



## Sustainability Disclosures

### 1. Legislative background

The EU has adopted a range of regulations which seek to reorient capital flows towards an increasingly sustainable economy. 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 promotes this purpose by imposing greater transparency and reporting requirements related to sustainability and financial products.

### 2. AK Jensen Norway AS

#### 2.1 Sustainability considerations

AK Jensen Norway AS (“AKJNO”) do not integrate sustainability risks into our business model or investment decision making process. This may have investment ramifications and may impact the investment’s long-term financial performance.

#### 2.2 Remuneration

AKJNO’s remuneration reflects the firm’s objectives for good corporate and long-term value creation for shareholders. This remuneration policy has been set up neutrally so that no incentives are paid to employees as a result of sustainability risks considerations or absence of.

### 3. Portfolio Management

#### 3.1 Portfolios under management

AKJNO is delegated management of some alternative investment funds on the AKJ hedge fund platform. The alternative investment management companies are sister companies of AKJNO.

As of today, we do not integrate sustainability risks in the investment decision making process of the funds where we have been delegated management. The reasons for this being primarily because it prevents the manager of the portfolio from allocating capital with the flexibility that is desirable and necessary to achieve the investment objectives specified in the portfolio's investment mandate. Secondly, the negative consequences of sustainability factors are not considered because empirical evidence indicates that a specific strategic investment focus on sustainability factors is required to achieve the expected return beyond a general allocation that does not consider sustainability risks.

We will actively engage with the funds to understand whether they have sustainability requirements about specific activities and / or industries and similar criteria, but do not have any funds with such requirements in the portfolios under management as of today.

### **3.2 Pre-investment information and reporting**

All funds have offering memorandum and supplement which are sent all potential professional investors before accepting their subscription into any portfolios that AKJNO manages. AKJNO report to the alternative investment managers on a regular basis. These clients are well-informed that AKJNO does not take into consideration sustainability risks into the investment decisions made in the funds' portfolios.

### **4. Principal Adverse Impacts**

Principal adverse impacts are those impacts arising from a particular decision taken which may have a negative effect on sustainability factors.

AKJNO does not consider adverse impacts of investment decisions on sustainability factors and hence, has no sustainability indicators. The reasons are that none of the funds where AKJNO has been delegated portfolio management has had any sustainability requirements, c.f. 2.1.

We will review this position annually.