

**MANDATUM INVESTMENT FUND
SCSP SICAV-RAIF
SUSTAINABILITY-RELATED DISCLOSURES**

 **MANDATUM**

Transparency of the promotion of environmental or social characteristics and of sustainable investments on websites

This document presents the website product disclosure for financial products that promote environmental or social characteristics in accordance with Article 10 of the EU 2019/2088 Sustainable Finance Disclosure Regulation (“SFDR”) and Article 24 of the EU 2022/1288 Regulatory Technical Standards (“RTS”).

Pursuant to Article 10 of the SFDR, the financial market participants shall publish and maintain on their websites the following information for each financial product referred to in Article 8(1) and Article 9(1), (2) and (3):

- (a) description of the environmental or social characteristics or the sustainable investment objective;
- (b) information on the methodologies used to assess, measure and monitor the environmental or social characteristics or the impact of the sustainable investments selected for the financial product, including its data sources, screening criteria for the underlying assets and the relevant sustainability indicators used to measure the environmental or social characteristics or the overall sustainable impact of the financial product;
- (c) the information referred to in Articles 8 and 9;
- (d) the information referred to in Article 11.

For further information please refer to [Mandatum's Responsible Investment Policy](#).

No sustainable investment objective

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

Maples Fund Management Ireland Limited (the “**Management Company**”), an alternative investment fund manager registered in Ireland, manages Mandatum Investment Fund SCSP SICAV-RAIF (LEI 254900DNKV4Q59T85J05).

The Management Company offers a sub-fund that promote, among other characteristics, environmental and social characteristics, or a combination of those characteristics, and the companies in which the investments are made follow good governance practices pursuant to Article 8 of the SFDR, but sub-fund does not have as its objective sustainable investment within the meaning of Article 2(17) of the SFDR. Mandatum Asset Management Ltd acts as the portfolio manager (the “**Portfolio Manager**”) for the sub-fund.

Environmental or social characteristics of the financial product

The Portfolio Manager invests its customers' funds responsibly, and the responsibility forms a key part of its risk management process. The Portfolio Manager believes that, in the long run, the securities of companies and issuers who operate responsibly will yield better results as investment objects, thanks to their more favourable growth prospects and more predictable cost development. The environmental and social characteristics that are promoted among other characteristics are:

Due diligence: the product considers compliance with international norms and standards including the UN Global Compact and the OECD Guidelines for Multinational Enterprises as part of their due diligence when making investments. The UN Global Compact principles are based on international standards concerning human rights, labour rights, the environment and anti-corruption.

ESG risk: When analysing the risks of an investment object, the Portfolio Manager considers environmental, social and governance factors as an integral part of its risk management process. The ESG risk rating of an external service provider is also used to quantify the extent to which risks related to ESG criteria may affect the investee company's value. Companies are divided into four risk categories based on the ESG risk rating. Depending on the risk category, further measures are required from the portfolio manager before making the investment. If the risk category of an investment included in the portfolio changes, the investment will be reassessed. Investment selection: as part of the investment selection process, these products use sensitive sector / norm-based screening. Negative screening is used to exclude potential investments in certain economic activities which the Portfolio Manager considers exhibit negative ESG externalities and are deemed to carry higher sustainability risks.

Investment strategy

Sub-fund of the Mandatum Investment Fund SCSp SICAV-RAIF is an actively managed fund which targets value creation by combining high interest income investments and pull-to-par investments with capital appreciation potential. It operates in the cross-section of public and private credit markets to find best relative value in each market situation. The strategy seeks to consistently deploy capital through the cycle independent on market conditions both in primary and secondary markets utilizing proprietary and co-investment opportunities across the private credit spectrum and public markets at the time of market or company related dislocation.

The product has industry-agnostic investment focus targeting a diversified credit portfolio of 20-30 core positions before recycling across Europe including the Nordics. It mainly focuses on secured positions in the capital structure ahead of common equity and subordinated debt.

