Fund Manager: Rubicon Healthcare Partners AS ("**Rubicon**" or the **"Manager**")

This document is a draft entity level disclosure prepared in accordance with Articles 3, 4, and 5 in the SFDR ((EU) 2019/2088).

Sustainability related disclosures

Rubicon is an alternative investment fund manager subject to requirements in the European Union's Sustainable Finance Disclosure Regulation (**SFDR**) ((EU) 2019/ 2088).

In accordance with the SFDR, this document includes the following disclosures:

- SFDR Article 3: Transparency of sustainability risk policies
- SFDR Article 4: Transparency of adverse sustainability impacts at entity level
- SFDR Article 5: Transparency of remuneration policies in relation to the integration of sustainability risks

SFDR Article 3:
Integration of sustainability risks in Rubicon's investment decision-making process

In accordance with article 3 of SFDR, Rubicon is required to publish on our website information about the policies on the integration of sustainability risks in our investment decision-making process. Sustainability risk means an environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of the investment. Information on how specific funds under management integrate sustainability risks will be made available to potential investors before making an investment decision in a separate document, either directly (through email or similar communication) or through a data room.

Sustainability risks are integrated in the decision-making process of Rubicon. Sustainability risks related to its investments are identified and assessed during the due diligence process. Prior to making an investment, the potential investment opportunity will be subject to a legal due diligence covering topics related to, inter alia, environmental, social and governance matters as well as screening. The due diligence process may for example include reviews of the investment's routines/procedures, safety reports and injury statistics, environmental issues or risks related to properties, internal control routines and any policies to ensure compliance with environmental laws, regulations and licenses. Based on the output from the due diligence, screening and discussions with management, the most material sustainability risks will be identified and assessed alongside other potential risks related to the investment that may impact the investments' value.

During the ownership period, Rubicon will monitor the sustainability risks of its investments by frequent engagement with the management and through appropriate governance mechanisms, which may include board representation and/or participation in the strategy committee.

Mitigating actions will be assessed if Rubicon identify significant sustainability risks, which may, in Rubicon's view, lead to a negative impact on the investment value. In case such risks cannot be resolved or sufficiently mitigated, Rubicon may abstain from making the investment or seek to exit the investment, depending on how material the risk is deemed.

Rubicon will, on an ongoing basis, assess our internal routines for integrating sustainability risks, which includes assessing whether the resources and competence of Rubicon is considered to be sufficient for the purpose of integrating sustainability risks in our investment decisions and during the ownership period.

SFDR Article 4:
No consideration of sustainability adverse impacts

In accordance with article 4 of the SFDR, Rubicon is required to disclose on its website whether or not principal adverse impacts (PAIs) of investment decisions on sustainability factors are taken into account.

Rubicon currently does not take into account PAIs of its investment decisions on sustainability factors within the meaning of SFDR. The main reason for this is that Rubicon currently doesn’t have the necessary resources for the extensive data collection and reporting that such consideration will necessitate, and implementation of such resources is currently considered to be unproportionable burdensome for Rubicon. Further, the investment will not necessarily be able to provide precise data readily available. Rubicon will closely monitor the regulatory development and may change its position in the future.

SFDR Article 5:
Integration of sustainability risks in remuneration policies

In accordance with article 5 of SFDR, Rubicon is required to disclose on its website information on how the remuneration policy of Rubicon is consistent with the integration of sustainability risks in the decision-making process.

As a registered (“sub-threshold”) AIFM, Rubicon has not adopted a remuneration policy pursuant to the Alternative Investment Fund Manager Directive, and no employees in Rubicon with decision-making authority receive variable remuneration. As such, there are no misalignments between the remuneration practices of Rubicon and the integration of sustainability risks in the decision-making process.

Date	**Amendment**
09 October 2025 (v.1.0)	Publication of disclosure