2025 11

Sustainability Related Disclosure

Sustainable Finance Disclosure Regulation (SFDR 2019/2088)

The European Commissioner's ambition to become the first climate-neutral continent by 2050 necessitates significant private investment in sustainable activities. To support this objective, the Commissioner has adopted the European Green Deal, a comprehensive policy framework aimed at enhancing transparency around corporate sustainability efforts. Among these initiatives is the Sustainable Finance Disclosure Regulation 2019/2088 ("SFDR"), which seeks to provide greater transparency on sustainability risks and impacts, prevent greenwashing and provide a common language on the sustainable attributes of financial products and services.

The SFDR mandates financial market participants to publicly disclose:

- How sustainability risks are integrated on entity- and product level, and into the remuneration policy
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- How principal adverse impacts are handled on entity- and product level

All financial products (i.e., alternative investment funds, portfolio management, UCITs, etc.) shall be categorized based on how sustainability is integrated into the investment strategy:

- Article 6: the financial product does not promote environmental or social characteristics nor have a sustainable investment objective
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- Article 8: the financial product promotes environmental and/ or social characteristics, and invests in companies that follow good governance practice
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- Article 9: the financial product has a sustainable investment objective and invests in sustainable investments that do no significant harm to other environmental/ social objectives, with good governance practices

TIND Asset Management AS Sustainability Related Disclosures

TIND Asset Management AS (“TIND”) is an alternative investment fund manager (“AIFM”) and is committed to adhering to SFDR by disclosing sustainability-related information related to our investment process, funds and managed portfolios. TIND is committed to make an entity level disclosure on how sustainability risks are integrated into the investment decision process, consideration of adverse impacts, and integration of sustainability risk in the remuneration policy.

1 Transparency on sustainability risk policies

According to SFDR Article 3, financial market participants shall publish information about their policies on the integration of sustainability risks in the investment decisions process.

TIND considers sustainability risk as an environmental, social or governance event or circumstance that could cause an actual or potential material adverse impact on the value of an investment (i.e., sustainability regulations, resource depletion, human rights issues, etc.)

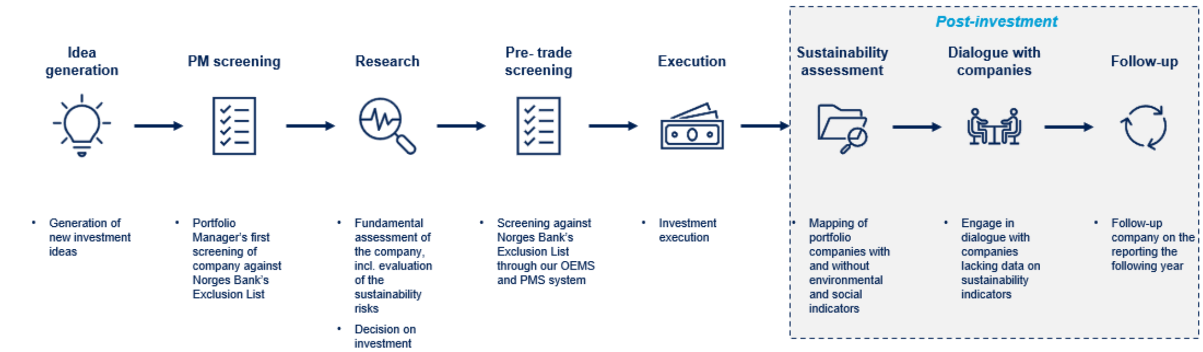
Before making an investment decision on long position companies, the AIFM evaluates sustainability risks on the same basis as traditional investment risk factors. These analyses are based on publicly available annual and quarterly reports and presentations, company meetings, media coverage, exclusion lists and other relevant sustainability information sources (e.g., data providers, external analysis, etc.)

If the sustainability risks are deemed excessively high, the AIFM will either refrain from investing or redeem existing investments.

Investors are informed about the integration of the AIFM’s integration of sustainability risks through public available information on the website, and in pre-contractual- and periodic agreements.

TIND's Investment cycle

SUSTAINABILITY IS AN INTEGRATED PART OF TIND'S INVESTMENT CYCLE



1.1 Upskilling of employees

To ensure that employees maintain the necessary competencies to identify and manage sustainability risks, the AIFM encourages ongoing learning and development. Employees are expected to stay informed about the development in the field of sustainability and are encouraged to participate in relevant seminars, courses and educational programs.

1.2 Review

The AIFM is committed to reviewing the sustainability risk policy at least once every year.

2. Considering Principal Adverse Impacts of our investments

Principal Adverse Impacts ("PAI") is the actual or potential adverse impact on sustainability factors (i.e., any environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters) caused by investments. In accordance with Article 4(1)(a) of the SFDR, the AIFM has elected to consider the PAI of investment decisions on sustainability factors. Accordingly, all long positions held by the AIFM will be subject to impact due diligence aimed at identifying any actual or potential adverse impacts on sustainability factors.

The AIFM monitors all long positions and reports on PAI on a yearly basis.

If significant risks related to an environmental, social or governance event or circumstance are identified in the impact due diligence, the AIFM will, through active ownership, encourage the investee company to implement measures and plans to reduce their adverse impact.

The AIFM considers (to the extent there is relevant data available to the AIFM) PAIs 1 – 14 as they appear in Table 1 of Annex 1 of the SFDR Delegated Regulation. In this regard, the AIFM will collect key metrics, including amongst others GHG emissions, board diversity and gender pay gap at the outset of a new long position investment. PAI data are primarily sourced from publicly available information but may also be supplemented with data from third-party providers (e.g., Bloomberg, Sustainalytics and ISS). Where specific PAI figures are unavailable, the AIFM may use industry-average values to ensure complete reporting.

The AIFM will publish a PAI statement by 30 June 30 every year. The first PAI statement will be published in 2026, for the year 2025. The PAI statement can be found on the AIFM's website.

3. Sustainability risks are integrated into our Remuneration Policy

According to SFDR Article 5, financial market participants shall include information in the remuneration policy on how those policies are consistent with the integration of sustainability risks.

The board of Directors of TIND has adopted a remuneration policy for the employees and representatives of the company in accordance with the rules set forth in the AIFM Act, the Norwegain AIFM Regulation, Annex II of the AIFMD, the Guidelines and the Norwegian Financial Supervisory Authority's (the "FSAN") (No: "Finanstilsynet") circular 02/2020 (the "Circular").

TIND has prepared its remuneration policy to foster good governance and effective risk management while discouraging employees and officers from excessive risks at the firm's expense. In alignment with our commitment to promote environmental and/ or social characteristics, sustainability risks are integrated into our sustainability process, and in our remuneration policy.

The Board shall at least once a year perform a review of the remuneration policy.

3.4 Product Governance Committee

The AIFM has a Product Governance Committee that will meet regularly to review the investment universe, the selected sustainability indicators and available data, ensuring they are consistently aligned with our business strategy.

Members of the Product Governance Committee:

- Christer Bjørndal, CEO
- Pauline Fiskaa, COO
- Mark Smyth, CEO, Falk AS

Version 1 – December 2023
Version 2 – June 2025
Version 3 – November 2025

This document was last updated on November 18th, 2025, with more information on TIND's process of considering PAI, and a new structure on the entity-level disclosure.