

2024

# CORPORATE SOCIAL RESPONSIBILITY REPORT

Alfred Berg Kapitalforvaltning

# HELGE SILJEHOLM ARNESEN, CEO OF ALFRED BERG KAPITALFORVALTNING



*Sustainability encompasses various dimensions, but presently, the primary focus is on mitigating the environmental impact of human activities, which stands as the most pressing concern. Urgent action is required to significantly reduce greenhouse gas emissions and other detrimental effects that imperil nature and life on earth. Regulatory shifts in finance, particularly concerning sustainability and nonfinancial factors, are aimed at accelerating this imperative. Moreover, attention is increasingly directed towards social aspects, notably within supply chains, demanding transparency from international companies sourcing raw materials and services globally.*

*As asset managers, our greatest influence on environmental and social conditions stems from the funds and mandates we oversee, acting on behalf of our clients, the asset owners. Consequently, we share responsibility for the resulting impact: through selection and for our investors through ownership and financing. Moreover, the looming threats posed by climate change and other external factors underscore the necessity of integrating Environmental, Social, and Governance (ESG) risks into our investment decisions from a double materiality standpoint. Achieving corporate sustainability yields manifold benefits. Environmental gains stem from identifying and subsequently minimizing our impact, while socially, both internally and externally, assessing the status quo through relevant Key Performance Indicators (KPIs) aids in pinpointing areas for improvement. Demonstrating robust governance practices reassures stakeholders of our company's ability to thrive over time. Ultimately, mitigating sustainability risks enhances the resilience of our business model in a world conducive to prosperity, aligning with our ethos at Alfred Berg.*

*On the investment front, notable EU regulations, namely the EU Taxonomy and the Sustainable Finance Disclosure Regulation (SFDR), have taken effect. Despite a delay in Norway's adoption of SFDR Regulatory Technical Standards, which were implemented in December 2023, efforts to enhance our ESG database persist, recognizing gaps in available data and reporting requirements. Our Sustainable Finance framework has been bolstered through integration and adaptation of the BNP Paribas Asset Management model to suit Alfred Berg Kapitalforvaltning. In the past three years, returns from green assets have trailed the broader market, partly due to their prior overperformance. In addition headwind brought by the changes in the administration in the US and demands for increased competitiveness in EU puts additional pressure on the sustainable agenda. Looking ahead, it is more important than ever to continue to pursue competitive returns while adhering to appropriate sustainability frameworks for our funds and mandates. Persistent underperformance in green assets vis-à-vis the market will further underscore the importance of effectively balancing these dual objectives.*

A stylized, handwritten signature in black ink, appearing to read 'H. Siljeholm'.

Helge Siljeholm Arnesen - CEO Alfred Berg Kapitalforvaltning

# Introduction

Every action we take leaves its mark on the world, impacting both the environment and society. Some actions have a bigger impact than others. Alfred Berg Kapitalforvaltning AS is deeply rooted in the financial services sector, specializing in asset management and financial advisory services. While our day-to-day operations may seem disconnected from environmental (E) and social (S) factors, it's essential to recognize that they're not entirely without consequence. Our primary impacts are indirect, mainly stemming from the investments we make in portfolios.

Addressing greenhouse gas (GHG) emissions is a multi-step process for any company. The first step, arguably the most critical, involves trimming down our consumption of goods and services to cut GHG emissions and other pollutants. Then, it's vital to ensure our electricity comes from renewable sources, often achieved through purchasing Guarantees of Origin in Europe. These initial measures are aimed at slashing GHG emissions to the bare minimum. The final step involves carbon offsetting through certified projects that compensate for our carbon footprint.

## STAKEHOLDERS

Alfred Berg Kapitalforvaltning's immediate stakeholders include:

- Clients
- Employees
- Owners
- Regulators
- Suppliers

This underscores the importance of our conduct, both as a company and as individuals within our organization, in shaping the attitudes and behaviors of these stakeholders towards us. Their perceptions of our business practices are vital for sustaining a robust business model since our success hinges on their support and collaboration. Therefore, it's crucial for us to prioritize their perspectives and address their concerns to safeguard the longevity and sustainability of our operations.

## MATERIALITY

For this report, we haven't conducted stakeholder interviews. Instead, we've relied on the materiality factor selection outlined by SASB (Sustainable Accounting Standards Board) for asset management. Additionally, we've incorporated information frequently requested by our stakeholders, primarily our clients who have specific requirements for their suppliers, including us.

### **Material factors for Alfred Berg Kapitalforvaltning:**

#### **From SASB:**

- Selling practices and product labelling
- Employee diversity and inclusion
- Incorporation of ESG in investment management and advisory
- Business ethics
- Systemic risk management

#### **From stakeholders:**

- Environmental impact
  - Direct from own activity and in portfolio investments
- Social impact
  - Direct from own activity and in portfolio investments
- Governance structure



## STRUCTURE OF THIS CSR REPORT

In the following sections, we will discuss the material factors derived from both SASB's guidelines for asset management and the specific requirements of our stakeholders, particularly our clients. We will address Environmental, Social, and Governance factors. We have also dedicated separate chapters to Environmental and Social factors related to portfolio investments.

As a subsidiary of BNP Paribas Asset Management, Alfred Berg Kapitalforvaltning adheres to its own local policies while also respecting the overarching policies of BNP Paribas Asset Management. Our local policies can be accessed [here](#).

It's important to note that sustainability reporting standards are continually evolving, this is driven by both regulatory changes and the evolving expectations of stakeholders. Different stakeholders may have varying purposes for utilizing a sustainability report. This sustainability report for Alfred Berg Kapitalforvaltning is prepared with the utmost care and intention. Should you identify any discrepancies or require further clarification, please don't hesitate to contact us. Please also refer to the disclaimer at the end of this document.



## **ENVIRONMENTAL (E) – EXPOSURE AND MITIGATION**

In managing our company offices, various factors like equipment, lighting, and climate control significantly shape our environmental impact. Additionally, our transportation methods, including planes, trains, and cars, also contribute to our carbon footprint. As asset managers, our investment decisions on behalf of clients further influence the environment through the companies we support. For a more detailed understanding of this impact, please refer to the subsequent paragraph on portfolio exposure (see Portfolio Exposure - Environmental (E) and Social (S)).

While our offices are located in regions predominantly powered by renewable electricity, we go the extra mile by procuring Guarantees of Origin. This practice, embedded in our renewable electricity contract, allows us to confidently affirm our use of renewable energy, reinforcing our steadfast commitment to sustainable operations

# IT AND ELECTRONIC EQUIPMENT

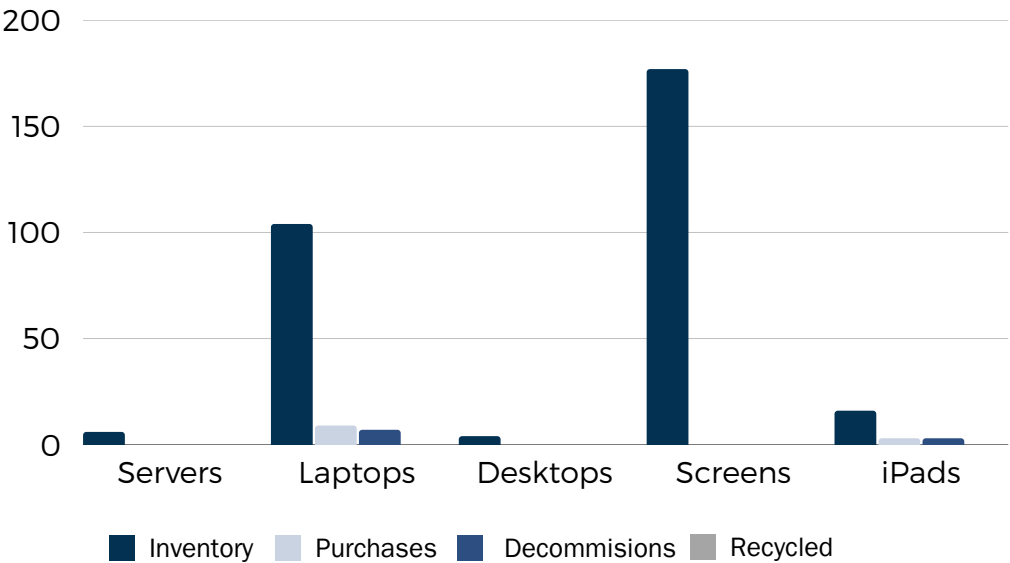
Our reliance on IT and electronic equipment sourced from diverse global regions exposes us to resource extraction processes, including mining, which can have adverse environmental effects. Presently, we recognize our limited direct control over these intricate supply chains, given the restricted availability of alternative options for meeting our operational requirements. Nonetheless, our attention is directed towards advocating responsible disposal and recycling practices, thereby fostering a circular economy mindset.



