

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

Date: 25. June 2025

Financial market participants: Fokus Nordic Fund Management DK A/S AIFM (LEI: 549300A58C2PD76LIF74) referred to as "FNFM" below.

Sammenfatning (Dansk)

FNFM tager hensyn til de vigtigste negative indvirkninger af sine investeringsbeslutninger på bæredygtighedsfaktorer. FNFM har tilladelse som forvalter af alternative investeringsfonde, og forvalter fonde, der alle er baseret på strategier indenfor fast ejendom. Denne erklæring af de vigtigste negative indvirkninger på bæredygtighedsfaktorer vedrører FNFM og er udarbejdet i henhold til EU-forordning 2019/2088 ("SFDR") og den delegerede forordning til SFDR 2022/1288 ("Delegerede Forordning").

Erklæringen om de vigtigste negative indvirkninger på bæredygtighedsfaktorer er udarbejdet med udgangspunkt i Bilag I til den Delegerede Forordning, hvor det fremgår af skema 1, skema 2 og skema 3, hvilke bæredygtighedsfaktorer der finder anvendelse for investering i fast ejendom. FNFM arbejder aktivt på, at de investeringsdispositioner, der foretages på vegne af fondene, i videst mulige omfang reducerer de negative indvirkninger på miljø-, sociale og ledelsesmæssige faktorer. Dette understøttes af FNFM's Politik for Bæredygtighed og forretningsgang for Investeringsprocessen.

FNFM har identificeret nedenstående negative bæredygtighedsfaktorer som de vigtigste:

Obligatoriske indikatorer for investeringer i fast ejendom:

- Indikator 17: Eksponering for fossile brændstoffer via fast ejendom
- Indikator 18: Eksponering for energiineffektiv fast ejendom (energimærke C eller dårligere)

Frivillige indikatorer for investeringer i fast ejendom

- Indikator 18: Drivhusgasemissioner
- Indikator 19: Energiintensitet
- Indikator 20: Affaldsproduktion under drift

PAI-erklæringen vil blive opdateret årligt, og FNFM indsamler data på fire specifikke datoer i referenceperioden fra 1. januar til 31. december: 31. marts, 30. juni, 30. september og 31. december. Denne erklæring dækker perioden fra 1. januar 2024 til 31. december 2024.

Summary

FNFM considers Principal Adverse Impacts ("PAI") of its investment decisions on sustainability factors. FNFM is a licensed manager of alternative investment funds and manages funds that are all based on strategies related to real estate assets. This PAI statement pertains to FNFM and 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 indicate the sustainability factors applicable to real estate investments. FNFM aims to ensure that the investment decisions made on behalf of the managed funds reduces the negative impacts of environmental, social and governance fact to the greatest extent possible. This is supported by FNFM's internal governance in the Policy on Sustainability and in the process for new Investments.

FNFM has identified the following PAI's on sustainability factors as being relevant:

Indicators applicable to investments in real estate assets

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

Other indicators applicable to investments in real estate assets

- Indicator 18: Greenhouse gas emissions
- Indicator 19: Energy consumption intensity
- Indicator 20: Waste production in operations

The PAI statement will be updated annually, and FNFM 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 a percentage of total energy sources	N/A	N/A	N/A	N/A	Not applicable to our Investment activities.	
	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 2024	Impact 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	0.1%	0.1%	100%	One property, accounting for 0.1% of the total AUM value, is exposed to fossil fuels (a gas station).	The objective is to have a portfolio with no exposure to fossil fuels through real estate assets. The fund is considering selling the

							property. No new investments will be made in real estate assets involved in the extraction, storage, transportation, or manufacturing of fossil fuels.
Energy efficiency	18. Exposure to energy-inefficient real estate assets	Share of investments in energy-inefficient real estate assets	67.7%	69.3%	100%	67.7% of AUM is exposed to energy-inefficient real estate assets, because they have a EPC label below B. The exposure has decreased from 69.3% end of 2023. The change is mainly related to sales, Energy Performance Certificate improvements and valuation adjustments.	Ongoing energy improvements identified through energy label screenings.
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 (metric tons of CO ₂)	0.0	43.2	Scope 1 greenhouse gas emissions decreased from 43.2 tonnes of CO ₂ in 2023 to 0 tonnes in 2024. This reduction is primarily attributable to the sale of a property with on-site heating.	N/A
			Scope 2 GHG emissions generated by real estate assets (metric tons of CO ₂)	6,600.5	6,688.1	Some of the estimated Scope 2 CO ₂ emissions are based on calculations derived from Energy Performance Certificates (EPCs), while the remaining	Moving forward, priority will be given to collecting actual consumption data for the funds where this is currently unavailable

