

Investmentpolicy

1 Background

According to Chapter 7, Section 10 of the Swedish Financial Supervisory Authority's regulations on securities funds (FFFS 2013:9), and Article 60 of Commission Delegated Regulation (EU) No 231/2013, the board of a company engaged in fund management shall:

- (i) establish internal rules specifying the investment strategies applied by the company for each fund it manages,
- (ii) establish internal rules specifying the procedures for investment decisions for each fund it manages, or ensure that the CEO establishes such internal rules,
- (iii) regularly monitor and verify that the general investment orientation, investment strategies, and risk limitation systems for each managed fund are implemented correctly and effectively and are being followed, and
- (iv) regularly monitor and verify the effectiveness of the company's risk management system.

According to Article 3 of Regulation (EU) 2019/2088 of the European Parliament and Council of 27 November 2019 on sustainability-related disclosures in the financial services sector, the Company shall disclose information regarding its policies for integrating sustainability risks into its investment decision-making process.

Against this background, ISEC Services AB ("the Company") has adopted this Investment Policy.

2 Investment strategies

Investment strategies refer to the fundamental principles of strategic asset allocation and the investment techniques required to implement the general investment orientation of each fund correctly and effectively.

Fund management shall comply with the investment rules set out in laws, regulations, and fund rules. For each fund, the board has decided to adopt specific investment strategies.

Fund management shall also demonstrate how sustainability risks are integrated into the investment decision-making process.

3 Investment decisions

Decisions shall be documented per fund and include any delegation of authority.

The following individuals are authorized to execute transactions on behalf of the funds:

- Chief Executive Officer
- Responsible Fund Manager
- Fund Managers authorized through service agreements to make investment decisions.

4 Monitoring and control

The Company's Risk Officer is responsible, in accordance with the Company's risk management guidelines, for regularly monitoring and verifying that the general investment orientation, investment strategies, and risk limitation systems for the Company's funds are being followed. The Risk Officer shall report the results of these controls to the board annually and as needed.

5 Review

The Company's risk management function is responsible for reviewing this policy at least annually and updating it as necessary.

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