

## WEBSITE PRODUCT DISCLOSURE

**Product name:** Sector Healthcare Fund (the **Fund**), managed by Sector Gamma AS (the **AIFM**)

**Legal entity identifier:** 635400GWZOBLSWCKD34

### A. Summary

This financial product promotes environmental and social characteristics, but does not have as its objective sustainable investment. Environmental and social characteristics promoted by the Fund are (i) biodiversity and the environment, (ii) ethical marketing and pricing practices, (iii) health and safety, and (iv) product safety and integrity.

The assessment of good governance factors is an important component of the Fund's investment process. The AIFM considers governance factors, including but not limited to, board independence and quality, diversity of board & management team, and transparency.

The AIFM believes that the engagement of environmental, social and governance factors enhance the long term sustainability of a business, which is of critical importance to the AIFM's approach to stock selection. Shareholder engagement is primarily exercised by attending and voting and investee companies' general meetings. In certain circumstances, constructive engagements are undertaken with companies which have high impact controversies, or which have a low ESG rating, in order to assess whether those violations, controversies or what the AIFM deems as weak ESG efforts, are being addressed adequately.

Where required, the AIFM may interact directly with management teams of the investee companies through in person meetings and conference calls to understand risks and opportunities at investee companies. This allows the AIFM to engage with investee companies on ESG matters and assess good corporate governance practices at those investee companies. The Fund aims to hold a minimum of 80% investments (through direct exposure) that are aligned with the environmental or social characteristics promoted by the Fund.

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The AIFM measures all investee companies using information provided by a third-party ESG data provider which allocates an ESG Rating. The ESG Rating is used to measure the environmental and social characteristics promoted by the Fund.

A rules-based methodology is used to identify companies that are (i) industry leaders (ii) average or (iii) laggards, according to their exposure to ESG risks and how well they manage those risks relative to peers. Portfolio companies that are classed as "laggards" are negatively impacted in the AIFM's value creation score. The integration of this ESG data into the investment process creates a direct link between ESG risks, portfolio construction and the allocation of capital. In addition, the Fund will apply an exclusion list, based on companies' products or conduct. The ESG rating and adherence to the exclusion list are sustainability indicators which will be used to measure the attainment of each of the environmental and social characteristics promoted by the Fund.

The AIFM applies pre-trade compliance checks to adhere to the Exclusion List, and the portfolio is monitored against the exclusion list daily. Additionally, the ESG Rating is integrated into the research

and portfolio construction process applied by the AIFM. The ESG ratings are automatically updated and continuously monitored by the AIFM.

The data used in the AIFM's investment process is fundamental data provided by the companies, third-party aggregators of that data, and ESG rating providers. The AIFM does not believe that any limitations to data sources or methodologies will affect the Fund's attainment of the environmental and social characteristics.

No reference benchmark has been designated for the Fund.

#### **B. No sustainable investment objective**

This financial product promotes environmental and social characteristics, but does not have as its objective sustainable investment.

#### **C. Environmental or social characteristics of the financial product**

As part of the investment process, the AIFM considers a variety of environmental and social characteristics. These environmental and social characteristics are considered using an exclusion list and third-party ESG rating system as further detailed below.

The environmental and social characteristics promoted by the Fund include:

##### Environmental characteristics:

- Biodiversity and the environment - The AIFM believes biodiversity is a key indicator of the health of an ecosystem and accordingly investee companies that make an active contribution to safeguarding the world's natural resources are more likely to receive a higher allocation of capital

##### Social characteristics:

- Ethical marketing and pricing practices - The AIFM believes that marketing strategies must not infringe on values such as honesty, transparency and autonomy. The main issue of pricing ethics concerns the balance of power between producer and consumer. The AIFM will consider the track record of investee companies in order to assess whether they have been involved in, among other things, unsustainable pricing policies collusion and/or aggressive tax planning;
- Health and Safety - The health and safety of workers and their surroundings is of critical importance to the AIFM. Investee companies that put staff at unnecessary risk are condemned by the AIFM. The AIFM looks to workers' compensation claims, workplace accidents and other health and safety concerns specific to the relevant industry; and
- Product Safety and Integrity - An investee company that cuts corners on product safety or mis-sells products risks long-term reputational damage. Drug safety reporting issues and clinical trial manipulation are among the factors that are considered by the AIFM in the allocation of the Fund's capital.

The AIFM believes that by promoting these environmental and social characteristics the Fund enhances capital allocation to companies with strong or improving environmental or social characteristics.

