

ANNIX IV

**Template periodic disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Product name:** Heimdal Credit Fund K/S  
**Legal entity identifier:** 984500BDF5783EEFA130

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

**The EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

## Environmental and/or social characteristics

<b>Did this financial product have a sustainable investment objective?</b>	
<p> <input checked="" type="radio"/> <input type="radio"/> <b>Yes</b> </p> <p> <input type="checkbox"/> It made <b>sustainable investments with an environmental objective:</b> ___%                     <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <p> <input type="checkbox"/> It made <b>sustainable investments with a social objective:</b> ___%                 </p> </p>	<p> <input type="radio"/> <input checked="" type="radio"/> <b>No</b> </p> <p> <input type="checkbox"/> It promoted <b>Environmental/Social (E/S) characteristics and</b> while it did not have as its objective a sustainable investment, it had a proportion of ___% of sustainable investments                     <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> With a social objective</li> </ul> <p> <input checked="" type="checkbox"/> It promoted E/S characteristics, but <b>did not make any sustainable investments</b> </p> </p>

**To what extent were the environmental and/or social characteristics promoted by this financial product met?**



	Asset types	Characteristics	KPI	Criterion	Threshold value (%)	Target achievement (%)
Sociale	All assets	Tax policy and justice	Collective agreement-like terms, or better.	Collective agreement-like terms, or better.	100	100
			No aggressive tax planning	No aggressive tax planning	100	100
Environmental	All assets	Climate change resilience	Climate risk assessment	Evaluation of data sources	100	100
	Construction of new assets	Sustainable design and construction	Certification	Recognized building certification	28	47
			Life cycle assessment performed and documented	Completed LCA 6,9 kg co2-eq/m2/year 9,96 kg co2-eq/m2/year	47	35
			Life cycle costs examined and documented	Completed LCC	28	35
			Avoid toxic materials	Within the threshold values for volatile organic compounds	28	35
	Standing assets	Energy efficiency	Energy Performance certificate/improvement of Energy Performance certificate	Energy label of D or higher after implementing cost-effective savings measures. Alternatively, a plan to improve the existing level by 2 steps.	37	41
			Greenhouse gas emissions	Calculated CO2 emissions	37	41
			Actual energy consumption	The borrower can provide data on this	37	53
Renewable energy consumption			The building does not use oil for energy, unless a phase-out plan exists.	37	41	

### Tax policy and justice

All borrowers with approved loans meet the requirements concerning:

- to comply with Danish legislation and ensure that their employees receive wages, working hours, and other employment conditions that are no less favorable than those applicable to similar work under a collective agreement concluded by the most representative labour market parties within the relevant sector in Denmark, and which applies across the entire Danish territory.
- not to engage in aggressive tax planning, and all borrowers are subject to taxation in Denmark.

Thus, 100% of the Assets Under Management (AuM) fulfil this characteristic.

### Climate change resilience

Sustainability due diligence has been conducted for all approved investments in 2024. The due diligence covers the identified sustainability risks: i) climate change, ii) environmental pollution, and iii) social risks. 100% of the AuM meet these characteristics.

### Sustainable design and construction

The financed new construction projects are certified, and thus 100% of the AuM for new construction (corresponding to 47% of total AuM) meet this KPI.

Documentation has been received for LCA and LCC calculations as well as the use of harmful materials for 73% of the AuM for new construction (corresponding to 35% of total AuM). The remaining 27% of AuM are required to submit the requested documentation no later than at the time of drawdown on the construction loan.

Thus, 100% of the AuM for new construction (corresponding to 47% of total AuM) meet the characteristics for sustainable design and construction.

### Energy efficiency

It has been assessed and documented whether the financed properties have an energy label and what their specific label is. 78% of the AuM for financed properties (corresponding to 41% of total AuM) meet the requirement of an energy label of D or better.

Greenhouse gas emissions have been calculated for the financed properties based on their energy labels. 78% of the AuM for financed properties (corresponding to 41% of total AuM) meet the requirement for calculated greenhouse gas emissions.

