

This disclosure has been prepared in accordance with articles 3, 4 and 5 of the Sustainable Finance Disclosure Regulation (EU) 2019/2088 (“SFDR”) and supplementing regulation (EU) 2022/1288 (“RTS”) article 13 which apply to NRP Project Finance AS (LEI: 2549005LYW0oCN6W8C17) as a financial adviser under Directive 2014/64/EU (MiFID II).

### **Integration of sustainability risks**

NRP Project Finance AS does not generally conduct advisory activities but may provide investment advice to clients on an ad hoc and infrequent basis. This represents a very limited part of NRP Project Finance AS’ business.

SFDR article 2 paragraph 22 defines “sustainability risk” as the following: an environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of the investment.

All clients of NRP Project Finance AS must state their sustainability preferences. This enables the company to provide suitable advice for the individual client. Sustainability preferences are one of several factors of information collected regarding the customer’s investment goals, risk tolerance, and investment experience and/or knowledge. That information is noted and considered by NRP Project Finance AS’ team when communicating with clients, and it will set guidelines on what advice that can be given.

When launching new products, the company must define a target market for the product. This involves, among other things, surveying the product and assessing it against potential clients’ criteria to ensure that the investment fits the client’s (among other) sustainability preferences. The product will then only be made available for those clients that it is considered suitable for.

NRP Project Finance AS recognizes that global sustainability challenges, including climate change, resource scarcity, and human rights are of critical importance and must be addressed.

### **No consideration of adverse impacts of investment advice on sustainability factors**

NRP Project Finance AS distributes products in all categories within the meaning of the SFDR. We highlight the benefits of our green products to potential and existing investors. Even though we promote the green transition the world needs to adapt, we are required to categorize ourselves in accordance with the SFDR and the RTS.

Although we distribute funds that are categorized according to SFDR article 6, 8 and 9 our position is that we do not consider the adverse impacts of our investment advice on sustainability factors.

Considering adverse impacts in an advisory service within the meaning of SFDR and the RTS, would require access to data on several mandatory sustainability indicators from our product providers. As of today, we do not have access to sufficient amounts of such data to enable us to consider principal adverse impacts of investment advice. This position will be evaluated on a regular basis.

However, when a client has expressed a sustainability preference that considers the principal adverse impact on sustainability factors, NRP Project Finance AS will only offer our products that fits this scope of interest.

In line with the NRP ESG Policy, the business of NRP Project Finance AS remains committed to integrating sustainability considerations within its business on a broad base and will generally

endeavor to minimize any significant detrimental impacts on sustainability factors that it considers may arise directly from its business activities.

**Integration of sustainability risks in the remuneration policies**

NRP Project Finance AS' remuneration policy promotes sound and effective risk management. It does not encourage excessive risk-taking, including with respect to sustainability risks. Sustainability risks are also factored in when determining the risk-adjusted performance of relevant employees.

Version history

Version	Date of publication
Version 1 (original publication)	13. April 2023