

## CODA PARTNERS AS – SHAREHOLDER ENGAGEMENT POLICY

Investment firms providing portfolio management are required to have an engagement policy in respect of shares admitted to trading on a regulated market situated in or operating within the EEA, or provide an explanation as to why the firm does not have any engagement policy (Section 9-16a of the Norwegian Securities Trading Act (verdipapirhandelloven) and Section 9-6a of the Securities Trading Regulations (verdipapirforskriften)).

Coda Partners AS is an investment firm authorised to, among other things, provide portfolio management, cf. Section 2-1(1) no. 4 of the Securities Trading Act. Active exercise of shareholder rights does not form part of the investment mandates managed by Coda. Coda does not exercise voting rights or any other form of active ownership in relation to the portfolio companies, including engagement with the companies aimed at influencing their management or strategy.

On this basis, Coda Partners AS has not established any specific engagement policy.