Data on actual energy consumption for the financed properties has been collected based on a "whole-building" approach. 100% of the AuM for financed properties (corresponding to 53% of total AuM) have provided actual energy consumption data.

Data on the use of renewable energy by the financed properties has also been collected. 78% of the AuM for financed properties (corresponding to 41% of total AuM) have submitted data on renewable energy consumption.

## ● ***How did the sustainability indicators perform?***

### Climate change resilience

The sustainability due diligence conducted for each individual investment identified a minor climate-related flood risk in one case. In collaboration with the borrower, the necessary measures were implemented, allowing construction to commence with only a slight delay.

### Energy efficiency

78% of the AuM for financed properties have an energy label of C, while the remaining 22% do not have an energy label.

For the financed properties without an energy label, the plan is to deconstruct the existing buildings and construct residential housing. The preliminary plans for the new housing developments include DGNB certification.

Greenhouse gas emissions have been calculated based on the energy labels. These emission levels will be used in the future to help establish a benchmark.

100% of the AuM for financed properties have provided data on actual energy consumption. The objective of raising awareness of actual energy consumption through dialogue and a requirement to submit data has led to positive and constructive discussions. Borrowers who initially believed they could not provide the requested data have done so, nonetheless. The energy consumption levels will contribute to the forward-looking development of a benchmark.

All financed properties use district heating and do not utilise other sources of renewable energy. This KPI has not proven to contribute significantly to the selected characteristic and will be revised for the investment criteria in 2025.

### Sustainable design and construction

100% of the AuM for the financed construction projects will be certified with either DGNB Gold or BREEAM Very Good.

The received documentation for the LCA calculations shows a climate impact ranging from 6.9 kg CO<sub>2</sub>-eq per m<sup>2</sup> per year to 9.96 kg CO<sub>2</sub>-eq per m<sup>2</sup> per year, which is below the current threshold value of 12 kg CO<sub>2</sub>-eq per m<sup>2</sup> per year for new buildings, according to BR18.

The received documentation for the LCC calculations, which reflect the total economic cost assessment, ranges from DKK 29,411 to DKK 32,062 per m<sup>2</sup>. These cost levels will contribute to the development of a forward-looking benchmark.

Documentation on the use of harmful materials in the construction projects has not yet been received, as this is only measured upon project completion. Since the ongoing construction projects are being certified, the fund expects that no harmful materials are used, as this is a requirement for certification.

#### Tax policy and justice

The two KPIs under this characteristic are fulfilled through the commitments accepted by the borrower upon signing the Committed Term Sheet and later the loan agreement. 87% of the AuM are committed via a signed loan agreement, while 13% of the AuM are committed via a Committed Term Sheet.

87% of the AuM have confirmed these commitments in the compliance certificate as of 31 December 2024.

The remaining 13% of the AuM have accepted these commitments through the Committed Term Sheet. The conditions will be incorporated into the loan documentation

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

● ***...and compared to previous periods?***

Not relevant, as this is the first report.

● ***What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?***

Not relevant

● ***How did the sustainable investments that the financial product partially made not cause significant harm to any environmental or social sustainable investment objective?***

Not relevant

— *How were the indicators for adverse impacts on sustainability factors taken into account?*

— *Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the FN Guiding Principles on Business and Human Rights? Details:*



## How did this financial product consider principal adverse impacts on sustainability factors?

Not relevant

The list includes the investments constituting the **greatest proportion of investments** of the financial product during the reference period which is:

*The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific Union criteria.*

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the Union criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the Union criteria for environmentally sustainable economic activities.