## Our policy:

Our policy dictates that all surplus IT hardware and electronic equipment no longer needed are directed to a recycling facility specializing in used electronics. This ensures not only responsible disposal but also allows us to reclaim compensation for any electronics still in usable condition. For items deemed unsuitable for reuse, we cover the recycling costs, thus actively contributing to sustainable waste management practices.

KPIs 2024



During 2024, there has only been a few purchases and decommissions of IT equipment.

## OFFICE ELECTRICITY USE AND HEATING/COOLING

At Alfred Berg Kapitalforvaltning, sustainability isn't just a buzzword; it's ingrained in our ethos and is evident in our day-to-day operations at both our Oslo and Stockholm offices.

Within our office premises, electricity powers essential functions, like lighting and IT infrastructure. In Oslo, our landlord, Norwegian Property (NPRO), takes the lead in providing heating and cooling services through district heating and cooling systems, using seawater pumps. These systems slash energy consumption and CO2 emissions by a whopping 75%, showcasing our steadfast commitment to minimizing our environmental impact and embracing eco-conscious solutions. Read more [here](#).

Since 2020, every ounce of electricity used in our Oslo and Stockholm offices has been sourced from renewable energy tariffs. This means that guarantees of origin cover all our electricity consumption, underscoring our dedication to sustainable practices. Moreover, we're currently in talks with our landlord to nudge them towards purchasing guarantees of origin for electricity consumed within our office premises. Though this process has been a tad slower than anticipated, we're unwavering in our resolve to drive sustainability initiatives hand in hand with our partners.

### KPIs for 2024:

	Used kWh	No specific contract	Renewable with specific contract	Renewable part	tCO2 emissions
Lighting, IT etc.	85 655		85 655	100 %	0,7
Heating/Cooling– Electricity (Landlord*)	24 825	40 633		0 %	0,3
Heating/Cooling– District heating (Landlord*)	51 212	73 446		0 %	0
Energy - Scope 2**					1

*\*This data comes from the landlord and represents Alfred Berg Kapitalforvaltning's share of the total energy use in the building. The share is based on the proportion of the area Alfred Berg Kapitalforvaltning rents in the building. If no specific contract for 100% renewable or Guarantees of Origin purchased, we use 2021 NVE product declaration for residual electricity: 405g/kWh (Market based - European residual mix). CO2 emissions are calculated by CEMAsys.*

*\*\*Scope 2 - emissions from energy consumption in own operations.*

# DATA STORAGE

Data storage requires energy, mainly to operate and cool down servers. All data storage is either with Microsoft or with BNP Paribas AM. The main bulk of the data is stored with Microsoft.

## Microsoft:

“Microsoft commits to being carbon negative by 2030 and by 2050 remove from the atmosphere an equivalent amount of all the carbon dioxide our company has emitted either directly or by our electricity consumption since we were founded in 1975.” See their CSR report [here](#).

## BNP Paribas:

BNP Paribas AM is calculating all the CO2 emissions from their main installations in the world and all internal datacenters are covered.

The BNP Paribas AM approach is:

- 1. Consume less electricity.
- 2. Buy renewable electricity through Guarantees of Origin in EU, and equivalents in other regions of the world.
- 3. Compensating the remaining carbon emissions through a selection of qualifying programs.

# WASTE LIMITATION & RECYCLING

Our office activities inevitably produce a range of waste, comprising both recyclable and non-recyclable materials. To mitigate our environmental impact, we place utmost importance on meticulous waste sorting procedures. This ensures that the bulk of our waste is channeled towards the appropriate recycling processes, minimizing our ecological footprint.

KPIs\* 2024

Type waste	Process	Consumption	tCO2 emissions
Water waste	Treatment	514 m3	0,1
Glass waste	Recycled	1 106 kg	0
Paper waste	Recycled	820 kg	0
EE waste	Recycled	108 kg	0
Food waste		828 kg	0
Iron/metal		18 kg	0
Other residual waste	Sorted waste	0 kg	0
Residual waste	Unsorted waste	3 376 kg	1,6
Waste - Scope 3			1,8

*\*This data comes from the landlord and represents Alfred Berg Kapitalforvaltning’s share of the total waste in the building. The share is based on the proportion of the area Alfred Berg rents in the building. CO2 emissions are calculated by CEMAsys.*



# BUSINESS TRAVEL

Transportation serves various purposes for us, ranging from commuting to meetings with clients, suppliers, and internal BNP Paribas AM events, to our employees' daily journeys to and from work. While we don't monitor the latter, it's a significant aspect of our transportation habits.

## Here's our policy:

Our travel policy mandates carbon compensation for all air travel conducted by our employees. We prioritize feasible alternatives like trains or other public transport options whenever they exist. The determination of what's considered a "realistic" alternative takes into account factors such as time constraints, costs, and other relevant considerations.

KPIs for 2024:

	Type	Units	GHG compensated at purchase	tCO2 emissions
Taxi	Km	3175		0,7
Train	Trips	320		0,0
Car	Km	5 529,4		0,9
Electric car	Km	470		0
Ferry	Trips	4		0
Air travel - Europe	Trips	152	135	2,1
Hotel	Nights	121		0,9
Travel - Scope 3				6,3

\*CO2 emissions are calculated by CEMAsys.

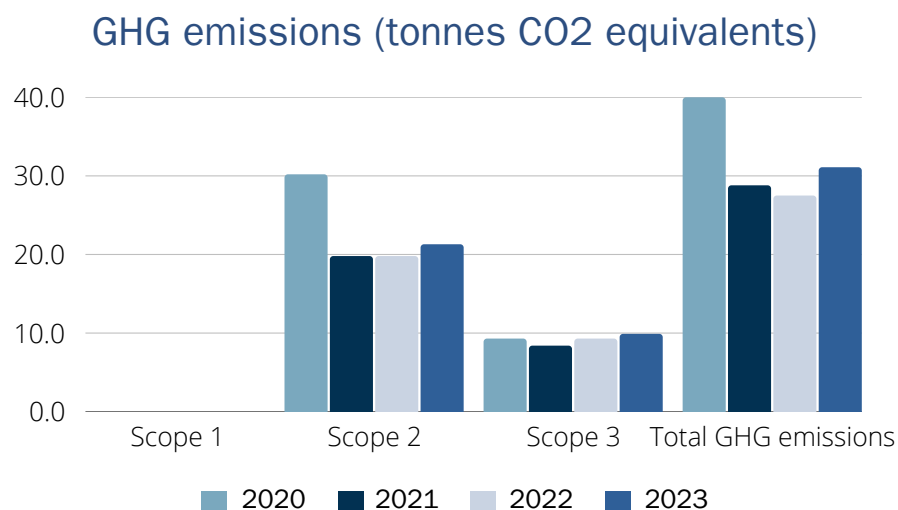
## Total GHG emissions and carbon compensation

KPIs - Scope accounting:

	Gross - tCO2	Carbon compensated	Initiative - Comment
Scope 1*	0		Insignificant direct emissions from the activity
Scope 2**	1	100 %	Guarantees of Origin for renewable energy + Carbon compensated through CEMAsys
Scope 3 (ex. portfolio investments***)	6,3	100 %	Carbon compensated through CEMAsys
Total	7,3	100 %	Carbon compensated through CEMAsys

\*Scope 1 - Direct emissions from own operations  
\*\*Scope 2 - emissions from energy consumption in own operations.  
\*\*\*See separate chapter on portfolio exposure for CO2 data. CO2 emissions are calculated by CEMAsys.





*The graph is not updated for 2024, because of a bug in the system used for calculating GHG emissions - CEMASYS. It will be updated as soon as CEMASYS solve the bug.*

## THE CARBON COMPENSATION

Alfred Berg Kapitalforvaltning has taken steps to carbon compensate for the remaining CO2 emissions by supporting the Certified Emission Reduction (CER) verified project 7469: a 50.6 MW wind energy project located in Gujarat, India.

This project aims to generate power using renewable energy sources, specifically wind energy, and distribute the generated power to the Indian grid. By harnessing wind energy, the project reduces anthropogenic emissions of greenhouse gases, estimated at approximately 101,733 tons of CO2 equivalent per year. This displacement equates to 108,597 MWh/year of electricity generated by power plants connected to the Indian grid, which are predominantly fueled by thermal or fossil fuels.

The adoption of renewable wind energy has positive global and local impacts, aligning with UN Sustainable Development Goals 7, 8, and 13. (Source: CEMAsys).

