

Statement on the principal adverse impacts of investment decisions on sustainability factors

Date: 24. June 2025

Financial market participant: Fokus Fund Management Norway AS (LEI: 213800YOZCTXOT68MM27) referred to as "FFMN" below.

Sammendrag

FFMN vurderer de mest betydelige negative virkningene av sine investeringsbeslutninger på bærekraftsfaktorer. FFMN er en lisensiert forvalter av alternative investeringsfond og forvalter fond som alle er basert på strategier knyttet til eiendomsaktiva. FFMN har som mål å sikre at investeringsbeslutningene som tas, reduserer de negative virkningene på miljømessige, sosiale og styringsmessige forhold (ESG) i størst mulig grad. Dette støttes av FFMNs bærekraftspolicy og forretningsprosedyre for investeringsprosessen.

Denne PAI-erklæringen er utarbeidet i samsvar med EU-forordning 2019/2088 ("SFDR") og den delegerte forordningen 2022/1288 ("Delegert forordning"). PAI-erklæringen er utarbeidet i henhold til Vedlegg I til den delegerte forordningen, hvor Tabell 1, Tabell 2 og Tabell 3 beskriver de negative bærekraftsfaktorene som gjelder for eiendomsinvesteringer.

De obligatoriske og valgfrie indikatorene for vesentlige negative virkninger (PAI-indikatorer) for eiendomsaktiva er valgt basert på deres relevans for de forvaltede eiendomsfondene. Målene for disse indikatorene er tilpasset de langsiktige målene for fondene.

Obligatoriske PAI-indikatorer for eiendomsinvesteringer:

17. Eksponering mot fossile brensler gjennom eiendomsaktiva

18. Eksponering mot energieffektive eiendommer (EPC C eller lavere)

Valgfrie indikatorer valgt for rapportering på forvaltede eiendomsaktiva:

18. Utslipp av klimagasser

19. Energiforbruk

20. Avfallsproduksjon i driften

Mål for PAI-indikatorer

Indikator 17: De forvaltede eiendomsaktiva har ingen direkte eksponering mot fossile brenslar, og ingen eiendommer i fondene er involvert i utvinning, lagring, transport eller produksjon av fossile brenslar. Dette er en bindende forpliktelse for fondene, og det vil ikke bli foretatt nye investeringer i aktiva knyttet til fossil energi.

Indikator 18: De forvaltede fondene har som mål at alle eiendommer skal oppnå minimum energimerke C innen 2030. I henhold til definisjonen av PAI-indikatorer anses imidlertid eiendommer med energimerke C fortsatt som energieffektive eiendommer.

Indikator 18: Redusere utleiers andel av klimagassutslipp i tråd med fondenes langsiktige mål, og sikre at reduksjonene planlegges i samsvar med Parisavtalen.

- De to hovedfondene forvaltet av AIFM har forpliktet seg til netto nullutslipp innen 2050, inkludert kompensasjonstiltak, med delmål for 2030 i tråd med Parisavtalen.

Indikator 19: Redusere energiforbruket i tråd med fondenes langsiktige mål.

- De to fondene forvaltet av AIFM har forpliktet seg til netto nullutslipp, og har som mål å redusere energiforbruket og sikre bruk av fornybar energi.

Indikator 20: Alle eiendommer er utstyrt med fasiliteter for avfallshåndtering og kildesortering.

PAI-erklæringen vil bli oppdatert årlig, og FFMN samler inn data på fire spesifikke datoer i referanseperioden fra 1. januar til 31. desember: 31. mars, 30. juni, 30. september og 31. desember. Denne erklæringen dekker perioden fra 1. januar 2024 til 31. desember 2024.

Summary

FFMN consider the most significant adverse impacts of their investment decisions on sustainability factors. FFMN is a licensed manager of alternative investment funds and manages funds that are all based on strategies related to real estate assets. FFMN aims to ensure that the investment decisions made reduces the negative impacts of environmental, social and governance fact to the greatest extent possible. This is supported by FFMN's Sustainability Policy and the business procedure for the investment process.

This PAI statement has been prepared in accordance with EU Regulation 2019/2088 ("SFDR") and the SFDR delegated regulation 2022/1288 ("Delegated Regulation"). The PAI statement is prepared in accordance with Annex I to the Delegated Regulation, where Table 1, Table 2 and Table 3 outline the adverse sustainability factors applicable to real estate investments.