*Any other sustainable investments must also not significantly harm any environmental or social objectives.*



## What were the top investments of this financial product?

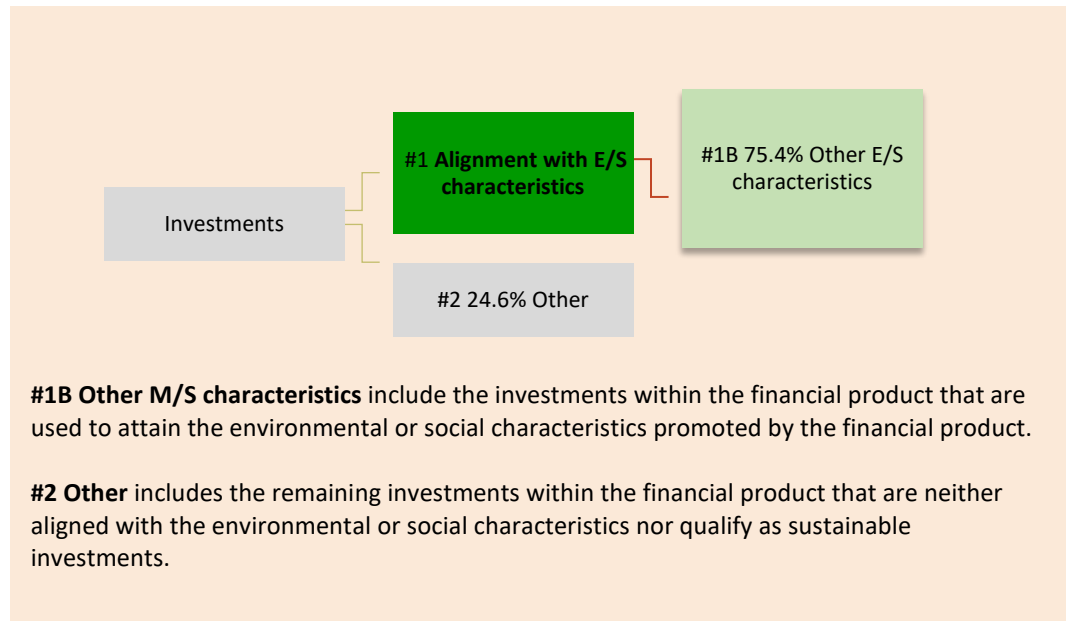
Largest investments	Sector	% Assets	Country
<i>Loan 1</i>	<i>Office</i>	<i>41</i>	<i>DK</i>
<i>Loan 2</i>	<i>Office(construction)</i>	<i>25</i>	<i>DK</i>
<i>Loan 3</i>	<i>Logistics(Construction)</i>	<i>13</i>	<i>DK</i>
<i>Loan 4</i>	<i>Logistics</i>	<i>11.5</i>	<i>DK</i>
<i>Loan 5</i>	<i>Logistics(construction)</i>	<i>9.5</i>	<i>DK</i>



## What was the proportion of sustainability-related investments?

Not relevant

### ● *What was the asset allocation?*



### ● *In which economic sectors were the investments made?*

All investments have been made in the real estate sector.



## To what extent were the sustainable investments with an environmental objective aligned with the EU Taxonomy?

Not relevant.

### ● *Did the financial product invest in activities related to fossil gas and/or nuclear energy that are aligned with the EU Taxonomy<sup>1</sup>?*

Yes:

