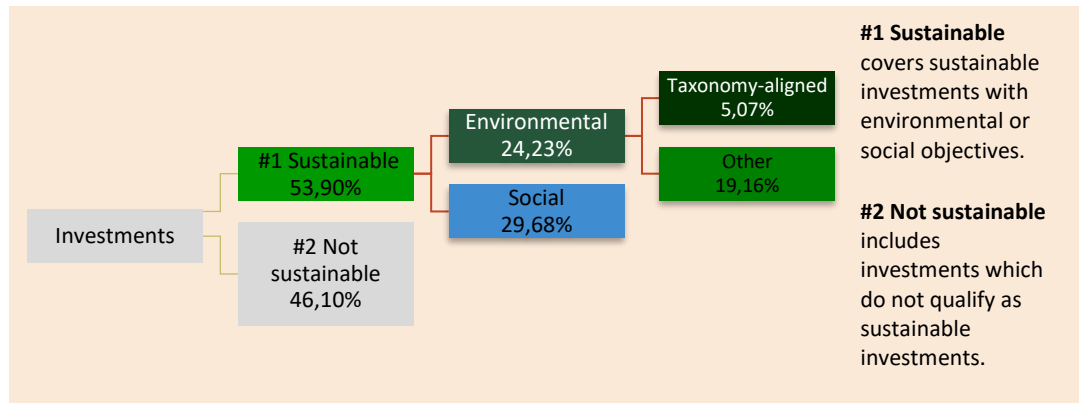


Based on the market value of holdings at the end the reference period, **53,90% of the fund had a sustainable investment objective**. Because the reference period for the fund was very short (less than a quarter), there is no average across the quarters. The fund seeks to invest in issuers that generate a net positive contribution, through their core products and services, to the SDGs. Specifically, the issuer's product and services must contribute to one or more SDGs at the target level and cannot have a significant negative impact on any of the SDGs.

Based on the market value of holdings at the end the reference period, **46,10% of the fund was held in cash balances or more liquid cash equivalent assets that do not have a sustainable investment objective**. This is illustrated under "Not sustainable" in the figure below.

In the pre-contractual disclosure of this fund, the Investment Manager estimated that ca. 20% could be included under "Not sustainable". Because the fund launched November 30th, 2022, there was not enough time during the reference period to invest the fund's more liquid assets in physical issuer holdings.

● **What was the asset allocation?**



Taxonomy-alignment activities are identified by revenue. They are shown in the figure above as a share of the market value of total assets at the end of the reference period. Total assets include physical holdings, cash and cash equivalents.

● **In which economic sectors were the investments made?**

During the reference period, the fund mainly invested in the financial & insurance activities and real estate activities sector. The sector categories are based on the Nomenclature of Economic Activities (NACE) defined in EC Regulation 1893/2006. NACE is the European statistical classification of economic activities used by the EU. The full overview can be found under the question above, "What were the top investments of this financial product?"

● **To what extent were sustainable investments with an environmental objective aligned with the EU Taxonomy?**

The share of investments based on market value with an environmental objective aligned with the EU Taxonomy (by revenues) that generates a net positive contribution, through their core products and services, to one or more of the SDGs associated with environmental goals was 5,07%* at the end the reference period. While the investment primarily targets environmental objectives, it may also at the same time target social objectives.

This share of investments is based on data modeled by the Upright project, an impact data provider (please see "Upright notice" above).

* This represents 5,07% of total assets. Total assets include physical holdings, cash and cash equivalents.



Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

● Did the financial product invest in fossil gas and/or nuclear energy related activities complying with the EU Taxonomy¹?

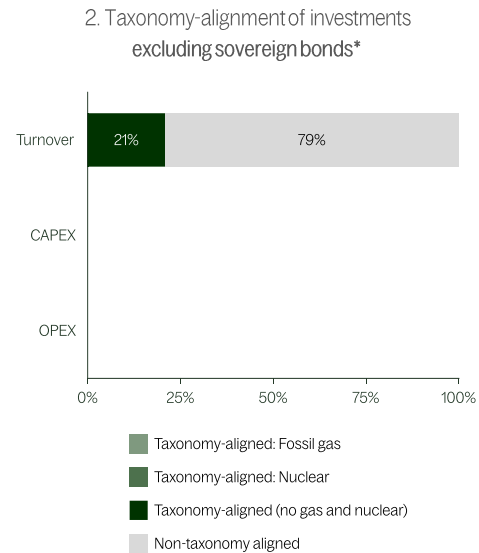
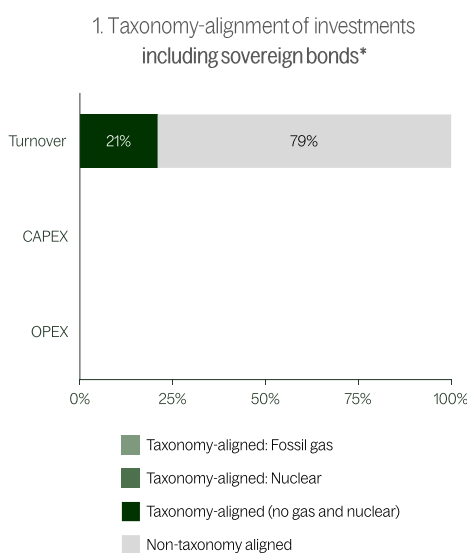
Yes: [specify below, and details in the graphs of the box]

In fossil gas In nuclear energy

No

¹ Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation”) and do no significant harm to any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

The graphs below show in green the percentage of investments that were aligned with the EU Taxonomy. As there is no appropriate methodology to determine the taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



This graph represents 24,23% of the total investments.