Details of the project can be found [here](#).

*See also: Portfolio exposure - Environmental (E) and Social (S)*



## **SOCIAL (S)**

### **– EXPOSURE AND MITIGATION**

As a company, our success relies and depends on the relationships we build with a diverse array of stakeholders, both internal and external. Understanding the impact we, as a company and as individual employees, have on these stakeholders is paramount to our success.

#### **Employee engagement, health and safety**

Our employees are the cornerstone of Alfred Berg Kapitalforvaltning 's existence. We are a people-centric business with highly skilled personnel, where well-being is high on the agenda. We've implemented various measures to ensure the well-being of our employees, including regular employee surveys. These surveys provide a platform for our employees to voice their opinions and share their experiences. Based on their feedback, we proactively take steps to continually improve Alfred Berg Kapitalforvaltning as a workplace.

## WELLBEING

### KPIs - 2024

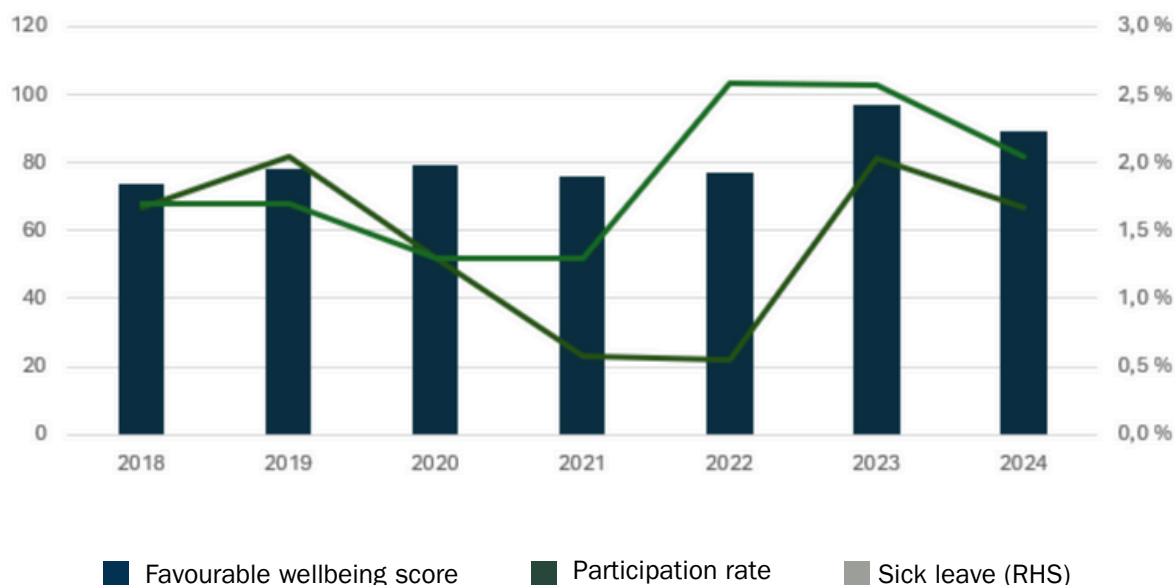
	Numbers of employees	Survey participation rate	Total favorable score of well-being	Sick leave	Accidents
<b>2024</b>	69	67 %	89 %	2,1 %	0
<b>2023</b>	73	81 %	97 %	2,6 %	0
<b>2022</b>	64	22 %	77%	2,6 %	0
<b>2021</b>	63	23 %	76 %	1,3 %	0
<b>2020</b>	48	52 %	79 %	1,3 %	0
<b>2019</b>	45	82 %	78 %	1,7 %	0
<b>2018</b>	36	67 %	74 %	1,7 %	0

In 2024, Alfred Berg conducted an employee survey, providing valuable insights into our organizational dynamics. The survey revealed that employees feel safe seeking help and addressing challenges, with a strong sense of social connection among colleagues. It also highlighted that our employees work autonomously, taking initiative in their roles, and fostering a culture of respect—essential for psychological safety and overall wellbeing. However, one area identified for improvement was greater involvement in employee development. This is an area we are committed to enhancing in 2025. Additionally, in response to feedback from the 2023 survey, employees expressed a need for more information. Over the course of 2023 and 2024, we took steps to address this by enhancing communication during Monday meetings and organizing a strategy day where each department shared insights into their work. The 2024 survey results show a positive trend in improved information sharing by managers.

As part of BNP Paribas AM, Alfred Berg Kapitalforvaltning conducts an annual employee survey, with 67% participation rate in 2024 which is 13% down from an 81% participation rate in 2023. We have promoted the survey in the same way as 2023, but fewer employees participated. The total favorable score for employee well-being reached 89% in 2024 which is 8% lower than 2023.

Maybe the participation rate has an impact on the decrease in well-being but 89% of well-being is still a high rating.

## Wellbeing



Alfred Berg Kapitalforvaltning supports employee health by subsidizing physical activities, covering expenses up to 3,000 Norwegian kroner per year in Norway and the equivalent in Sweden. Additionally, in Norway, all permanent employees are offered a compulsory annual health check.

### KPI for 2024:

Number of employees taking advantage of the physical activity subsidy:	40
Employees turning up to the annual health check in Norway:	100 %

# EMPLOYEE DIVERSITY AND INCLUSION

At Alfred Berg Kapitalforvaltning, we champion diversity as a driving force behind our success, understanding that a team with diverse perspectives enriches our decision-making processes, practices, and problem-solving abilities. We firmly believe that attributes such as gender, background, and culture should never hinder professional development or limit access to senior and management roles.

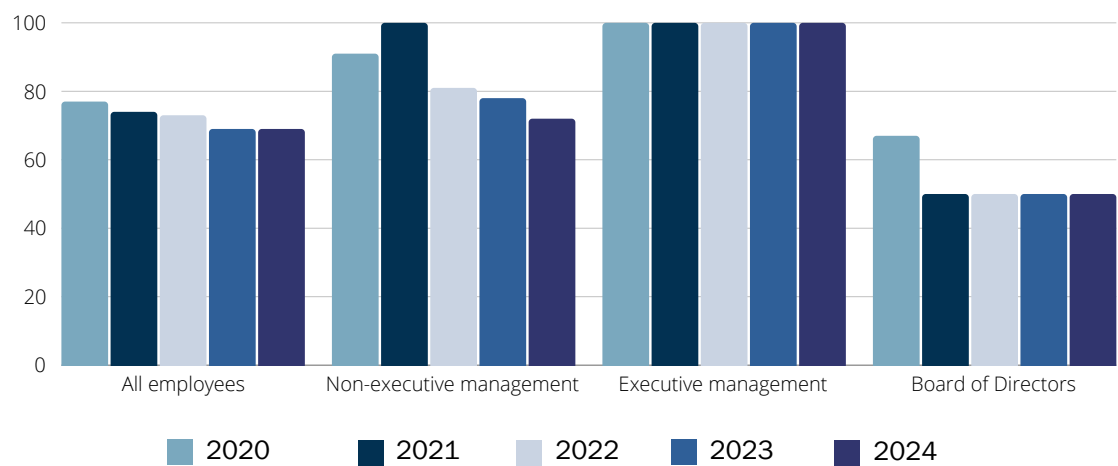
In Alfred Berg, an overweight of employees are men and less employees are women. This gives an unbalanced gender workforce. In a try to outline the difference, we have an ambition that a minimum of all new hires under the age of 30 years should be women. In 2024, we didn't hire any employees under 30 years old, but 50% of our permanent staff under 30 years old are women. However, as indicated by the data, the overall proportion of women in our workforce remains relatively low, highlighting the need for ongoing efforts to enhance diversity. We're actively exploring measures to bolster diversity within our workforce.

BNP Paribas AM Diversity Policy can be found [here](#).

KPIs for 2024

	Male %	Female %	Non Nordic %	Non European %
Board of Directors	50	50	50	0
Executive Management (Alfred Berg Kapitalforvaltning ExecutiveCo)	100	0	0	0
Non Executive Management (Alfred Berg Kapitalforvaltning ManCo)	72	22	17	0
All employees	69	35	8	1

Diversity - Male %



# EQUALITY AND DISCRIMINATION REPORT 2024

At Alfred Berg Kapitalforvaltning, we work to promote equality and non-discrimination. We work actively with equality and against discrimination throughout the entire employee cycle, which includes recruitment, pay and working conditions, promotion, development opportunities, facilitation and the combination of work and family life.