The mandatory and optional principal adverse impact (PAI) indicators for real estate assets have been selected based on their relevance to the managed real estate fund products. The targets for these indicators are aligned with the long-term objectives of the managed real estate funds.

Mandatory PAI indicators applicable for investments in real estate.

17. Exposure to fossil fuels through real estate assets.
18. Exposure to energy-inefficient real estate assets (EPC C or below).

Optional indicators selected for reporting on the managed real estate assets.

18. Greenhouse Gas Emissions.
- 19: Energy consumption
20. Waste production in operations.

Targets for PAI Indicators

Indicator 17: The managed real estate assets have no exposure to fossil fuels, with no properties within the funds involved in the extraction, storage, transport, or manufacture of fossil fuels. This is a binding commitment for the funds, and no new investments will be made in assets related to fossil fuel activities.

Indicator 18: The managed funds have a target to ensure that all properties meet a minimum Energy Performance Certificate (EPC) rating of C by 2030. However, according to the definition of principal adverse impact (PAI) indicators, properties classified with a C rating will still be considered energy-inefficient real estate assets.

Indicator 18: Reduce landlords' share of greenhouse gas emissions in alignment with the long-term targets of the underlying funds, ensuring reductions are planned in accordance with the Paris Agreement.

- The two master funds managed by the AIFM are committed to achieving net-zero emissions by 2050, including emission offsetting, with interim reduction targets for 2030 aligned with the Paris Agreement.

Indicator 19: Reduce energy consumption in alignment with the long-term targets of the managed funds.

- The two funds managed by the AIFM are committed to achieving net-zero emissions, aiming to reduce energy consumption and ensure the use of green energy.

Indicator 20: All properties are equipped with waste handling and sorting facilities.

The PAI statement will be updated annually, and FFMN collects data on four specific dates during the reference period from January 1 to December 31: March 31, June 30, September 30, and December 31. This statement covers the period from 1 January 2024 to 31 December 2024.

Description of the principal adverse impacts on sustainability factors

Indicators applicable to investments in investee companies							
Adverse sustainability indicator	Metric	Impact 2024	Impact 2023	Data coverage	Explanation	Actions taken, and actions planned and targets set for the next reference period	
CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS							
Greenhouse gas emissions	1. GHG emissions	Scope 1 GHG emissions	N/A	N/A	N/A	N/A	Not applicable to our Investment activities.
		Scope 2 GHG emissions	N/A	N/A	N/A	N/A	Not applicable to our Investment activities.
		Scope 3 GHG emissions	N/A	N/A	N/A	N/A	Not applicable to our Investment activities.
		Total GHG emissions	N/A	N/A	N/A	N/A	Not applicable to our Investment activities.
	2. Carbon footprint	Carbon footprint	N/A	N/A	N/A	N/A	Not applicable to our Investment activities.
	3. GHG intensity of investee companies	GHG intensity of investee companies	N/A	N/A	N/A	N/A	Not applicable to our Investment activities.
	4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	N/A	N/A	N/A	N/A	Not applicable to our Investment activities.
	5. Share of non-renewable energy consumption and production	Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as	N/A	N/A	N/A	N/A	Not applicable to our Investment activities.

		a percentage of total energy sources					
	6. Energy consumption intensity per high impact climate sector	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector	N/A	N/A	N/A	N/A	Not applicable to our Investment activities.
Biodiversity	7. Activities negatively affecting biodiversity-sensitive areas	Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas	N/A	N/A	N/A	N/A	Not applicable to our Investment activities.
Water	8. Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	N/A	N/A	N/A	N/A	Not applicable to our Investment activities.
Waste	9. Hazardous waste and radioactive waste ratio	Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average	N/A	N/A	N/A	N/A	Not applicable to our Investment activities.
INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS							
Social and employee matters	10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	N/A	N/A	N/A	N/A	Not applicable to our Investment activities.
	11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance /complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	N/A	N/A	N/A	N/A	Not applicable to our Investment activities.
	12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	N/A	N/A	N/A	N/A	Not applicable to our

							Investment activities.
	13. Board gender diversity	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members	N/A	N/A	N/A	N/A	Not applicable to our Investment activities.
	14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investments in investee companies involved in the manufacture or selling of controversial weapons	N/A	N/A	N/A	N/A	Not applicable to our Investment activities.

