Lyra Financial Wealth
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Sustainability Policy

(Summary of Company Policy)

2024 – Adopted annually by the CEO

1. SUSTAINABILITY

Sustainability and sustainable investments are important to Lyra. Lyras's goal is to contribute to a more sustainable world. This is outlined in the company's sustainability policy and is continuously considered in the work we perform, both internally and on behalf of our clients when investing in financial markets. This informational material provides a summary of the company's sustainability policy.

Lyra's operations are subject to the EU Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector.

2. KEY CONCEPTS AND REGULATIONS

Our work is guided by several regulations that define and quantify various concepts. The purpose of these regulations is to create transparency and establish a common framework for defining *sustainability*.

*At Lyra, we base o*ur Sustainability Policy on the concept of **sustainable development**, a concept developed by the United Nations World Commission on Environment and Development, defined as *development that meets the needs of the present without compromising the ability of future generations to meet their own needs*.

Another key concept is **ESG**, i.e. Environmental, Social, and Governance, which was coined in 2004 by leading financial institutions and the UN.

Further, the European regulations (Disclosure Regulation and Taxonomy Regulation) also use the following terms:

Sustainability risk - an environmental, social, or governance-related event or circumstance that, if it were to occur, would have an actual or potential material adverse effect on the value of an investment.

Environmentally sustainable investment - an investment in one or more economic activities that are considered environmentally sustainable under the Taxonomy Regulation.

The environmental objectives - (i) climate change mitigation, (ii) climate change adaptation, (iii) sustainable use and protection of water and marine resources, (iv) transition to a circular economy, (v) prevention and mitigation of environmental pollution, and (vi) protection and restoration of biodiversity and ecosystems.

To be considered as an ***environmentally sustainable economic business*** – the business must (i) significantly contribute to one or more of the environmental objectives defined above, (ii) while not simultaneously causing significant harm to any of the environmental objectives above, (iii) be carried out in compliance with the minimum protective measures defined in the Taxonomy Regulation, and finally, (iv) comply with technical screening criteria established by the Commission.

3. LYRA'S INTERNAL WORK

Lyra is working actively on three of the 17 global development goals set up by the UN: *gender equality*, *sustainable consumption*, and *climate change*, all of which have been tied to a tangible goal in our business plan. Lyra strives to align its business operations with the 1.5-degree target. Additionally, all employees are to dedicate one workday per year to an external initiative aimed at contributing to one of the company's three defined goals.

3. LYRA'S PORTFOLIO MANAGEMENT

In the company's sustainability policy, it is outlined how we integrate sustainability aspects into the portfolio management. Lyra offers discretionary portfolio management through the selection and weighted combinations of external funds, meaning that individual mandates may vary depending on clients' allocation and sustainability preferences. The goal of portfolio management is to achieve good risk-adjusted returns.

Although portfolio management does not explicitly target environmental or social objectives, it promotes such characteristics through sustainable investments. In accordance with the SFDR, portfolio management is considered equivalent to a financial product (under Article 8). We have chosen to define the promotion of environmental or social objectives as a percentage of revenues contributing to one of the UN's 17 Sustainable Development Goals (SDGs).

Our sustainability policy specifies how the fund selection process should consider sustainability factors in investment decisions and ongoing evaluations.

We have decided on the following:

> We require that the fund managers have signed UNPRI.[1]
> We ensure that fund managers prioritize corporate governance within their holdings. This is achieved by verifying that the funds' governance guidelines clearly outline how sustainability efforts should be conducted, i.e. principles for voting and principles for working with active ownership.
> We integrate sustainability risks (as defined above) into our fund selection.
> We consider the negative impacts of investment decisions on sustainability factors in portfolio management. For further information, please refer to the annual sustainability report published on our website.
> We offer discretionary management consisting solely of so-called "Article 8" funds. In such management, companies generating revenues from problematic industries are excluded, and companies with high (low) greenhouse gas emissions are underweighted (overweighted).

[1] UNPRI is a global initiative aimed at promoting responsible practices within ESG. Companies that join UNPRI commit to integrating the following principles into their operations and annually reporting the results of this work.
The principles are:

- to consider environmental, social, and governance (ESG) aspects in investment analyses and decision-making processes.
- to be an active owner and include ESG factors in ownership policies and processes.
- to strive for the fund management company's funds to provide transparent and adequate reporting on ESG matters.
- to promote the acceptance and implementation of UNPRI by other investors and stakeholders in the investment industry.
- to collaborate with other stakeholders to implement UNPRI, and
- to annually report and disclose how these responsible practices are being implemented.