

## **Pre-contractual Sustainability Disclosure Pursuant to Article 8 of SFDR**

### **Section 1: Environmental or social characteristics promoted by the Mandatum Life European Small & Midcap Equity Fund**

The Mandatum Life European Small & Midcap Equity Fund promotes, among other characteristics, environmental or 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 SFDR.

The Mandatum Life European Small & Midcap Equity Fund aims to achieve long-term capital growth by investment in European equities and equity-related securities. The Mandatum Life European Small & Midcap Equity Fund seeks to achieve returns in excess of its Benchmark Index primarily through its active selection of investments.

The Mandatum Life European Small & Midcap Equity Fund invests its customers' funds responsibly, and responsibility forms a key part of the Management Company's risk management process. The Management Company 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.

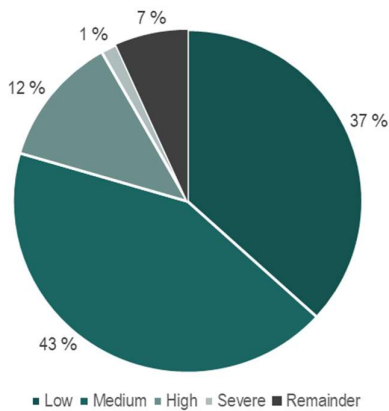
For these reasons, the Management Company has incorporated responsibility into its investment operations, and its investment decisions take into account not only financial aspects, but also factors related to the environment, society, employees, respect for human rights, and anti-corruption and anti-bribery (hereinafter sustainability factors), as well as the related risks.

When analysing the risks of an investment object, the Management Company considers environmental, social and governance factors as an integral part of its risk management process. In decision-making, the Portfolio Manager employs both negative and positive screening, taking the special characteristics of different asset classes into account. Investments can also be made with an emphasis on certain sustainability themes, for instance, climate change and climate risk.

The Management Company's approach is to impact companies' operating methods in terms of responsibility also as an active owner by meeting with the management of the companies and through engagement together with other investors. When selecting direct equity investments, the Portfolio Manager takes sustainability matters into account as part of the investment object analysis. Investments are continuously monitored from a sustainability perspective. Portfolio managers and analysts monitor the news flow on their investment objects daily, in addition to which an external service provider specialising in sustainability matters reviews the investments quarterly.

The Adverse Sustainability Impacts Statement is published on the Website.

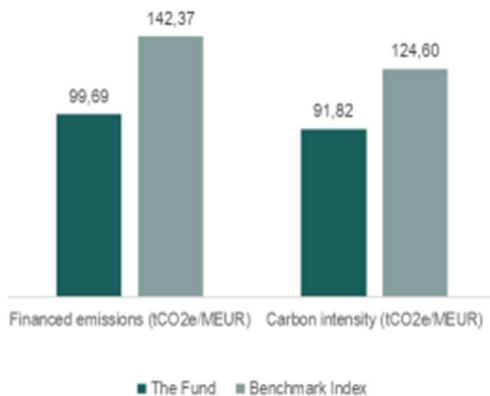
### ESG Risk Rating



### Norm Based Screening



### Carbon Footprint



The Mandatum Life European Small & Midcap Equity Fund's investments are divided into four ESG risk categories based on Sustainalytic's ESG Risk Rating. The Mandatum Life Group's Responsible Investment Policy requires portfolio managers to prepare a report on the reasons of ESG risk in High and Severe risk categories. The Severe risk category also requires the approval of the Chief Investment Officer of the Portfolio Manager.

