

No consideration of adverse impacts of investment decisions on sustainability factors

This disclosure relates to Article 4(1) of the Sustainable Finance Disclosure Regulation (SFDR)¹. Mandatum Fund Management S.A. (LEI code 5493002HIZQQVP6JNL03) (“Management Company”) does not currently consider principal adverse impacts (“PAI”) of its investment decisions on sustainability factors as the availability of the data on the investment objects is not yet in an adequate level for the purposes of publishing a full PAI statement. Lack of data has been recognized especially in the field of equity investments made in small and mid-size enterprises and fixed income instruments issued by unlisted companies. The Management Company will assess its position annually and is evaluating the ability to develop its process concerning consideration of PAI by reference to the indicators listed in Table 1 of Annex I of SFDR Level II².

¹ Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector

² Commission Delegated Regulation (EU) 2022/1288 of 6 April 2022 supplementing Regulation (EU) 2019/2088 of the European Parliament and of the Council

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