

Report on the assessment of fundamental human rights and decent working conditions

as of 30 June 2023

Arctic Asset Management AS (AAM) is authorised pursuant to the Act of 29 June 2007 no. 75 on securities trading ("the Securities Trading Act") to undertake portfolio management of investors' portfolios of financial instruments in accordance with section 9 of the Securities Trading Act, cf. § 2-1 (1) no. 4 of the same Act.

This section has been developed in order to comply with the legal requirements set out in the Norwegian Transparency Act that entered into force on 1 July 2022. The report describes how we work on human rights and labour rights due diligence, how the work is organized and how we have embedded responsible business conduct in our management systems, identified risks of adverse impacts and measures to mitigate these.

Responsibility for AAM's due diligence processes is shared between the administration and the compliance functions. The internal processes are adjusted to the company's size and identified risk areas. The purpose of the assessment is to identify which human rights and working conditions that are most likely to be significant for AAM's operations and supply chain. The risk assessment will be revised on a yearly basis or as needed to ensure that AAM remains responsive to changing circumstances and emerging risks.

This report has been prepared based on work done at Arctic Group level and at entity level, Arctic Asset Management AS (AAM), which are independently subject to the Transparency Act. Arctic Securities AS provides services to the Group's subsidiaries and to other companies in the Arctic Group, inclusive of AAM.

Policies and procedures in Arctic Group have embedded responsible business conduct in its governing documents. The Code of Conduct outlines Arctic's commitment to respect human rights and labour rights in operations. The Code also include other principles that are important for human rights and labour rights efforts, such as principles to counteract discrimination, bullying and harassment and promote diversity and inclusion.

In the Arctic Group there is established a reporting mechanism (Whistle Blowing) that enables anonymous reporting of misconduct, breaches or potential violations of our Code of Conduct. The function applies to all Group Employees.

Based on the severity and likelihood of potential adverse impacts, we have assessed human rights and decent working conditions risks that are relevant to the company's own operations and supply chain.

The likelihood of potential and actual severe adverse impact on human rights and working conditions in the company's own operations is not significant. AAM is domiciled in Norway, with one branch operating in Sweden. These countries are highly regulated in the areas of labour rights and health and safety, with high levels of human development and low risk of violations of fundamental human rights. AAM considers the risks related to our own operations to be well managed through existing systems,

policies and procedures, and we have concluded that both human rights and working conditions are well within acceptable conditions with no urgent need for further mitigating measures in the company's own operations.

AAM's supply chain is at an overall level, very close to being identical to the Arctic Group Supply Chain. Group functions primarily offers administrative and management services to subsidiaries and other group related companies, such as technology services and human resources support. Group Functions was involved in AAM's high-level risk assessment, providing insights and perspectives related to its specific operations. AAM rely on the supply chain assessment at group level and include a link to their assessment. <https://www.arctic.com/p/esg>