

*REGULATION (EU) 2019/2088 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL  
of 27 November 2019 on sustainability-related disclosures in the financial services sector  
Regulatory Technical Standards, ANNEX I, Template principal adverse sustainability impacts statement*

Table 1  
**Principal adverse sustainability impacts statement**

<b>Financial market participant</b> Holberg Fondsforsvaltning AS (LEI: 2549008JKPHX8EZXTT28)
<b>Summary</b> Holberg Fondsforsvaltning AS (Holberg) considers principal adverse impacts of its investment decisions on sustainability factors. The present statement is the consolidated statement on principal adverse impacts on sustainability factors of funds managed by Holberg.  This statement on principal adverse impacts on sustainability factors covers the reference period from 1 January to 31 December 2022.  Holberg is an active fund manager and the funds' objective is to create the highest possible long-term risk adjusted return compared to each fund's investment universe. The portfolio managers seek to invest in companies with a focus on long-term value creation based on a sustainable business model and seek to avoid companies that exploit scarce natural resources or labour. Holberg applies three overarching methods to manage and limit sustainability risks and principal adverse impacts on sustainability factors. These are: <ol style="list-style-type: none"> <li>1. Holberg's proprietary ESG model, Tellus</li> <li>2. Exclusion lists and monitoring</li> <li>3. Active ownership</li> </ol> Data has been obtained from Sustainalytics. The year 2022 is the first reported period and thus a historical comparison of the reported period with the previous reported period will be made starting from 2024, when this data is available. The portfolio coverage for each indicator is shown under the heading "Coverage". Holberg will seek to reduce the principal adverse impacts on sustainability factors over time as more reliable data becomes available.
<b>Description of the principal adverse impacts on sustainability factors</b> Date of approval of the policies by the governing body of Holberg: 13.12.2022  Sustainability is integrated in the fund management. Each portfolio manager is responsible for the implementation of the policies within their own strategy.  Holberg is an active fund manager and the funds' objective is to create the highest possible long-term risk adjusted return compared to each fund's investment universe. The portfolio managers seek to invest in companies with a focus on long-term value creation based on a sustainable business model and seek to avoid companies that exploit scarce natural resources or labour. Holberg applies three overarching methods to manage and limit sustainability risks and principal adverse impacts on sustainability factors. These are: <ol style="list-style-type: none"> <li>1. Holberg's proprietary ESG model, Tellus</li> <li>2. Exclusion lists and monitoring</li> <li>3. Active ownership</li> </ol> Holberg has developed the Tellus model, which is our proprietary analysis tool for ESG and sustainability and contains common quality requirements for the portfolio companies. This integration gives us a broader understanding of the companies and potential risks. A sustainability related event may affect one single company directly or may have a wider impact on an industry, geographic area, or country, which can affect bigger parts of the portfolio. Integrating sustainability risks into the portfolio construction contributes to create the desired risk adjusted return. Tellus is our fact-based method for systematizing sustainability risks and analyses, and it is an efficient tool to monitor each investment over time.  Holberg also apply a set of exclusions to the portfolio, which is based on the Government Pension Fund Global's guidelines. In addition to this, we have chosen to exclude gambling and pornography from our investment universe. We want our portfolio companies to operate in line with international norms, including UN Global Compact. Holberg's equity funds are screened by Sustainalytics' online database «Global Standard Screening» monthly.  Holberg practice active ownership to encourage the companies to improve. As an active fund manager with concentrated portfolios, we have an investment philosophy that is founded on close follow-up of the companies we are invested in. We have dialogues with the company management and vote on general meetings to contribute to transparency for the shareholders. Holberg's voting guidelines and an overview of what we have voted for or against on general meetings is available on Holberg's webpage.  The methodologies described are dependent on data availability and quality, partly directly from the portfolio companies, but also third-party data.  Data sources used in this report: Sustainalytics

