NO CONSIDERATION OF ADVERSE IMPACTS OF INVESTMENT DECISIONS ON SUSTAINABILITY FACTORS

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Updates: The statement has been updated with a more specific reference to the legislation.

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Fund Manager: FundRock Asset Management Denmark A/S, CVR-no. 43723464

Fund: Upfin Fund I K/S, CVR-no. 42981680

While the Fund Manager does consider sustainability risks in its investment decisions, Fund Manager does not consider all of the specific adverse impact indicators set out in Annex 1 of the Commission's delegated regulation (EU) 2022/1288 of 6 April 2022 supplementing Regulation (EU) 2019/2088 (the "SFDR") in its investment decisions.

The reason for this is that Fund Manager has decided to focus on a few specific sustainability risk indicators fit for each of the Fund's investment profile rather than consider all of the indicators set out in Table 1-3 of Annex 1. While the Fund Manager does not expect to consider the principal adverse impacts on sustainability factors within near future, Fund Manager will, on a continuous basis, assess whether to consider all of the specific adverse impact indicators set out in Table 1-3 of Annex 1 in its investment decisions.