

## ESG

Asgard Asset Management is Subject to SFDR as the investment manager of the Asgard Risk Premia Fund and as a Financial Market Participant (FMP).

### **No consideration of adverse impacts of investment decisions on sustainability factors**

Asgard Asset Management does not consider Principal Adverse Impacts in our investment decisions. Asgard Asset Management operates in markets and instruments where the ESG element is already considered good, but the relative differences in the financial instruments are marginal. Where possible – at no economic loss to the funds – Asgard Asset Management we will pursue investments that favor a better level of sustainability. However, any effects will be marginal given the already strong starting point.

### **Remuneration Policy and sustainability**

The remuneration policy promotes healthy and efficient risk management also on the topic of ESG. As an example, sustainability considerations must not be dominated by excessive risk taking. Potential unwanted activities such as (but not limited to) greenwashing, incorrect marketing or misleading description of the investment strategy are monitored and included in the evaluation of and by the Board of Directors and the Executive Board related to remuneration.

The Asgard Risk Premia fund is categorized as **an article 6 fund with respect to SFDR**. That said the fund, where possible at no economic cost, strives to select the most sustainable investments.