

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 3 in the SFDR.

Transparency of sustainability risk policies

Prior to making an investment decision, Shift Advisory will seek to identify and assess relevant sustainability risks. The method may include the use of ESG screening, exclusion list, company and market analysis, due diligence and third-party expertise.

During the ownership period, Shift Advisory will monitor the KPIs that the portfolio companies are required to report on a regularly basis. Further, Shift Advisory will seek to monitor the development of potential sustainability risks by utilizing its industrial expertise to assess mitigating actions if significant sustainability risks are identified, which in the Manager’s view, may lead to a negative impact on the investment value. In case such risks cannot be resolved or sufficiently mitigated, the Manager may, on this basis, abstain from making the investment.

Date	Version	Amendment
17.10.2023	1	Publication of disclosure