						emissions are based on actual energy consumption using the market-based method. Scope 2 emissions have decreased from 6,688 tonnes of CO ₂ in 2023 to 6,600 tonnes in 2024.	and where data is currently estimated.
			Scope 3 GHG emissions generated by real estate assets (metric tons of CO ₂)	8.5	7.6	The reported Scope 3 emissions is based on available data, primarily reflecting tenant energy consumption. However, some data is currently unavailable for certain funds, and efforts are being made to improve data collection for these funds to improve the accuracy and completeness of reported emissions.	Moving forward, priority will be given to collecting actual consumption data for the funds where this is currently unavailable.
			Total GHG emissions generated by real estate assets (metric tons of CO ₂).	6,609.0	6,739.9	Total greenhouse gas emissions have decreased from 6,739.9 tonnes of CO ₂ in 2023 to 6,609.0 tonnes in 2024.	Screenings and initiatives to improve energy efficiency and reduce CO ₂ emissions are ongoing across the managed funds.
	Energy consumption	2. Energy consumption intensity	Energy consumption in GWh of owned real estate assets per square meter	0.000123	0.000132	Energy consumption intensity, measured in gigawatt hours (GWh) per square meter of owned real estate assets, decreased from	Continuous efforts are being made to implement energy-saving initiatives and upgrade building systems, with the goal of reducing

						0.000132 GWh/m ² in 2023 to 0.000123 GWh/m ² in 2024.	energy intensity over time in alignment with the fund's sustainability strategies 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%	N/A	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	No new construction or major renovations in the funds managed by FNFM.
	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

Alternative Investment Funds

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

Article 8 Funds

- DEAS Property Fund Finland I Ky
- Deas Property Fund Finland I Feeder Ky (feeder fund to DEAS Property Fund Finland I Ky)
- DEAS Tonttirahasto II Ky
- DEAS Tontti Holding II Ky (feeder fund to DEAS Tonttirahasto II Ky)
- DEAS Tontti Holding II PB Ky (feeder Fund to DEAS Tonttirahasto II Ky)
- DEAS Swedish Balanced Property Fund

Article 6 Funds

- Dansk Ejendomsfond I P/S
- Ejendomspartnerselskabet af 1/7 2003
- DEAS Invest I Holding A/S
- DEAS Tonttirahasto Ky
- DEAS Tontti Holding Ky (feeder fund to DEAS Tonttirahasto Ky)

Data Coverage

Emission data is based on actual measured emissions where available. For assets where such data is not accessible, estimates have been applied using energy performance certificates (EPCs) and location-based emission factors.

It should be noted that certain managed financial products, specifically Article 6 funds, do not consider Principal Adverse Impact (PAI) indicators at the product level. However, their

associated adverse impacts are included in this consolidated statement to ensure transparency across the portfolio. In addition, for the ground rent funds managed by Fokus, namely DEAS Tonttirahasto II Ky and DEAS Tonttirahasto Ky, energy consumption data is not available. As a result, these funds have been excluded from the calculations related to energy intensity, energy inefficiency and greenhouse gas emissions.

Description of policies to identify and prioritize principal adverse impacts on sustainability factors

1. Responsible investment policy

Fokus Nordic Fund Management 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-Nordic-Fund-Management-DK.pdf>

2. Investment Approach and Process

Fokus Nordic Fund Management 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 carbon 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

Company Level

- 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

- The DEAS Swedish Balanced Property Fund managed by Fokus Nordic Fund Management reports 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 specific UN Sustainable Development Goals (SDGs).

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, DGNB, and LEED 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, a range of properties in the Article 8-funds, risk and vulnerability assessments have been conducted in accordance with the Taxonomy Regulation.

Historical Comparison

Additional comparative figures will be included in the PAI statement for the reference year 2025, which will be published no later than 30 June 2026. It should be noted that year-on-year comparisons may be challenging due to changes in the composition of the managed funds over time, as well as continuous improvements in data quality.