The Portfolio Manager has incorporated a sustainability analysis into its investment processes and monitors all investment objects in its portfolios also from the perspective of sustainability. When analysing the risks of an investment object, the Portfolio Manager considers sustainability factors as a key part of risk management. In decision-making, the Portfolio Manager employs both negative and positive screening, taking into account the characteristics of different asset classes.

At the due diligence stage and during the holding period, the fund's investments are screened on the basis of international norms and standards including the UN Global Compact and the OECD Guidelines for Multinational Enterprises. The UN Global Compact principles are based on international standards concerning human rights, labour

rights, the environment and corruption. If abuses or breaches related to the standards are observed in the investee company during the holding period, the incident is investigated, and measures are taken on a case-by-case basis. Depending on the severity, nature and extent of the breach, the portfolio management measures may consist of direct dialogue with the company's executive management, an engagement action or, as a last resort, selling the investment if the engage company does not respond to the engagement efforts and does not take measures to prevent the abuse or breach within a reasonable time frame.

Proportion of investments

All investments in the sub-fund of the Mandatum Investment Fund SCSp SICAV-RAIF that promote, among other characteristics, environmental or social characteristics, or a combination of those characteristics (i.e., Article 8 SFDR financial products) are aligned with the E/S characteristics described above and the investments are investigated comprehensively in terms of possible ESG risks during the due diligence phase.

The fund-specific table in the *Section of website product disclosure for financial products that promote environmental or social characteristics* in this file under (e) 'Proportion of investments' describe the allocation of the sub-fund. In addition, the pre-contractual disclosures pursuant to the SFDR Article 8 present further information on the asset allocation with the sub-funds. The sub-fund's investments are divided into #1 and #2 categories, where #1 presents the investments aligned with E/S characteristics as a percentage of the whole portfolio. In addition, category #2 presents other assets, which include cash and derivatives held by the sub-fund to ensure the funds' smooth operation when fulfilling its investment strategy and potential other investments made from a diversification perspective. Category #2 may also include Collateralised Loan Obligations (CLOs), which are actively managed securitised products backed by a highly diversified pool of leveraged loans.

Monitoring of environmental or social characteristics

Investments are continuously monitored from a sustainability perspective. Portfolio managers and analysts monitor the news flow on the investee companies. Portfolio Manager carries out regular sustainability monitoring and reporting.

As a signatory of the UN PRI, the Portfolio Manager (Mandatum Asset Management Ltd) has committed to reporting annually on the responsible investment practices that have been taken into use and on how the implementation of these practices has been promoted.

The investment products are monitored quarterly for their ESG risk ratings and screened based on sensitive sector and norm-based screening such as UN Global Compact and OECD Guidelines. Note: ESG risk ratings and sensitive sector and norm-based screening are primarily available only for listed issuers, coverage for unlisted issuers is limited. Compliance with exclusion criteria is also monitored by the portfolio managers as part of the portfolio and market monitoring.

The carbon footprint of investments and GHG intensity of investee companies are measured and disclosed annually. Semi-annual sustainability reports are published for the investment products. In addition, the periodic reports are published for the products, pursuant to the SFDR requirements.

Methodologies

Sustainability indicators are used to measure the attainment of environmental or social characteristics. The indicators used to measure the achievement of environmental or social characteristics promoted by the sub-fund include ESG risk rating, sensitive sector screening, norm-based screening, carbon footprint, and GHG intensity of investee companies.

ESG risk rating

The ESG risk rating is based on external service provider's ESG risk rating, and it describes the amount of the company's unmanaged ESG risk. Risk levels are described on a scale of low, medium, high, or severe risk. The company's sector affects the risk assessment, which is why a high or even a severe risk level does not always mean that the company's operations would be irresponsible. Based on Mandatum's Responsible Investment Policy, investments in investment objects with a severe ESG risk can only be made with the approval of the Chief Investment Officer. Investing in a high-risk investment requires a separate review. See table 1 below for further information.