In fossil gas  In nuclear energy

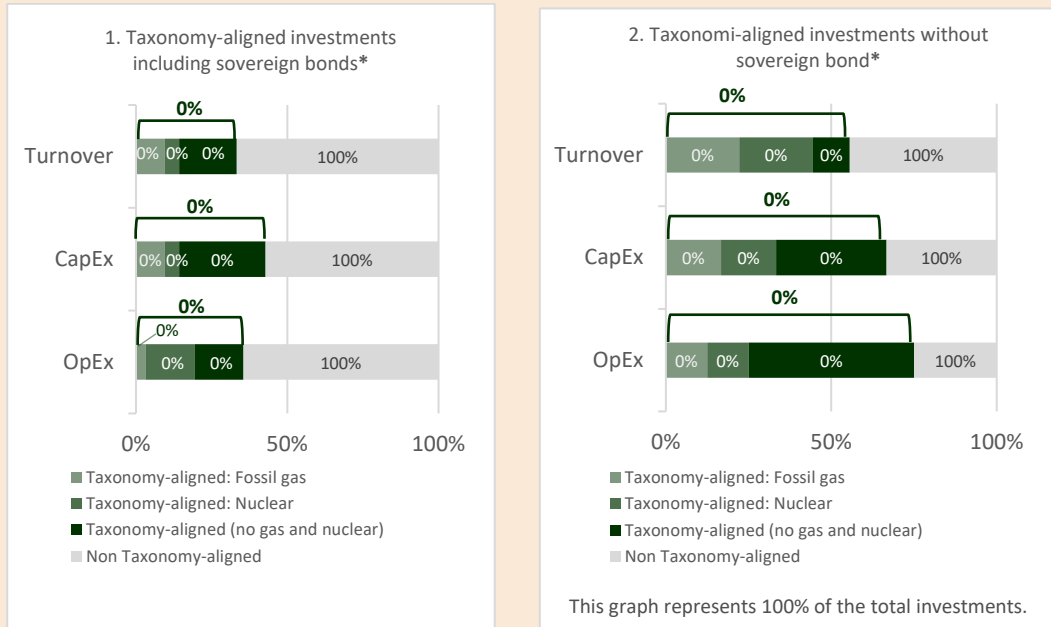
No

<sup>1</sup> Activities related to fossil gas and/or nuclear energy will only be aligned with the EU Taxonomy where they contribute to climate change mitigation and do not significantly harm any other EU Taxonomy objective — see explanatory note in the left margin. The full criteria for economic activities related to fossil gas and nuclear energy that are aligned with the EU Taxonomy are set out in Commission Delegated Regulation (EU) 2022/1214.

Taxonomy-aligned activities are expressed as a share of:

- **Turnover** reflects the “greenness” of investee companies today.
- **capital expenditure (CapEx)** shows the green investments made by investee companies, relevant for a transition to a green economy.
- **operational expenditure (OpEx)** reflects the green operational activities of investee companies.

The graphs below show, in green, the percentage of investments that were aligned with the EU Taxonomy. As there is no appropriate method for determining the taxonomy alignment of sovereign bonds, the first graph shows the taxonomy alignment relative to all investments in the financial product, including sovereign bonds, while the second graph shows the taxonomy alignment relative only to investments in the financial product excluding sovereign bonds.\*



\* For the purpose of these graphs, “sovereign bonds” include all government-related exposures

The fund has not screened the approved investments for alignment with the EU Taxonomy, as it is not the fund’s ambition to make taxonomy-aligned investments.

● **What was the share of investments made in transitional and enabling activities?**

Not relevant

● **How did the percentage of investments that were aligned with the EU Taxonomy compare with previous reference periods?**

Not relevant



**What was the share of sustainable investments with an environmental objective not aligned with the EU Taxonomy?**

Not relevant



**What was the share of socially sustainable investments?**

Not relevant



are sustainable investments with an environmental objective that do not take into account the criteria for environmentally sustainable economic activities under Regulation (EU) 2020/852.



**Which investments were included under "other," what was their purpose, and were there any minimum environmental or social protection measures ?**

Investments classified as “other” are those that only partially meet the defined characteristics. All investments comply with the requirements related to tax policy, justice, and climate change resilience.

However, certain characteristics, although it is the fund’s general ambition to invest in assets that promote sustainable characteristics, cannot be sufficiently documented to categorize the investment as promoting the fund’s characteristics.



**What actions have been taken to meet the environmental and/or social characteristics during the reference period?**

Not relevant



**How did this financial product perform compared to the reference benchmark?**

Not relevant

- *How does the reference benchmark differ from a broad market index?*
- *How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the environmental or social characteristics promoted?*
- *How did this financial product perform compared with the reference benchmark?*
- *How did this financial product perform compared with the broad market index?*

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.