#### D. Investment strategy

ESG characteristics are considered at two levels:

(ii) Third-party ESG data analysis

In addition to integrating the aforementioned Exclusion List into the portfolio construction process, the AIFM measures all portfolio companies using information provided by a third-party ESG data provider which allocates a specific ESG rating to company holdings in the Fund and investee companies that the AIFM is looking at as potential investments (the "ESG Rating"). The ESG Rating is used to measure the environmental and social characteristics promoted by the Fund.

This ESG Rating is designed to measure an investee company's resilience to long-term industry material environmental, social and governance risks. A rules-based methodology is used to identify companies that are (i) industry leaders (ii) average or (iii) laggards, according to their exposure to ESG risks and how well they manage those risks relative to peers. Investee companies that are classed as "laggards" are negatively impacted in the AIFM's value creation score. The integration of this ESG data into the investment process creates a direct link between ESG risks, portfolio construction and the allocation of capital.

By integrating this third-party ESG analysis into the overall company view, there is a direct link between the analysis of material ESG characteristics and portfolio construction activities across the Fund's strategy.

(ii) Exclusion List

To ensure that the environmental and social characteristics promoted by the Fund can be attained, the AIFM applies specific investment exclusions when determining what investments to make for the Fund. These exclusions are applied as part of the portfolio construction process to ensure the environmental and social characteristics promoted by the Fund can be attained.

The AIFM adheres to the Norges Bank observation and exclusion of companies list (the "Exclusion List"). The Norwegian Ministry of Finance has established ethically motivated guidelines regarding the observation and exclusion of companies. The guidelines contain criteria for exclusion based either on the companies' products or on their conduct.

The Norwegian Ministry of Finance has established an independent Council on Ethics to make ethical assessments of companies. The Council on Ethics sends its recommendations to Norges Bank's Executive Board, which then makes the final decision on exclusion, observation or active ownership, and updates the Observation and Exclusion List accordingly on an ongoing basis. The Exclusion list can be found at <https://www.nbim.no/en/the-fund/responsible-investment/exclusion-of-companies/>.

The assessment of good governance factors, including with respect to sound management structures, employee relations, remuneration of staff and tax compliance, is an important component of the Fund's investment process.

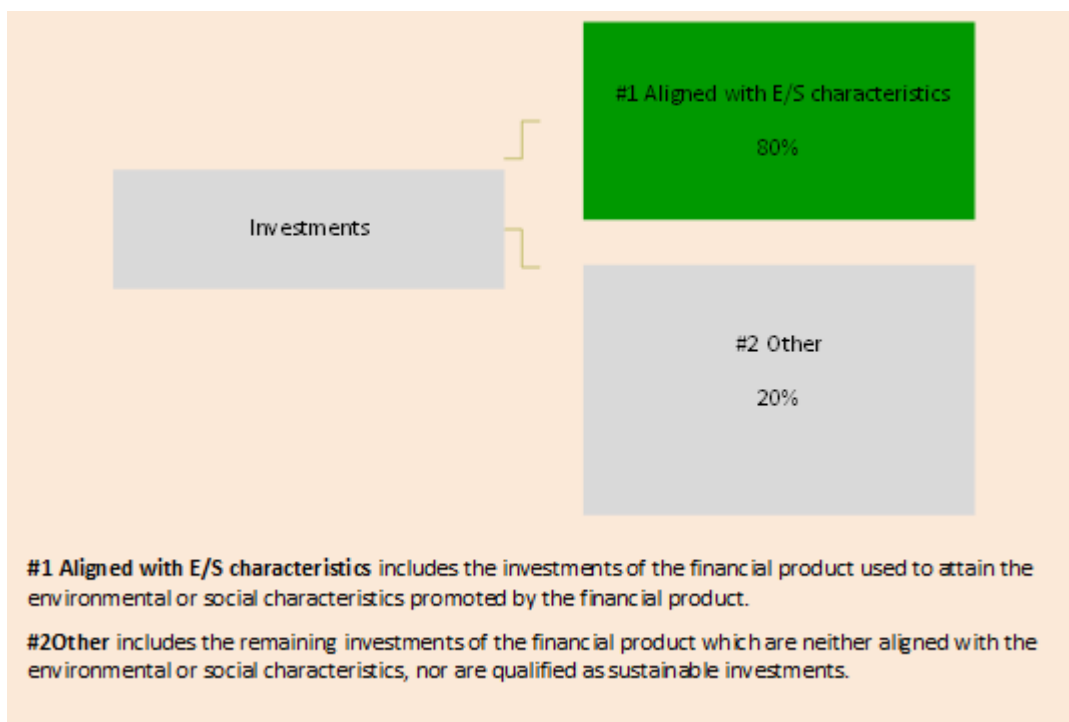
Based on the Fund's investment strategy, the AIFM considers the following additional governance factors to be of particular relevance:

- Board Independence and Quality - The AIFM believes firms with stronger board independence enjoy more effective governance through improved oversight and increased accountability.