## Part 1: State of gender equality

### 1.1 Gender balance, temporary employees, leaves of absence and part-time work

Gender balance		Temporary employees		Maternity leave		Part-time employees		Involuntary part-time	
		Percentage of women and men working on temporary contracts		Percent of weeks women and men have taken maternity leave		Number of women and men working part-time		Number of women and men working part-time involuntary	
Women	Men	Women	Men	Women	Men	Women	Men	Women	Men
31 %	69 %	100 %	0 %	72 %	28 %	2	0	0	0

As can be seen from the table, the proportion of women at the end of 2024 is 31%, which is 2% lower than 2023. The proportion of women has the years before increased due to several measures such as recruitment of women. We will continue to work on a recruitment process that is equal to all genders and take measures for the working environment that Alfred Berg is a good place to work for all genders. The proportion of temporary employees is particularly high for women. The temporary positions are mainly used in connection with parental leave and projects. The average number of weeks on parental leave in 2024 was higher for women than for men, which varies from year to year. We try as far as possible to arrange so that employees have the best opportunities to take leave when it suits them. At Alfred Berg, we create part-time positions based on employees' own wishes for either reduced working hours or as an extension of their time on the labour market before they retire full-time. There are no employees who work part-time involuntarily.



## Part 2: Our work for equality and against discrimination

In this section, we explain our actual work within equality and against discrimination and what measures we are taking going forward. Our work stems from our Code of Conduct policy, where it is described that everyone is obliged to keep a positive working environment where everyone is treated with respect and dignity. Everyone must reject any form of discrimination, bullying or harassment against any person who has a relation to BNPP. Everyone is expected to treat each other with respect regardless of gender, nationality, health, disability, age, or identity. All employees go through Code of Conduct training every year, which gives them information about how we are expected to treat each other. In addition, we have the “respect for persons” policy, which informs employees about what discrimination is and how to deal with discrimination if someone is exposed to it. This includes information about our whistle blower channel, where anyone who has a relation to BNPP can send an objection if they experience inappropriate behaviour. In 2024, BNP Paribas implemented a new whistle blower system that ensures individual remain anonymous throughout the entire reporting process. All employees were informed about the system and provided with guidance on how to raise an alert. Additionally, updated information was made available on Alfred Berg’s website for external partners. No alerts have been received in 2024. Each year, employees are reminded of both policies through training, webinars and written communication.

The work on equality and non-discrimination takes place, among other things, at working environment committee meetings where both management, employer representatives and employee representatives take part. Before the meetings, employees can give matters to be taken up at the meeting.

In addition, HR works together with other Nordic BNPP companies and Group HR to improve policies and measures for the dissemination of knowledge to employees.

### **2.1 Recruitment**

In Alfred Berg, 31% of all employees are women, 9% of all employees are non-Nordic and 1% of all employees are from non-European countries. The number of women has risen from 23% in 2020 to 31% in 2024. To ensure we keep a fair recruitment process, we have a recruitment policy. The policy ensures inclusion of both sexes in the selection process as at least one woman must be included in the selection process and equal opportunity and non-discrimination must be respected. In addition, we have an ambition of hiring 50% women for all new hires under the age of 30 years. In 2024, non-employees under 30 years were hired.

In 2024, we worked on improving our efforts to ensure that job advertisements appeal to all genders and nationalities. We utilized AI tools to write job advertisements in a neutral language, aiming to attract candidates of all genders and nationalities. As outlined in our recruitment policy, both women and men must be included in the selection process for every position, and we successfully achieved this goal in 2024.

## **2.2 Promotion and development opportunities**

At Alfred Berg, we want all employees to develop and learn more both professionally and personally. During the year, all employees receive mandatory trainings that must be completed to ensure all employees are trained in essential information. In addition, our learning platform llearn, gives access to learning videos on many different topics.

In addition to the internal opportunities for development, some employees are offered external courses because the internal courses do not meet all needs. In 2024, 4 employees took part in external courses or education, of which 3 were women and 1 man.

In the beginning of each year, all employees have a development conversation with their manager, where they together set goals for the year. During the year, manager and employee have at least one meeting, where they evaluate the goals. The conversations help develop the employees in addition to continuous feedback. In 2024, one of the initiatives of improvement was that all employees should have an extra evaluation conversation halfway through the year so that all employees have a better opportunity to develop. By the end of 2024, 84% employees had registered at least one written continuous feedback in our Group tool. In addition, all managers give verbal continuous feedback on employees' work all year.

As mentioned earlier in the report, employees have expressed a desire for more involvement from their managers in their development process. To address this, we aim to make improvements in 2025 by providing more regular feedback. HR will also support managers in learning tools to enhance their ability to guide employee development.

As Alfred Berg is a flat organisation, there are few management positions and therefore it is not often possible to be promoted to manager. Since 2020 there has been no new promotions to senior management at Alfred Berg.

## **2.3 Facilitation**

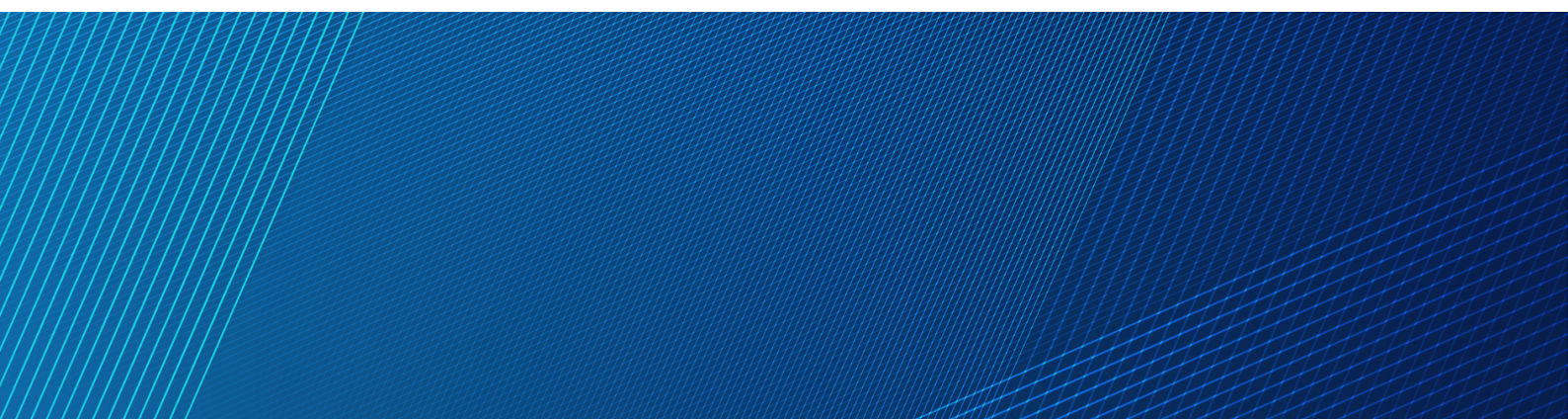
Every year employees need help in relation to sick leave, parental leave, age, or other reasons. In relation to sick leave and parental leave, we have procedures for follow-ups which we arrange in collaboration with the employee. Each follow-up process is made together with the employee, the manager and HR as each case is different. In the follow-up process, we make use of, reduced working hours, flexible working hours, changed work tasks and auxiliary equipment. The procedures for follow-up of sick leave and parental leave were formally written down in 2023. After which they were communicated to all employees and managers who, in collaboration with HR, will work on the follow-up processes. The results of the new procedures cannot yet be measured, but the work on improving facilitation will continue in 2025.

## **2.4 The combination of work and private life**

In Alfred Berg, core working hours is from 9-15 which should help all employees combine work and private life. In addition, home office is a possibility on days where it is difficult to get private life to work. The experience is that the flexibility is particularly useful for employees, but Alfred Berg also experience that it is important to be physically present as it strengthens the working environment and the feeling of belonging.

The results from the 2024 employee survey indicate that some employees feel that work demands are interfering with their personal or family life. To address this, managers are encouraged to have one-on-one conversations with employees to explore possible adjustments or measures that can help reduce this impact and improve work-life balance.

We find that many employees with young children do not have the opportunity to take part in social events after work because they need to go home and take care of their families. In 2024, we tried a new type of social event to make it easier for employees with families to combine work and family life and still take part in social events. We arranged social events during working hours at the office so that it was possible for everyone to take part but at the same time leave work as usual. It was a success, and we will continue with these types of events in 2025.



## TALENT ATTRACTION AND RETENTION

Considering Alfred Berg Kapitalforvaltning's reliance on skilled personnel, our foremost objective is to attract and retain skilled personnel. We are committed to nurturing a workforce equipped with the essential skills to address present challenges and propel future achievements.

## TRAINING AND EDUCATION

Four employees had external training in 2024, which represents 81 % of costs spent on education in 2024.