Indicators applicable to investments in sovereigns and supranationals

Adverse sustainability indicator		Metric	Impact 2024	Impact 2023		Explanation	Actions taken, and actions planned and targets set for the next reference period
Environmental	15. GHG intensity	GHG intensity of investee countries	N/A	N/A	N/A	N/A	Not applicable to our Investment activities.
Social	16. Investee countries subject to social violations	Number of investee countries subject to social violations (absolute number and relative number divided by all investee countries), as referred to in international treaties and conventions, United Nations principles and, where applicable, national law	N/A	N/A	N/A	N/A	Not applicable to our Investment activities

Indicators applicable to investments in real estate assets

Adverse sustainability indicator		Metric	Impact [year 2024]	Impact [year 2023]	Data coverage	Explanation	Actions taken, and actions planned and targets set for the next reference period

Fossil fuels		17. Exposure to fossil fuels through real estate assets	Share of investments in real estate assets involved in the extraction, storage, transport or manufacture of fossil fuels	0.0%	0.0%	100%	None of the properties within the funds are involved in the extraction, storage, transport, or manufacture of fossil fuels.	Within target.
Energy efficiency		18. Exposure to energy-inefficient real estate assets	Share of investments in energy-inefficient real estate assets	52.8%	52.2%	100%	As of the end of 2024, 52.8% of Gross Asset Value (GAV) is exposed to energy-inefficient real estate assets, increased from 52.2% at the end of 2023. This is due to properties holding an EPC label below B, with the change primarily attributed to value adjustments.	In line with the fund's ESG strategies and the target of achieving a minimum Energy Performance Certificate (EPC) rating of C by 2030.
Other indicators for principal adverse impacts on sustainability factors Indicators applicable to investments in real estate assets								
	Greenhouse gas emissions	1. GHG emissions	Scope 1 GHG emissions generated by real estate assets	98.4	150.8	100%	The reported Scope 1 emissions represent direct greenhouse gas emissions from owned or controlled sources within the real estate assets, for example, on-site fuel combustion for heating. In 2024, Scope 1 emissions amounted to 98.4 tons of CO ₂ , compared to 150.8 tons in 2023.	Expected to decrease as certain properties with on-site heat production are expected to be sold or have their heat source replaced.
			Scope 2 GHG emissions generated by real estate assets	135.4	766.3	100%	The reported Scope 2 emissions are calculated using the market-based method, taking into account the	Going forward, the funds are expected to reduce emissions in alignment with the net-zero target

							fund's green origin guarantees on the landlords' share of electricity. Scope 2 emissions amounted to 135.4 tons of CO2 in 2024, compared to 766.3 tons in 2023.	for 2050 by continuously optimizing property energy efficiency and utilizing origin guarantees, which are anticipated to also cover heating (district heating).
			Scope 3 GHG emissions generated by real estate assets	20,630.1	19,121.2	100%	The reported Scope 3 emissions are based on available data and primarily reflect tenant emissions. Scope 3 emissions amounted to 20,630.1 tons of CO2 in 2024, compared to 19,121.2 tons in 2023.	Initiatives in collaboration with tenants to reduce greenhouse gas emissions are ongoing.
			Total GHG emissions generated by real estate assets	20,938.2	20,038.3	100%	Total CO ₂ emissions amounted to 20,938.2 tons in 2024, compared to 20,038.3 tons in 2023.	Screenings and initiatives to improve energy efficiency and reduce CO ₂ emissions are ongoing across the managed funds in accordance with the fund ESG strategies.
Energy consumption	2. Energy consumption intensity	Energy consumption in GWh of owned real estate assets per square meter	0.000161	0.000162	100%	Energy consumption intensity Energy consumption in GWh of owned real estate assets per square meter 161.1 kWh in 2024 compared to 162.2 kWh in 2023.	Continuous efforts are being made to implement energy-saving initiatives and upgrade building systems, with the goal of reducing energy intensity over time in alignment with the fund's sustainability	