Risk category	Measures required by the risk category
Low risk	The risk emerging from sustainability issues is considered low. The decision to make an investment in a company with a low sustainability risk rating does not require any separate action from a responsible investment point of view.
Medium risk	The risk emerging from sustainability issues is considered medium. The decision to make an investment in a company with a medium sustainability risk rating does not require any separate action from a responsible investment point of view. However, due to the increased level of sustainability risk, the portfolio manager analyses the causes and possible consequences of sustainability risks related to the target company.
High risk	The risk emerging from sustainability issues is considered high. Due to the high sustainability risk, the portfolio manager analyses the causes and possible consequences of sustainability risks related to the target company. New investments in this risk category and the background to their sustainability risk categorization are reported to the next internal committee meeting.
Severe risk	The risk emerging from sustainability issues is considered severe. Due to the severe sustainability risk, the Chief Investment Officer's approval is required before a new investment can be made. In addition, the portfolio manager prepares a written analysis on the causes and possible consequences of sustainability risks related to the target company. New investments in this risk category and the background to their sustainability risk categorization are reported to the next internal committee meeting.

Table 1. ESG risk ratings and measures required by the risk category

Breaches of international norms and standards

The investments are monitored on the basis of international norms and standards laid down in international conventions, such as the UN Global Compact and the OECD Guidelines for Multinational Enterprises.

Carbon footprint

An investment portfolio's total emissions are calculated by allocating companies' emissions to the investment portfolio based on the share of ownership calculated using the underlying investee company's adjusted enterprise value. The emissions include scope 1 and scope 2 emissions, i.e., emissions from the company's operations and purchased energy.

The carbon footprint of investments is measured and disclosed annually in a SFDR periodic disclosure.

GHG intensity of investee companies

GHG intensity of investee companies i.e. weighted average carbon intensity expresses emissions in relation to the company's revenue. The reported figure is a weighted average of the investments' carbon intensities. The emissions include scope 1 and scope 2 emissions, i.e., emissions from the company's operations and purchased energy. GHG intensity of investee companies is reported in bi-annual sustainability reports and SFDR periodic disclosures, with measurements taken annually.

Additional methodologies included in investment strategies

Active ownership and sustainability in ownership practices

Portfolio Manager only engages with companies it has invested in and can decide not to engage with a company, for example, to avoid conflicts of interest. Additional criteria to consider before engaging can be e.g., materiality of the sustainability issue, size of the investment, actions already taken by the investee company, and geographical location. Portfolio Manager's Engagement Principles are available on its website: [Mandatum Asset Management - Engagement Principles](#).

Portfolio Manager utilises pooled engagement to engage with the investee companies together with other investors, if it is believed that it can be an effective means of achieving a desired change in the investment company. Pooled engagement is used mainly in a reactive manner to address issues that may have already occurred.

Sensitive industries screening

Certain industries are deemed to carry higher sustainability risks, including reputational, climate, and regulatory risks. Mandatum regularly monitors investments in these sensitive sectors. Additionally, Mandatum adheres to legally mandated exclusions (e.g., domestic and international laws, bans, treaties, or embargoes).

The Portfolio Manager has defined criteria and thresholds for sensitive industry exclusions in [Mandatum's Responsible Investment Policy](#) and the sub-fund complies with these criteria. The criteria allow investments in transitioning companies in the coal and oil sectors for *SFDR article 8 investment products*. Restrictions are based on Mandatum's evaluation of the possible sustainability risks and adverse sustainability impacts of different industries. If an investment

no longer meets the criteria, Mandatum will seek to divest it within a reasonable timeframe, considering clients' best interests and market conditions.

Industries and product groups are categorized by tolerance levels based on the proportion of the company's net sales generated from these activities:

- a) Zero tolerance: No direct or indirect sales from the business activity are allowed.
- b) Low tolerance: Some revenue from the business activity is permissible.