- Two employees finished the AFA program at NHH, a two-year program.
- Two employees took courses in asset management at FFN.

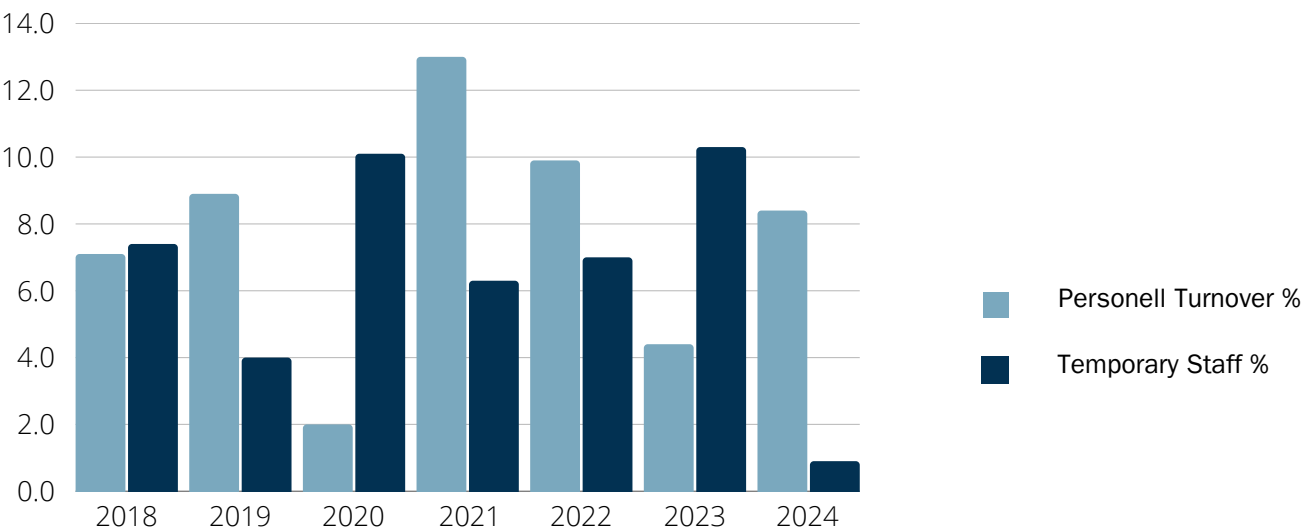
Additionally, two employees were certified for authorization certificate within Savings and Investments and two employees completed the annually updating courses.

# EQUITY PROGRAM

In 2022, Alfred Berg Kapitalforvaltning opened its equity capital for investment to the majority of permanent staff, who collectively now own 25% of the company through Drypnir A/S. This initiative aims to foster employee engagement and commitment by empowering them as owners.

KPIs:

	2018	2019	2020	2021	2022	2023	2024
Personnel turnover %	7,1 %	8,9 %	2,0 %	13 %	9,9 %	4,2 %	8,4 %
Temporary staff %	7,4 %	4,0 %	10,1 %	6,3 %	7,0 %	10,3 %	0,9 %



In 2024, we observed an increase in personnel turnover, aligning with a decrease in the well-being score. This positive trend affirms our commitment to cultivating a workplace where employees thrive, and we remain dedicated to sustaining and enhancing this environment. The decrease in temporary staff is since it has not been necessary to find substitutes for employees on leave in 2024. Generally, we make ongoing efforts to foster stability and growth within our workforce.



## TRANSPARENT INFORMATION AND FAIR ADVICE FOR CLIENTS

We prioritize strict adherence to regulatory requirements governing documentation and advisory activities to guarantee our clients receive transparent information and unbiased advice. You'll find comprehensive product details and mandatory regulatory disclosures readily available on our websites. Moreover, clients can easily access documents by reaching out to us directly, ensuring transparency and accessibility at every step.

### Policies:

The code of conduct includes:

- Customers interests
- Financial security
- Market integrity
- Professional ethics
- Respect for persons
- Group protection
- Involvement with society

### Programs:

As part of BNP Paribas AM, all employees must complete internal eLearning modules, ensuring a comprehensive understanding of company policies. After each training employees must pass a test.



Alfred Berg Kapitalforvaltning has no employees with a record of investment-related investigations, private civil litigations, or regulatory proceedings and has had no cases or losses related to legal proceedings because of marketing practices. There were no consumer-initiated complaints in 2024.

## BUSINESS ETHICS

At Alfred Berg Kapitalforvaltning, upholding business ethics is paramount to safeguarding both our stakeholders and the company. It's essential to prevent any form of misconduct. We believe that good business ethics stem from a deep understanding and consistent practice by our employees. Recognizing its importance, we prioritize ongoing training and frequent policy reinforcement to cultivate a culture where ethical conduct is ingrained in our daily operations. This ensures the protection of our stakeholders and the integrity of our company.

### Policies:

- **Code of conduct** – BNP Paribas AM
- **Protection of interest of clients** – BNP Paribas AM
- **Conflict of interest** – BNP Paribas AM
- All Alfred Berg Kapitalforvaltning policies can be found **here**.

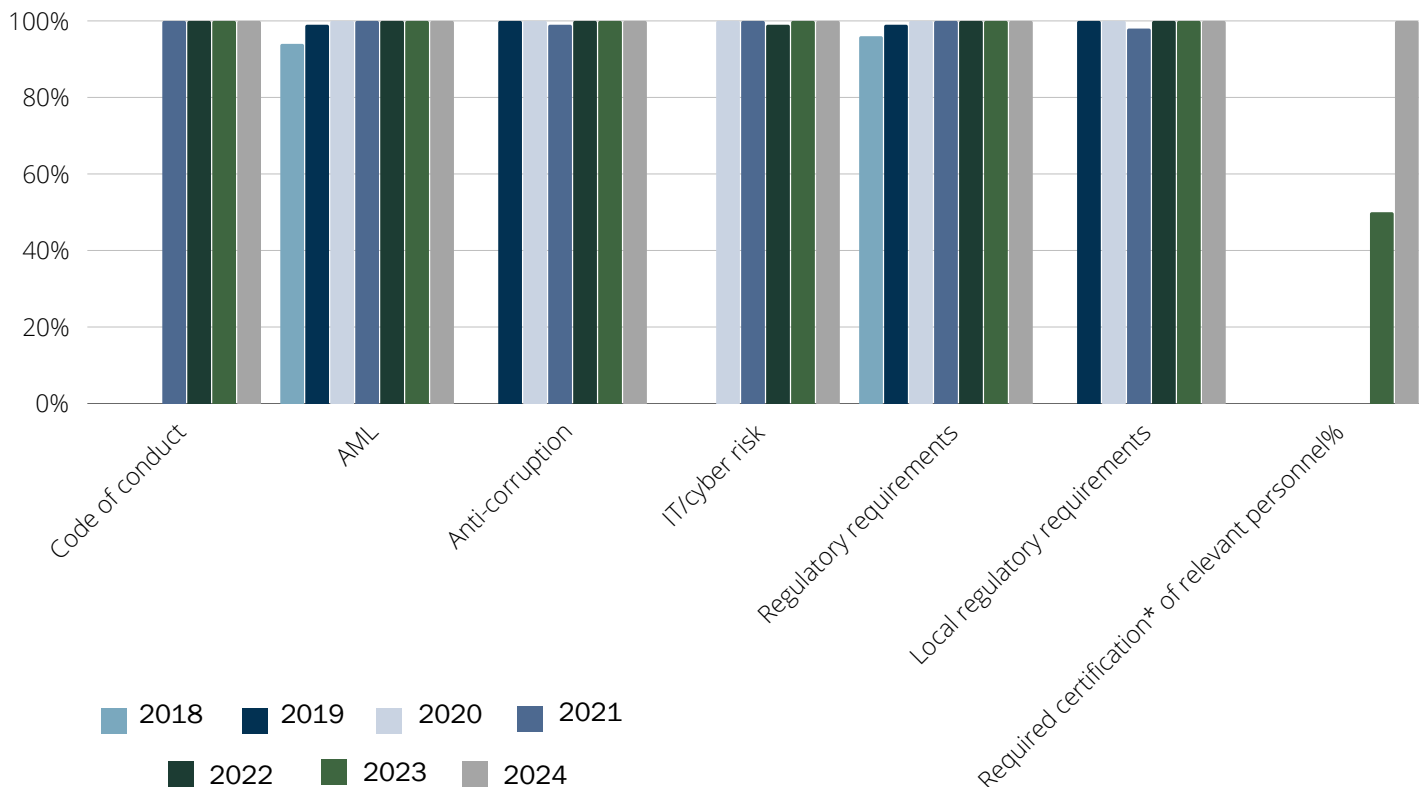
### Programs:

As part of BNP Paribas AM, all relevant Alfred Berg Kapitalforvaltning employees get compulsory training in anti-money laundering (AML), anti-corruption, IT/cyber risk, regulatory requirements, etc. through eLearning modules.

