

Stockholm 9 January 2026

Areim fund level website disclosures

Sustainable Finance Disclosure Regulation (2019/2088) (the "Disclosure Regulation")

Areim AB ("Areim", the "Manager") makes the following disclosures in accordance with Article 10 of the Disclosure Regulation in relation to Areim Fastigheter DC (D) AB. Investments are made by the Fund through a holding company that is jointly owned by the Fund and Areim Fastigheter DC (Eq) AB

a) Sammanfattning

- b) **Inga mål för hållbar investering:** Denna finansiella produkt främjar miljörelaterade egenskaper, men har inte hållbar investering som mål.
- c) **Den finansiella produktens miljörelaterade eller sociala egenskaper:** Fonden främjar miljörelaterade egenskaper genom att primärt fokusera på hållbara och klimatsmarta datacenter. Fondens miljörelaterade egenskap är att möjliggöra för den gröna omställningen.
- d) **Investeringsstrategi:** Fondens investeringsstrategi är att förvärva EcoDC AB ("EcoDC") och att göra investeringar i dess dotterbolag på platser där elmixen är fossilfri, samtidigt som det primära fokuset är att minska växthusgasutsläppen inom den egna verksamheten till så nära noll som möjligt. Fondens förvaltare har åtagit sig att säkerställa att praxis för god styrning för investeringarna efterlevs, och är ansvarig för företagspraxis vilket beskrivs ytterligare i förvaltarens 'ESG policy' samt 'Ethics policy'.
- e) **Andel av investeringar:** Förvaltaren förväntar sig att majoriteten av investeringarna kommer att främja den miljörelaterade egenskapen, därav uppskattas 90% kategoriseras som 'Nr 1 i linje med miljörelaterade/sociala egenskaper'. Den återstående andelen kategoriseras som 'Nr 2 Övrigt', vilket inkluderar kontanter.
- f) **Övervakning av miljörelaterade eller sociala egenskaper:** Förvaltaren och det dedikerade teamet ansvarar för investeringen och är delaktiga under hela livscykeln. Förvaltaren säkerställer en aktiv utvärdering av fondens miljörelaterade egenskaper genom att utse medlemmar i fondens investeringskommitté samt genom att ingå i EcoDC:s styrelse.
- g) **Metoder:** Förvaltaren utvärderar att miljöegenskaperna uppnås med hjälp av följande mätningar:

Möjliggör för den gröna omställningen:

- Energieffektivitet utvärderas med Carbon Usage Effectiveness, "CUE", och Power Usage Effectiveness, "PUE"
 - Andel av förnybar el från olika källor
 - Återanvändning av energi utvärderas med hjälp av Energy Reuse Factor, "ERF"
 - Vattenanvändning utvärderas genom mängden grundvatten som används och Water Usage Efficiency, "WUE"
- h. Datakällor och databehandling:** Fonden hämtar data direkt från EcoDC som ansvarar för att samla in och beräkna data via sina egna system. Därefter skickas data via en dataplattform till Areim. Uppgifterna verifieras av en extern revisor.
- i. Begränsningar för metoder och data:** Viss data kan komma att estimeras beroende på rapporteringens tidpunkt. Det finns inga kända begränsningar för de metoder som används.
- j. Due Diligence:** Under due diligence-processen utvärderas hållbarhetsindikatorer för att bättre hantera risker, förbättra avkastning och skydda nedsidan. Alla investeringsbeslut som presenteras för investeringskommittéen tar hänsyn till hållbarhet, samt EcoDC:s övergripande affärsmodell för hållbara datacenter, finansiella mål och dess syfte, detta för att säkerställa att affärsmodellen för EcoDC är i linje med den miljörelaterade egenskapen som fonden främjar.
- k. Policyer för aktieägarengagemang:** Fonden placeras i regel inte medel i aktier som är upptagna till handel på en reglerad marknad och som har getts ut av ett bolag inom EES, varför Förvaltaren anser att 8 kap. 27a§ i lagen (2013:561) om förvaltare av alternativa investeringsfonder ("LAIF") inte är tillämplig på dess verksamhet i förhållande till Fonden. Därmed är Förvaltaren inte skyldig att ha en policy för aktieägarengagemang i lagens mening. Förvaltaren strävar dock efter att utöva ett aktivt och ansvarsfullt ägande i investeringar i operativa bolag i största möjliga utsträckning i de få fall sådana investeringar görs.
- l. Valt referensvärde:** Inget referensvärde har valts för att mäta miljörelaterade egenskaper som främjas av den finansiella produkten.