Indicators applicable to investments in investee companies						
Adverse sustainability indicator		Metric	Impact 2022	Coverage	Explanation	Actions taken
CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS						
Greenhouse gas emissions	1. GHG emissions	Scope 1 GHG emissions	97 055,92	49,75 %	Sum of portfolio companies' Carbon Emissions - Scope 1 (tCO2e) weighted by the portfolio's value of investment in a company and by the company's most recently available enterprise value including cash.	Holberg seeks to increase coverage for the next reference period.
		Scope 2 GHG emissions	18 906,30	49,75 %	Sum of portfolio companies' Carbon Emissions - Scope 2 (tCO2e) weighted by the portfolio's value of investment in a company and by the company's most recently available enterprise value including cash.	Holberg seeks to increase coverage for the next reference period.
		Scope 3 GHG emissions	391 362,41	49,75 %	Sum of portfolio companies' Scope 3 - Total Emission Estimated (tCO2e) weighted by the portfolio's value of investment in a company and by the company's most recently available enterprise value including cash.	Holberg seeks to increase coverage for the next reference period.
		Total GHG emissions	507 101,35	49,75 %	The total annual Scope 1, Scope 2, and estimated Scope 3 GHG emissions associated with the market value of the portfolio. Companies' carbon emissions are apportioned across all outstanding shares and bonds (based on the most recently available enterprise value including cash).	Holberg seeks to increase coverage for the next reference period.
	2. Carbon footprint	Carbon footprint	549,57	49,75 %	The total annual Scope 1, Scope 2, and estimated Scope 3 GHG emissions associated with 1 million EUR invested in the portfolio. Companies' carbon emissions are apportioned across all outstanding shares and bonds (based on the most recently available enterprise value including cash).	Holberg seeks to increase coverage for the next reference period.
3. GHG intensity of investee companies	GHG intensity of investee companies	812,82	55,57 %	The portfolio's weighted average of its holding issuers' GHG Intensity (Scope 1, Scope 2 and estimated Scope 3 GHG emissions/EUR million revenue).	Holberg seeks to increase coverage for the next reference period.	
4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	6,54 %	58,80 %	The percentage of the portfolio's market value exposed to issuers with fossil fuels related activities, including extraction, processing, storage and transportation of petroleum products, natural gas, and thermal and metallurgical coal.	Holberg seeks to increase coverage for the next reference period.	

	5. Share of non-renewable energy consumption and production	Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage of total energy sources	68,09 %	20,13 %	The portfolio's weighted average of issuers' energy consumption and/or production from nonrenewable sources as a percentage of total energy used and/or generated.	Holberg seeks to increase coverage for the next reference period.
	6. Energy consumption intensity per high impact climate sector	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector	<p>NACE Code A (Agriculture, Forestry and Fishing): N/A</p> <p>NACE Code B (Mining and Quarrying): 0,65</p> <p>NACE Code C (Manufacturing): 0,48</p> <p>NACE Code D (Electricity, Gas, Steam and Air Conditioning Supply): 0,00</p> <p>NACE Code E (Water Supply; Sewerage, Waste Management and Remediation Activities): N/A</p> <p>NACE Code F (Construction): 0,14</p> <p>NACE Code G (Wholesale and Retail Trade; Repair of Motor Vehicles and Motorcycles): 0,03</p> <p>NACE Code H (Transportation and Storage): 9,93</p> <p>NACE Code L (Real Estate Activities): 0,39</p>	25,71 %	The portfolio's weighted average of Energy Consumption Intensity (GwH/million EUR revenue) for issuers classified within each of the NACE Codes.	Holberg seeks to increase coverage for the next reference period.
Biodiversity	7. Activities negatively affecting biodiversity-sensitive areas	Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas	2,52 %	58,80 %	The percentage of the portfolio's market value exposed to issuers' that reported having operations in or near biodiversity sensitive areas and have been implicated in controversies with severe or very severe impacts on the environment.	Holberg seeks to increase coverage for the next reference period.
Water	8. Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	0,67	3,46 %	The total annual wastewater discharged (metric tons reported) into surface waters as a result of industrial or manufacturing activities associated with 1 million EUR invested in the portfolio. Companies' water emissions are apportioned across all outstanding shares and bonds (based on the most recently available enterprise value including cash).	Holberg seeks to increase coverage for the next reference period.

Waste	9. Hazardous waste and radioactive waste ratio	Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average	0,70	48,67 %	The total annual hazardous waste (metric tons reported) associated with 1 million EUR invested in the portfolio. Companies' hazardous waste is apportioned across all outstanding shares and bonds (based on the most recently available enterprise value including cash).	Holberg seeks to increase coverage for the next reference period.
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INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS						
Social and employee matters	10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	1,57 %	58,80 %	The percentage of the portfolio's market value exposed to issuers with very severe controversies related to the company's operations and/or products.	Holberg seeks to increase coverage for the next reference period.
	11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance/ complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	50,38	57,55 %	The percentage of the portfolio's market value exposed to issuers that are not signatories in the UN Global Compact.	Holberg seeks to increase coverage for the next reference period.
	12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	22,80 %	2,50 %	The portfolio holdings' weighted average of the difference between the average gross hourly earnings of male and female employees, as a percentage of male gross earnings.	Holberg seeks to increase coverage for the next reference period.
	13. Board gender diversity	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members	35,18 %	61,40 %	The portfolio holdings' weighted average of the ratio of female to male board members.	Holberg seeks to increase coverage for the next reference period.
	14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investments in investee companies involved in the manufacture or selling of controversial weapons	0,00 %	58,80 %	The percentage of the portfolio's market value exposed to issuers with an industry tie to landmines, cluster munitions, chemical weapons or biological weapons. Note: Industry ties includes ownership, manufacturing and investments. Ties to landmines do not include related safety products.	Holberg seeks to increase coverage for the next reference period.
Indicators applicable to investments in sovereigns and supranationals						
Adverse sustainability indicator		Metric	Impact 2022	Coverage	Explanation	Actions taken
Environmental	15. GHG intensity	GHG intensity of investee countries	N/A	N/A	Not relevant as Holberg has no investments in sovereigns and supranationals.	
Social	16. Investee countries subject to so-cial violations	Number of investee countries subject to social violations (absolute number and relative number divided by all investee countries), as referred to in international treaties and conventions, United Nations principles and, where applicable, national law	N/A	N/A	Not relevant as Holberg has no investments in sovereigns and supranationals.	