## KPIs - Percentage of completed training in relevant policies:

	Code of conduct	AML	Anti-corruption	IT/ Cyber risk	Regulatory requirements	Local regulatory requirements	Required certification* of relevant personnel
<b>2024</b>	100 %	100 %	100 %	100 %	100 %	100 %	100 %
<b>2023</b>	100 %	100 %	100 %	100 %	100 %	100 %	50 %
<b>2022</b>	100 %	100 %	100 %	99 %	100 %	100 %	N/A
<b>2021</b>	100 %	100 %	99 %	100 %	100 %	98 %	N/A
<b>2020</b>	N/A	100 %	100 %	100 %	100 %	100 %	N/A
<b>2019</b>	N/A	99 %	100 %	N/A	99 %	100 %	N/A
<b>2018</b>	N/A	94 %	N/A	N/A	96 %	N/A	N/A

## Personnel training in policies



All employees in Sweden have Swedsec licenses or has 6-months after start date to achieve it. In 2024, the completion rate was 100%.

In 2024, Alfred Berg Kapitalförvaltning had no legal proceedings due to fraud, insider trading, antitrust or anti-competitive behaviour, market manipulation, malpractice, etc.

In 2024, the 2 employees that were acquiring the authorization certificate with Savings and Investments through Finaut in 2023 completed the tests. All employees at Investment Solutions & Advisory have acquired the certificate.

## WHISTLEBLOWER CHANNEL

Whistleblower policies and procedures are integral to both BNP Paribas and Alfred Berg Kapitalforvaltning. In 2024, BNPP implemented a new alert system for both employees and external stakeholders. External stakeholders who wish to report concerns to Alfred Berg Kapitalforvaltning can utilize the dedicated channel: [whistleblowing@alfredberg.com](mailto:whistleblowing@alfredberg.com). This reinforces our commitment to transparency, accountability, and providing a secure avenue for reporting any issues that may arise.

Alfred Berg Kapitalforvaltning did not have any whistleblower cases in 2024.

## CLIENT SURVEYS - EXTERNAL

Once again, Alfred Berg Kapitalforvaltning secured the top spot in both institutional investors' and distributors', consultants', and fund selectors' rankings in the Prospera surveys for 2024. This marks the sixth consecutive year that we've clinched the number 1 position. Notably, in 2020, we made history in the Nordic region as the first manager to achieve this dual recognition by both customer groups. Conducted annually by Kantar Sifo among Norwegian asset managers, the surveys gather feedback from 72 institutional investors with a minimum of NOK 300 million placed with external managers, along with 33 distributors, investment consultants, and fund selectors. This recognition underscores our unwavering commitment to excellence and the trust placed in us by our valued partners and clients.

[Link](#) to External Asset Management 2024 Norway.

[Link](#) to Fund distributors & Selectors 2024 Norway.

## SYSTEMIC RISK MANAGEMENT

As an investor managing significant amounts of assets, we bear the responsibility of carefully assessing the systemic risk our investments may pose on behalf of our clients.

At Alfred Berg Kapitalforvaltning, our portfolios primarily consist of listed equities and listed bonds, with a strong emphasis on prioritizing liquidity. We recognize that liquidity varies across different asset classes, with listed large-cap equities and investment-grade bonds exhibiting higher liquidity compared to small-cap/micro-cap equities and high-yield bonds issued by smaller companies. It's important to note that these less liquid asset classes represent only a minimal portion of Alfred Berg Kapitalforvaltning's total assets under management. Consequently, the systemic risk contribution from our portfolios is deemed very low.

We've implemented robust liquidity risk management programs into our portfolio strategy and redemption risk management, guided by internal guidelines and procedures. This ensures that we maintain a prudent approach to managing liquidity risks, safeguarding the interests of our clients and mitigating potential systemic risks.



# **PORTFOLIO EXPOSURE - ENVIRONMENTAL (E) AND SOCIAL (S)**

## **Reducing negative impact on nature and human beings**

We exclude several sectors and activities from our investment universe that we consider controversial or do not wish to invest in on behalf of our clients. Additionally, we screen out companies that violate the UN Global Compact and other international norms.

The majority of these exclusions are based on social factors, with the aim of minimizing negative impacts on human well-being. More about this [here](#).

All our Sustainability and Responsible Investment policies and documents can be found [here](#).

## Overview relative to Sustainable Finance Disclosure Regulation (SFDR) per end 2024:

<b>Total AUM (bnNOK)</b>	163
<b>Screening out of norm breaches and activity/product</b>	97 %
<b>ESG risk integration (regulated by SFDR art 6)</b>	97 %
<b>Promotion of environmental and/or social characteristics (regulated by SFDR art 8)</b>	97 %
<b>Promotion of environmental and/or social characteristics with Sustainable Investment pocket (regulated by SFDR Art 8)</b>	89 %
<b>Sustainable investment (regulated by SFDR art 9)</b>	0 %

This only includes Alfred Berg Kapitalforvaltning funds (including delegated fund of funds) and does not include mandates.

## ESG RISK INTEGRATION - ESG SCORES AND DATA COVERAGE

Through our investment decisions, taken on behalf of our clients, we respect the fiduciary duty and integrate ESG risks in the investment decision processes. This means that we have an understanding of the material Environmental, Social and Governance risks of holdings in the portfolios. We base this understanding on ESG research that is mainly provided by BNP Paribas AM. In some segments where coverage from BNPP AM is low, sustainAX provides the ESG research and ESG scores.

For each fund, we track the average weighted ESG score, and the percentage of the funds' market value being covered by ESG scores. 0 represents the lowest ESG score (highest ESG risk) and 100 is the best ESG score (lowest ESG risk). 50 represent the average sector ESG score for the relevant region. Details of the BNP Paribas AM ESG scoring can be found [here](#). It is important to keep in mind that the ESG factors are only a part of all the factors that are taken into consideration in an investment decision process.







## TRAINING FOR PORTFOLIO MANAGERS

Portfolio managers has access to ESG data in their front office systems and use them to comply with thresholds on ESG parameters, We have during 2024 implemented minimum sustainable investments pockets on nearly all our funds. We use BNPP AM framework to determine if companies qualify for a sustainable investment. The coverage of ESg analysis on our portfolios companies covered by BNPP AM has improved during the last year. We will use local provider Sustainax to cover entities not covered by BNPP AM.

We have three ESG champions in Alfred Berg responsible for information flow from BNPP AM on development in BNPP framework and regulations. BNPP AM also provides online education in ESG framework and methodologies used internally. Portfolio Managers will participate in different seminars/venues on ESG topics. We have regularly meetings with ESG analysts in the market to keep us updated. We have members in the Norwegian Mutual fund associations ESG forum and Norsif.

# GREEN HOUSE GAS (GHG) EMISSION “RESPONSIBILITY” METHODOLOGY AND DATA COVERAGE

In the table below, the GHG footprint is calculated as the weighted average based on the covered companies. When calculating this on a fund level, we apply the same average footprint to the non-data covered holdings. It's important to note that this approach may result in either an overstatement or an understatement of the GHG footprint. As more companies communicate carbon emission data, these figures will become more accurate. We do not report for funds with less than 50% coverage for GHG data.

The primary remaining source of financing for the company, when using this methodology, is bank financing. We anticipate banks to be transparent regarding their financing of GHG emissions by reporting this for their credit portfolio.

## Green House Gas footprint

For our equity portfolios, we estimate that a given fund finances companies that all have GHG emissions, and as an equity owner, the fund should take "responsibility" for the GHG emissions they "own." This is calculated by dividing the portfolio companies' GHG emissions (Scope 1+2) by their Enterprise Value (EV) and then multiplying by the market value of the fund's equity holding.

As for our fixed income portfolios, the calculation is theoretically less straightforward since bond investors do not own shares in the company. However, as investors, we are still "responsible" for a portion of the GHG emissions of the companies we finance. This is calculated similarly to equity portfolios, by dividing the portfolio companies' GHG emissions (Scope 1+2) by their Enterprise Value (EV) and then multiplying by the market value of the fund's bond holding.

## Green House Gas Intensity

The Taskforce on Climate-related Financial Disclosure (TCFD) approach defines a portfolio's exposure to carbon-intensive companies to be expressed in tons CO<sub>2</sub> equivalents relative to sales. Due to lacking data availability with the right quality, we do not publish this data in the following list, but it is included in the graph below for funds with over 50% GHG data coverage.