* For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures.

Enabling activities

directly enable other activities to make a substantial contribution to an environmental objective

Transitional activities are economic activities

for which low-carbon alternatives are not yet available and that have greenhouse gas emission levels corresponding to the best performance.

The figure above illustrates the total share of investments with an environmental objective only. The turnover data in the above figure is modeled by the Upright project, an impact data provider (please see "Upright notice" above). Turnover is defined as revenue for the purpose of this figure. At the time of writing, information on issuers' CapEx and OpEx were not available. We expect to improve this reference once issuers publish their annual reports for 2022.

● **What was the share of investments made in transitional and enabling activities?**

The share of investments based on market value made in transitional activities (by revenues) under the EU Taxonomy was 0,16%* at the end the reference period. The share of investments based on market value made in enabling activities (by revenues) under the EU Taxonomy was 1,74%* at the end the reference period*.

This share of investments is based on data modeled by the Upright project, an impact data provider (please see "Upright notice" above).

* This represents 0,16% and 1,74% of total assets. Total assets include physical holdings, cash and cash equivalents.

● **How did the percentage of investments aligned with the EU Taxonomy compare with previous reference periods?**

N/A. There is no previous Annex IV periodic disclosure for this fund.



are

sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.



● **What was the share of sustainable investments with an environmental objective that were not aligned with the EU Taxonomy?**

The share of investments based on market value with an environmental objective that generates a net positive contribution, through their core products and services, to one or more of the SDGs associated with environmental goals was 19,16%* at the end of the reference period. While the investment primarily targets environmental objectives, it may also at the same time target social objectives.

In the pre-contractual disclosure of this fund, the Investment Manager estimated that ca. 25% would be included under "Sustainable investment with an environmental objective". Because the reference period for the fund was very short (less than a quarter), there was not enough time during the reference period to invest the fund's more liquid assets in physical issuer holdings.

* This represents 19,16% of total assets. Total assets include physical holdings, cash and cash equivalents.



● **What was the share of socially sustainable investments?**

The share of investments based on market value with a social objective that generates a net positive contribution, through their core products and services, to one or more of the SDGs associated with social goals was 29,68%* at the end of the reference period. While these investments primarily target social objectives, they may also at the same time target environmental objectives.

In the pre-contractual disclosure of this fund, the Investment Manager estimated that ca. 55% could be included under "Sustainable investment with a social objective". Because the reference period for the fund was very short (less than a quarter), there was not enough time during the reference period to invest the fund's more liquid assets in physical issuer holdings.

* This represents 29,68% of total assets. Total assets include physical holdings, cash and cash equivalents.



What investments were included under "not sustainable", what was their purpose and were there any minimum environmental or social safeguards?

Based on the market value of holdings at the end the reference period, 46,10%* of the fund was held in cash balances or more liquid cash equivalent assets that do not have a sustainable investment objective. These included cash balances in different currencies in bank deposits, and short-term Norwegian municipal bonds. As these are liquid holdings pending investment, no minimum safeguards were applied.

In the pre-contractual disclosure of this fund, the Investment Manager estimated that ca. 20% could be included under "Not sustainable". Because the reference period for the fund was very short (less than a quarter), there was not enough time during the reference period to invest the fund's more liquid assets in physical issuer holdings.

* This represents 46,10% of total assets. Total assets include physical holdings, cash and cash equivalents.



What actions have been taken to attain the sustainable investment objective during the reference period?

During the reference period, all new investments underwent the structured and rigorous initial assessment described above under "To what extent was the sustainable investment objective of this financial product met?". 39% of the physical holdings of the fund also underwent the due diligence described above before being cleared for investment by the Product Governance Committee.

Because the reference period for the fund was very short (less than a quarter), there was limited engagement during the reference period. There was also limited monitoring during this same period. The Investment Manager was, nevertheless, able to communicate the Investment Manager's expectations towards impact and sustainability to several issuers before investing.



How did this financial product perform compared to the reference sustainable benchmark?

The fund did not use a designated index to reference benchmark its investments.

● **How did the reference benchmark differ from a broad market index?**

The fund did not use a designated index to reference benchmark its investments.

- ***How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the sustainable investment objective?***

The fund did not use a designated index to reference benchmark its investments.

- ***How did this financial product perform compared with the reference benchmark?***

The fund did not use a designated index to reference benchmark its investments.

- ***How did this financial product perform compared with the broad market index?***

The fund did not use a designated index to reference benchmark its investments.