POLICY FOR INTEGRATION OF SUSTAINABILITY RISK

INVESTMENT OBJECTIVES AND INVESTMENT POLICY

Introduction

Storm Capital Management AS ("**Storm**" or the "**Company**") will consider relevant risks related to sustainability (environmental, social and governance aspects) when making investment decisions as well as on an ongoing basis during the life of an investment.

Sustainability risks

As a matter of principle, Storm makes investment decisions considering sustainability risks.

Sustainability risks can arise from environmental and social impacts on a potential asset as well as from the corporate governance of the issuer of an asset.

The sustainability risk can either represent a separate risk category or have a reinforcing effect on other risk categories relevant to the fund / sub-fund, such as market risk, liquidity risk, credit risk or operational risk and in this context can substantially contribute to the overall risk of the fund / sub-fund.

Insofar as sustainability risks materialize, they may have a significant impact – up to and including a total loss – on the value and/or return of the assets concerned. Such effects on the asset(s) can negatively influence the overall return of the fund / sub-fund.

By taking into consideration sustainability risks, it is Storm aim to identify the occurrence of these risks at an early stage and to take appropriate measures to minimise the impact on the affected asset(s) or the overall portfolio of the fund / sub-fund.

The sustainability aspects that can have a negative impact on the return of the fund / sub-fund are divided into environmental, social and governance aspects (hereinafter "**ESG**"). While environmental aspects include e.g. climate protection, social aspects include e.g. compliance with workplace safety requirements. Consideration of compliance with employee rights and data protection are among the components of the governance aspects. In addition, climate change aspects are also considered, including physical climate events or conditions such as heat waves, rising sea levels and global warming.

Counterparty specific sustainability risks

The risks associated with ESG aspects can have a negative impact on the market value of an asset.

The market value of financial instruments issued by companies that do not comply with ESG standards and / or do not (neither) commit to implementing ESG standards in the future may be negatively affected by materialising sustainability risks.

Such influences on the market value can be caused, e.g. by reputational damage and/or sanctions. Other examples include physical risks and transition risks caused, e.g. by climate change.

Specific operational risks regarding sustainability

The fund / sub-fund or the management company may suffer losses due to environmental disasters, socially induced aspects relating to employees or third parties, as well as due to failures in corporate governance. These events may be caused or exacerbated by a lack of attention to sustainability aspects.

Investment policy sub-funds

The investment decisions made for this fund / sub-fund do not consider the EU criteria for environmentally sustainable economic activities.

Risk management procedure

Key risk indicators can be used to assess sustainability risks. The key risk indicators can be of quantitative- or qualitative nature and are based on environmental, social and governance aspects and measure the risk of the aspects under consideration.

PRACTICAL INTEGRATION

Investment process

A due diligence addressing sustainability risks has been implemented into the investment process of Storm. When considering an investment, this policy shall be part of the consideration.

During an investment process, Storm shall hold a meeting in order to review such matters as described under section 1. A summary shall be prepared based on the findings of this meeting. The compliance responsible at Storm shall ensure that such meeting is held and a summary prepared. The summary shall be reviewed and taken into consideration in the final decision concerning whether an investment shall be made.

Effect on returns

The effects that potential adverse effect on sustainability factors may have on the returns of the fund / sub-fund, shall be considered as a part of the due diligence process.

Marketing communication

No marketing material or communication must be conflict with this policy.

Regulation (EU) 2019/2088 (sustainability-related disclosures in the financial services sector)

Storm Capital Management shall comply with the disclosure requirements that follows from Regulation (EU) 2019/2088.