

**PROCEDURE FOR THE EXERCISE OF VOTING RIGHTS**

17 March 2024

This Policy (hereinafter: “**Policy**”) sets forth principles fund management company AS Trigon Asset Management (hereinafter “**Trigon**”) follows when exercising the voting rights (hereinafter “**Voting rights**”) attached to the securities held in Fund<sup>1</sup>’s portfolios.

**1. GENERAL**

- 1.1. In exercising the Voting rights and in deciding whether to vote or refrain from voting, Trigon is guided by the principle of acting in the long-term best interests of the relevant Fund, taking into account the cost-benefit analysis, the advantage that voting would bring to the Fund’s portfolio, the investment objectives and policy of the relevant Fund.
- 1.2. Upon request by an investor of the Fund, Trigon discloses specific measures taken under hereby policy to the investor, free of charge.
- 1.3. The Policy is reviewed at least annually and a decision is made to amend the policy if needed.

**2. MONITORING IMPORTANT EVENTS**

- 2.1. In order to exercise the Voting rights, fund manager or a person delegated by Trigon monitors relevant corporate events regarding shares on the basis of the notices available in the major information channels used by Trigon (e.g. Bloomberg, stock exchange information systems) and via the custodian banks.
- 2.2. In addition to shares, the provisions of hereby clause are also applicable to other securities from which voting rights arise.

**3. EXERCISE OF VOTING RIGHTS**

- 3.1. Voting rights are usually exercised at shareholders’ meetings by attending physically, granting power of attorney or sending a postal/electronic vote.
- 3.2. The final decision regarding exercising the specific Voting rights is made by the fund manager. The fund manager determines whether and how to vote with regards to each agenda item as well as the specific issues to be presented in the interest of the Funds, independently from any inappropriate influence.
- 3.3. In exercising the Voting rights Trigon will not put its own interests ahead of those of any Fund and will resolve any possible conflicts between its interests and those of the Fund in favor of the Fund. In the event that a potential conflict of interest arises, Trigon will undertake the below analysis.
- 3.4. To specify if the conflict of interests is material or not the following analyze shall be conducted. A conflict of interest will be considered material to the extent that it is determined that the conflict has the potential to influence Trigon’s decision making in exercising the Voting rights. If such a material conflict is deemed to exist, Trigon will refrain completely from exercising the Voting rights and will instead refer that vote to an outside service for its independent consideration. If it is determined that any such conflict or potential conflict is not material, Trigon may exercise the Voting rights.
- 3.5. Trigon documents the relevant decision process for exercising the Voting rights. Investors have the right to ask specific information regarding the implementation of this strategy.

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<sup>1</sup> Fund is defined as each investment fund Trigon manages or renders investment management services.

- 3.6. Trigon monitors the efficacy of the measures applied to exercising the Voting rights and reviews this strategy at least once a year.
- 3.7. The back office department of Trigon shall keep the registry on the specifics of the exercise of voting rights.

#### 4. EXERCISE OF VOTING RIGHTS IN STANDARD SITUATIONS

In case of the following standard agenda items of ordinary and extraordinary general meetings Trigon shall vote in the following manner:

| <i>Agenda item</i>  | <i>Vote For</i> | <i>Vote Against</i> | <i>Depends</i> |
|---|-----------------|---------------------|----------------|
| Approval of annual report with positive auditor's opinion | X               |                     |                |
| Election of an auditor for the next term                  | X               |                     |                |
| Approval of dividend distribution                         | X               |                     |                |
| Amendments to the articles of association                 |                 |                     | X              |
| Remuneration of management via stock-option program       |                 |                     | X              |
| Approval of updated remuneration policy                   |                 |                     | X              |
| Raising capital   |                 |                     | X              |
| Removal of supervisory board member                       |                 |                     | X              |
| Election of new supervisory board members                 |                 |                     | X              |
| Adding of independent supervisory board member            | X               |                     |                |
| Election of audit committee                               | X               |                     |                |

This Policy and any future updates are made available on Trigon's web page [www.trigoncapital.com](http://www.trigoncapital.com).