Direct business refers to the manufacture or production of a product or service, while indirect business encompasses various parts of the product or service production value chain, described in more detail below.

Principal Adverse Impacts

The Portfolio Manager aims to recognize and mitigate the adverse impacts of its investment operations to the environment, climate, society, employees, respect for human rights, and anti-corruption and anti-bribery. Therefore, the Portfolio Manager has incorporated sustainability into its investment operations, and the company's investment decisions take into account not only financial aspects, but also sustainability factors, as well as the related risks. The Responsible Investment Policy outlines the minimum level of measures taken to mitigate sustainability risks and adverse sustainability impacts. Stricter rules and engagement procedures can be applied to certain products or portfolios. The following Principal Adverse Impacts are monitored and disclosed for the sub-fund:

Adverse sustainability indicator		Metric
Greenhouse gas emissions	2. Carbon footprint	Carbon footprint
	3. GHG intensity of investee companies	GHG intensity of investee companies
	4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector
Social and employee matters	10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises
	14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investments in investee companies involved in the manufacture or selling of controversial weapons

Table 2. Principal Adverse Impact indicators

	SFDR Classification	Fund committed to make sustainable investments	Sustainability analysis incorporated into investment analysis	Norm-based screening	Sensitive industries screening & exclusion	Monitoring of exposure to fossil fuels	Active ownership & engagement	PAI*
Mandatum Credit Opportunities II	8		✓	✓	✓	✓	✓	✓

Table 3. Methodologies for Mandatum Investment Fund SCSp SICAV-RAIF funds E/S characteristics

* Selected PAI's are defined in the Table 2 above

Data sources and processing

The Portfolio Manager uses various ESG data sources in its investment and risk management processes. ESG data sources are an integral part of the whole investment life cycle, e.g. during due diligence, screening of investments and reporting.

The Portfolio Manager utilises ISS ESG for norms-based screening and sensitive industries screening. Note: sensitive sector and norm-based screening are primarily available only for listed issuers, coverage for unlisted issuers is limited. Compliance with exclusion criteria is also monitored by the portfolio managers as part of the portfolio and market monitoring.

The ESG risk ratings are provided by Sustainalytics. ESG risk ratings are typically available only for listed issuers, coverage for unlisted issuers is limited.

In addition, The Upright Project is used for Principal Adverse Impact (PAI) data and to model their net impact.

To ensure that the financial product aligns with its promoted environmental and social characteristics, a combination of internal and external data sources is utilized. External data providers are used to gather raw data at the issuer level, which can then be supplemented with additional external datasets. Internal research and analysis from portfolio management teams and the ESG team also contribute to data enrichment. Measures are taken to ensure data quality, such as comparing the portfolios' carbon footprint analysis results to previous years and confirming the emission figures of investee companies (data provider's data vs. actual reported data). Priority is given to data reported by companies, regulatory authorities, and non-governmental organizations. However, when reported data is unavailable or of inadequate quality, some reliance on estimations and estimated data from external providers is necessary. Ongoing assessment of external data providers and other sources is conducted to evaluate data quality and coverage. Overall, the processing of data involves enriching raw data and conducting in-house ESG analysis.

Limitations to methodologies and data

The methodologies and data sources used have limitations, including the use of estimated data from external providers and reliance on historical data that may not accurately reflect future ESG performance or risks. However, measures have been implemented to address these limitations. Solid due diligence measures and manual analysis and verification processes are in place to complement external data providers and to ensure the limitations do not affect the promotion of environmental or social characteristics. Data quality is evaluated on an ongoing manner. In addition, consideration is given to new data providers that could enhance and supplement the analysis and models currently in use.

In order to gain an even better understanding of the industry's development, the current and potential data providers are reviewed continuously. In addition to this, the Portfolio Manager monitors the data availability, comparability, and quality. External data providers are used as well to extend the coverage.