In the following, Alfred Berg Kapitalforvaltning reports using euro (€) as base. When comparing to other local providers in Norway and Sweden for instance, the GHG footprint and GHG intensity numbers of Alfred Berg should be adjusted to the same currency. A good approximation is to divide the Alfred Berg Kapitalforvaltning numbers by 11,22 when comparing to funds reporting in Norwegian Krone and 11,14 for funds reporting in Swedish Krona.

KPIs - Alfred Berg Kapitalforvaltning funds - ESG scores, GHG footprint with data coverage, AUM and fund GHG emissions\* – per end of 2024:

Alfred Berg funds	ESG score	ESG score coverage	GHG footprint* (tCO2/EV€)	GHG data* coverage	€ AUM	Fund GHG emissions* (tCO2)
ALFRED BERG AKSJE	7,12	12%	11,35	12%	19 763 973	0
ALFRED BERG AKTIV	56,40	99%	102,15	97%	333 196 128	35 460 508
ALFRED BERG GAMBAK	56,15	97%	61,61	95%	1 101 002 154	15 320 923
ALFRED BERG GLOBAL	57,19	98%	23,54	97%	76 834 214	192 158 210
ALFRED BERG GLOBAL CORPORATE ENHANCED INDEX	62,22	99%	20,04	96%	226 014 920	159 096 259
ALFRED BERG HUMANFOND	56,86	97%	102,20	95%	11 837 878	0
ALFRED BERG INCOME	56,93	94%	45,63	58%	532 828 750	58 512 491
ALFRED BERG INDEKS	55,85	100%	134,83	98%	537 905 430	62 569 170
ALFRED BERG KOMBI	55,60	92%	57,85	57%	34 183 775	26 148 036
ALFRED BERG KORT STAT	69,61	86%	0,00	0%	62 791 982	0
ALFRED BERG LIKVIDITET	61,35	78%	0,06	35%	89 353 099	29 450
ALFRED BERG LIKVIDITET PLUSS	58,41	98%	40,02	50%	981 470 075	34 888 659
ALFRED BERG NORDIC CREDIT OPPORTUNITY	52,36	83%	282,89	41%	167 352 593	36 829 757
ALFRED BERG NORDIC GAMBAK	57,72	96%	43,37	96%	112 545 827	66 782 335
ALFRED BERG NORDIC HIGH YIELD	52,29	80%	271,47	38%	419 747 850	36 829 838
ALFRED BERG NORDIC HIGH YIELD ACC	51,65	78%	290,75	40%	540 399 724	38 215 151
ALFRED BERG NORDIC HIGH YIELD RESTRICTED	50,94	77%	232,86	30%	26 333 194	10 829 934
ALFRED BERG NORDIC INDEX	56,96	100%	34,67	99%	386 748 139	171 237 741
ALFRED BERG NORDIC INVESTMENT GRADE	58,56	95%	45,79	69%	723 625 203	120 114 961
ALFRED BERG NORDIC INVESTMENT GRADE ACC	58,23	95%	34,42	68%	579 492 689	88 829 026
ALFRED BERG NORDIC INVESTMENT GRADE FO	58,30	92%	31,80	67%	375 610 782	119 149 394
ALFRED BERG NORDIC INVESTMENT GRADE LONG DURATION	59,19	93%	22,04	68%	585 193 155	122 525 198
ALFRED BERG NORDIC INVESTMENT GRADE MEDIUM DURATION	58,20	94%	31,42	66%	1 696 576 944	123 170 279
ALFRED BERG NORDIC SMALL CAP	52,51	96%	39,03	94%	16 140 656	9 042 144
ALFRED BERG NORDISK ANSVARLIG KAPITAL	57,72	89%	0,20	61%	99 840 264	369 890
ALFRED BERG NORDISK LIKVIDITET PLUSS	59,29	99%	27,64	57%	349 649 063	57 877 006
ALFRED BERG NORDISK LIKVIDITET PLUSS ACC	57,44	97%	36,84	51%	839 078 097	84 215 523
ALFRED BERG NORGE	56,86	97%	102,19	95%	583 237 961	51 377 350
ALFRED BERG NORGE RESTRICTED	56,24	98%	84,44	97%	356 008 352	34 336 093
ALFRED BERG OBLIGASJON	58,84	94%	43,22	59%	835 386 943	38 965 015
ALFRED BERG OMF KORT	56,04	88%	0,01	51%	35 841 572	13 595

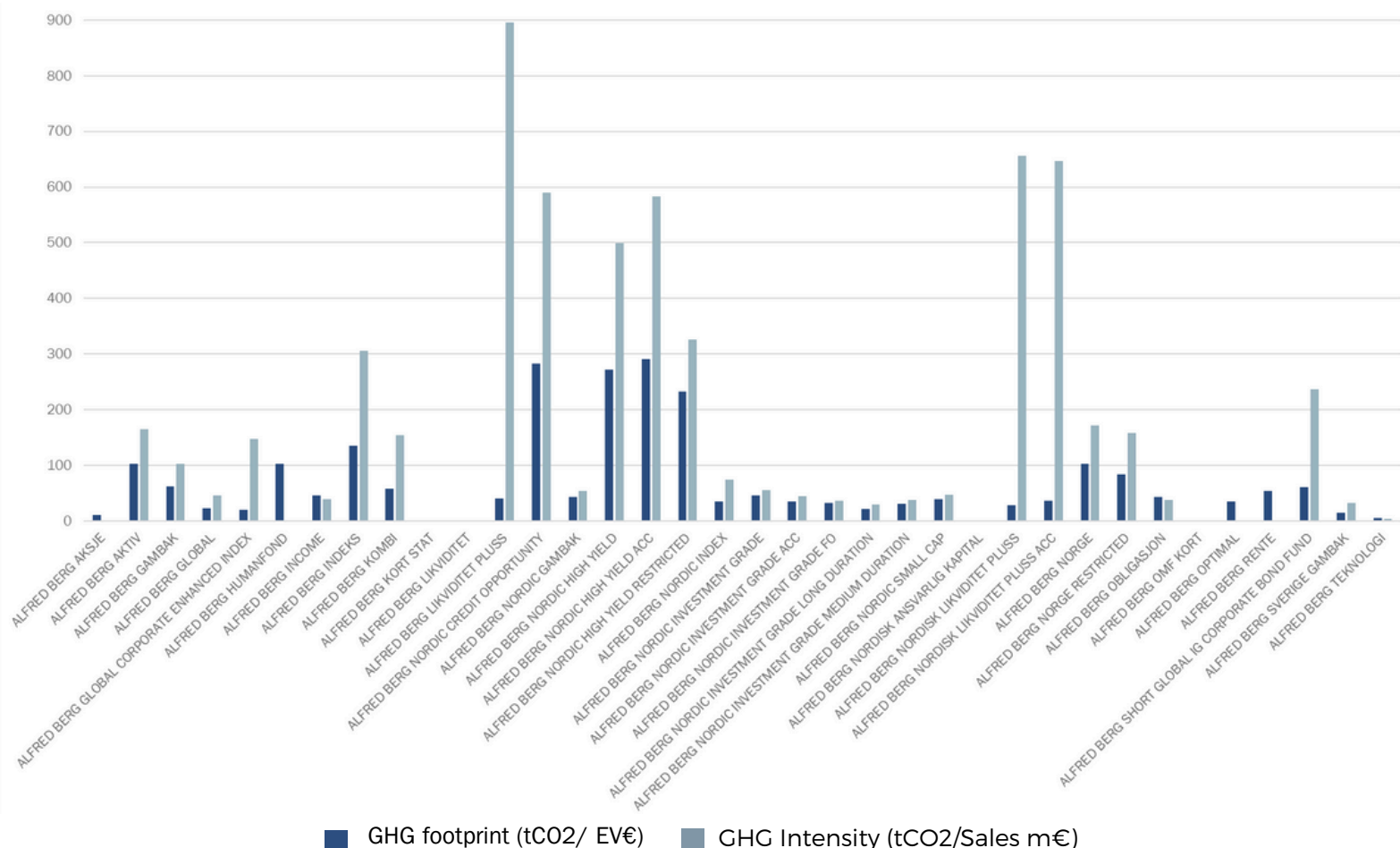


KPIs - Alfred Berg Kapitalforvaltning funds - ESG scores, GHG footprint with data coverage, AUM and fund GHG emissions\* – per end of 2024:

