

Ignoring the negative impact of investment decisions on sustainability factors

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In this statement, the fund management company AS Trigon Asset Management (hereinafter referred to as Trigon) provides sustainability-related information as set out in Regulation (EU) 2019/2088 of the European Parliament and of the Council of 2019-11-27 on disclosure of sustainability-related information in the financial services sector (hereinafter referred to as SFDR).

Due to the size of Trigon as a company, the SFDR makes the entity level Principal Adverse Impacts (PAI) consideration voluntary for us. Although Trigon has integrated the assessment of ESG factors and their risks into its investment decision-making procedures, on entity level Trigon currently does not take into account the main negative impact of investment decisions on sustainability factors.

The decision to not to perform PAI is triggered mainly due to the lack of consistent and accessible data on how to measure investments in a fund in this regard. Also there is no harmonized sector-wide reporting framework

In relation to managed investment funds that promote environmental or social characteristics, Trigon considers principal adverse impacts to the extent described in that fund's prospectus.

Remuneration policies with regards to sustainability risks

Trigon applies the Remuneration Principles, which ensures that Trigon's employee remuneration determination practices are consistent with and contribute to the effective management of the risks that Trigon faces. This includes an assessment of the risks associated with the application of ESG.

The remuneration principles are applied taking into account Trigon's business strategy and long-term goals of the managed funds. The remuneration policy is applied in conjunction with the Responsible Investment and Sustainability Risk Integration Policy.

The reasonable and appropriate remuneration determination environment ensures that Trigon's employees are not encouraged to take excessive or inappropriate risks. Risk associated with ESG are part of all risks Trigon and the managed funds are exposed to.

The Remuneration Principles are published on Trigon's website.