It should be noted that sensitive sector and norm-based screening are primarily available only for listed issuers, coverage for unlisted issuers is limited. Compliance with exclusion criteria is also monitored by the portfolio managers. Also, ESG risk ratings are typically available only for listed issuers, coverage for unlisted issuers is limited.

Due diligence

Investments are monitored through ESG risk rating and sector/norm-based screening. Sustainalytics' ESG risk rating is also used to quantify the extent to which risks related to ESG criteria may affect the company's value. Note: ESG risk ratings and sensitive sector and norm-based screening are primarily available only for listed issuers, coverage for unlisted issuers is limited. Compliance with exclusion criteria is also monitored by the portfolio managers.

To ensure smooth operation when fulfilling their investment strategy, the sub-fund hold also cash and potentially hedging instruments, which are subject to minimum safeguards (ensured by screening counterparties for compliance with the international norms and standards including the UN Global Compact and the OECD Guidelines for Multinational Enterprises). The investments may also include Collateralised Loan Obligations (CLOs), which are actively managed securitised products backed by a highly diversified pool of leveraged loans. No minimum environmental or social safeguards are applied to investments in CLOs.

Engagement policies

Active ownership and sustainability in ownership practices: Sustainability risks and factors, especially those related to climate change, are taken into account in all engagement activities. Further information can be found in MAM's Engagement Principles ([Engagement Principles](#)).

Designated reference benchmark

The environmental and/or social characteristics are attained by using the sustainability indicators defined above and no index has been designated as a reference benchmark to determine whether the financial products are aligned with the environmental and/or social characteristics that are promoted.

Section of website product disclosure for financial products that promote environmental or social characteristics

This section includes information of financial products that promote environmental or social characteristic in accordance with Article 24 of supplementing Regulation (EU) 2019/2088 of the European Parliament and of the Council with regard to regulatory technical standards specifying the details of the content and presentation of the information in relation to the principle of 'do no significant harm'. The following information is divided per investment product and supplementary information can be found from above sections. Section '(a) Summary' is disclosed on the Website: <https://www.mandatumam.com/responsible-investing/>

The sections required by this Regulation are the following:

- (a) 'Summary';
- (b) 'No sustainable investment objective';
- (c) 'Environmental or social characteristics of the financial product';
- (d) 'Investment strategy';
- (e) 'Proportion of investments';
- (f) 'Monitoring of environmental or social characteristics';
- (g) 'Methodologies';
- (h) 'Data sources and processing';
- (i) 'Limitations to methodologies and data';
- (j) 'Due diligence';
- (k) 'Engagement policies';
- (l) where an index is designated as a reference benchmark to attain the environmental or social characteristics promoted by the financial product, 'Designated reference benchmark'.