Indicators applicable to investments in real estate assets					
Adverse sustainability indicator	Metric	Impact 2022	Coverage	Explanation	Actions taken
Fossil fuels	17. Exposure to fossil fuels through real estate assets	Share of investments in real estate assets involved in the extraction, storage, transport or manufacture of fossil fuels	N/A	N/A	Not relevant as Holberg has no investments in real estate assets.
Energy efficiency	18. Exposure to energyinefficient real estate assets	Share of investments in energy-inefficient real estate assets	N/A	N/A	Not relevant as Holberg has no investments in real estate assets.

#### Other indicators for principal adverse impacts on sustainability factors

Holberg has chosen to report on the principal adverse impacts on sustainability factor 2.4 as this helps to measure the holdings' conformity and adaptation to the Paris Agreement.

Holberg has chosen to report on the principal adverse impacts on sustainability factor 3.6 and 3.9 as these indicators are relevant to the Norwegian Transparency Act.

#### Description of policies to identify and prioritise principal adverse impacts on sustainability factors

The principal adverse impacts on sustainability factors are identified through the third-party data provider, Sustainalytics. Holberg's assumed biggest challenge is data availability for the Norwegian and other Nordic issuers in our fixed income products. Holberg will seek to increase coverage for the next reference period, either by collecting data directly from investee companies, and/or by carrying out additional research, subscribe to additional third-party data providers and/or making reasonable assumptions.

Subject to data availability, the selection of voluntary principal adverse impact indicators follows the methodology/guiding principle of selecting the indicators which are deemed most relevant to consider based on our investment management philosophy and exposures as well as the Norwegian Transparency Act.

#### Engagement policies

Holberg practice active ownership to encourage the portfolio companies to improve. As an active fund manager with concentrated portfolios, we have an investment philosophy that is founded on close follow-up of the companies we are invested in. We have dialogs with the company management and vote on general meetings to contribute to transparency for the shareholders. Holberg's voting guidelines and an overview of what we have voted for or against on general meetings is available on our webpage.

#### References to international standards

Holberg applies a set of exclusions to the fund portfolios, which is based on the Government Pension Fund Global's guidelines. We also want our portfolio companies to operate in line with international norms, including UN Global Compact. Holberg's equity funds are screened by Sustainalytics' online database «Global Standard Screening» monthly. Any deviations are flagged to the portfolio manager and Compliance and Risk. The principal adverse impacts on sustainability factors indicators that measure the holding's compliance with the above-mentioned international standards are primarily the following:

1.10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises

1.11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises

#### Historical comparison

The earliest historical comparison will be provided in June 2024.

Table 2

#### Additional climate and other environment-related indicators

Adverse sustainability impact	Adverse impact on sustainability factors (qualitative or quantitative)	Metric	Impact 2022	Coverage	Explanation	Actions taken
Indicators applicable to investments in investee companies						
CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS						
Emissions	4. Investments in companies without carbon emission reduction initiatives	Share of investments in investee companies without carbon emission reduction initiatives aimed at aligning with the Paris Agreement	51,48 %	58,19 %	The percentage of the portfolio's market value exposed to issuers without a carbon emissions reduction target aligned with the Paris Agreement.	Holberg seeks to increase coverage for the next reference period.

Table 3

Additional indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters

INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS						
Adverse sustainability impact	Adverse impact on sustainability factors (qualitative or quantitative)	Metric	Impact 2022	Coverage	Explanation	Actions taken
Indicators applicable to investments in investee companies						
Social and employee matters	6. Insufficient whistleblower protection	Share of investments in entities without policies on the protection of whistleblowers	6,80 %	58,68 %	The percentage of the portfolio's market value exposed to issuers without a whistleblower protection policy.	Holberg seeks to increase coverage for the next reference period.
Human Rights	9. Lack of a human rights policy	Share of investments in entities without a human rights policy	13,03 %	55,31 %	The percentage of the portfolio's market value exposed to issuers without a formal human rights policy.	Holberg seeks to increase coverage for the next reference period.