a) **Summary**

- b) **No sustainable objective:** This financial product promotes environmental characteristics but does not have as its objective sustainable investment.
- c. **Environmental or social characteristics of the financial product:** The Fund promotes the environmental characteristic by putting a primary focus on the sustainable and climate positive data management centres. The environmental characteristic promoted by the Fund is enabling the green transition.
- d. **Investment strategy:** The investment strategy of the Fund is to acquire EcoDC AB (“EcoDC”) and to make investments in its affiliates in locations where the electricity mix is fossil-free while putting a primary focus on reducing GHG emissions within own operations as close to zero as possible. The Manager is committed to ensuring good governance practices of the investments, and is responsible for corporate behavior as further described in the ESG policy and Ethical policy.
- e. **Proportion of investments:** The Manager expects the majority of the Fund’s assets to promote the environmental characteristic and therefore approx. 90% is considered to be categorised in “#1 Aligned with E/S characteristics”. The remaining portion falls within the category of “#2 Other”, including cash.
- f. **Monitoring of environmental or social characteristics:** The Manager and the associated team are responsible for the investment and involved throughout the entire investment cycle. The Manager ensures its active and responsible involvement in monitoring the attainment of the promoted environmental characteristic by appointing the members of the Fund’s investment committee as well as through representation on the board of EcoDC to serve as an advisory/consulting panel.
- g. **Methodologies:** The Manager assesses and monitors the attainment of the environmental characteristic using the below measurements:
- Enabling the green transition
- Energy efficiency by monitoring Carbon Usage Effectiveness (“CUE”) and Power Usage Effectiveness (“PUE”)
 - % of renewable electricity from the difference sources
 - Reuse of energy by monitoring Energy Reuse Factor (“ERF”)
 - Water usage by monitoring the amount of groundwater used and Water Usage Efficiency (“WUE”)
- h. **Data sources and processing:** The Fund sources data directly from the investment as the data centre is responsible for collecting their own data through its own systems. The investment calculates sustainability indicators

and submits them via Manager's designated data platform to the Manager. The data is also verified by an external auditor.

- i. **Limitations to methodologies and data:** Some data may be estimated due to the timing of reporting. There are no known limitations to the methodologies used.
- j. **Due diligence:** During the deal due diligence process, the Fund incorporates assessment of sustainability indicators to better manage risks, to improve returns and to protect down-side. All investment decisions presented to the Fund's investment committee take into consideration sustainability, EcoDC's overall business model for sustainable data centres, financial targets and business rationale to ensure that the overarching business model of EcoDC aligns with the environmental characteristic promoted by the Fund.
- k. **Engagement policies:** The Fund does not, as a general rule, invest in shares admitted to trading on a regulated market and issued by companies within the EEA. On this basis, the Manager assesses that Chapter 8, Section 27a of the Swedish Alternative Investment Fund Managers Act (Sw. *lag (2013:561) om förvaltare av alternativa investeringsfonder*, the "AIFM Act") is not applicable to the Manager's activities in relation to the Fund. Accordingly, the Manager is not required to establish and maintain a shareholder engagement policy within the meaning of the AIFM Act.

Nevertheless, the Manager seeks to exercise active and responsible ownership in relation to investments in operating companies to the greatest extent possible in the limited instances where such investments are made.

- l. **Designated reference benchmark:** No index has been designated as a reference benchmark to meet the environmental characteristics promoted by the financial product.

b. No sustainable investment objective

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

c. Environmental or social characteristics of the financial product

The Fund promotes the following environmental characteristic in the meaning of Article 8 in Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector. The environmental characteristic promoted by the Fund is:

- Enabling the green transition

The Fund promotes this environmental characteristic by putting a primary focus on the sustainable and climate positive data management centres through investing in EcoDC AB (“EcoDC”). The focus of the green transition is in relation to energy efficiency, renewable electricity, reuse of energy, and water usage. The Fund sets measurable and reportable key performance indicators for environmental improvement to ensure progress in performance of the investments in relation to the environmental characteristic promoted. During the acquisition phase, an in-depth analysis against the business plan strategy is performed, which includes sustainability ambitions and targets.

d. Investment strategy

a. The investment strategy used to meet the environmental or social characteristics promoted by the financial product

The investment strategy of the Fund is to acquire EcoDC and to make investments in EcoDC’s affiliates with the purpose of owning data centre premises and/or conducting data centre business. This investment strategy is based on the overarching business model of EcoDC, which involves building and managing data centres in locations with access to fossil-free electricity. The Fund promotes the targeted environmental characteristic by putting a primary focus on reducing the GHG emissions within own operations as close to zero as possible by working with energy efficiency, renewable electricity and reuse of energy. Further, the Fund promotes the targeted environmental characteristic by putting a primary focus on acquiring sustainable and climate positive data management centres. The performance of the Fund’s investment in respect of attaining the promoted environmental characteristic is carefully monitored and measured to drive energy and emission reductions by optimizing energy efficiency. The CUE and PUE are indicators continuously monitored and evaluated, among other sustainability indicators such as % of renewable electricity, reuse of energy and water usage.