								strategy and targets.
	Waste	3. Waste production in operations	Share of real estate assets not equipped with facilities for waste sorting and not covered by a waste recovery or recycling contract	0.0%	0.0%	100%	Within required limit.	On target.
	Resource consumption	4. Raw materials consumption for new construction and major renovations	Share of raw building materials (excluding recovered, recycled and biosourced) compared to the total weight of building materials used in new construction and major renovations	N/A	N/A	N/A	N/A	No new construction or major renovations in the funds managed by FFMN.
	Biodiversity	5. Land artificialisation	Share of non-vegetated surface area (surfaces that have not been vegetated in ground, as well as on roofs, terraces and walls) compared to the total surface area of the plots of all assets	N/A	N/A	N/A	N/A	N/A

Alternative Investment Funds Covered

The following Alternative Investment Funds were managed by Fokus Fund Management Norway in 2024.

Article 8 funds

- Fokus Norway Balanced Property Fund AS
- Fokus Eiendomsfond Norge I IS/AS
- Fokus Eiendomsfond Norge I Invest AS (feeder fund to Fokus Eiendomsfond Norge I IS/AS)

Data Coverage

All figures are based on actual consumption data with 100% coverage verified by third party Veritas.

Description of policies for identifying and prioritizing the most significant negative impacts on sustainability factors

1. Responsible investment policy

Fokus Fund Management Norway AS has a Responsible Investment Policy to identify, manage, and mitigate significant environmental, social, and governance (ESG) risks. Established on June 1, 2021, and updated in 2022 to align with the EU Sustainable Finance Disclosure Regulation (SFDR), the policy integrates sustainability into the investment process. Key ESG risks, including environmental, social characteristics, and PAI indicators, are assessed for their financial materiality. Sustainability risks are thoroughly evaluated before investment approval, and investments with disproportionate risks are rejected. ESG risks are monitored continuously and reviewed annually or when significant changes occur, ensuring integration into risk management strategies and compliance with regulatory standards.

Sustainability policy: <https://fokusnordic.com/wp-content/uploads/2025/06/Board-Instruction-on-Sustainability-Fokus-Fund-Management-Norway-AS.pdf>

2. Investment Approach and Process

Fokus Fund Management Norway integrates sustainability into every stage of the investment process to address negative impacts on sustainability factors while maximizing ESG opportunities. ESG risks, including energy efficiency, carbon emissions, and social factors, are systematically identified and assessed during due diligence to align investments with fund ESG targets and international standards. Annual investment plans outline specific ESG actions and long-term goals, such as reducing greenhouse gas emissions and improving energy efficiency. Progress is reviewed mid-year, with adjustments made as needed. The Investment Board oversees ESG strategies, ensuring transparency and accountability.

3. Deas Asset Management CSR report 2024:

<https://fokusnordic.com/wp-content/uploads/2025/06/CSR-report-2024-DEAS-Asset-Management.pdf>

Policy on Active Ownership

This is not relevant, as the funds own the properties directly.

International Standards

Group Level - DEAS Asset Management

- Deas Asset Management Group has been a signatory to the Principles for Responsible Investment (PRI) since 2022.
- DEAS Asset Management has implemented a Supplier Code of Conduct that aligns with international standards. In the coming years, the focus will be on ensuring suppliers formally adhere to this Code of Conduct and conducting ongoing due diligence to verify compliance.

Fund Level

- Both master funds managed by Fokus Fund Management Norway AS report to the Global Real Estate Sustainability Benchmark (GRESB), which assesses and benchmarks the environmental, social, and governance (ESG) performance of real estate portfolios and assets.
- ESG fund strategies are aligned with the UN Sustainable Development Goals (SDGs).

- Both funds are classified as article 8 funds, which means they promote environmental characteristics.

Asset Level

- For a selection of the managed funds, the Carbon Risk Real Estate Monitor (CRREM) tool is utilized to assess climate-related risks.
- Certifications such as BREEAM are obtained for various assets to ensure adherence to recognized sustainability standards.
- A selection of properties is regularly screened for alignment with the EU Taxonomy. Furthermore, climate risk assessments have been conducted for most properties in the funds.

Historical Comparison

Comparative figures can be found in this statement, where the figures for 2023 and 2024 are compared. Additional comparative figures will be included in the statement for 2025, which will be available before June 30, 2026.