Sustainability related disclosures

Fund Manager: Vanir Asset Management AS (“**Vanir Asset Management, Vanir** or **the Manager**”)

Vanir Asset Management is an alternative investment fund manager subject to requirements in the European Union’s Sustainable Finance Disclosure Regulation (**SFDR**) ((EU) 2019/ 2088).

This document is a draft entity level disclosure prepared in accordance with Article 3 in the SFDR for Vanir Asset Management.

SFDR Article 3: Sustainability risk policies

In accordance with article 3 of SFDR, Vanir Asset Management is required to publish on our website information about the policies on the integration of sustainability risks in our investment decision-making process. Sustainability risk means an environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of the investment.

The fund currently managed by Vanir Asset Management will invest in companies across the energy transition value chain, industry verticals and technology segments. The investment focus includes investment opportunities within extraction, refining, OEMs, energy production, energy systems, energy storage, recycling and carbon as well as tech, software, services and logistics enabling the energy transition. The approach used to integrate sustainability risk in Vanir’s investment process may vary depending on the type of investment.

Based on the investment strategy of the Fund, typical sustainability risks that may impact the value of an investment include, but is not limited to, greenhouse gas emissions, physical climate risk, carbon and climate impacts, ecosystems / circularity impacts, information technology risk, product impacts and supply chain impacts; and company exposure risks such as reputation and brand exposure.

Prior to making an investment decision, the Manager will seek to identify and assess relevant sustainability risks. The method will depend on the relevant investment opportunity but may include ESG screening, checklists, company and market analysis, due diligence, use of internal energy transition expertise, and in some cases, third party advisors. Certain parts of the investment universe as described above may be subject to more challenging and severe sustainability risks. The Manager seeks to invest in companies with a clear pathway towards reducing its GHG emissions and with a strong focus on improving other sustainability risk elements. Assessing the sustainability risks and how the prospective investment company targets, handles, and reports on the risks will be a part of the investment analysis of a potential investment. Companies which do not to a sufficient degree target, handle or report on these risks may be subject to exclusion from the investable universe of the fund managed by the Manager. The Manager seeks to utilize the industrial expertise in the group to analyze the sustainability risks for companies and industries included in the investment universe.

Mitigating actions will be assessed if Vanir identify significant sustainability risks, which may, in Vanir’s view, lead to a negative impact on the investment value. In case such risks cannot be resolved or sufficiently mitigated, Vanir may abstain from making the investment, depending on how material the risk is deemed.

Date	Version	Amendment
15.09.2023	1	Publication of disclosure