

## 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 4 in the SFDR for Vanir Asset Management.

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### **SFDR Article 4: Statement on principal adverse impacts of investment decisions on sustainability factors**

Vanir Asset Management currently does not take into account principal adverse impacts (PAIs) of its investment decisions on sustainability factors within the meaning of SFDR.

Vanir Asset Management is a newly established manager and currently has limited resources. The Manager deems that its objective of contributing to reduced emissions while not adversely impacting environmental and/or social objectives is best achieved by prioritising its focus on adverse impacts that are most material to investments made by the fund managed by the Manager. Therefore, the Manager considers that other tailored indicators may, as of now, be more suitable for assessing the performance of the fund. However, the Manager acknowledges the PAIs relevance, and will strive to increase its resources so that PAIs also can be considered at a later stage.

<b>Date</b>	<b>Version</b>	<b>Amendment</b>
15.09.2023	1	Publication of disclosure