Investee companies need directors with specific skillsets that can grow key functions and build stakeholder value.

- Diversity of board & management team - A diverse board of directors can help companies enhance their reputations as responsible and aware corporations. The AIFM sees board diversity as a critical factor in business resiliency, sustainability and long-term financial performance.
- Transparency - The AIFM sees transparency as a crucial element to gaining credibility and trust among stakeholders. It is important to the AIFM that a company is transparent in respect of its record in management of governance matters, outstanding lawsuits or negative financial exposures and historic misbehaviours.

## E. Proportion of investments



The Fund aims to hold a minimum of 80% investments that are aligned with the environmental or social characteristics promoted by the Fund. The Fund will have direct exposure to the investee companies.

The Fund does not hold sustainable investments.

The Fund aims to hold a maximum of 20% investments that are not aligned with the environmental or social characteristics promoted by the Fund and are not sustainable investments, and which fall into the “Other” section of the Fund.

“Other” includes the remaining investments of the Fund which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments. This “Other” section in the Fund might include companies that are not well covered by third party ESG rating

agencies, thereby reducing the AIFM's visibility on ESG matters in respect of these companies. Young, smaller market capitalization companies often fall into this category.

A lack of disclosure and visibility on ESG matters will impact the capital allocation towards this "Other" segment but the investee companies that comprise the "Other" are not strictly excluded from the Fund as the AIFM believes there are mis-pricings that can be capitalised on within this segment.

As noted above, the Fund will be invested in compliance with the Exclusion List, on a continuous basis. The AIFM believes that compliance with the Exclusion List prevents investment in companies that breach environmental and/or social minimum standards and ensures that the Fund can successfully promote its environmental and social characteristics. The above steps ensure that robust environmental and social safeguards are in place.

Please note that while the AIFM aims to achieve the asset allocation targets outlined above, these figures may fluctuate during the investment period and ultimately, as with any investment target, may not be attained.

The exact asset allocation of this Fund will be reported in the Fund's mandatory periodic report SFDR template, for the relevant reference period.

#### **F. Monitoring of environmental or social characteristics**

The Exclusion List is implemented and fully automated in the AIFM's compliance system. Pre trade checks are performed towards the exclusion list on all transactions, in addition to end of day checks against the current portfolio. Third party ESG ratings are automatically updated and continuously monitored by the AIFM. The AIFM produces a quarterly review of the portfolio's relevant ESG ratings, including exposures and performance attribution on each of the rating categories.

#### **G. Methodologies**

The AIFM will track and report on the performance of the sustainability indicators namely, (i) the adherence to the Exclusion List applied to the Fund; and (ii) the ESG Rating. These sustainability indicators will be used to measure the attainment of each of the environmental and social characteristics promoted by the Fund.

#### **H. Data sources and processing**

The data used in the AIFM's investment process is fundamental data provided by the companies, third-party aggregators of that data, and ESG rating providers. The AIFM is continuously monitoring and comparing multiple third-party data sources to ensure quality. Details of how the data is incorporated into the AIFM's investment process is described in the ESG Policy. The majority of the data are not estimated, but rather based on historical data provided by companies, third-party aggregators of data and ESG rating providers.

#### **I. Limitations to methodologies and data**

The AIFM's approach is dependent on the companies providing relevant information and for companies to be covered by third-party ESG rating providers. Further, the approach is dependent on the quality of the Exclusion List adhered to by the Fund. By utilizing high quality, third-party ESG rating providers and Exclusion List provider, the AIFM believes that any limitations of data sources and methodologies

are minimized, and that such limitations will not affect the Fund's attainment of the environmental and social characteristics.

#### **J. Due diligence**

The AIFM applies pre-trade compliance checks to adhere to the Exclusion List. Additionally, the ESG Rating is integrated into the research and portfolio construction process applied by the AIFM. This process is further described in the AIFM's ESG Policy (available [here](#)). The AIFM is relying on public information and third-party data providers, and is not carrying out internal due diligence. Information is analysed and compared as described above and in more detail in the ESG Policy

#### **K. Engagement policies**

The AIFM believes that the engagement of environmental, social and governance factors enhance the long term sustainability of a business, which is of critical importance to the AIFM's approach to stock selection. Such shareholder engagement is primarily exercised by attending and voting and investee companies' general meetings.

In certain circumstances, constructive engagements are undertaken with companies which have high impact controversies, or which have a low ESG rating, in order to assess whether those violations, controversies or what the AIFM deems as weak ESG efforts, are being addressed adequately.

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#### **L. Designated reference benchmark**

No reference benchmark has been designated for the Fund.