Alfred Berg funds	ESG score	ESG score coverage	GHG footprint* (tCO2/EV€)	GHG data* coverage	€ AUM	Fund GHG emissions* (tCO2)
ALFRED BERG OPTIMAL	50,08	83%	34,78	57%	17 746 592	0
ALFRED BERG RENTE	54,42	89%	54,36	56%	22 004 724	0
ALFRED BERG SHORT GLOBAL IG CORPORATE BOND FUND	60,14	94%	60,67	83%	152 631 554	244 704 507
ALFRED BERG SVERIGE GAMBAK	54,45	99%	14,89	99%	862 409	7 054 514
ALFRED BERG TEKNOLOGI	56,33	100%	5,76	93%	110 123 578	242 639
BULDER 100	18,39	26%	7,76	25%	22 929 612	0
BULDER 20	41,15	65%	44,65	43%	595 160	0
BULDER 50	34,58	54%	33,07	40%	1 823 616	0
BULDER 80	24,53	38%	22,25	32%	8 781 474	0
NORNE AKSJE	8,82	15%	7,46	15%	129 227 256	0
NORNE AKSJE NORGE	56,64	91%	90,20	91%	14 605 435	40 937 387
NORNE KOMBI 20	31,73	47%	17,69	34%	9 169 639	0
NORNE KOMBI 50	28,24	42%	19,18	34%	21 701 648	0
NORNE KOMBI 80	19,68	32%	15,03	28%	17 233 071	0
NORNE RENTE	30,17	44%	15,32	32%	98 896 924	0
SBANKEN FRAMGANG SAMMEN	56,81	97%	102,11	95%	7 893 479	0
SPV 100	16,97	24%	6,51	23%	1 440 472	0
SPV 20	42,74	68%	43,17	45%	7 417 004	0
SPV 50	33,25	51%	28,63	38%	8 573 792	0
SPV 80	25,35	39%	22,30	33%	1 833 570	0
SPV RENTE+	41,80	67%	39,87	43%	48 872 861	0
STRATEGI 100					14 965 518	0
STRATEGI 35	4,71	8%	2,54	5%	5 695 627	0
STRATEGI 50	3,36	5%	1,82	4%	98 764 556	0
STRATEGI 65	1,78	3%	0,96	2%	20 655 985	0
STRATEGI 85					253 738 740	0

*\*Due to lack of data and varying data quality, we only take Scope 1 and Scope 2 into account here. For funds with less than 50% coverage of GHG data we do not publish the numbers as they are not meaningful. We expect to see GHG data availability to increase going forward.*

## GHG footprint\* (tCO2/EVm€) and GHG intensity\* (tCO2/Sales m€) of the Alfred Berg Kapitalforvaltning portfolios with minimum 50% GHG data coverage:



\*Due to lack of data and varying data quality, we only take Scope 1 and Scope 2 into account here.  
The data is not calculated for all fund of funds or feeder funds for the moment.

## Total GHG footprint of all the Alfred Berg Kapitalforvaltning portfolios with minimum 50 % GHG data coverage:

	GHG footprint (tCO2/EVm€)	AUM (m€)	% of total AUM	GHG emission "responsibility" (tCO2)
<b>Total 2024</b>	29,45	13 834	66 %	2 087 732
<b>Total 2023</b>	36,41	12 440	65 %	2 581 705
<b>Total 2022</b>	49,27	11 113	67 %	2 722 916

\*Due to lack of data and varying data quality, we only take Scope 1 and Scope 2 into account here.

## The GHG responsibility or carbon footprint of Alfred Berg Kapitalforvaltning's clients:

Investors in Alfred Berg Kapitalforvaltning funds can calculate their own GHG financing "responsibility" this way:

Investor carbon footprint = Fund GHG footprint x Investor's invested amount in m€.

Example with 2 000 000 € invested in Alfred Berg Nordic Investment Grade:  
 $50,93 \times 2 = 101,86$  tonnes GHG (or tCO2)

For the description of:

- approach to incorporation of environmental, social, and governance (ESG) factors and risks in investment processes and strategies
- proxy voting and investee engagement policies and procedures see more [here](#).

# GOVERNANCE (G)

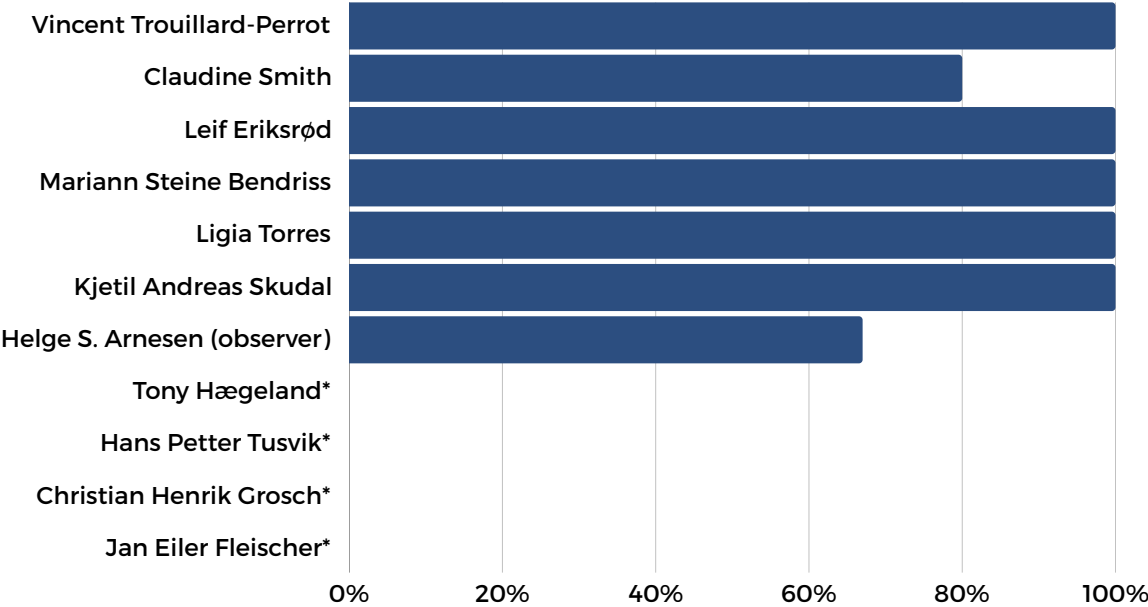
Alfred Berg Kapitalforvaltning is a private company owned 75% by BNP Paribas AM and 25% by Drypnir AS. There is only one share class and all shares have the same voting right.

## The Board of Directors (BOD) per end 2024:

	Gender	Role	Compensation in 2024	Independent	Representative of
Vincent Trouillard-Perrot	Male	Chairman	0	No	Owner representative
Claudine Smith	Female	Board member	0	No	Owner representative
Ligia Torres	Female	Board member	100 000 NOK	No	Ex senior manager in BNPP AM
Mariann Steine Bendriss	Female	Board member	100 000 NOK	Yes	Client representative
Kjetil Andreas Skudal	Male	Board member	100 000 NOK	Yes	Client representative
Leif Eriksrød	Male	Board member	0	No	Part of executive management
Tony Hægeland	Male	Deputy board member	0	Yes	Former Client representative
Hans Petter Tusvik	Male	Deputy board member	0	No	Employee
Christian Henrik Grosch	Male	Deputy board member	0	No	Part of executive management
Jan Eiler Fleischer	Male	Deputy board member	0	Yes	



In 2024 the BOD held 5 meetings and the attendance was as follows:



\*Deputy board member

The information on the individual BOD members can be found [here](#).

BOD committees

The BOD has installed a remuneration committee. Members are Vincent Trouillard-Perrot (chair) and Claudine Smith. There are no separate audit or nomination committees, the BOD in its entirety takes the role of these committees.

CEO and BOD shareholding:

Helge S. Arnesen	3,67 %
Leif Eriksrød	3,22 %



## CEO Remuneration:

**Helge S. Arnesen:**

Salaries	Other remuneration	Other benefits	Total
2 730 894	817 798	21 305	3 569 997

## CEO Bonus system:

The CEO is part of the same remuneration system as all employees of Alfred Berg Kapitalforvaltning. The remuneration policy can be found (in Norwegian) [here](#).

## DISCLAIMER

This sustainability report for Alfred Berg Kapitalforvaltning has been done with the best intentions to give a fair image of how Alfred Berg Kapitalforvaltning is dealing with sustainability. The report is for information purposes only, not a solicitation or offer to buy or sell any financial product and does not constitute any kind of advice. Alfred Berg Kapitalforvaltning makes no representation as to the accuracy or completeness of the information in the report. Alfred Berg Kapitalforvaltning will not be responsible for any loss or damage, direct or indirect, incurred by the use of the information in the report.