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Sifter Capital Oy – Principles of Sustainable Investing 1/2023

This document outlines the principles of sustainable investing for Sifter Capital Oy ("Sifter Capital").

Incorporating Sustainability Factors in Investment Activities Incorporating sustainability factors in investment activities refers to considering environmental, social, and employee-related issues, respecting human rights, and combating corruption and bribery.

Sustainability Risks Sustainability risks refer to environmental, social, or governance-related events or conditions that could have a material actual or potential negative impact on the value of an investment.

Considering ESG Factors and Sustainability Risks in Sifter Capital's Operations

Securities Brokerage

Sifter Capital Oy acts as the distributor for the Sifter Global Fund, a fund registered in Luxembourg ("Fund"), receiving and transmitting subscription and redemption orders for units (securities brokerage). The Fund is compliant with Article 6 of the Sustainable Finance Disclosure Regulation (SFDR), meaning it does not consider sustainability factors to the extent required by ESG regulations in its investment activities.

Asset Management

Sifter Capital also serves as the external portfolio manager for the Fund based on its asset management license granted in 2022. Sifter Capital does not offer asset management services beyond this role.

In managing the Fund's portfolio, Sifter Capital adheres to the Fund's current ESG policies and guidelines. As the portfolio manager, Sifter Capital ensures the application of the Fund's responsible investment principles in practical investment activities. The Fund's current ESG principles are published at: <https://sifterfund.com/en/sustainable-and-responsible-investing/>



Principal Adverse Impacts on Sustainability Factors

Sifter Capital follows the current ESG policies of the Fund it manages, which do not currently consider principal adverse impacts on sustainability factors in the Fund's investment activities.

Stewardship

Due to the size of the invested capital and the diversification of the Fund's investment targets, the ownership and voting rights derived from an individual equity investment are too small to be significant for stewardship purposes. Therefore, Sifter Capital does not currently actively exercise ownership rights associated with the Fund's equity investments in decision-making of the target companies.

Considering Sustainability Risks in Sifter Capital's Remuneration

For Sifter Capital employees, whose tasks include considering ESG factors and sustainability risks (Fund portfolio managers), the qualitative evaluation of each employee's performance includes adherence to the Fund's current policies and guidelines. However, due to the nature of Sifter Capital's portfolio management activities, considering ESG factors or sustainability risks is not an independent criterion for remuneration. Remuneration is based on a fixed salary plus a variable bonus linked to the company's overall performance.