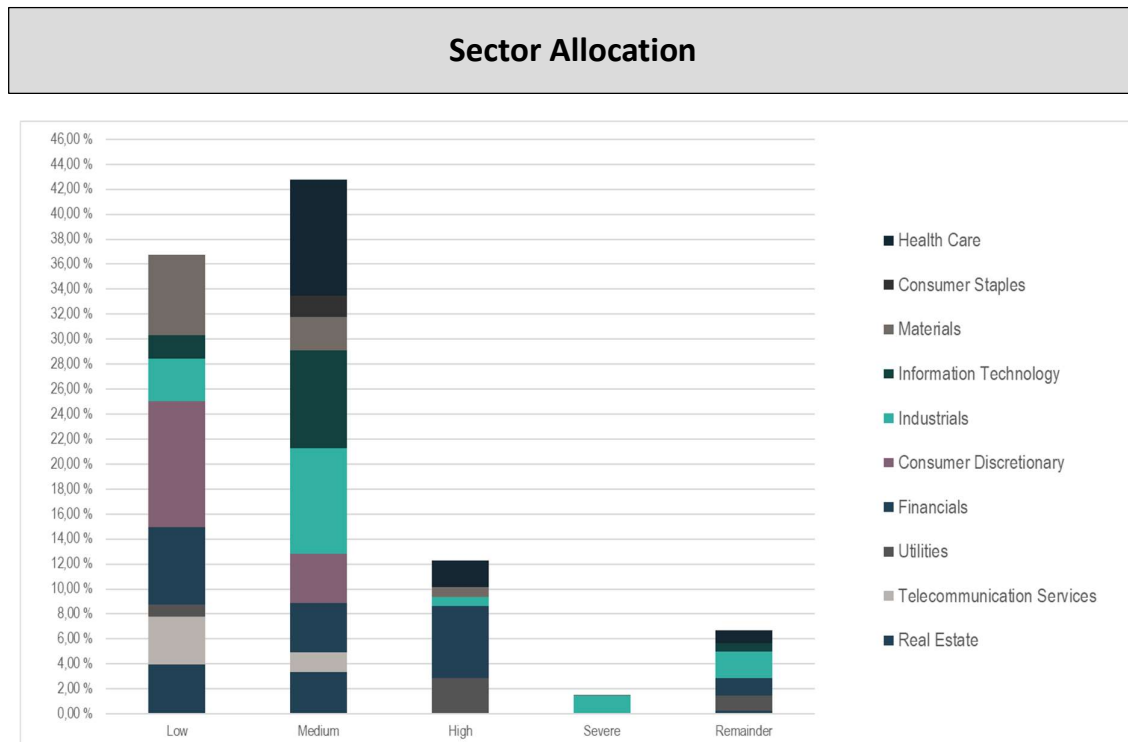
The investments are monitored on the basis of the UN Global Compact principles. The principles are based on international standards concerning human rights, labour rights, the environment and corruption. Additionally, the Management Company has set limits on investments in companies whose business involves controversial weapons, war materials, coal, tobacco, adult entertainment, alcohol or gambling.

The carbon footprint of investments is measured and disclosed annually.

The ESG characteristics promoted by the Mandatum Life European Small & Midcap Equity Fund are measured and monitored through ESG risk rating, norm based screening and carbon footprint. investments are monitored on a quarterly basis and 93% of the investments are covered by the ESG Risk Rating. The remainder of 7% consists of six non-rated companies. The Mandatum Life European Small & Midcap Equity Fund also has cash positions that are excluded from the measures. ESG risk rating, norm based screening and carbon footprint are presented as latest available information.

The Mandatum Life European Small & Midcap Equity Fund aims to achieve long-term capital growth by investment in European equities and equity-related securities. The Mandatum Life European Small & Midcap Equity Fund seeks to achieve returns in excess of its benchmark Index primarily through its active selection of investments.

The Sector Allocation presents the exposure to ESG risks in different sectors. The Severe risk category mainly consists of industrial sector.



**Section 2: No sustainable investment objective**

The Mandatum Life European Small & Midcap Equity Fund does not have as its objective sustainable investment.

The investments are monitored on the basis of the UN Global Compact principles. The principles are based on international standards concerning human rights, labour rights, the environment and corruption. If abuses or breaches related to these standards are observed in the investee company, 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 engagee company does not respond to the engagement efforts and does not take measures to prevent the abuse or breach within a reasonable time frame.

In addition, the Mandatum Life European Small & Midcap Equity Fund excludes investments in certain sensitive sectors or product areas. The table presents a list of the criteria that have been set and which new investment objects of the Mandatum Life European Small & Midcap Equity Fund must meet. Investments that are not aligned with the criteria presented on the table below are excluded from the Mandatum Life European Small & Midcap Equity Fund. If an investment object in the Mandatum Life European Small & Midcap Equity Fund no longer meets the criteria, the investment will be sold within six months at the latest.

Industry/Product group	Percentage of net sales		Description
	Direct business	Indirect business	
<b>Zero tolerance</b>			
Controversial weapons	0 %	0 %	Investments are not made in companies whose business involves the manufacture, subcontracting or distribution of contro-versial weapons. Controversial weapons are considered to be, among others, biological, chemical, nuclear and cluster weapons.
<b>Low tolerance</b>			
Tobacco	0 %	50 %	Investments are not made in companies whose business involves the manufacture of tobacco products or whose core business is tobacco production subcontracting or the distribution of tobacco products.
Adult entertainment	0 %	50 %	Investments are not made in companies whose business involves the production of adult entertainment or whose core business is adult entertainment industry subcontracting or distribution.
Carbon	0 %	50 %	Investments are not made in companies whose business involves mining of carbon or coal or whose core business is coal mining subcontracting, or the production or distribution of carbon-based energy
<b>Partial tolerance</b>			
Alcohol	50 %	50 %	Investments are not made in companies whose core business involves the manufacture, subcontracting or distribution of alcohol products.
Gambling	50 %	50 %	Investments are not made in companies whose core business involves gambling or gambling subcontracting
War materials	50 %	50 %	Investments are not made in companies whose core business involves the manufacture, subcontracting or distribution of war materials.

