

Sustainability Related Disclosure - Entity Level

Fund Manager: Shift Advisory AS (“Shift Advisory” or the **Manager**)

Shift Advisory 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 an entity level disclosure for Shift Advisory prepared in accordance with Article 4 in the SFDR.

Statement on principal adverse impacts of investment decisions on sustainability factors

Shift Advisory does currently not take into account principal adverse impacts (**PAI**) of its investment decisions on sustainability factors within the meaning of SFDR.

Shift Advisory is a newly established manager and currently has limited resources. The reporting requirements that apply when taking into account principal adverse impacts would necessitate extensive data collection and validation. The Manager does currently not consider the implementation of required data collection, validation and reporting requirements to be proportionate with the anticipated impacts of taking principal adverse impacts into account. 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.

Date	Version	Amendment
17.10.2023	1	Publication of disclosure