Annually, the Manager reviews the investment using the Fund’s business plan to ensure that the investment follows its targeted goals and objectives. The results of the review are reflected in the business plan for the next period as action plans. The topics covered in the business plan not only

include economical results, but also results related to the targeted sustainability goals and how the investment continues to attain its targeted environmental characteristic. The business plan is followed up regularly on an investment level.

- b. The policy to assess good governance practices of the investee companies, including with respect to sound management structures, employee relations, remuneration of staff and tax compliance

Delivering sustainable results is the Manager's commitment to creating long-term financial sustainability with transparent governance. The Manager assesses and ensures good governance practices.

Where applicable, the Manager assesses good governance practices. This assessment includes ensuring clear organisational structure and sound management framework, positive employee relations, fair remuneration, and compliance with applicable legislation, including tax obligations, anti-bribery measures, anti-money laundering/counter-terrorist financing requirements, and international sanctions legislation. The evaluation is conducted through:

- ongoing and continuous monitoring of activities throughout the holding period in accordance with the Areim's ESG Policy, and
- exercising active and responsible ownership by supporting EcoDC's business in the development of strategy, business plans, target formulation and management work as well as through representation within the Board of EcoDC and appointment of the Fund's investment committee.

The Manager is committed to responsible corporate behaviour which is also reflected in the Fund managed by Areim. The Manager is well equipped to ensure robust and effective governance structure from a sustainability perspective.

Further, the Manager has signed the Global Compact and follows the UN's guiding principles for businesses and human rights, as well as the OECD's guidelines for multinational enterprises, including the International Labour Organisation's ("ILO") declaration on fundamental rights and principles at work, ILO's eight core conventions, and the International Convention on Human Rights. The Manager ensures that these principles are carried through to the Fund by having Areim's presence within the Fund's investment's Board members.

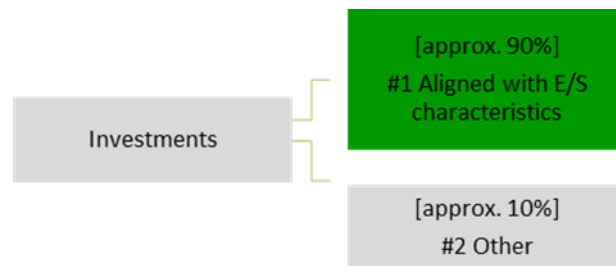
The Manager's commitment to responsible corporate behavior is further described in the ESG Policy and Ethical policy.

e. Proportion of investments

The majority of the Fund's assets are intended to have direct exposures in promoting the environmental characteristic by following the investment strategy

noted above including the good governance practice, and therefore the Manager considers that approx. 90% of the assets to be in “#1 Aligned with E/S characteristics” category.

The remaining portion falls within the category of “#2 Other” as there are certain assets, including cash to pay fees and other expenses, that are not intended to attain the environmental characteristic of the Fund and therefore considered to be other types of exposures.



f. **Monitoring of environmental or social characteristics**

The Fund Manager and the associated team are responsible for the investment and involved throughout the entire investment cycle, including due diligence and the business plan strategy during the transaction phase, execution of the business plan with primary responsibility, and in the divestment phase.

The Fund monitors the promoted environmental characteristic as part of the acquisition respectively of the annual business plan review process, taking into account the environmental characteristic promoted by the Fund. The Manager ensures its active and responsible involvement in monitoring the attainment of the promoted environmental characteristic by appointing the members of the Fund’s investment committee. The Fund’s investment committee nominates Areim’s representatives to be appointed as board members within the board of EcoDC to serve as an advisory/consulting panel to the board of EcoDC.

During the divestment phase, in-depth divestment analysis is conducted and presented by those appointed responsible within the transaction group. It includes analysis on each investment’s sustainability performance including the comparison against the up-to-date business plan and the impact on sustainability goals and objectives.

g. **Methodologies**

The Manager assesses and monitors the attainment of the environmental characteristic using the below measurements:

Enabling the green transition

Data centres are substantial energy consumers. In order to attain the Fund's environmental characteristic of enabling green transition through data centres, the Fund measures the following sustainability indicators and reports on such annually.