### Section 3: Investment strategy

The Mandatum Life European Small & Midcap Equity Fund may invest a maximum of 125 % of its net assets in European equity markets. The Mandatum Life European Small & Midcap Equity Fund may enter into financial derivatives contracts for the purpose of hedging, efficient portfolio management and/or implementing its investment strategy. The Mandatum Life European Small & Midcap Equity Fund may invest in fixed income and money market securities only for liquidity management.

Regardless of other investments, the Mandatum Life European Small & Midcap Equity Fund may invest in financial derivatives contracts provided that the global exposure relating to such derivatives does not exceed net assets of the Mandatum Life European Small & Midcap Equity Fund.

### *Binding elements of investment strategy*

Different industries/product groups have been divided into tolerance categories based on how much of the company's net sales is generated, either directly or indirectly, by the business in question:

- a) Zero tolerance: the investment object must have no direct or indirect net sales from the business in question.
- b) Low tolerance: the investment object must have no direct net sales from the business in question. The limit for indirect net sales is 50%.
- c) Partial tolerance: the business in question must not be the investee's main business (more than 50% of net sales).

In addition to standard- and business-based monitoring, the carbon footprint of investments is determined annually and monitored separately for the Mandatum Life European Small & Midcap Equity Fund. The Portfolio Manager is responsible for effectively managing the climate risk of the investment object it manages, in line with the commitments made by the Management Company.

When selecting direct equity investments, the Portfolio Manager takes sustainability matters into account as part of the investment object analysis.

Investments are continuously monitored from a sustainability perspective. Portfolio managers and analysts monitor the news flow on their investment objects daily, in addition to which an external service provider specialising in sustainability matters reviews the investments quarterly. The investments are monitored on the basis of the UN Global Compact principles. The principles are based on international standards concerning human rights, labour rights, the environment and corruption. Additionally, the Management Company has set limits on investments in companies whose business involves controversial weapons, war materials, coal, tobacco, adult entertainment, alcohol or gambling.

### *Good governance assessment*

When analysing investment objects and making investment decisions, the ESG risk rating of an external service provider is also used. The aim is to quantify the extent to which a risk related to ESG criteria may affect the company's value. The risk rating is a two-dimensional framework that measures the company's exposure to ESG risks and how well the company is managing those risks in relation to the manageable risks.

The ESG risk rating focusses on identifying the ESG risks that are significant to the target company using numerous criteria and on assessing possible discrepancies based on information published by the company.

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. Companies for which an external service provider's ESG risk rating is not available are thoroughly analysed on the part of all

factors influencing the return/risk ratio. This also includes an analysis of risks arising from ESG factors. The analysis is based on the available material.

**Section 4: Sustainability indicators**

The sustainability analysis of an investment is based on information collected from public sources. Sustainability is analysed in both quantitative and qualitative terms. Direct dialogue is a key component of the sustainability analysis of an investment object. To back their analysis, portfolio managers and analysts also use the sustainability analysis of an external service provider.

The ESG risk rating of an external service provider is also used to quantify the extent to which a risk related to ESG criteria may affect the 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, as indicated in table below. If the risk category of an investment included in the portfolio changes, the investment will be reassessed.

Risk category	Measures required by the risk category
Low risk	Making an investment decision does not require separate actions from a responsible investment perspective.
Moderate risk	The risk related to ESG factors is considered to be moderate. The portfolio manager/analyst must be sure to have taken into account in his/her analysis the ESG risks that have led to a raised risk level, as well as the consequences of the potential realisation of such risks.
High risk	The risk related to ESG factors is considered to be high. Due to a high risk level, the portfolio manager/analyst must prepare a report on the reasons for and potential consequences of the ESG risks in the context of the entire portfolio.
Severe risk	The risk related to ESG factors is considered to be severe. Due to a severe risk level, the portfolio manager/analyst must prepare a report on the reasons for and potential consequences of the ESG risks in the context of the entire portfolio. Making the investment requires the approval of the Chief Investment Officer responsible for client assets.

Companies for which an external service provider’s ESG risk rating is not available are thoroughly analysed on the part of all factors influencing the return/risk ratio. This also includes an analysis of risks arising from ESG factors. The analysis is based on the available material.

The investments are also monitored on the basis of the UN Global Compact principles. The principles are based on international standards concerning human rights, labour rights, the environment and corruption. If abuses or breaches related to these standards are observed in the investee company, 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 engagee company does not respond to the engagement efforts and does not take measures to prevent the abuse or breach within a reasonable time frame.

The carbon footprint of investments is determined annually and monitored separately for each fund.

Section 5: Use of derivatives

The Mandatum Life European Small & Midcap Equity Fund may enter into financial derivatives contracts for the purpose of hedging, efficient portfolio management and/or implementing its investment strategy.

Section 6: Website reference

More product-specific information can be found on the Website.

Section 7: Reference benchmark

The Benchmark Index is used to represent the target market only for financial performance comparison purposes and does not reflect the desired sustainability characteristics. The Mandatum Life European Small & Midcap Equity Fund can deviate 100% from the Benchmark Index.