Product name: Mandatum Credit Opportunities II	
Legal entity identifier: 254900M7Y0ZA5F29Z390	
(b) 'No sustainable investment objective'	This investment product promotes environmental and social characteristics but it does not have as its objective sustainable investment.
(c) 'Environmental or social characteristics of the financial product';	The Portfolio Manager invests its customers' funds responsibly, and the responsibility forms a key part of its risk management process. The environmental and social characteristics that are promoted among other characteristics are compliance with international norms and standards, ESG risk as part of the investment analysis, and investment selection by using sensitive sector/norm-based screening.
(d) 'Investment strategy'	Mandatum Credit Opportunities II is an actively managed fund which targets value creation by combining high interest income investments and pull-to-par investments with capital appreciation potential. It operates in the cross-section of public and private credit markets to find best relative value in each market situation. The strategy seeks to consistently deploy capital through the cycle independent on market conditions both in primary and secondary markets utilizing proprietary and co-investment opportunities across the private credit spectrum and public markets at the time of market or company related dislocation. The product has industry-agnostic investment focus targeting a diversified credit portfolio of 20-30 core positions before recycling across Europe including the Nordics. It mainly focuses on secured positions in the capital structure ahead of common equity and subordinated debt. The Portfolio Manager has incorporated a sustainability analysis into its investment processes and monitors all investment objects in its portfolios also from the perspective of sustainability. When analyzing the risks of an investment object, the Portfolio Manager considers sustainability factors as a key part of risk management. In decision-making, the Portfolio Manager employs both negative and positive screening, taking into account the characteristics of different asset classes.
(e) 'Proportion of investments'	All investments, covering more than 80% of the total assets, are aligned with E/S characteristics and are monitored through ESG risk rating and sector/norms-based screening. The other less than 20 % of the total assets include cash and hedging instruments, which are subject to minimum safeguards. Additionally, category #2 includes investments that have been made from a diversification perspective, such as CLOs.
(f) 'Monitoring of environmental or social characteristics'	The investment product are monitored quarterly for their ESG risk ratings and screened based on sensitive sector and norm-based screening such as UN Global Compact and OECD Guidelines. The carbon footprint of investments and GHG intensity of investee companies are measured and disclosed annually, and semi-annual sustainability reports are published for the investment product. In addition, the periodic reports are published for the product, pursuant to the SFDR requirements.
(g) 'Methodologies'	Sustainability indicators are used to measure the attainment of the environmental or social characteristics (for Article 8 SFDR financial products). Sustainability indicators specified by the Portfolio Manager are: ESG risk rating, sensitive sector screening, norm-based screening, carbon footprint, GHG intensity of investee companies. Further information above under section 'Methodologies'.
(h) 'Data sources and processing'	The norms-based screening and sensitive industries screening is done in cooperation with ISS ESG. The ESG-risk ratings are provided by Sustainalytics. The Upright Project is used for emission data and PAI indicators. In addition Portfolio Manager can use other sources to access investment relevant information. Further information above under section 'Data sources and processing'.
(i) 'Limitations to methodologies and data'	The use of estimated data from external providers and reliance on historical data that may not accurately reflect future ESG performance or risks. However, measures have been implemented to address these limitations. Solid due diligence measures and manual analysis and verification processes are in place to complement external data providers and to ensure the limitations do not affect the promotion of environmental or social characteristics. Data quality is evaluated on an ongoing manner. ESG risk ratings and sensitive sector and norm-based screening are primarily available only for listed issuers, coverage for unlisted issuers is limited. Compliance with exclusion criteria is also monitored by the portfolio managers.
(j) 'Due diligence'	The due diligence process includes monitoring of the ESG risk rating and sector/norm-based screening which are used to model potential ESG risks and opportunities. Further information above under section 'Due diligence'.
(k) 'Engagement policies'	The Portfolio Manager only engages with companies it has invested in. Decision to engage is based among other materiality of the sustainability issue, size of the investment, actions already taken by the investee company, and geographical location. More information can be found in Mandatum's Engagement Principles .

This summary of the information provided in the sustainability disclosures is related to Mandatum Investment Fund SCSp SICAV-RAIF, an umbrella Luxembourg Investment Company with Variable Capital (the “RAIF”) and its sub-fund(s). This is a marketing communication for professional investors. The RAIF is managed by Maples Fund Management Ireland Limited (32 Molesworth Street, Dublin 2, D02 Y512, Ireland). Mandatum Asset Management Ltd is the portfolio manager of the RAIF. Please refer to the prospectus of the RAIF before making any final investment decision. This summary does not constitute an offer or invitation to subscribe for, buy or sell any units or shares in the RAIF. The information presented should not be relied upon to make any investment decision as it is incomplete and subject to change. The decision to invest in the sub-fund of the RAIF should take into account all the characteristics or objectives of the sub-fund as described in the prospectus of the RAIF. Mandatum Group or Mandatum Asset Management Ltd does not guarantee that the information presented in the summary is correct, perfect or up to date or is not liable for any direct or indirect costs, damage or losses that use of the information presented in this material may cause. Data source: Mandatum Group