- Energy efficiency
 - Carbon Usage Effectiveness (“CUE”), calculated as the ratio of the total CO2 emissions produced by a data centre over the energy consumption of IT equipment
 - Power Usage Effectiveness (“PUE”), calculated as the ratio of total energy used in a data centre over the energy consumption of IT equipment
- % of renewable electricity
 - The % of renewable electricity from the different sources, including Guarantees of Origin (“GOs”) or similar certificates, Power Purchase Agreement (“PPA”), and own generation from renewable sources (i.e., solar panels), etc. The Fund has established a target of 100% renewable electricity for the Fund
- Reuse of energy
 - Energy Reuse Factor (“ERF”), calculated by the ratio of the data centre's reused energy over the energy consumption of energy
- Water usage
 - The amount of groundwater used
 - Water Usage Efficiency (“WUE”), calculated by the ratio of the data centre's water consumption over the energy consumption of IT equipments

h. Data sources and processing

- a. The data sources used to attain each of the environmental or social characteristics promoted by the financial product

The Fund uses a sustainability data management platform to collect sustainability data from the investment of the Fund. The Fund sources data directly from the investment as the data centre is responsible for collecting their own data through its own systems and suppliers.

The investment of the Fund measures, calculates and submits the sustainability indicators associated with the environmental characteristic of the Fund. The Manager then retrieves the data from the data platform.

- b. The measures taken to ensure data quality

The process of quality checks of the data is in place to assure a high level of data quality, for example by performing coverage checks within the data platform. The data platform collecting sustainability data directly from the investment also mitigates any errors in data collection.

The Fund Manager is responsible for the follow-up of the data to ensure data quality within the system. Annually, the investment is assessed as part of the review of the

business plan of the Fund, where the sustainability indicators are also reviewed and assessed. If any inconsistencies or abnormality of data is noted, it will be further investigated and resolved at that point in time.

The data is also verified by an external auditor

c. How data are processed

Most of our integrated and systematic environmental work is data-driven and done in our daily operations. The data platform is used to follow up on the sustainability data of the investment. The investment measures and calculates the data required for sustainability indicators directly.

d. The proportion of data that are estimated

There may be minimum estimation made in data provided by the investment, such as over- or underestimation of energy consumption due to timing of reporting.

i. Limitations to methodologies and data

As noted above in Section h, Data sources and processing, there may be minimum estimation made in the data collected from the investment. There are no known limitations to the methodologies used.

j. Due diligence

During the deal due diligence process of EcoDC, the Fund incorporates assessment of sustainability indicators to better manage risks, to improve returns and to protect down-side. All investment decisions presented to the Fund's investment committee take into consideration sustainability, Eco DC's overall business model for sustainable data centres, financial targets and business rationale to ensure that the overarching business model of EcoDC aligns with the Fund's environmental characteristic. The relevant focus areas for the due diligence assessment are deemed to have interdependence and are evaluated as a whole. This is particularly evident regarding the sustainability analysis, which affects most other focus areas.

Based on the findings, potential mitigating actions can be performed during the hold period to increase the building's environmental and climate change performance. Findings and conclusions are included in the final investment memorandum to the investment committee and, where an investment opportunity is pursued, in the business plan of the investment.

The Fund Manager monitors Eco DC's sustainability indicators and is responsible for reviewing any propose changes to the business plan of the investment to be in line with the Fund portfolio and overall fund strategy, including the attainment of the environmental characteristic. There are no additional internal or external controls associated with the due diligence process unless deemed necessary.

k. Engagement policies

The Fund does not, as a general rule, invest in shares admitted to trading on a regulated market and issued by companies within the EEA. On this basis, the Manager assesses that Chapter 8, Section 27a of the Swedish Alternative Investment Fund Managers Act (Sw. lag (2013:561) om förvaltare av alternativa investeringsfonder, the "AIFM Act") is not applicable to the Manager's activities in relation to the Fund. Accordingly, the Manager is not required to establish and maintain a shareholder engagement policy within the meaning of the AIFM Act.

However, the Manager exercises active and responsible ownership in relation to the investment, EcoDC, to the greatest extent possible given the size of the ownership stake, by supporting EcoDC's business in the development of strategy, business plans, target formulation and management work as well as through representation on the board and appointment of the Fund's investment committee, in order to foster the attainment of the environmental characteristic promoted by the Fund.

The Manager is well equipped to ensure a robust and effective governance structure from a sustainability perspective. The Manager's commitment to responsible corporate behaviour is further described in the Manager's Ethical policy and Ownership Instruction.

EcoDC is a wholly owned subsidiary of the Fund, which is managed and controlled by Areim. At EcoDC's shareholder meeting, which is its highest-decision making body, the Fund is entitled to directly exercise its influence over the investment as EcoDC's only shareholder. EcoDC's board, which consists of representatives nominated by Areim, is responsible for making strategic decisions that guide EcoDC's direction where sustainability impact and risks are embedded.

I. Designated reference benchmark

No index has been designated as a reference benchmark to meet the environmental characteristic promoted by the financial product.